

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 LOEVY & LOEVY
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

6

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

10

11 LAW OFFICES OF KENNETH N. FLAXMAN, P.C.
12 MR. JOEL A. FLAXMAN (via videoconference)
13 200 South Michigan Avenue
14 Suite 201
15 Chicago, Illinois 60604
16 Phone: 312.427.3200
17 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.;

18

19 MOHAN GROBLE SCOLARO
20 MR. ERIC S. PALLES (via videoconference)
21 55 West Monroe Street
22 Suite 1600
23 Chicago, Illinois 60603
24 Phone: 312.422.9999
E-mail: epalles@mohangroble.com

23

On behalf of the Defendant Kallatt Mohammed;

24

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

6

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

8

9 JOHNSON & BELL, LTD.
10 MR. BRIAN P. GAINER (via videoconference)
11 33 West Monroe Street
12 Suite 2700
13 Chicago, Illinois 60603
14 Phone: 312.372.0770
15 E-mail: gainerb@jbltd.com

12

13 On behalf of the Defendant Ronald Watts;

13

14 LEINENWEBER BARONI & DAFFADA, LLC
15 MS. MEGAN K. McGRATH (via videoconference)
16 120 North LaSalle Street
17 Suite 2000
18 Chicago, Illinois 60602
19 Phone: 866.786.3705
20 E-mail: mkm@ilesq.com

17

18 On behalf of the Defendants Mathew Cadman and
19 Michael Spaargaren;

18

19 REITER BURNS
20 MS. DHAVIELLA N. HARRIS
21 311 South Wacker Drive
22 Suite 5200
23 Chicago, Illinois 60606
24 Phone: 312.982.0090
E-mail: dharris@reiterburns.com

22

23 On behalf of the Defendants City of Chicago;
24 Phillip Cline; Debra Kirby; Karen Rowan; and
J. Bosak.

24

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 style="text-align: right;">Page 6</p> <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 style="text-align: right;">Page 8</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 style="text-align: right;">Page 7</p> <p>1 MR. BAZAREK: This is William Bazarek. I represent 2 numerous individual defendants that are represented by 3 Hale & Monico in the Watts Coordinated Pretrial 4 Proceedings. 5 MS. HARRIS: Dhaviella Harris on behalf of the City 6 and supervisory officers, appearing in person at 7 Reiter Burns. 8 MR. GAINER: Good morning. This is -- 9 MR. PALLES: Eric Palles -- 10 MR. GAINER: Go ahead, Eric. You go first. 11 MR. PALLES: Eric Palles appearing remotely from 12 downtown Chicago for Kallatt Mohammed. 13 MR. GAINER: Good morning. This is Brian Gainer. 14 I'm also appearing remotely from Chicago. And I 15 represent Ronald Watts. 16 MS. McGRATH: Excuse me. Megan McGrath appearing 17 remotely. And I represent Defendants Cadman and 18 Spaargaren in the coordinated cases. 19 MR. FLAXMAN: This is Joel Flaxman on Zoom. I 20 represent the Flaxman plaintiffs. 21 MS. HARRIS: And sorry. One more. And 22 Patrick Griffin is also on. He's an intern at our 23 office, and he will just be listening for a little bit. 24 THE VIDEOGRAPHER: Will the court reporter please</p>	<p style="text-align: right;">Page 9</p> <p>1 Q. And when did you last testify under oath? 2 A. I think it was January of 2022. 3 Q. And what were you testifying in January 2022 4 about? 5 A. Well, it wasn't January 2022. It was August, 6 I believe, about a case that I had previously, what I 7 was arrested for in federal court. 8 Q. Okay. And you understand when you testify, 9 you need to be truthful, right? 10 A. Yes. 11 Q. Is there -- Are you taking any type of 12 medication that would affect your ability to testify 13 truthfully and accurately at this deposition? 14 A. No. 15 Q. Just some other ground rules I want to go over 16 with you for the deposition since this was the first 17 time you were actually deposed. If there's any question 18 that I ask you today that you don't understand, can you 19 let me know right away, and I'll do my best to rephrase 20 the question? 21 A. Yes. 22 Q. Because I want to make sure that you 23 understand -- Strike that. 24 I want to make sure that you only answer</p>

6 (Pages 6 to 9)

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</p> <p>2 you?</p> <p>3 A. Yes.</p> <p>4 Q. Anytime today, Mr. Baker, that you want to</p> <p>5 clarify an answer or you think that you misspoke, please</p> <p>6 feel free to clarify or add whatever you want to some</p> <p>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</p> <p>10 let us know. Okay?</p> <p>11 A. Okay.</p> <p>12 Q. If you -- The questions you answer today,</p> <p>13 would you agree that you're only going to ask -- Strike</p> <p>14 that.</p> <p>15 To the answers that you give today to my</p> <p>16 questions or any other attorneys' questions, you agree</p> <p>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</p> <p>20 his question.</p> <p>21 BY MR. BAZAREK:</p> <p>22 Q. You know, strike that question. I'll ask you</p> <p>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</p> <p>2 questions, is that wrong?</p> <p>3 MR. TEPFER: Objection: form, argumentative,</p> <p>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</p> <p>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</p> <p>18 is"?</p> <p>19 A. Well, you could tell me something, but I don't</p> <p>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</p> <p>23 would guess it was true.</p> <p>24 Q. Okay. But you have the ability to tell right</p>
Page 11	Page 13
<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</p> <p>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</p> <p>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</p> <p>13 and a number of current and former police officers,</p> <p>14 correct?</p> <p>15 A. Correct.</p> <p>16 Q. Okay. And you knew when you filed that</p> <p>17 lawsuit that you would have to answer questions about</p> <p>18 the lawsuit, right?</p> <p>19 A. Yes.</p> <p>20 Q. And you knew that you had to be truthful when</p> <p>21 you gave answers to the questions that you were asked,</p> <p>22 right?</p> <p>23 A. Well, I answered the questions as they was</p> <p>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</p> <p>5 ADE, Inc., on 130th. I was a machine operator and</p> <p>6 laborer.</p> <p>7 Q. And did you receive income for that job</p> <p>8 in 2017?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. Did you receive any income from any</p> <p>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,</p> <p>19 correct?</p> <p>20 A. Yes.</p> <p>21 Q. And you sold the illegal narcotics out of the</p> <p>22 home that you shared with Clarissa Glenn and your</p> <p>23 children, correct?</p> <p>24 A. Yes.</p>

7 (Pages 10 to 13)

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

<p style="text-align: right;">Page 14</p> <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 style="text-align: right;">Page 16</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: right;">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: right;">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

<p style="text-align: right;">Page 18</p> <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 style="text-align: right;">Page 20</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: right;">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: right;">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	<p>1 MR. TEPFER: Objection to the characterization,</p> <p>2 mischaracterizes the testimony, form.</p> <p>3 BY THE WITNESS:</p> <p>4 A. I don't -- I don't know.</p> <p>5 MR. TEPFER: Let me finish, Ben.</p> <p>6 THE WITNESS: Oh, okay.</p> <p>7 MR. TEPFER: Go ahead. Go ahead now.</p> <p>8 BY THE WITNESS:</p> <p>9 A. I don't know what -- Bali, he Bali.</p> <p>10 Q. All right. So in the dep, I'll just call</p> <p>11 him -- Bali, that's what you refer to him as, Bali?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. Was Bali your best customer in your</p> <p>14 sale of illegal narcotics during 2017?</p> <p>15 MR. TEPFER: Objection to the form of the question.</p> <p>16 BY THE WITNESS:</p> <p>17 A. I sold drugs to Bali.</p> <p>18 Q. Okay. So I -- But I'm trying to understand --</p> <p>19 Bali -- what? He just -- On one day, he knocks on your</p> <p>20 door or rings your doorbell?</p> <p>21 A. A lot of times he knocked on my door.</p> <p>22 Q. Okay. Did he tell you he was coming over?</p> <p>23 A. No, not -- It depend when you talking.</p> <p>24 Q. 2017.</p>	Page 24
Page 23	<p>1 MR. TEPFER: Objection to foundation. 2017 is</p> <p>2 365 days.</p> <p>3 BY MR. BAZAREK:</p> <p>4 Q. Let's do it this way: What month -- What's</p> <p>5 the first time you had contact with Bali in 2017?</p> <p>6 A. I'm not sure because Bali would just show up</p> <p>7 and Bali would just have stuff to sell. So I can't say</p> <p>8 when the first time in 2017 that I seen Bali.</p> <p>9 Q. Okay.</p> <p>10 A. I've seen Bali in 2016 selling stuff. So I</p> <p>11 can't say when the first time Bali came, showed up at my</p> <p>12 door. I don't know.</p> <p>13 Q. Okay. When did you first move in to</p> <p>14 6215 South Rhodes?</p> <p>15 A. I moved into 2- -- well, 6215 in 2016.</p> <p>16 Q. Do you know the month?</p> <p>17 A. No.</p> <p>18 Q. Do you know what season?</p> <p>19 A. I got out in January, so I would say maybe</p> <p>20 around April.</p> <p>21 Q. And you signed a lease?</p> <p>22 A. No.</p> <p>23 Q. How did you end up living there?</p> <p>24 A. Because my girl and my kids was living there,</p>	Page 25

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**

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.

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

<p style="text-align: right;">Page 26</p> <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</p> <p>11 system if that's -- Is that the rule?</p> <p>12 A. No, I don't visit him.</p> <p>13 Q. Okay.</p> <p>14 MR. TEPFER: Okay.</p> <p>15 BY MR. BAZAREK:</p> <p>16 Q. Is he -- He's -- What's he incarcerated for?</p> <p>17 Do you know?</p> <p>18 A. Narcotics.</p> <p>19 Q. Selling narcotics?</p> <p>20 A. (Nodding head.)</p> <p>21 Q. Yes?</p> <p>22 A. Yes.</p> <p>23 Q. Did he -- Did Jamar Lewis have a girlfriend?</p> <p>24 MR. TEPFER: Objection: foundation, what time</p>	<p style="text-align: right;">Page 28</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</p> <p>6 friend?</p> <p>7 MR. TEPFER: Objection: asked and answered.</p> <p>8 BY THE WITNESS:</p> <p>9 A. Jamar Lewis is my friend.</p> <p>10 Q. Is he one of your closest friends?</p> <p>11 MR. TEPFER: Objection: asked and answered.</p> <p>12 BY THE WITNESS:</p> <p>13 A. Yes.</p> <p>14 Q. Is he a confidante?</p> <p>15 A. Jamar Lewis is my friend.</p> <p>16 Q. And you've engaged in illegal narcotics</p> <p>17 activity with Jamar Lewis, right?</p> <p>18 MR. TEPFER: Objection to the form, argumentative.</p> <p>19 I think it's asked and answered.</p> <p>20 Go ahead.</p> <p>21 BY THE WITNESS:</p> <p>22 A. I have.</p> <p>23 Q. When was the first time you engaged in illegal</p> <p>24 narcotics activity with Jamar Lewis?</p>
<p style="text-align: right;">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</p> <p>4 about now, Mr. Baker, is about 2017.</p> <p>5 A. Yes.</p> <p>6 Q. It was Ms. Mayfield, right?</p> <p>7 A. Who is that?</p> <p>8 Q. Okay. Who was Jamar -- Do you know who -- Do</p> <p>9 you know a woman named Mayfield who dated Jamar Lewis?</p> <p>10 A. I might know the first name.</p> <p>11 Q. Drove a Mercedes?</p> <p>12 A. Toya. Toya?</p> <p>13 Q. Toya? What's Toya's last name?</p> <p>14 A. I don't know.</p> <p>15 Q. Okay. All right. Let's go back to the</p> <p>16 conversation with Jamar Lewis. And as best you can</p> <p>17 recall, was the conversation in March of 2017 or would</p> <p>18 have been before?</p> <p>19 A. I'm not sure.</p> <p>20 Q. Prior to Bali asking you to, you know, get him</p> <p>21 some drugs, when had been the last time that you had any</p> <p>22 interactions with Jamar Lewis?</p> <p>23 MR. TEPFER: Objection to the form of the question.</p> <p>24 Go ahead.</p>	<p style="text-align: right;">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</p> <p>5 recall, like, the first time we sold drugs together.</p> <p>6 Q. Did you sell drugs together with Jamar Lewis</p> <p>7 during the 2000s?</p> <p>8 A. Yes.</p> <p>9 Q. Okay.</p> <p>10 A. Like I say, I don't recall the first time, the</p> <p>11 first day.</p> <p>12 Q. And what are Jamar Lewis's nicknames?</p> <p>13 A. Tweet.</p> <p>14 Q. Does he ever go by any other nicknames that</p> <p>15 you know?</p> <p>16 A. I call him Tweet.</p> <p>17 Q. Was Jamar -- Was or is Jamar Lewis a</p> <p>18 Gangster Disciple, if you know?</p> <p>19 A. He never told me he was a Gangster Disciple.</p> <p>20 Q. And I know you were a Gangster Disciple and</p> <p>21 you were beginning around the age of 18, correct?</p> <p>22 A. Yes.</p> <p>23 Q. And then you stopped being a Gangster</p> <p>24 Disciple, at least according to your interrogatory</p>

11 (Pages 26 to 29)

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

Page 30	<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>	Page 32	<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	<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>	Page 33	<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>

12 (Pages 30 to 33)

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

<p style="text-align: right;">Page 34</p> <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 style="text-align: right;">Page 36</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: right;">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: right;">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>

13 (Pages 34 to 37)

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

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

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

<p style="text-align: right;">Page 42</p> <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 style="text-align: right;">Page 44</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: right;">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: right;">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>

15 (Pages 42 to 45)

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

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

16 (Pages 46 to 49)

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

<p style="text-align: right;">Page 50</p> <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 style="text-align: right;">Page 52</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 style="text-align: right;">Page 51</p> <p>1 Other than Bali, did you sell anyone else</p> <p>2 narcotics during 2017?</p> <p>3 MR. TEPFER: Objection to the form of the question,</p> <p>4 mischaracterizes the prior testimony.</p> <p>5 Go ahead.</p> <p>6 BY THE WITNESS:</p> <p>7 A. Yes.</p> <p>8 Q. Who?</p> <p>9 A. Zachary Brown.</p> <p>10 Q. Who is Zachary Brown?</p> <p>11 A. He's a person I knew growing up.</p> <p>12 Q. From Ida B. Wells?</p> <p>13 A. No.</p> <p>14 Q. Where -- How long have you known</p> <p>15 Zachary Brown?</p> <p>16 A. For as long as I can remember.</p> <p>17 Q. Grammar school?</p> <p>18 A. Before that.</p> <p>19 Q. Like 4 or 5 years old?</p> <p>20 A. As long as I can remember, yes. His mother</p> <p>21 and my mother were friends --</p> <p>22 Q. Were they best friends?</p> <p>23 A. -- before we was born.</p> <p>24 Q. Okay. Were they best friends?</p>	<p style="text-align: right;">Page 53</p> <p>1 Q. Do you know the street? area?</p> <p>2 A. No.</p> <p>3 Q. Was it near your home?</p> <p>4 A. No.</p> <p>5 Q. Okay. Was it downtown?</p> <p>6 A. I'm not sure where it was at that he actually</p> <p>7 approached me. But I would -- I'm not sure.</p> <p>8 Q. Prior to that day when he approached you about</p> <p>9 getting narcotics, when had been the last time he had</p> <p>10 seen you?</p> <p>11 A. We would see each other from time to time</p> <p>12 different places, like maybe the gym, different places.</p> <p>13 Q. And just so -- I want to make sure I got the</p> <p>14 time frame right. This is during 2017?</p> <p>15 A. I believe, yes.</p> <p>16 Q. Okay. Did you ever sell narcotics to</p> <p>17 Zachary Brown during 2018?</p> <p>18 A. I'm not sure. Maybe; maybe not. I'm not</p> <p>19 sure.</p> <p>20 Q. Okay. So tell me about this conversation that</p> <p>21 you had with Zachary Brown in 2017.</p> <p>22 A. I just did. He asked me can I get him some,</p> <p>23 and I said I can see.</p> <p>24 Q. And what did he ask for?</p>

17 (Pages 50 to 53)

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

<p style="text-align: right;">Page 54</p> <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</p> <p>5 that.</p> <p>6 You know what a -- Here. You know what a drug</p> <p>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</p> <p>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 style="text-align: right;">Page 56</p> <p>1 that he wanted heroin, did you call Jamar Lewis the same</p> <p>2 day, or did you meet Jamar Lewis in person? How did</p> <p>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</p> <p>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</p> <p>11 that.</p> <p>12 Do you know any block in Chicago where</p> <p>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</p> <p>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: right;">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</p> <p>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</p> <p>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</p> <p>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</p> <p>23 that.</p> <p>24 When Zachary Brown approached you, told you</p>	<p style="text-align: right;">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</p> <p>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</p> <p>7 the five grams of heroin?</p> <p>8 A. Yes.</p> <p>9 Q. Other than that narcotics sale, were there any</p> <p>10 other narcotic sales you were involved with with</p> <p>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</p> <p>16 transactions that you engaged in with Zachary Brown, how</p> <p>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>

18 (Pages 54 to 57)

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

Page 58	<p>1 A. Heroin.</p> <p>2 Q. And is this when you're living on Vernon or</p> <p>3 Rhodes or both?</p> <p>4 A. I'm not quite sure about on Vernon with Zach.</p> <p>5 I'm not sure. I think maybe one time with Zach on</p> <p>6 Vernon, but I'm not sure. But I know on Rhodes a couple</p> <p>7 times. Yeah.</p> <p>8 Q. And would Mr. Brown come into your house to</p> <p>9 get the narcotics from you?</p> <p>10 A. No.</p> <p>11 Q. How did you give the narcotics to Mr. Brown</p> <p>12 during the narcotics transactions that you conducted</p> <p>13 with him?</p> <p>14 A. I would meet him different places.</p> <p>15 Q. So not -- Outside of your apartment; is that</p> <p>16 correct?</p> <p>17 A. Yes.</p> <p>18 Q. During 2017 or 2018, did you ever provide</p> <p>19 illegal narcotics to someone who was inside your</p> <p>20 apartment on Vernon or Rhodes?</p> <p>21 A. Well, with Bali, it was always between the</p> <p>22 door. So we're not actually inside the house, but</p> <p>23 inside the -- I guess the doorway between doors.</p> <p>24 Q. When is the last time you saw Zachary Brown?</p>	Page 60	<p>1 Q. Bali was an informant for the federal</p> <p>2 government, right?</p> <p>3 A. Yes.</p> <p>4 Q. And when he would buy the narcotics from you,</p> <p>5 on at least some occasions, he would have audio and</p> <p>6 video recording the transactions, right?</p> <p>7 MR. TEPFER: Objection to the form of the</p> <p>8 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 --</p> <p>13 your federal prosecution, did you ever review audio</p> <p>14 recordings or video recordings of you engaging in</p> <p>15 narcotics transactions?</p> <p>16 A. No. I had the -- But I never listened to it.</p> <p>17 But I never had the video. I lost interest after they</p> <p>18 say the first one, something was wrong with it. So ...</p> <p>19 Q. So you -- But you had access to audio</p> <p>20 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>
Page 59	<p>1 A. I just seen Zach at the King reunion.</p> <p>2 King High School had a reunion maybe like two weeks ago</p> <p>3 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</p> <p>7 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</p> <p>11 I saw Bali.</p> <p>12 Q. Did you see Bali at any time after you were</p> <p>13 arrested by federal authorities?</p> <p>14 A. I think I seen Bali on like 63rd standing</p> <p>15 there. But as far as communication, no, I haven't seen</p> <p>16 Bali like that.</p> <p>17 Q. When you saw Bali on 63rd, did you speak to</p> <p>18 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</p> <p>23 interactions with Bali?</p> <p>24 A. Yes.</p>	Page 61	<p>1 MR. TEPFER: Objection to form of the question,</p> <p>2 calls for speculation, foundation, time period you're</p> <p>3 talking about.</p> <p>4 BY MR. BAZAREK:</p> <p>5 Q. I'm -- 20-- Mr. Baker, 2017, 2018. You know</p> <p>6 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</p> <p>9 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</p> <p>13 access to them.</p> <p>14 MR. TEPFER: Just very carefully, there's no</p> <p>15 attorney-client waiver. You can -- That's a fine</p> <p>16 answer. But you can't talk about any communications</p> <p>17 that you had with your lawyer during the federal matter.</p> <p>18 Okay?</p> <p>19 THE WITNESS: Okay.</p> <p>20 BY MR. BAZAREK:</p> <p>21 Q. The recordings that you did have, whatever</p> <p>22 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

Page 62	Page 64
<p>1 them?</p> <p>2 A. No.</p> <p>3 Q. Okay. Other than Bali and Zachary Brown,</p> <p>4 during the time period of 2017 and 2018, did you sell</p> <p>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,</p> <p>8 you refer to someone named Fay that you sold narcotics</p> <p>9 to.</p> <p>10 A. I didn't say I sold them to her. I -- Fay</p> <p>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</p> <p>17 Ida B. Wells.</p> <p>18 Q. How did you come into contact with Fay during</p> <p>19 2017 or 2018?</p> <p>20 A. I know Fay.</p> <p>21 Q. Right. She just showed up at your front step?</p> <p>22 How did you have interactions with her?</p> <p>23 A. I seen her around the city. We travel in the</p> <p>24 same circles, so I would see her from time to time. She</p>	<p>1 Q. Right. Like, say I wanted to call Fay as a</p> <p>2 witness in the Watts Coordinated Pretrial Proceedings.</p> <p>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</p> <p>18 proper line of questioning.</p> <p>19 MR. BAZAREK: Well, I think it is proper. I'm</p> <p>20 trying to get information about an individual who</p> <p>21 Mr. Baker was going to engage in narcotics transactions</p> <p>22 with. It is relevant.</p> <p>23 MR. TEPFER: Mr. Baker communicates with you</p> <p>24 through his attorney. So if you -- He is not obligated</p>
Page 63	Page 65
<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</p> <p>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</p> <p>14 in the same social circles.</p> <p>15 A. Yeah. I seen her around at that time. I</p> <p>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</p> <p>22 with Fay?</p> <p>23 A. Quite sure I do. We lived in the same</p> <p>24 neighborhood.</p>	<p>1 to answer a question of whether he should contact you on</p> <p>2 your cell phone directly.</p> <p>3 MR. BAZAREK: That's not what I said. I said pass</p> <p>4 along the message to Fay. I -- You know, I'd like to</p> <p>5 talk to her, if she wants to talk to me.</p> <p>6 MR. TEPFER: If that's your request that Ben Baker</p> <p>7 does that, he'll consult with me and we'll talk about it</p> <p>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</p> <p>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</p> <p>14 prior to 2017?</p> <p>15 A. No.</p> <p>16 Q. And you don't know where it was where she</p> <p>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</p> <p>20 don't know. I don't recall.</p> <p>21 Q. All right. So after she made that request to</p> <p>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>

20 (Pages 62 to 65)

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</p> <p>3 were going to give to Fay?</p> <p>4 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</p> <p>8 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</p> <p>13 see what was to it. And she wanted a piece, and she was</p> <p>14 going to have somebody test it. So I don't know if it</p> <p>15 was a tenth, or I don't know how much it was. But it</p> <p>16 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</p> <p>2 don't know her surname. But do you know, does it begin</p> <p>3 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</p> <p>10 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</p> <p>17 criminal complaint?</p> <p>18 A. Which one?</p> <p>19 Q. How many are there?</p> <p>20 A. I don't know.</p> <p>21 MR. TEPFER: Objection to the form of the question,</p> <p>22 federal from a -- the criminal complaint, you said?</p> <p>23 MR. BAZAREK: Yes. Federal criminal complaint.</p> <p>24 Yes.</p>
Page 67	Page 69
<p>1 than marijuana.</p> <p>2 Q. All right. So you get the heroin from Jamar.</p> <p>3 Then what do you do?</p> <p>4 A. I called her and said, "I got what you asked</p> <p>5 me for."</p> <p>6 Q. By the way, do you still have the same cell</p> <p>7 phone today that you did when you were engaging in</p> <p>8 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</p> <p>12 since -- It's been a while. It's been years.</p> <p>13 Q. Was she -- But you had her contact on your</p> <p>14 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</p> <p>19 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>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</p> <p>6 individual from DEA that set forth in the affidavit the</p> <p>7 different narcotics transactions you engaged in? Did</p> <p>8 you ever read that?</p> <p>9 A. The only thing that I seen was pertaining to</p> <p>10 Bali.</p> <p>11 Q. Okay. All right. So what happened when Fay</p> <p>12 arrived at your apartment on Rhodes?</p> <p>13 A. She called and said she was outside. So I</p> <p>14 went outside and gave it to her. She left.</p> <p>15 Q. And did -- The narcotics that you gave to her,</p> <p>16 you had it on your cocktail table?</p> <p>17 A. I had it in my pocket.</p> <p>18 Q. Okay. Was anyone home at the time when you</p> <p>19 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

<p style="text-align: right;">Page 70</p> <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 style="text-align: right;">Page 72</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: right;">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: right;">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>

22 (Pages 70 to 73)

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

Page 74

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?**
4 MR. TEPFER: Objection to the form of the question,
5 mischaracterizes the prior testimony.
6 BY THE WITNESS:
7 A. Not that I recall.
8 **Q. Would anything help you recall?**
9 A. I don't know.
10 **Q. Other than -- Well, let me ask you this: You**
11 **were released from prison in January of 2016, correct?**
12 A. Correct.
13 **Q. Since that time, did anyone other than**
14 **Zachary Brown, Fay, or Bali ask you for narcotics?**
15 A. I don't recall.
16 **Q. So are you saying someone could have and you**
17 **just don't remember?**
18 A. I'm saying --
19 MR. TEPFER: Objection: calls for speculation. He
20 said he doesn't recall.
21 BY THE WITNESS:
22 A. I'm saying I don't recall.
23 **Q. Other than -- Strike that.**
24 **Since your release from prison in January**

Page 75

1 **of 2016, who have you had discussions with about illegal**
2 **narcotics transactions?**
3 A. That I remember, it's Bali, Zach, Fay. I
4 guess Jamar, you would put him in there.
5 **Q. Anyone else?**
6 A. Well, I used to buy marijuana, so whoever I
7 bought marijuana from. At that time, it was illegal.
8 **Q. Anyone else?**
9 A. Not that I recall, sir.
10 **Q. How much total money did you receive from Bali**
11 **when you sold him narcotics?**
12 MR. TEPFER: Objection to the form of the question,
13 mischaracterizes the prior testimony. Okay.
14 BY THE WITNESS:
15 A. They say it was like 3,000 and some. I think
16 either 3,200 or 3,600.
17 **Q. What did you do with that money?**
18 A. What you mean?
19 **Q. What did you do with the money?**
20 A. What do you mean?
21 **Q. What did you do with the \$3,200 or whatever**
22 **the amount was?**
23 A. I paid it back to the federal government.
24 **Q. When you first got the money from Bali, what**

Page 76

1 **did you do with it?**
2 A. I told you, I gave it to Jamar.
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?**
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.
10 **Q. Was it more?**
11 A. No. I believe it was less. But --
12 **Q. What do you think it was?**
13 A. Less. But I believe they made me pay whatever
14 they gave to her. So I don't know.
15 **Q. So you do admit you did keep 20 of the dollars**
16 **that Bali gave to you to purchase drugs, correct?**
17 A. No.
18 MR. TEPFER: Objection: mischaracterizes the prior
19 testimony, form.
20 BY THE WITNESS:
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.

Page 77

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?**
4 A. Right.
5 **Q. Did you ever tell that to Judge Norgle?**
6 MR. TEPFER: Objection. Well, he's asking -- Okay.
7 Go ahead. You can answer.
8 BY THE WITNESS:
9 A. I don't know. I know I never kept a dime of
10 it. None of it went in my pocket.
11 **Q. Did you tell Judge Norgle that?**
12 A. I don't know.
13 MR. TEPFER: Are you asking if he personally or
14 through his attorney or --
15 MR. BAZAREK: Yeah. I'm asking him personally.
16 Yes.
17 MR. TEPFER: Okay. Go ahead.
18 THE WITNESS: I don't recall telling the judge. I
19 don't recall.
20 BY MR. BAZAREK:
21 **Q. I mean, you had numerous court proceedings in**
22 **front of Judge Norgle, right?**
23 A. True.
24 **Q. You spoke with Judge Norgle, right?**

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

Page 78	<p>1 A. Yes.</p> <p>2 Q. How much money total did you receive from</p> <p>3 Zachary Brown for the narcotics sales that you made to</p> <p>4 him?</p> <p>5 MR. TEPFER: Objection to the form of the question,</p> <p>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</p> <p>12 getting like five grams at a time. So -- But I don't</p> <p>13 recall how many times, so I can't give you a number.</p> <p>14 Q. Yeah. I'm just asking you approximately,</p> <p>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</p> <p>24 testimony is you have no knowledge as to the number of</p>	Page 80	<p>1 Q. And what type of vehicle did you have during</p> <p>2 2017, 2018?</p> <p>3 A. A Cadillac.</p> <p>4 Q. Is that the only car you had during those two</p> <p>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</p> <p>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</p> <p>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</p> <p>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	<p>1 times that you engaged in narcotics sales with</p> <p>2 Zachary Brown?</p> <p>3 MR. TEPFER: Objection to the form of the -- form</p> <p>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</p> <p>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</p> <p>14 identification.)</p> <p>15 THE VIDEOGRAPHER: The time is 12:16 p.m. We are</p> <p>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</p> <p>19 transport illegal narcotics inside of your vehicle?</p> <p>20 MR. TEPFER: Objection to the form of the question.</p> <p>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>	Page 81	<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</p> <p>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</p> <p>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,</p> <p>24 form of the question.</p>

24 (Pages 78 to 81)

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</p> <p>7 gave you?</p> <p>8 A. Pay it back.</p> <p>9 Q. Interest-free?</p> <p>10 A. I believe so.</p> <p>11 Q. Okay. Was there anything in writing?</p> <p>12 A. Just pay it back.</p> <p>13 Q. How much money did this individual give you?</p> <p>14 A. I think -- I believe it was \$10,000. And I</p> <p>15 used it to get the car.</p> <p>16 Q. Do you remember what year and month that was?</p> <p>17 A. No, I don't recall.</p> <p>18 Q. Okay. And did you pay this individual back?</p> <p>19 A. Yes.</p> <p>20 Q. And then how long did it take you to pay him</p> <p>21 back?</p> <p>22 A. I'm not sure. Maybe eight months. Maybe</p> <p>23 seven. I'm not sure.</p> <p>24 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</p> <p>7 the Cadillac as you drove to meet Mr. Brown, right?</p> <p>8 A. Yes.</p> <p>9 Q. Was Jamar Lewis ever inside that Cadillac with</p> <p>10 you?</p> <p>11 A. He's been in there.</p> <p>12 Q. Did he have illegal narcotics with him when he</p> <p>13 would be inside your Cadillac?</p> <p>14 MR. TEPFER: Objection: calls for speculation.</p> <p>15 If you know, you can answer.</p> <p>16 BY THE WITNESS:</p> <p>17 A. I don't know if he had any hard drugs. But I</p> <p>18 know we used to smoke marijuana in there.</p> <p>19 Q. Yeah. So at any time did Jamar Lewis ever</p> <p>20 have heroin or cocaine or fentanyl while inside your</p> <p>21 Cadillac that you know of?</p> <p>22 A. Not that I know of, no.</p> <p>23 Q. What type of vehicle did Jamar drive during</p> <p>24 2017 and 2018?</p>
Page 83	Page 85
<p>1 that.</p> <p>2 Where would you store the illegal narcotics</p> <p>3 inside the Cadillac?</p> <p>4 A. In my hand.</p> <p>5 Q. Anywhere else?</p> <p>6 A. In my hand.</p> <p>7 Q. Right. Anywhere else in the car other than</p> <p>8 your hand?</p> <p>9 A. Not that I recall, no. When I would travel</p> <p>10 with -- I only traveled to serve Zachary Brown, I</p> <p>11 believe. That's when I had the illegal drugs in my car.</p> <p>12 Q. So you would drive to him?</p> <p>13 A. Yeah. We would meet in different places.</p> <p>14 Q. Yeah. Did you ever tell Clarissa that you</p> <p>15 were engaging in narcotics transactions during 2017</p> <p>16 and 2018?</p> <p>17 A. For what?</p> <p>18 Q. Did you?</p> <p>19 A. No.</p> <p>20 Q. Why not?</p> <p>21 A. Why?</p> <p>22 Q. Yes.</p> <p>23 A. That's what I'm saying. Why would I?</p> <p>24 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</p> <p>10 Jamar.</p> <p>11 Q. Okay. Did Jamar ever supply you with illegal</p> <p>12 narcotics while you were inside the Mercedes?</p> <p>13 A. When Jamar brought me the heroin, he would</p> <p>14 bring it to the house.</p> <p>15 Q. And would he drive the Mercedes to your house?</p> <p>16 A. I mean, he has driven the Mercedes to my</p> <p>17 house.</p> <p>18 Q. With the narcotics inside to give to you?</p> <p>19 A. I guess. I'm not sure. I mean, I don't know.</p> <p>20 Q. During all the times where Jamar Lewis</p> <p>21 provided you with illegal narcotics during 2017 and</p> <p>22 2018, did he always give them to you in one of the</p> <p>23 apartments you were living at?</p> <p>24 A. When I would call him for drugs, yes, he would</p>

25 (Pages 82 to 85)

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

<p style="text-align: right;">Page 86</p> <p>1 bring it to me.</p> <p>2 Q. And he would actually come inside to your</p> <p>3 apartment, right?</p> <p>4 A. Yeah.</p> <p>5 Q. And that was both on Rhodes and Vernon,</p> <p>6 correct?</p> <p>7 A. Correct.</p> <p>8 Q. Other than the cocktail table that you</p> <p>9 described, did you store the heroin in any other place</p> <p>10 in either of your apartments?</p> <p>11 A. It was never that long enough to actually</p> <p>12 store it. I mean, five grams here, five grams there.</p> <p>13 It wasn't -- It was only there when somebody would call</p> <p>14 for it.</p> <p>15 Q. Were there times where you received the heroin</p> <p>16 from Jamar during 2017 or 2018 and your customer didn't</p> <p>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 style="text-align: right;">Page 88</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</p> <p>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</p> <p>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,</p> <p>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</p> <p>15 name because that was the first time I met her, so I</p> <p>16 don't recall her name. But I do know they drove and we</p> <p>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</p> <p>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: right;">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</p> <p>4 deposition, on the day you received the heroin from --</p> <p>5 Strike that.</p> <p>6 On the days that you received the heroin from</p> <p>7 Jamar, when he'd come to your house and give you the</p> <p>8 heroin, you would provide it to the buyer on that same</p> <p>9 day, correct?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. What do you know about Jamar Lewis's</p> <p>12 narcotics operations during 2017 and 2018?</p> <p>13 A. I know when I would call him for it, he would</p> <p>14 bring it to me.</p> <p>15 Q. Who did Jamar Lewis get his illegal narcotics</p> <p>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</p> <p>21 supplier of narcotics who lives somewhere in the</p> <p>22 suburbs?</p> <p>23 A. Me?</p> <p>24 Q. Yes.</p>	<p style="text-align: right;">Page 89</p> <p>1 Q. Okay.</p> <p>2 A. Well, close friend of Jamar's. He's an</p> <p>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,</p> <p>8 Hen.</p> <p>9 Q. And he sold narcotics out of the 527 building,</p> <p>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</p> <p>15 back in the day?</p> <p>16 A. I probably did before. I'm not sure. But I</p> <p>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</p> <p>22 friends --</p> <p>23 A. Yes.</p> <p>24 Q. -- would you say?</p>

26 (Pages 86 to 89)

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

<p style="text-align: right;">Page 90</p> <p>1 A. Yes. They grew up together.</p> <p>2 Q. And who was the lady that Jamar took on the</p> <p>3 cruise?</p> <p>4 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</p> <p>10 cruise?</p> <p>11 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</p> <p>15 on the cruise after you filed the federal lawsuit,</p> <p>16 right?</p> <p>17 A. Yeah, I believe so.</p> <p>18 Q. Okay. And the cruise that you went on, that</p> <p>19 was before you were arrested by federal authorities,</p> <p>20 correct?</p> <p>21 A. Correct.</p> <p>22 Q. Did you talk to Jamar or Henry Thomas at all</p> <p>23 about your lawsuit?</p> <p>24 A. No. For what?</p>	<p style="text-align: right;">Page 92</p> <p>1 the Bahamas.</p> <p>2 Q. During that cruise, did you ever receive any</p> <p>3 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</p> <p>13 cruise, was it during the summer months? spring? winter?</p> <p>14 Do you know the season?</p> <p>15 A. No, I don't know the -- I don't recall the</p> <p>16 season. I'm -- because it was hot where we was at. And</p> <p>17 then we got on the cruise in Florida. So -- But I don't</p> <p>18 recall. I believe it was -- But I don't know.</p> <p>19 Q. Okay. All right. So during the -- Obviously,</p> <p>20 you're out at sea somewhere?</p> <p>21 A. Yeah.</p> <p>22 Q. You're not -- Did you engage in any narcotics</p> <p>23 transactions while on that boat?</p> <p>24 A. With who? No.</p>
<p style="text-align: right;">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</p> <p>4 going to file a lawsuit, too"? Did they ever say that</p> <p>5 to you?</p> <p>6 A. No.</p> <p>7 Q. Okay. Did you use any of your own money</p> <p>8 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</p> <p>13 and Clarissa's travel?</p> <p>14 A. Just that, the travel and the accommodations</p> <p>15 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</p> <p>24 don't remember the other places. But I know we went to</p>	<p style="text-align: right;">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</p> <p>6 on the trip?</p> <p>7 A. I mean, we smoked some marijuana on the</p> <p>8 cruise. But that's it.</p> <p>9 Q. Yeah. On the cruise, did you ever see Jamar</p> <p>10 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</p> <p>13 service. And the reason I'm asking, I wanted to know if</p> <p>14 you were fielding, you know, phone calls or texts from</p> <p>15 the three people that you said you engaged in narcotics</p> <p>16 transactions with.</p> <p>17 A. No.</p> <p>18 Q. Okay. And then how long were you gone on the</p> <p>19 trip?</p> <p>20 A. I think it was like a five day, four -- five</p> <p>21 day, four nights. I'm not sure. But I believe it was</p> <p>22 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>

27 (Pages 90 to 93)

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>
Page 95	Page 97
<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>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 dolphin -- 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>

28 (Pages 94 to 97)

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

<p style="text-align: right;">Page 98</p> <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</p> <p>14 these are -- Do you have it in front of you, Exhibit 1?</p> <p>15 A. That's what this is?</p> <p>16 Q. Yeah. So these are Plaintiffs Ben Baker and</p> <p>17 Clarissa Glenn's responses to Defendant Officer Brian</p> <p>18 Bolton's first set of interrogatories. Do you see that</p> <p>19 caption?</p> <p>20 MR. TEPFER: For the record, this is the version</p> <p>21 that was signed on 4/20/2017, and these were</p> <p>22 supplemented up until yesterday. So --</p> <p>23 MR. BAZAREK: Okay.</p> <p>24 MR. TEPFER: -- just for the record, that's the one</p>	<p style="text-align: right;">Page 100</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</p> <p>4 verification?</p> <p>5 A. I could.</p> <p>6 Q. Yes. Please do.</p> <p>7 A. Oh, you're asking me to read it?</p> <p>8 Q. Yes.</p> <p>9 A. Oh. "I, Ben Baker, certify that I have</p> <p>10 reviewed the foregoing responses to Defendant Bolton's</p> <p>11 first set of interrogatories and certify that the</p> <p>12 responses are true and correct to the best of my</p> <p>13 knowledge, information, and memory."</p> <p>14 Q. And then you -- That's -- You signed that</p> <p>15 verification and you dated it April 20, 2017. Is that</p> <p>16 right?</p> <p>17 A. Yeah.</p> <p>18 Q. Do you remember where you were when you signed</p> <p>19 it?</p> <p>20 A. I think I was at the law firm.</p> <p>21 Q. At Loevy & Loevy?</p> <p>22 A. Yeah.</p> <p>23 Q. Okay. On Aberdeen?</p> <p>24 A. Or May. One of them.</p>
<p style="text-align: right;">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</p> <p>6 that you gave to Officer Bolton in 2017, right?</p> <p>7 A. To Officer Bolton?</p> <p>8 Q. Yeah. Brian -- Do you know who Brian Bolton</p> <p>9 is?</p> <p>10 A. Yeah, I know who he is.</p> <p>11 Q. Okay.</p> <p>12 A. But he didn't question me.</p> <p>13 Q. Okay. But you have -- you have interrogatory</p> <p>14 answers that you gave back in 2017 --</p> <p>15 A. Yes.</p> <p>16 Q. -- as Defense Exhibit Number 1, right?</p> <p>17 A. Yes. My name is there.</p> <p>18 Q. Or Deposition Exhibit Number 1.</p> <p>19 A. My name is there.</p> <p>20 Q. Okay. And if --</p> <p>21 A. First set of interrogatories?</p> <p>22 Q. Yeah. And so if you go to the very last page,</p> <p>23 can you take a look at the very last page?</p> <p>24 A. Yes.</p>	<p style="text-align: right;">Page 101</p> <p>1 Q. Or May. One. Okay. Understood.</p> <p>2 And you read these interrogatory answers that</p> <p>3 you gave before you signed the verification, right?</p> <p>4 A. Some.</p> <p>5 Q. Oh, did you skip some?</p> <p>6 A. Yeah.</p> <p>7 Q. Why is that?</p> <p>8 A. Because I was with my lawyers. I didn't think</p> <p>9 that they would have me with something that was no good</p> <p>10 for me.</p> <p>11 Q. Okay. So is it your testimony that you didn't</p> <p>12 read all of the answers that you gave to Bolton's</p> <p>13 interrogatories?</p> <p>14 A. I probably didn't read all the questions.</p> <p>15 Q. Well, the ones that you did read, were you</p> <p>16 truthful?</p> <p>17 A. To the best of my knowledge.</p> <p>18 Q. Okay. So I want to ask you, take a look at</p> <p>19 Interrogatory Number 10.</p> <p>20 A. What page?</p> <p>21 MR. TEPFER: I think it's about six pages in,</p> <p>22 right? I got seven pages in is the question you want.</p> <p>23 THE WITNESS: Where it say "Please identify any and</p> <p>24 all employment"?</p>

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

<p style="text-align: right;">Page 102</p> <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 style="text-align: right;">Page 104</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: right;">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: right;">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

<p style="text-align: right;">Page 106</p> <p>1 August 7, 2017, response to Kallatt Mohammed's 2 interrogatories that's marked. It was supplemented as 3 recently as yesterday. 4 BY MR. BAZAREK: 5 Q. All right. Mr. Baker, do you have 6 Exhibit Number 2 in front of you? 7 A. Yes. 8 Q. And Exhibit Number 2 is Plaintiff Ben Baker's 9 responses to Defendant Kallatt Mohammed's first set of 10 interrogatories, correct? 11 A. That's what it says. 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? 15 A. Yes. 16 Q. Go ahead. Read it out loud. 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." 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 style="text-align: right;">Page 108</p> <p>1 A. And eloquently. 2 Q. Okay. And you answered that question back in 3 August of '17, right? 4 A. Yes. 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? 8 MR. TEPFER: Objection to the characterization as a 9 lawyer objection. 10 But go ahead. 11 BY THE WITNESS: 12 A. I see it. 13 Q. Can you read it? 14 A. The answer? 15 Q. The answer. 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." 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? 24 MR. TEPFER: Objection and note for the record that</p>
<p style="text-align: right;">Page 107</p> <p>1 A. "To the best of my knowledge, information, and 2 memory." 3 Q. Okay. And you signed that on August 7, 2017, 4 right? 5 A. Yes. 6 Q. And that was the -- That was one of the years 7 where you were selling narcotics, right? 8 MR. TEPFER: Objection: mischaracterizes the 9 testimony, form of the question. 10 You can answer the question as asked. 11 BY THE WITNESS: 12 A. Yes. 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? 23 A. Yeah. 24 Q. Did I read it accurately?</p>	<p style="text-align: right;">Page 109</p> <p>1 this was supplemented as much as -- as recently as 2 yesterday. 3 But you can answer the question based on this 4 document. 5 BY THE WITNESS: 6 A. Yes. 7 Q. Why didn't you -- 8 MR. PALLES: 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. 14 MR. TEPFER: You can answer the question. 15 BY MR. BAZAREK: 16 Q. Do you want me to read the question back? 17 A. I just answered it. I said yes. 18 Q. Why didn't you include the narcotics sales 19 that you engaged in during 2017 and 2018? 20 A. When I -- When I -- 21 MR. TEPFER: Hold on. Objection to the form of the 22 question. It mischaracterizes the prior testimony. 23 Go ahead. 24</p>

31 (Pages 106 to 109)

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

<p style="text-align: right;">Page 110</p> <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 style="text-align: right;">Page 112</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: right;">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: right;">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,</p> <p>2 correct?</p> <p>3 A. On here, yes.</p> <p>4 Q. Is that truthful?</p> <p>5 MR. TEPFER: Objection to -- I don't -- the form of</p> <p>6 the question. I don't understand the question.</p> <p>7 BY MR. BAZAREK:</p> <p>8 Q. Is that a truthful answer, "Plaintiff Baker</p> <p>9 sold cocaine and heroin at various times between</p> <p>10 approximately 1998 to 2004"?</p> <p>11 MR. TEPFER: Are you asking if that's a truthful</p> <p>12 statement or --</p> <p>13 MR. BAZAREK: Yes.</p> <p>14 BY THE WITNESS:</p> <p>15 A. Well, for what I thought I was talking about,</p> <p>16 yes.</p> <p>17 Q. Well, it's true you were a drug dealer from</p> <p>18 approximately 1998 to 2004, at least according to this</p> <p>19 answer, right?</p> <p>20 A. Yes. I sold drugs during that time.</p> <p>21 Q. Okay. And you sold drugs out of Ida B. Wells,</p> <p>22 right?</p> <p>23 A. Out of the Extensions, yes.</p> <p>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?</p> <p>2 MR. TEPFER: Objection to the form. The</p> <p>3 question --</p> <p>4 BY MR. BAZAREK:</p> <p>5 Q. Is that yes?</p> <p>6 MR. TEPFER: -- asks about various things.</p> <p>7 But go ahead.</p> <p>8 MR. BAZAREK: Plenty of speaking objections here</p> <p>9 throughout -- I'll just note that -- through this</p> <p>10 deposition.</p> <p>11 BY MR. BAZAREK:</p> <p>12 Q. But anyway, it's asking you for --</p> <p>13 A. It's saying from -- since my release from</p> <p>14 prison for attempted murder in Cook County?</p> <p>15 Q. Yes. Since that time. Yes. Right?</p> <p>16 A. It says "If your answer is yes, then</p> <p>17 specifically identify every geographic location where</p> <p>18 you engaged in such activities."</p> <p>19 Q. Right. And then there's this lawyer objection</p> <p>20 that's made. And then the answer is, the geographic</p> <p>21 location for the drug-related activities, you give the</p> <p>22 address of 527 East Browning Street, correct?</p> <p>23 MR. TEPFER: Objection to the characterization of</p> <p>24 the lawyer objection.</p>
<p style="text-align: right;">Page 115</p> <p>1 that you sold between 1998 to 2004?</p> <p>2 A. Various places.</p> <p>3 Q. Where?</p> <p>4 A. In vacant apartments. A lot of times, in</p> <p>5 vacant apartments.</p> <p>6 Q. How about the apartment that you lived in with</p> <p>7 Clarissa and your children?</p> <p>8 A. Once.</p> <p>9 Q. So from 1998 to 2004, it's your testimony you</p> <p>10 only stored illegal narcotics in your apartment once?</p> <p>11 A. That I recall, yes.</p> <p>12 Q. Okay.</p> <p>13 MR. TEPFER: Did you say you wanted to take a lunch</p> <p>14 at 1:00? It's 12:58.</p> <p>15 MR. BAZAREK: Yeah. I'm gonna -- I'll -- Let me</p> <p>16 finish -- see if I can finish up with this exhibit.</p> <p>17 BY MR. BAZAREK:</p> <p>18 Q. But, okay. All right. Looking at</p> <p>19 Interrogatory Number 2, it's asking you about the --</p> <p>20 every geographic location where you engaged in such</p> <p>21 activities, including, if known, the street address. Do</p> <p>22 you see that, the last part of that question?</p> <p>23 A. Yeah.</p> <p>24 Q. Okay. And it's asking -- That question is</p>	<p style="text-align: right;">Page 117</p> <p>1 But go ahead.</p> <p>2 BY THE WITNESS:</p> <p>3 A. Yes.</p> <p>4 Q. So why didn't you include 6215 South Rhodes in</p> <p>5 this answer?</p> <p>6 A. Because I was under the impression that we was</p> <p>7 strictly talking about the time frame of the Watts case.</p> <p>8 Q. Why didn't you include 6540 South Vernon in</p> <p>9 this answer?</p> <p>10 A. Because I assumed that we was strictly talking</p> <p>11 about the Watts case, as evident with my answer,</p> <p>12 527 East Browning.</p> <p>13 Q. Why didn't you include the occasions where you</p> <p>14 would bring the narcotics to Zachary Brown?</p> <p>15 A. Because I assumed that we was strictly talking</p> <p>16 about the Watts case.</p> <p>17 Q. Take a look at Number 3. You were asked,</p> <p>18 "With reference to the time frame described in</p> <p>19 Interrogatory Number 2, have you ever engaged in</p> <p>20 drug-related activity jointly with another person or</p> <p>21 persons or on behalf of a group? If so, please" -- you</p> <p>22 know, it asks you to identify individuals, group,</p> <p>23 specific locations. And there's just an objection</p> <p>24 there. Do you see that?</p>

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

Page 118	<p>1 A. Yes.</p> <p>2 Q. So why didn't you include information about</p> <p>3 narcotics activity at Rhodes and Vernon that you engaged</p> <p>4 in?</p> <p>5 MR. TEPFER: To the extent this -- If you can</p> <p>6 answer the question without violating privilege,</p> <p>7 attorney-client or work product privilege, then I guess</p> <p>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 --</p> <p>16 there's no answer to Bolton that you engaged in</p> <p>17 narcotics activity on Rhodes and Vernon, right?</p> <p>18 A. Because I thought we was talking about the</p> <p>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</p> <p>22 why he didn't answer that question.</p> <p>23 Do not answer that question.</p> <p>24</p>	Page 120	<p>1 A. I don't know.</p> <p>2 Q. Well, the other answers, you said it was</p> <p>3 because, "Ah, I thought it was Watts related."</p> <p>4 A. Yeah. Because this question was framed</p> <p>5 differently. So I -- What I was doing, I smoked</p> <p>6 marijuana.</p> <p>7 Q. Right. But you were also dealing drugs?</p> <p>8 MR. TEPFER: Objection: mischaracterizes the prior</p> <p>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,</p> <p>14 the late '90s when you're selling narcotics. It's</p> <p>15 saying "Please state the last year during which you</p> <p>16 engaged directly or indirectly in any drug-related</p> <p>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</p> <p>23 you signed in answer to these -- Strike that.</p> <p>24 That was the same year, 2017, you were engaged</p>
Page 119	<p>1 BY MR. BAZAREK:</p> <p>2 Q. Are you going to follow your attorney's advice</p> <p>3 and not answer that question?</p> <p>4 A. Yes.</p> <p>5 Q. Could you answer that question but for your</p> <p>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</p> <p>10 engaged directly or indirectly in any drug-related</p> <p>11 activity." Did I read that right?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. And you gave an answer to that</p> <p>14 question, right?</p> <p>15 A. Yes.</p> <p>16 Q. And there's an objection made by an attorney.</p> <p>17 And you answer. The only answer you give is "Plaintiff</p> <p>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</p> <p>23 you not include the narcotics transactions that you were</p> <p>24 engaging in during 2017?</p>	Page 121	<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</p> <p>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</p> <p>17 dealer, correct?</p> <p>18 MR. TEPFER: Objection: mischaracterizes the prior</p> <p>19 testimony.</p> <p>20 BY THE WITNESS:</p> <p>21 A. When you say "drug dealer," I figure I would</p> <p>22 have to be getting currency directly for me. And I</p> <p>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</p> <p>2 that went into my pocket for drugs. But you keep</p> <p>3 calling me a drug dealer. I passed along drugs, yes.</p> <p>4 But I never received currency.</p> <p>5 Q. That's drug-related activity that you're</p> <p>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</p> <p>13 activity with Bali, right?</p> <p>14 A. Yes.</p> <p>15 Q. And were you engaging in narcotics-related</p> <p>16 activity with Zachary Brown?</p> <p>17 A. Yes.</p> <p>18 Q. And were you engaging in narcotics-related</p> <p>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</p> <p>24 occasions, you don't consider that narcotics-related</p>	<p>1 Q. So why didn't you include that, the -- all</p> <p>2 that narcotics-related activity in answer to Number 4?</p> <p>3 MR. TEPFER: Objection: asked and answered</p> <p>4 multiple times.</p> <p>5 BY THE WITNESS:</p> <p>6 A. Because I didn't think -- I didn't think to do</p> <p>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</p> <p>9 going to go on a lunch break. I warned that I wanted --</p> <p>10 Are you --</p> <p>11 MR. BAZAREK: Let me just --</p> <p>12 MR. TEPFER: If you have one or two more questions.</p> <p>13 But --</p> <p>14 MR. BAZAREK: Yeah, yeah. I think I'm almost done</p> <p>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</p> <p>18 at your -- Strike that.</p> <p>19 You know, I just have -- Yeah, I do have a</p> <p>20 question about Number 9. This question, Number 9, is</p> <p>21 asking you about the last date on which you were</p> <p>22 involved directly or indirectly in drug-related</p> <p>23 activities at Ida B. Wells, right?</p> <p>24 MR. TEPFER: Objection: mischaracterizes the</p>
Page 123	Page 125
<p>1 activity?</p> <p>2 MR. TEPFER: Hold on. Objection. Please let him</p> <p>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</p> <p>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</p> <p>11 activity with Jamar Lewis, right?</p> <p>12 MR. TEPFER: Objection: It's argumentative. I'm</p> <p>13 going to ask for a break pretty soon, so if you want to</p> <p>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</p> <p>18 him and pass them to the people that was asking for it.</p> <p>19 Q. Right. That's narcotics-related activity,</p> <p>20 right?</p> <p>21 MR. TEPFER: Objection: asked and answered, form,</p> <p>22 argumentative.</p> <p>23 BY THE WITNESS:</p> <p>24 A. Right.</p>	<p>1 question --</p> <p>2 BY MR. BAZAREK:</p> <p>3 Q. You know what? I'll read the question. I'll</p> <p>4 read it. I want to make sure you -- Do you need to</p> <p>5 clarify any answer that you've given so far in this</p> <p>6 deposition?</p> <p>7 A. It says "Plaintiff objects to this</p> <p>8 interrogatory on the basis that it is not relevant,</p> <p>9 overly broad, and not proportional to the needs of the</p> <p>10 case."</p> <p>11 Q. No.</p> <p>12 A. "Subject to and without waiving these</p> <p>13 objections, 2005."</p> <p>14 Q. Okay. So let me just get the question out</p> <p>15 because your counsel said it was -- my question was</p> <p>16 confusing.</p> <p>17 You were asked in Interrogatory Number 9 "Did</p> <p>18 you engage at any time in any drug-related activities in</p> <p>19 the 527 building of the Ida B. Wells housing project?</p> <p>20 If your answer is yes, what was the last date on which</p> <p>21 you were involved directly or indirectly in such</p> <p>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

Page 126

1 A. Yes.

2 **Q. And so your answer to that question was 2005,**

3 **correct?**

4 A. Yes, that's what it says here.

5 **Q. And was that truthful?**

6 A. Well, I look at marijuana as illegal drugs at

7 that time.

8 **Q. What about heroin or cocaine?**

9 A. Those are illegal, too.

10 **Q. Right. And you were engaging in illegal**

11 **narcotics activity with cocaine and heroin in 2005,**

12 **right?**

13 A. I don't think so. I don't recall that.

14 **Q. What's the drug-related activities you're**

15 **referring to that occurred during 2005?**

16 A. Marijuana. Smoking marijuana.

17 **Q. Anything else?**

18 A. That's all I smoked.

19 **Q. Any other illegal activity in 2005 that you**

20 **engaged in?**

21 A. Not that I recall.

22 **Q. And I'm sorry. Be more specific. Any drug --**

23 **Did you engage in any drug-related activities in the**

24 **527 building involving heroin during 2005?**

Page 127

1 A. Not that I recall.

2 **Q. How about cocaine?**

3 A. Not that I recall.

4 **Q. But you do recall the marijuana?**

5 A. I know I've been smoking marijuana forever,

6 since 19- -- what? -- '97, '98.

7 **Q. Okay. Do you still smoke it?**

8 A. No. I can't smoke it now because I drive

9 trucks.

10 MR. BAZAREK: Okay. All right. Let's take a break

11 for lunch.

12 THE VIDEOGRAPHER: The time is 1:11 p.m. We are

13 now off the record.

14 (A short break was had.)

15 THE VIDEOGRAPHER: The time is 1:52 p.m. We are

16 now back on the record.

17 MR. TEPFER: Go ahead.

18 BY MR. BAZAREK:

19 **Q. Mr. Baker, do you know what a burner phone is?**

20 A. A burner phone?

21 **Q. Yes.**

22 A. I guess it's just another phone.

23 **Q. During the times --**

24 MR. PALLES: Excuse me. Are we back on the record?

Page 128

1 MR. TEPFER: Yeah. He announced --

2 MR. PALLES: Sorry. Okay. I apologize, Bill.

3 MR. BAZAREK: Were -- Do you want -- Let's read the

4 question back.

5 (Record read as requested.)

6 BY MR. BAZAREK:

7 **Q. Oh. During the time -- Strike that.**

8 **During the times when you were selling**

9 **narcotics during 2017 and 2018, did you have more than**

10 **one phone?**

11 MR. TEPFER: Objection to the characterization, and

12 the question mischaracterizes the testimony.

13 Go ahead.

14 BY THE WITNESS:

15 A. Not that I recall. I believe I only had one

16 phone.

17 **Q. Okay. And what was the phone number for that**

18 **phone?**

19 A. I don't know.

20 **Q. Do you still have that same phone number?**

21 A. No.

22 **Q. Okay. Who was your carrier back in 2017 and**

23 **2018?**

24 A. I don't know. Probably either Boost or

Page 129

1 T-Mobile. I'm not sure.

2 **Q. Did the federal -- The federal authorities who**

3 **arrested you were from DEA?**

4 A. I don't know. I turned myself in to the

5 federal building. So I don't know.

6 **Q. So it's your -- Strike that.**

7 **Were you -- You were provided with evidence by**

8 **the federal government in relation to the federal**

9 **prosecution against you?**

10 A. Did I receive something from the federal

11 government?

12 **Q. Yes.**

13 A. Like they gave it to me in my hand?

14 **Q. Or your attorney.**

15 A. Well, I did get some paperwork from my

16 attorney.

17 **Q. Yeah. Did the -- And you talked about**

18 **audiotapes that you had access to. Do you recall that**

19 **earlier in the deposition?**

20 A. Yeah. I think they're in the form of a disc.

21 **Q. Okay. Did they -- Strike that.**

22 **Did the federal government supply to you any**

23 **texts that you sent or received during the time when you**

24 **were -- during -- at any time during 2017 or 2018?**

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

37 (Pages 130 to 133)

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</p> <p>13 narcotics in bags at your residence on Vernon?</p> <p>14 A. I was before, yes.</p> <p>15 Q. Were any of your family members present when</p> <p>16 that was --</p> <p>17 A. No.</p> <p>18 Q. -- going on?</p> <p>19 A. No.</p> <p>20 Q. Okay. And then what would he -- what would</p> <p>21 Jamar do with the bags he was putting the narcotics</p> <p>22 into?</p> <p>23 A. He would leave with it.</p> <p>24 Q. To go sell it?</p>	<p>1 When Jamar was putting the narcotics in the</p> <p>2 bags in your apartment on Vernon, what were you doing?</p> <p>3 A. Playing a game, smoking marijuana.</p> <p>4 Q. Like video games-type thing?</p> <p>5 A. Yes. Madden.</p> <p>6 Q. How long of a time period was it where Jamar</p> <p>7 was putting the narcotics in the bags at your Vernon</p> <p>8 residence?</p> <p>9 A. I can't really say. Like, I don't know how</p> <p>10 long it took him to do it. I don't know.</p> <p>11 Q. What was the quantity he had?</p> <p>12 A. I don't know that either.</p> <p>13 Q. During 2017 or 2018, did you ever observe</p> <p>14 Jamar Lewis with a kilo of heroin?</p> <p>15 A. I can't say that I did. I don't know. I</p> <p>16 didn't actually -- I don't know if I actually seen him</p> <p>17 with a key of heron.</p> <p>18 Q. Did Jamar tell you who he was going to sell</p> <p>19 the heroin to?</p> <p>20 A. No.</p> <p>21 Q. Who did -- Where did Jamar get the heroin</p> <p>22 from?</p> <p>23 A. I wouldn't know.</p> <p>24 Q. Did he ever tell you?</p>
Page 135	Page 137
<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</p> <p>14 Minnesota?</p> <p>15 Q. I'm going to -- I'd have to google that. Was</p> <p>16 it that day?</p> <p>17 A. No. It was that year.</p> <p>18 Q. Okay. And so when Jamar was putting the</p> <p>19 narcotics in the bag at your home on Rhodes, what were</p> <p>20 you doing?</p> <p>21 A. I didn't say on Rhodes.</p> <p>22 MR. TEPFER: Objection. Yeah.</p> <p>23 BY MR. BAZAREK:</p> <p>24 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</p> <p>3 his supplier was?</p> <p>4 A. Right.</p> <p>5 Q. Is that right?</p> <p>6 A. He never told me.</p> <p>7 Q. Okay. And you never heard him say who his</p> <p>8 supplier was?</p> <p>9 A. Never cared.</p> <p>10 Q. You never heard him say it, right?</p> <p>11 A. No. I don't recall hearing him say it. Like,</p> <p>12 he wouldn't have a reason to tell me, that I know of.</p> <p>13 Q. Let's take a look at Deposition Exhibit</p> <p>14 Number 3. Those are your answers to Defendant Watts's</p> <p>15 interrogatories. Just give me a moment.</p> <p>16 In Interrogatory Number 6, you were asked to</p> <p>17 identify any and all sources of income since your</p> <p>18 release from custody of the Illinois Department of</p> <p>19 Corrections; is that correct?</p> <p>20 A. That's what it says here.</p> <p>21 Q. And I'm paraphrasing it. But that's -- You</p> <p>22 understand the time frame, right?</p> <p>23 A. That's the -- Yeah. That's what it's saying</p> <p>24 here.</p>

38 (Pages 134 to 137)

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

Page 138	<p>1 Q. Okay. And you agree in answer to</p> <p>2 Interrogatory Number 6, you provided no information</p> <p>3 concerning any moneys that you would have received from</p> <p>4 Bali or Zachary Brown, correct?</p> <p>5 MR. TEPFER: Objection: That clearly</p> <p>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.</p> <p>9 I didn't keep the money.</p> <p>10 Q. When you would get the money from Bali or</p> <p>11 Zachary Brown for the drugs you sold them, would you</p> <p>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</p> <p>14 along to Bali and Zach, yes, I would get the money from</p> <p>15 them and give it to Jamar.</p> <p>16 Q. Would you give the money to Jamar the same day</p> <p>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</p> <p>22 would you go to him to give him the money? How did that</p> <p>23 work?</p> <p>24 A. Wherever I would see him at that day, I would</p>	Page 140	<p>1 Q. On the day that Jamar was packaging the</p> <p>2 narcotics inside your residence on Rhodes, did you give</p> <p>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</p> <p>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</p> <p>9 interrogatory answers, take a look at the last page.</p> <p>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</p> <p>13 that right?</p> <p>14 A. Yes.</p> <p>15 Q. And can you just read the verification into</p> <p>16 the record?</p> <p>17 A. "I, Ben Baker, verify that I have reviewed the</p> <p>18 attached Plaintiff Ben Baker's responses to Defendant</p> <p>19 Watts' interrogatories, and I certify that the answers</p> <p>20 are true and correct to the best of my knowledge,</p> <p>21 information, and memory."</p> <p>22 Q. And you read those interrogatories over before</p> <p>23 you signed them; is that right?</p> <p>24 A. Maybe.</p>
Page 139	<p>1 give him the money. So he might come to my house, or I</p> <p>2 might see him outside. And I would give him the money.</p> <p>3 Q. Okay. Did you ever give Jamar Lewis money</p> <p>4 from the narcotics sale at your apartment on Vernon?</p> <p>5 MR. TEPFER: Objection to the form of the question.</p> <p>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</p> <p>9 giving the drugs to Bali and getting the money, I would</p> <p>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</p> <p>13 drugs; I would pass it to Bali or Zachary, get the</p> <p>14 money.</p> <p>15 Q. Right.</p> <p>16 A. And then when I seen Jamar later on that day,</p> <p>17 I would give him the money back.</p> <p>18 Q. Okay. So it was always on that -- the same</p> <p>19 day you received the money, you would have given it to</p> <p>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</p> <p>24 believe I would give it back to him the same day.</p>	Page 141	<p>1 Q. Okay. Mr. Baker, have you ever paid a law</p> <p>2 enforcement officer a bribe?</p> <p>3 A. No.</p> <p>4 Q. Have you ever told anyone that you paid a law</p> <p>5 enforcement officer a bribe?</p> <p>6 A. No.</p> <p>7 Q. Have you ever observed anyone pay a law</p> <p>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</p> <p>11 you're claiming were unlawful, have you ever observed a</p> <p>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</p> <p>16 witnessed them take drugs and sell them theirself. I've</p> <p>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

Page 142	<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>	Page 144	<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>
Page 143	<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>	Page 145	<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>

41 (Pages 146 to 149)

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

<p style="text-align: right;">Page 150</p> <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 style="text-align: right;">Page 152</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: right;">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: right;">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

1 **Q. Were you on probation in 2004?**
2 A. Yes.
3 **Q. Or maybe I'm mixing it up.**
4 **Were you on parole in 2004?**
5 A. No. I was on probation, gang intensified
6 probation.
7 **Q. And what led you to being on -- Strike that.**
8 **What led you to being on probation in 2004?**
9 A. A drug case.
10 **Q. And what was the drug case?**
11 A. Distribution.
12 **Q. Where were you -- Right. Do you remember what**
13 **year or month you were arrested and --**
14 A. No.
15 **Q. Who arrested you for that arrest?**
16 A. I don't recall who arrested me for that
17 arrest.
18 **Q. How did you get caught?**
19 A. But I know when I went to -- They took me to
20 the police station. Well, they took me to the
21 substation on -- in the Robert Taylor Homes.
22 MR. TEPFER: I'm sorry. What did you call it? I
23 didn't hear you.
24 THE WITNESS: The substation.

Page 155

1 MR. TEPFER: Substation. Sorry.
2 THE WITNESS: Yeah. They had those in the
3 projects. Like, they would take you there before
4 actually taking you to the police station. So I was
5 there. And they was like, "Okay. We writing it up
6 as" -- Well, the -- the substation, and then they took
7 me to 51st Street.
8 BY MR. BAZAREK:
9 **Q. How did you get caught?**
10 MR. TEPFER: Objection to the form.
11 BY THE WITNESS:
12 A. What you mean caught? They grabbed me.
13 **Q. You were arrested?**
14 A. Yes, I was arrested. You said -- I was
15 arrested and taken to the police station, to the
16 substation.
17 **Q. But that was not an arrest by Ronald Watts's**
18 **team, correct?**
19 A. Right.
20 **Q. Different set of officers?**
21 A. Yeah.
22 **Q. Do you remember --**
23 A. But Ronald Watts was out there that night,
24 though. That was my actually first time, I believe,

Page 156

1 seeing him. But he didn't, like, come in. I just seen
2 him downstairs after they took me out of there.
3 **Q. What -- Did you see any members of Watts's**
4 **team?**
5 A. No. They wasn't there yet.
6 **Q. Okay.**
7 A. Or they wasn't assigned over there yet, I
8 guess.
9 **Q. So the -- Strike that.**
10 **What was -- What were -- Strike that.**
11 **What were the terms of your probation?**
12 A. Well, I had a curfew, and I was on house
13 arrest.
14 **Q. And what does that mean?**
15 A. I had to be in the house by a certain time.
16 Like, I think it was 7:00 to 7:00.
17 **Q. And were you also not to engage in criminal**
18 **activity?**
19 A. I mean, you're on probation. I guess so.
20 **Q. And while you were on that probation, you were**
21 **not to possess illegal narcotics; is that right?**
22 A. Correct.
23 **Q. How about firearms? Have you ever carried a**
24 **firearm?**

Page 157

1 A. Yes, I've carried firearms before.
2 **Q. Why?**
3 A. Protection, I guess.
4 **Q. Have you ever shot anyone?**
5 A. I've shot at people. I don't know if I
6 actually shot someone. I've never been charged with
7 shooting someone.
8 **Q. Were you ever convicted of attempted murder?**
9 A. Yes, I was. That was bull, too.
10 **Q. And were -- Did you have a firearm with you?**
11 A. No.
12 **Q. Was there some type of instrument that you had**
13 **that --**
14 A. I --
15 **Q. -- you were being charged with attempted**
16 **murder?**
17 A. I didn't have nothing. They didn't give me a
18 gunshot residue test or nothing. Just the lady jumped
19 out the car and said, "He did it," and that was that. I
20 said, "No, I didn't, lady. I don't even know you." But
21 I wound up going to -- Well, I was going to trial for
22 it. And then the guy came in with a nurse and stuff,
23 and it just didn't look good. He saying I did it, but I
24 never even knew the dude.

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

Page 158

1 **Q. Who --**
2 A. So I took the plea deal.
3 **Q. Who was the -- Who was the guy?**
4 A. I don't even remember his name.
5 **Q. Was he in the Gangster Disciples?**
6 A. I don't know. I didn't know the guy is what
7 I'm telling you.
8 **Q. So it was just, like, case of mistaken**
9 **identity?**
10 A. Yeah.
11 **Q. But you still pled guilty to that?**
12 A. Yeah, because he was coming to court to say I
13 did it. I believe the lady did it. But that's just me.
14 **Q. So is it your testimony that you pled guilty**
15 **to attempted murder even though you were innocent?**
16 A. Yes.
17 **Q. All right. So let me take you to June**
18 **of 2004. You're on probation, right?**
19 A. Yes.
20 **Q. You are a drug dealer at Ida B. Wells, right?**
21 MR. TEPFER: Objection to form.
22 Go ahead.
23 BY MR. BAZAREK:
24 **Q. Right?**

Page 159

1 A. I sold drugs.
2 **Q. Right. During 2004, you sold illegal**
3 **narcotics out of Ida B. Wells, right?**
4 MR. TEPFER: It's been asked and answered.
5 BY THE WITNESS:
6 A. Yes.
7 **Q. Okay. June 14, 2004, do you remember that**
8 **day?**
9 A. No.
10 **Q. What -- Is there a day that you -- Or strike**
11 **that.**
12 You're aware that at least the police account
13 says narcotics were recovered from your mailbox in
14 June of '04?
15 A. Yes.
16 **Q. Okay. And the reason I said the day is**
17 **because I know you were in some type of --**
18 A. Community service.
19 **Q. Yeah. Community service, right?**
20 And specifically, on June 14, 2004, was -- did
21 you have community service on that day?
22 A. Yes.
23 **Q. And tell me what -- Tell me what you remember**
24 **about that day.**

Page 160

1 A. I remember going to community service.
2 **Q. How did you get there?**
3 A. Clarissa had drove me to community service.
4 **Q. What kind of car did you have in 2004?**
5 A. I believe we had a Dodge Intrepid.
6 **Q. Did you know anyone with a blue Chevrolet?**
7 A. A blue Chevrolet, no.
8 **Q. Yeah. What color was --**
9 A. Well, Jamar had a blue Lumina.
10 **Q. Is that -- That's a Chevy?**
11 A. Yeah.
12 **Q. Blue Chevy?**
13 A. Yeah.
14 **Q. Okay. And you'd been in that car before, that**
15 **blue Chevy?**
16 A. Yes, I've been in it before.
17 **Q. Okay. And then did Clarissa have to work that**
18 **day?**
19 A. Yes.
20 **Q. Where was she working on that day?**
21 A. I believe she was working at Michael Reese
22 Hospital doing the -- her auntie was involved some type
23 of way with a help-at-home service.
24 **Q. And what were her hours?**

Page 161

1 A. I think it was from like 8:00 or something
2 like that to I don't know when. But I know she had to
3 be there at 8:00 because I had to be at the community
4 service, the Streets and Sanitation at 7:00.
5 **Q. And so what time did you finish up your work**
6 **for the Adult Probation Department?**
7 A. I think she came and got me about 3:00. But
8 we went to the school to get the kids. And then we went
9 and got swimming trunks. And then we went to the
10 McCormick.
11 **Q. So was it planned that you were going to go**
12 **to --**
13 A. Yes.
14 **Q. -- the Hyatt at the McCormick Place?**
15 A. Yes, because that was the last day of school.
16 So, yes.
17 **Q. Do you know when Clarissa made the reservation**
18 **for the Hyatt?**
19 A. We didn't make reservations. We just went in
20 and got a room.
21 **Q. Had you on any occasion ever gone to a hotel**
22 **because you knew the police were looking for you?**
23 A. Well, I knew that that day, I got a call
24 saying Watts said he got some drugs out the mailbox and

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

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

45 (Pages 162 to 165)

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

Page 166	<p>1 A. Right. I don't know.</p> <p>2 Q. Because, like you said, you could have the</p> <p>3 other individuals that are involved in narcotics</p> <p>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</p> <p>6 see me, I was being charged for those drugs. That's</p> <p>7 what I did know. So when they were on shift, I wouldn't</p> <p>8 even come around.</p> <p>9 Q. Patrick told -- Patrick told you that Watts</p> <p>10 told him that --</p> <p>11 A. He announced --</p> <p>12 Q. -- the narcotics were recovered from your</p> <p>13 mailbox, correct?</p> <p>14 A. What you say?</p> <p>15 Q. Patrick told you that Watts had told him that</p> <p>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</p> <p>21 mailbox. He didn't say my mailbox. He just said from a</p> <p>22 mailbox.</p> <p>23 Q. Okay.</p> <p>24 A. And when he see me, my smart-ass was going to</p>	Page 168	<p>1 visit from -- Jamar and Elgen came to the hotel, and</p> <p>2 Clarissa went and got something to eat. Now, if she</p> <p>3 went back to the building at that time, I don't know.</p> <p>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</p> <p>6 building.</p> <p>7 A. I'm telling you --</p> <p>8 MR. TEPFER: Objection: form, if that's a</p> <p>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</p> <p>14 that during an interview and then you said, "Clarissa is</p> <p>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</p> <p>21 Clarissa.</p> <p>22 Q. To your knowledge, from any source of</p> <p>23 information, did Clarissa tell COPA that you did go back</p> <p>24 to the building on June 14th?</p>
Page 167	<p>1 jail.</p> <p>2 Q. Did Patrick say there was anyone else present</p> <p>3 other than Watts?</p> <p>4 A. I guess Watts' team. But he didn't, like,</p> <p>5 specifically name people. He said "Watts and them." So</p> <p>6 I took that to mean Watts' team.</p> <p>7 Q. All right. Other than the sound of kicking</p> <p>8 that you heard being made against your apartment door,</p> <p>9 what else are you hearing in terms of sounds or noise?</p> <p>10 A. Nothing, because then Pat walked away. And he</p> <p>11 was saying, "Man, dude talking about you're going to go</p> <p>12 to jail." And I was like, "Man, fuck him. I wasn't</p> <p>13 over there." And we, like, really ended the call.</p> <p>14 Q. Now, you say you weren't over there. But</p> <p>15 you're aware that Clarissa said that you did return to</p> <p>16 Ida B. Wells on June 14, 2004, right?</p> <p>17 A. I'm not aware of that. I don't -- But she</p> <p>18 wrong. We wasn't.</p> <p>19 Q. Well, I know that's what you told -- You told</p> <p>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</p> <p>24 did take -- When we was at the hotel and then I got a</p>	Page 169	<p>1 MR. TEPFER: Objection: calls for speculation,</p> <p>2 form.</p> <p>3 BY THE WITNESS:</p> <p>4 A. I got questioned by COPA about something</p> <p>5 Clarissa said. But I don't know what she actually said.</p> <p>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</p> <p>8 McCormick Place, the Hyatt?</p> <p>9 A. I don't know. I was upstairs when they came</p> <p>10 up. They caught the elevator up. It wasn't on the</p> <p>11 elevator with him, if he did.</p> <p>12 Q. I'm going to read this. This is COPA Watts</p> <p>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</p> <p>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</p> <p>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</p> <p>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	<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>	Page 172	<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	<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>	Page 173	<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

<p style="text-align: right;">Page 174</p> <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</p> <p>7 community service on June 17, 2004, did you return to</p> <p>8 Ida B. Wells?</p> <p>9 A. No.</p> <p>10 Q. But according to that report, Clarissa said</p> <p>11 you did go back there, right?</p> <p>12 A. That's something you would have to take up</p> <p>13 with Clarissa. I'm telling you I didn't go back there.</p> <p>14 Q. So if Clarissa is saying that you did go back</p> <p>15 there, she's wrong?</p> <p>16 A. Yeah. She's --</p> <p>17 MR. TEPFER: Objection: calls for speculation.</p> <p>18 But go ahead.</p> <p>19 BY THE WITNESS:</p> <p>20 A. Yeah. She's mistaken.</p> <p>21 Q. Have you ever talked to her about that?</p> <p>22 A. No.</p> <p>23 Q. Not once?</p> <p>24 A. No. I don't know what she said during none of</p>	<p style="text-align: right;">Page 176</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</p> <p>4 the swimming trunks and -- swimming trunks off of 22nd,</p> <p>5 I believe, off of Cermak. And then we -- I drove into</p> <p>6 the hotel. And then they had the -- like, the valet</p> <p>7 parking. And we went up to the room. And the kids went</p> <p>8 swimming initially by themselves. And they said that the</p> <p>9 kids couldn't be down there by themselves; an adult had</p> <p>10 to be with them. So Clarissa went down there with them,</p> <p>11 and they swam for a while. Then they came back up.</p> <p>12 And then at that time, Jamar and Elgen came,</p> <p>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</p> <p>15 King Drive. It was a little soul food restaurant over</p> <p>16 there. Now, I'm saying from the time she left there to</p> <p>17 the time she came back with the food, maybe she stopped</p> <p>18 at the hote- -- I mean, the building. But she didn't go</p> <p>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</p> <p>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</p> <p>24 tell Clarissa what Patrick had told you?</p>
<p style="text-align: right;">Page 175</p> <p>1 her interviews. No.</p> <p>2 Q. Well, after COPA interviewed you, they brought</p> <p>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</p> <p>8 interview with COPA, did you talk to Clarissa about</p> <p>9 that?</p> <p>10 A. No.</p> <p>11 Q. Did you ever say to her, "Hey, why did you say</p> <p>12 I was at Ida B. Wells on June 17th when I wasn't in</p> <p>13 the -- you know, after the community service?"</p> <p>14 A. No, because I knew there was a chance that she</p> <p>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</p> <p>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</p> <p>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: right;">Page 177</p> <p>1 A. Yeah. So that's how I know I didn't go back</p> <p>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</p> <p>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</p> <p>11 that evening at the hotel?</p> <p>12 A. When she came back with the food, Jamar and</p> <p>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</p> <p>15 police are looking for you. Right?</p> <p>16 A. Well, I can't say they was really -- Well,</p> <p>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</p> <p>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

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

<p style="text-align: right;">Page 182</p> <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</p> <p>8 heroin?</p> <p>9 A. I used to get heroin from my cousin.</p> <p>10 Q. What's your cousin's name?</p> <p>11 A. Eddie Baker.</p> <p>12 Q. Did you have any -- In 2004, did you have any</p> <p>13 other supplier for that narcotic other than Eddie Baker?</p> <p>14 A. Maybe if he didn't have none, there probably</p> <p>15 was somebody here or there that did. I don't, like,</p> <p>16 recall who.</p> <p>17 Q. Where is Eddie Baker these days?</p> <p>18 A. He living.</p> <p>19 Q. He's -- Is he a drug dealer --</p> <p>20 A. No.</p> <p>21 Q. -- or just a supplier?</p> <p>22 A. Neither.</p> <p>23 Q. Well, where would he get the drugs to give</p> <p>24 you?</p>	<p style="text-align: right;">Page 184</p> <p>1 Q. Eddie Baker.</p> <p>2 Who supplied you with cocaine to sell during</p> <p>3 2004?</p> <p>4 A. It was a few people. Like, I know this guy</p> <p>5 named Polo. I got cocaine from him mainly.</p> <p>6 Q. During 2004, did you sell more heroin or more</p> <p>7 cocaine?</p> <p>8 A. I'm not sure.</p> <p>9 Q. Was it equal?</p> <p>10 A. I'm not sure.</p> <p>11 Q. Other than Polo, did anyone else supply you</p> <p>12 with cocaine during 2004?</p> <p>13 A. I believe somebody, yeah. But I can't recall.</p> <p>14 It was so long ago.</p> <p>15 Q. So the only one who you remember supplying you</p> <p>16 with cocaine to sell during 2004 was Polo?</p> <p>17 A. It was the constant. That's who I used to go</p> <p>18 to.</p> <p>19 Q. Okay. When is the last time you saw or had</p> <p>20 contact with Polo?</p> <p>21 A. I actually talked to Polo the other day</p> <p>22 because his friend died and he was trying to raise money</p> <p>23 for the funeral.</p> <p>24 Q. Is it, like, a GoFundMe page?</p>
<p style="text-align: right;">Page 183</p> <p>1 A. That, I don't know.</p> <p>2 Q. Is -- Earlier in the dep, we were talking</p> <p>3 about David Baker, Bali. Is David Baker related to you?</p> <p>4 A. No. I have a cousin named David Baker.</p> <p>5 Q. All right. It's a different David Baker,</p> <p>6 right?</p> <p>7 A. Yeah, yeah. He live in Milwaukee.</p> <p>8 Q. And I don't know if I asked you this, but do</p> <p>9 you remember ballpark how old David Baker, aka Bali, is?</p> <p>10 A. No, I don't know how old Bali is.</p> <p>11 Q. Okay. All right. So, I'm sorry. David Baker</p> <p>12 would supply you with heroin or cocaine?</p> <p>13 MR. TEPFER: Objection.</p> <p>14 BY THE WITNESS:</p> <p>15 A. I never said --</p> <p>16 MR. TEPFER: Objection: misstates the testimony.</p> <p>17 MR. BAZAREK: Now I'm confused.</p> <p>18 MR. TEPFER: You said David Baker.</p> <p>19 MR. BAZAREK: What did I say?</p> <p>20 MR. TEPFER: You said David Baker.</p> <p>21 BY MR. BAZAREK:</p> <p>22 Q. Who supplied you with heroin during 2004 that</p> <p>23 you would sell?</p> <p>24 A. Eddie. Eddie Baker.</p>	<p style="text-align: right;">Page 185</p> <p>1 A. I don't know if it's a GoFundMe page. He</p> <p>2 called me off Facebook Messenger.</p> <p>3 Q. On Facebook, what does he go by? Polo?</p> <p>4 A. No. Mark.</p> <p>5 Q. What's Mark's last name?</p> <p>6 A. Holliman.</p> <p>7 Q. Can you spell it?</p> <p>8 A. H-O-L-L-I-M-A-N.</p> <p>9 Q. To your knowledge, does Mark Holliman still</p> <p>10 engage in narcotics activity?</p> <p>11 A. No. If he did, he wouldn't have been calling</p> <p>12 me trying to raise money for his friend's funeral.</p> <p>13 Q. Okay. All right. So let's go to the next</p> <p>14 month, July of '04. You know the police are looking for</p> <p>15 you, right?</p> <p>16 A. Okay.</p> <p>17 Q. And --</p> <p>18 MR. TEPFER: We've been going about an hour and ten</p> <p>19 minutes straight. I'm going to need a little</p> <p>20 five-minute break at some point soon.</p> <p>21 MR. BAZAREK: Do you want to break now?</p> <p>22 MR. TEPFER: Can we?</p> <p>23 MR. BAZAREK: Let's just break.</p> <p>24 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

1 now off the record.
2 (A short break was had.)
3 THE VIDEOGRAPHER: The time is 3:13 p.m. We are
4 now back on the record.
5 BY MR. BAZAREK:
6 Q. All right. Mr. Baker, I want to ask you about
7 your arrest on July 11, 2004. Do you remember that day?
8 A. Yes.
9 Q. What's the first thing you remember about that
10 day?
11 A. The officers knocking on the door.
12 Q. Who knocked on the door?
13 A. It was Watts; I believe it was AJ and a couple
14 more.
15 Q. Who were the other two?
16 A. I can't recall.
17 Q. Who was inside your apartment?
18 A. Me, Clarissa, and Elgen Moore.
19 Q. Did Elgen Moore sell narcotics for you that
20 day?
21 A. No.
22 Q. Why not?
23 A. Because your clients was looking for me to put
24 drugs on me, so I wouldn't sell drugs.

Page 187

1 Q. What time would Elgen Moore ordinarily sell
2 narcotics for you?
3 A. We didn't sell during that time period.
4 Q. What does that mean?
5 A. I refused to sell drugs with your officers
6 running roughshod trying to put drugs on me, put a drug
7 case on me. So we didn't sell drugs during that time.
8 Q. So it's your testimony, sir, that during
9 July of 2004, you engaged in no narcotics activity?
10 A. Right.
11 Q. And that also means that you didn't have
12 people selling drugs for you during July of '04,
13 correct?
14 A. Right.
15 Q. Okay. What time did Elgen get to your
16 apartment?
17 A. I don't know. It was -- because he lived in
18 the building. He just came downstairs.
19 Q. Okay.
20 A. Because he called my phone and was like -- I'm
21 like, "I'm in the crib." And he came down. I don't
22 exactly know what time it was.
23 Q. Okay. And Clarissa was home, right?
24 A. Yes.

Page 188

1 Q. And was she working that day?
2 A. No.
3 Q. Was it her day off, or she just wasn't
4 working?
5 A. She wasn't working that day.
6 Q. Okay. Do you remember what day of the week it
7 was?
8 A. No.
9 Q. Were the kids home?
10 A. No.
11 Q. Where were the kids?
12 A. I told you, the kids was -- (gesturing) -- for
13 the summer.
14 Q. Okay. All right. So you hear a knock on the
15 door. Is anyone saying anything?
16 A. No. Clarissa go to the door and ask, "Who is
17 it?"
18 Q. Then what happened?
19 A. It's the police. And she opened the door.
20 Q. Then what happened?
21 A. They came in.
22 Q. Who came in?
23 A. Watts, AJ, and a couple more officers.
24 Q. Who were the other officers?

Page 189

1 A. I don't recall who the other officers were.
2 Q. What race were they?
3 A. I don't recall.
4 Q. Were they men or women?
5 A. They were Chicago police officers.
6 Q. Were they -- Were any of them female?
7 A. They were Chicago police officers. That's
8 what I recall.
9 Q. All right. So as you sit here at this
10 deposition, you don't know if those other two officers
11 were male or female?
12 A. I don't recall.
13 Q. Right. As you sit here at this deposition,
14 you don't know whether those two other officers were
15 male or female, correct?
16 MR. TEPFER: Asked and answered.
17 BY THE WITNESS:
18 A. I don't recall. But I know I encountered
19 other officers at the substation. And I know that
20 Gonzalez and Bolton drove me from the substation to
21 51st Street.
22 Q. I want to focus on inside your apartment.
23 A. Of course.
24 Q. So Clarissa let the officers in?

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

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

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

<p style="text-align: right;">Page 194</p> <p>1 A. I don't know.</p> <p>2 Q. Why do you think -- Why do you think Jones was</p> <p>3 laughing?</p> <p>4 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</p> <p>8 kept in your apartment?</p> <p>9 A. I don't believe so. There was no dog there at</p> <p>10 that time. When they arrested me, no, we didn't have a</p> <p>11 dog at that time. But I have had dogs there.</p> <p>12 Q. What kind of dogs have you had in your</p> <p>13 apartment?</p> <p>14 A. I had a pit bull before. And I had -- Well, I</p> <p>15 had probably two pit bulls, you know, different</p> <p>16 occasions. And then as we left, when I went to jail</p> <p>17 in 2006, then we had a cane corso. But she was, like, a</p> <p>18 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</p> <p>24 rolled around?</p>	<p style="text-align: right;">Page 196</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</p> <p>7 out?</p> <p>8 A. I wasn't saying anything to him, so he -- I</p> <p>9 don't know. I just was so mad. I don't know if he said</p> <p>10 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</p> <p>18 and AJ?</p> <p>19 A. No. He didn't get in at that time. He just</p> <p>20 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</p> <p>23 we drove to the substation on -- I think it was</p> <p>24 37th Place or Street. It was close to Cottage Grove. I</p>
<p style="text-align: right;">Page 195</p> <p>1 A. Well, Diamond had went deaf, so I gave her</p> <p>2 away to somebody that I figured could take care of her</p> <p>3 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.</p> <p>6 She wasn't there then.</p> <p>7 Q. And so after you gave Diamond away, what was</p> <p>8 the next dog you had?</p> <p>9 A. Diamond was the next dog. I had a little dog</p> <p>10 named Bar None. But then I took him to my auntie's</p> <p>11 house one time because they was doing an inspection or</p> <p>12 something, and her dog actually killed Bar None. And</p> <p>13 then I got Diamond.</p> <p>14 Q. Okay. All right. In any event, there was no</p> <p>15 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</p> <p>18 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</p> <p>22 know who put handcuffs on Elgen. They took me</p> <p>23 downstairs first.</p> <p>24 Q. By yourself?</p>	<p style="text-align: right;">Page 197</p> <p>1 know that.</p> <p>2 Q. Okay. So in the car that took you to the</p> <p>3 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</p> <p>6 drive to the substation?</p> <p>7 A. I don't know. I probably said something along</p> <p>8 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</p> <p>11 to the wall. And I guess they was doing paperwork. And</p> <p>12 then after they got through with me saying "This some</p> <p>13 bullshit" and whoo, whoo but ain't nobody really saying</p> <p>14 nothing to me that I can recall, then Gonzalez and</p> <p>15 Bolton, who were partners at the time, drove me to</p> <p>16 51st Street.</p> <p>17 And at that time, if they going to be</p> <p>18 truthful, Gonzalez and Bolton -- Well, Bolton didn't say</p> <p>19 anything. But Gonzalez was like, "Well, I don't know</p> <p>20 what's going on with you and Watts. But you know if we</p> <p>21 wanted to put something on you, we could have been done</p> <p>22 that" when he was -- Him and Bolton used to work what we</p> <p>23 call the alligator, which was a squad van with the</p> <p>24 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

<p style="text-align: right;">Page 198</p> <p>1 Cadman and a couple more of them, Sergeant Ramirez or</p> <p>2 something like that, before they actually got in</p> <p>3 Watts' -- on Watts' team. So they used to be running in</p> <p>4 and out the building.</p> <p>5 So it -- That's what he said, "If we wanted to</p> <p>6 put something on you, we could have -- If we wanted to</p> <p>7 arrest you, we could have been put something on you.</p> <p>8 But we don't work like that." But you cosigning it, so</p> <p>9 I guess times changed.</p> <p>10 Q. So Gonzalez told that to you on your way to</p> <p>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</p> <p>16 were at the substation, did any officer say anything at</p> <p>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</p> <p>21 was upset. So if they was saying something, they wasn't</p> <p>22 talking about not putting that case on me. So whatever</p> <p>23 they said ...</p> <p>24 Q. Did you say anything to anyone while you were</p>	<p style="text-align: right;">Page 200</p> <p>1 2nd District. Then what happens? You go to lockup?</p> <p>2 A. 2nd District is 51st and Wentworth? Yeah,</p> <p>3 they took me there. And, yeah, I went to lockup.</p> <p>4 Q. Okay. Did Gonzalez or Bolton say anything to</p> <p>5 you inside 51st and Wentworth?</p> <p>6 A. Not that I can recall.</p> <p>7 Q. And then ultimately, you had to make a court</p> <p>8 appearance, right?</p> <p>9 A. Yeah.</p> <p>10 Q. And were you released on bond, or were you</p> <p>11 in -- did you stay in jail?</p> <p>12 A. I stayed in jail.</p> <p>13 Q. For how long?</p> <p>14 A. I think from that time until we filed a motion</p> <p>15 to suppress. Like, and then they continued the motion.</p> <p>16 And then Thanksgiving eve, the judge actually heard the</p> <p>17 motion. And that's when Clarissa supplied the pictures</p> <p>18 and all that. And the judge said, "Motion granted.</p> <p>19 Have a nice Turkey Day, Mr. Baker."</p> <p>20 Q. Okay. So then you were in custody from the</p> <p>21 time of your arrest until the Wednesday before</p> <p>22 Thanksgiving of 2004?</p> <p>23 A. Yes, I guess so.</p> <p>24 Q. Okay. I'm just trying to figure out if you</p>
<p style="text-align: right;">Page 199</p> <p>1 at the substation?</p> <p>2 A. Yeah. I kept hollering out -- Well, not to no</p> <p>3 one specific that I believe. But I was just hollering</p> <p>4 out "This some bullshit" because there was another team</p> <p>5 of officers there. Like, I guess they was doing</p> <p>6 paperwork, too, because there was an officer sitting at</p> <p>7 the desk while I'm handcuffed to this -- to the wall.</p> <p>8 But he wasn't part of Watts' team, that I knew of.</p> <p>9 Q. But tell me what -- anything that you said.</p> <p>10 A. I was just cursing and saying "This is bull,</p> <p>11 and this ain't right." But --</p> <p>12 MR. TEPFER: I want to remind you to let him finish</p> <p>13 the question just for her. Okay?</p> <p>14 THE WITNESS: Oh, okay.</p> <p>15 BY MR. BAZAREK:</p> <p>16 Q. Did anyone respond to you?</p> <p>17 A. I don't know.</p> <p>18 Q. Okay. Did you ask to talk to a supervisor or</p> <p>19 anything like that?</p> <p>20 A. Watts was the supervisor.</p> <p>21 Q. Right. Someone who -- higher rank than Watts?</p> <p>22 A. No. I don't believe there was somebody higher</p> <p>23 than Watts.</p> <p>24 Q. Okay. So Gonzalez and Bolton take you to the</p>	<p style="text-align: right;">Page 201</p> <p>1 had bonded out or anything like that.</p> <p>2 A. No. I -- No.</p> <p>3 Q. Okay. And then I know you have said that at</p> <p>4 some point you came upon Officer Jones, and he discussed</p> <p>5 the case being dismissed. Is that right?</p> <p>6 A. Yes.</p> <p>7 Q. And where was this conversation that you had</p> <p>8 with Officer Jones?</p> <p>9 A. It's, like, on Browning but, like, the side of</p> <p>10 the building, side of 527 and 511. They was on either</p> <p>11 side of the fire lane. So we, like, at the end of the</p> <p>12 fire lane, but I'm standing in the grass on the 527</p> <p>13 side.</p> <p>14 Q. Do you remember what month it was?</p> <p>15 A. It might have still been November, or it could</p> <p>16 have been the beginning of December.</p> <p>17 Q. Were you with anyone?</p> <p>18 A. Yeah. Toke was right there. Well,</p> <p>19 Talawrence (phonetic). He -- Rest in peace. He's dead</p> <p>20 now.</p> <p>21 Q. He's deceased?</p> <p>22 A. (Nodding head.)</p> <p>23 MR. TEPFER: You okay?</p> <p>24 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. TEPFER: Do you need some water?</p> <p>2 THE WITNESS: No.</p> <p>3 BY MR. BAZAREK:</p> <p>4 Q. How did he die?</p> <p>5 A. He got shot. But I was in jail.</p> <p>6 Q. What was -- And his last name was Fullbanks?</p> <p>7 A. Fumbanks.</p> <p>8 Q. Fumbanks.</p> <p>9 What was his role in the narcotics operations</p> <p>10 at Ida B. Wells?</p> <p>11 A. He didn't sell drugs with me, so I don't --</p> <p>12 I'm not privy to that. I don't know.</p> <p>13 Q. Was he a high-level drug dealer?</p> <p>14 A. I don't know.</p> <p>15 Q. Okay. Did you ever work for him?</p> <p>16 A. No.</p> <p>17 Q. Did he ever supply you with narcotics to sell?</p> <p>18 A. No.</p> <p>19 Q. Okay. So tell me everything said -- Strike</p> <p>20 that.</p> <p>21 Anyone else other than you, Mr. Fumbanks, and</p> <p>22 Jones?</p> <p>23 A. It was -- Now I know that the little Asian</p> <p>24 person was Manny Leano. But I know I described him as</p>	<p>1 A. July 11?</p> <p>2 Q. July 11, 2004.</p> <p>3 A. The day when they arrested me?</p> <p>4 Q. Yes.</p> <p>5 A. I'm not sure. I don't think so, though.</p> <p>6 Q. Okay. By the way, you recall earlier in the</p> <p>7 deposition you testified that there were two other</p> <p>8 officers -- you don't know if they were a man or a</p> <p>9 woman -- that went inside your apartment --</p> <p>10 A. Right.</p> <p>11 Q. -- on July 11, 2004, correct?</p> <p>12 A. Right.</p> <p>13 Q. Was Bolton or Gonzalez either of those</p> <p>14 officers?</p> <p>15 A. I don't know. It could have been. But I'm --</p> <p>16 I don't remember.</p> <p>17 Q. Okay. What else did Jones say at that time?</p> <p>18 A. "Kenny won't be there next time to fuck up the</p> <p>19 testimony." His words. So I took that to mean they was</p> <p>20 going to put another case on me. That was me thinking</p> <p>21 logically.</p> <p>22 Q. Okay. So that's going to be in November or</p> <p>23 December of '04, correct?</p> <p>24 A. Yes.</p>
Page 203	Page 205
<p>1 an Asian person or Filipino or something. But that's</p> <p>2 who was with AJ that day.</p> <p>3 Q. And this is sometime in 2004?</p> <p>4 A. I believe so. I believe it was Manny</p> <p>5 because -- I believe it was Manny. But, then again, I</p> <p>6 don't know because at that time, when he said it, he was</p> <p>7 like, "Yeah, Kenny fucked up the" -- I said, "Man, you</p> <p>8 know that was some bullshit y'all put that case on me."</p> <p>9 He was like, "Well, you know the game. You win some;</p> <p>10 you lose some." Then he had the nerve to tell me I</p> <p>11 should have been gone for a couple of Olympics. You</p> <p>12 know, Olympics every four years. You know, so I should</p> <p>13 have been gone two or three Olympics. But that's</p> <p>14 neither here nor there.</p> <p>15 I was like, "Man, that was some bullshit."</p> <p>16 And he was like, "Well, Kenny fucked up the testimony,</p> <p>17 but he won't be able to fuck it up no more." So I took</p> <p>18 that to mean whoever this guy was was Kenny's</p> <p>19 replacement.</p> <p>20 Q. Who is Kenny?</p> <p>21 A. Kenneth Young, the one that testified with AJ</p> <p>22 in the mailbox case.</p> <p>23 Q. At any time on July 11, 2004, did you observe</p> <p>24 Officer Kenneth Young?</p>	<p>1 Q. At the time, you know, November, December</p> <p>2 of '04, did you tell anyone about your discussion with</p> <p>3 Officer Jones?</p> <p>4 A. I believe -- I believe I told -- I told, like,</p> <p>5 the people I was hanging around with.</p> <p>6 Q. Who?</p> <p>7 A. Like the people from the building, Jamar,</p> <p>8 Elgen, Bryant. Just whoever would be standing at the</p> <p>9 building.</p> <p>10 Q. So after the mailbox case got dismissed, did</p> <p>11 you go back to selling narcotics at Ida B. Wells?</p> <p>12 A. I probably did. But I'm not sure. But, yeah,</p> <p>13 I probably did.</p> <p>14 Q. When was -- After that discussion with</p> <p>15 Officer Jones, when would have been your next</p> <p>16 interaction with any member of Watts's team?</p> <p>17 A. Basically every day. They was there basically</p> <p>18 every day. So if I'm sitting on the front of the</p> <p>19 building, they would come through; they would say</p> <p>20 different things.</p> <p>21 Q. Say what?</p> <p>22 A. You know, "You out here, huh? CPR working.</p> <p>23 Is y'all doing this, doing that?" Things like that.</p> <p>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

Page 206	Page 208
<p>1 A. That was the name of the drug line, the heroin</p> <p>2 line. Well, that was one of the names in the building.</p> <p>3 Q. What was your drug line called?</p> <p>4 A. CPR.</p> <p>5 Q. So what does that mean? Like, strong stuff</p> <p>6 that's going to stop your heart?</p> <p>7 A. When you give people CPR, you're actually</p> <p>8 jumping their heart; ain't you? If you fell out right</p> <p>9 now and your heart stopped, I give you CPR, I'm</p> <p>10 resuscitating you.</p> <p>11 Q. Right. But the reason you --</p> <p>12 A. I just thought it was clever.</p> <p>13 Q. The reason you need CPR is because --</p> <p>14 A. Your heart stopped.</p> <p>15 Q. -- your heart stopped?</p> <p>16 A. Yeah.</p> <p>17 Q. Okay. What were the names of some of the</p> <p>18 other drug lines?</p> <p>19 A. It was a lot of names of drug lines. I can't,</p> <p>20 like, remember them all over there. They -- But you had</p> <p>21 a lot of names. People get creative.</p> <p>22 Q. All right. So was the CPR line, was that for</p> <p>23 heroin?</p> <p>24 A. Yeah.</p>	<p>1 jail. I know it wasn't me.</p> <p>2 Q. Would Bryant and Elgen sell both heroin and</p> <p>3 cocaine for you?</p> <p>4 A. One would sell one, and the other would sell</p> <p>5 the other.</p> <p>6 Q. Okay. So they were interchangeable?</p> <p>7 A. Yeah.</p> <p>8 Q. Okay. So tell me other interactions that you</p> <p>9 had with Watts or his team. You said you'd see them</p> <p>10 every day, something -- words to that effect, right?</p> <p>11 A. Yeah.</p> <p>12 Q. Okay. And that's because they worked down</p> <p>13 there, right?</p> <p>14 A. If that's what you call work.</p> <p>15 Q. And -- But you weren't arrested during those</p> <p>16 times, right?</p> <p>17 A. Because I wasn't out there doing nothing.</p> <p>18 Q. Well, you were next arrested on</p> <p>19 March 23, 2005, correct?</p> <p>20 A. Yeah.</p> <p>21 Q. Okay. So I want to focus on just -- I want to</p> <p>22 go back to this time frame. Your case gets dismissed on</p> <p>23 the Wednesday before Thanksgiving in 2004?</p> <p>24 A. Yeah.</p>
Page 207	Page 209
<p>1 Q. What -- Did you have a name for your cocaine</p> <p>2 line?</p> <p>3 A. Well, we had knockout.</p> <p>4 Q. I've heard that one.</p> <p>5 A. I know you did.</p> <p>6 Q. Did you call -- So you called your cocaine</p> <p>7 knockout?</p> <p>8 A. Yeah, when I was selling it.</p> <p>9 Q. Did any -- Now, could only you use that name,</p> <p>10 or could other people use it?</p> <p>11 A. Only I could use it when I was selling. But</p> <p>12 when I stopped selling, it's free enterprise.</p> <p>13 Q. Okay. So how long did you use the term</p> <p>14 "knockout" for your cocaine that you sold?</p> <p>15 A. I don't know. I'm not sure.</p> <p>16 Q. The cocaine that you --</p> <p>17 A. But I know it was still -- they was still</p> <p>18 saying knockout when I stopped. Even while I was in</p> <p>19 jail, they was still selling cocaine and calling it</p> <p>20 knockout. So I was in jail. I know it wasn't me.</p> <p>21 Q. Was the cocaine --</p> <p>22 A. They was --</p> <p>23 Q. Go ahead. Sorry. Go ahead.</p> <p>24 A. They was still selling CPR while I was in</p>	<p>1 Q. Up to, let's say, March 22, 2005, at any time</p> <p>2 during that time period, did you speak to any of the</p> <p>3 officers on -- Strike that.</p> <p>4 You've already talked about this conversation</p> <p>5 that you had with Jones after your case was dismissed,</p> <p>6 right?</p> <p>7 A. Right.</p> <p>8 Q. So from -- from that day -- which was late</p> <p>9 November, early December 2004 -- up through</p> <p>10 March 22, 2005, did you ever speak with any members of</p> <p>11 Watts's team?</p> <p>12 MR. TEPFER: Just object to the extent it</p> <p>13 mischaracterizes the testimony.</p> <p>14 But go ahead.</p> <p>15 BY THE WITNESS:</p> <p>16 A. Just not, like, actual conversations with</p> <p>17 them. But they would say different things when they see</p> <p>18 me. "Oh, you still out here? Oh, you don't learn," or</p> <p>19 things of that nature.</p> <p>20 Q. Who said that to you?</p> <p>21 A. All of them.</p> <p>22 Q. Who is all of them?</p> <p>23 A. AJ, Watts. But Watts would just say it in</p> <p>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: right;">Page 210</p> <p>1 bravado. And Gonzalez would just look and he would say</p> <p>2 different little things, like -- but it wasn't nothing</p> <p>3 really threatening. But I don't know why, but it was</p> <p>4 more so like Watts and AJ really just had it in for me</p> <p>5 for some reason, because I refused to pay them to keep</p> <p>6 selling drugs, I guess.</p> <p>7 Q. Well, is it your testimony that Alvin Jones</p> <p>8 demand 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</p> <p>11 demand money from you to sell drugs?</p> <p>12 A. And my answer is that you was paying the team.</p> <p>13 You wasn't paying no one specific person. You would pay</p> <p>14 the team. And I'm quite sure I'm not the only one that</p> <p>15 would say that.</p> <p>16 Q. I'm just asking --</p> <p>17 A. I'm just -- I answered.</p> <p>18 Q. I'm asking you, did Alvin Jones ever demand</p> <p>19 money from you to sell narcotics at Ida B. Wells?</p> <p>20 A. No. He never -- No.</p> <p>21 Q. Did any members of Sergeant Watts's team ever</p> <p>22 demand money from you to sell illegal narcotics at</p> <p>23 Ida B. Wells?</p> <p>24 A. Yeah. Sergeant Watts did.</p>	<p style="text-align: right;">Page 212</p> <p>1 were on?</p> <p>2 A. No. I believe that was terminated. I'm not</p> <p>3 sure, though. But I believe that was terminated</p> <p>4 unsatisfactorily. Or did they terminate it when I went</p> <p>5 to jail? I know it was terminated, but I don't know</p> <p>6 when, if it was when I got arrested in -- I think it was</p> <p>7 while I was fighting the case. I'm not sure, though,</p> <p>8 when it was terminated.</p> <p>9 Q. Okay. So is it your testimony that you don't</p> <p>10 know one way or another whether or not you were on</p> <p>11 probation on March 23, 2005?</p> <p>12 A. Right. That was my -- That's my -- Yes,</p> <p>13 because I know I supposed to have two years of</p> <p>14 probation, and I know it was supposed to have been like</p> <p>15 a week or two left before the mailbox case. So they</p> <p>16 kind of extended it. But I don't know if it was</p> <p>17 terminated unsatisfactorily at the end of the mailbox</p> <p>18 case or if it was terminated when I was sentenced</p> <p>19 in 2006. I'm not sure. I don't -- as to the date that</p> <p>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: right;">Page 211</p> <p>1 Q. I -- My question was, sir -- Let me ask it --</p> <p>2 I'm talking about his team. Did any members of</p> <p>3 Sergeant Watts's team ever demand money from you to sell</p> <p>4 drugs at Ida B. Wells?</p> <p>5 A. Sergeant Watts did.</p> <p>6 Q. Okay. But none of the -- his subordinates</p> <p>7 did, correct?</p> <p>8 A. Personally, they never -- Well, I did have --</p> <p>9 Like, I started a conversation with Kallatt Mohammed.</p> <p>10 But it was this guy named CK standing there. So I never</p> <p>11 knew what that conversation was going to go to. But he</p> <p>12 was like, "Man, it cost a lot of money to bond out and</p> <p>13 pay lawyers." And then CK stood right there, and he</p> <p>14 stopped talking and walked off. So I don't know the</p> <p>15 extent of what that conversation would have went to. So</p> <p>16 I don't know. But other than that ...</p> <p>17 Q. Other than Watts and then you started some</p> <p>18 type of conversation with Mohammed, no other members of</p> <p>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</p> <p>24 you still on this probation, that gang probation you</p>	<p style="text-align: right;">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</p> <p>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</p> <p>11 Bebe?</p> <p>12 A. Last time I saw Bebe, it was this year. I</p> <p>13 know I seen him on 79th and Luella because he stay over</p> <p>14 east. But I was on 79th and Luella. And him and his</p> <p>15 son was in the car, and they pulled up. And then prior</p> <p>16 to that, I saw him at his other son's funeral. And then</p> <p>17 I saw him again, like, before the funeral. But other</p> <p>18 than that, it's in spurts. You'll see him, and you</p> <p>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

<p style="text-align: right;">Page 214</p> <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 style="text-align: right;">Page 216</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: right;">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: right;">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>

58 (Pages 214 to 217)

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

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

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

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

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

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

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

Page 230	Page 232
<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>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>
Page 231	Page 233
<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>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

1 front. So I don't know.

2 **Q. How long did it take for the paperwork to be**
3 **completed?**

4 MR. TEPFER: Objection: calls for speculation.

5 Go ahead.

6 BY THE WITNESS:

7 A. I don't -- I don't know how long it took for
8 them to finish the report. I don't know.

9 **Q. All right. But do you remember who -- was**
10 **anyone taking the lead in terms of filling out the**
11 **paperwork?**

12 A. I don't know who took the lead. I think
13 Gonzalez had started on the paperwork, and then they was
14 just, "Put this. Put this." Like, AJ was saying, "Put
15 this. Put this." I believe Watts said something. But
16 I'm not sure that time.

17 **Q. When you say Officer Jones said, you know,**
18 **"Put this," what did Officer Jones say?**

19 A. I don't know. He was like, "Word it -- Reword
20 that." That's what he was saying, "Reword that."

21 **Q. Who was he saying that to?**

22 A. To Gonzalez. So I don't -- I wasn't privy to
23 what was actually on the report.

24 **Q. Did Officer Jones say anything other than that**

Page 236

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.

4 **Q. Okay. Other than that, anything else occur**
5 **during the time that Gonzalez was filling out the**
6 **report?**

7 A. I'm not sure. I don't know what you speaking
8 to. I don't -- I just --

9 **Q. What happened next?**

10 A. The next thing I remember is being put in
11 lockup.

12 **Q. Who brought you to lockup?**

13 A. I don't recall that either.

14 **Q. And then right from lockup, at some point you**
15 **had to be taken before a judge?**

16 A. Yeah. I went to 51st -- Well, not 51st. I
17 was at 51st. Went to 26th and California in the -- I
18 don't know what they call it -- but the transporter.
19 They transported us. It go from police station to
20 police station and get you to bond court or whatever the
21 next -- you know, well, to 26th and California.

22 **Q. Did you see Bebe or Twany at the police**
23 **station?**

24 A. No.

Page 235

1 **to Gonzalez at the police station?**

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.

8 **Q. But you don't -- Strike that.**

9 **Anything else happen during the time when the**
10 **report or reports are being filled out?**

11 A. I don't know what you saying. I don't ...

12 MR. TEPFER: Object to form.

13 BY MR. BAZAREK:

14 **Q. Well, okay. You said that there's -- other**
15 **officers are at the station, report is being filled out,**
16 **you said, by Gonzalez, right?**

17 A. He was the one typing, yes.

18 **Q. Did you ever see anyone other than Gonzalez**
19 **actually typing out the report?**

20 A. No.

21 **Q. Okay. And then you said Officer Jones would**
22 **say, "Put this. Put that," right?**

23 A. Like, "Reword that."

24 **Q. Reword -- Reword it?**

Page 237

1 **Q. After you were taken to court for the very**
2 **first time after the March 23, 2005, arrest, when would**
3 **have been the next time you were not in custody?**

4 A. I don't know because I believe I bonded out
5 from that, I believe. So I don't know, like, when I
6 actually -- Like, I don't think I stayed there that
7 long. I'm not sure.

8 **Q. Who put the bond up for you?**

9 A. Probably Clarissa. I don't know. I don't
10 know. Or -- I don't know. Or if that was when
11 Dave Navarro stepped in. I'm not sure, like, as to -- I
12 just know I got bonded out, I guess.

13 **Q. And then when you bonded out, were there**
14 **conditions of your bond you were supposed to follow?**

15 A. Not that I can recall.

16 **Q. You know, when you bond out, for instance, you**
17 **sign a piece of paper, and it says you're not going to**
18 **engage in criminal activity, that type of thing?**

19 A. I mean, probably. I'm not sure.

20 **Q. Okay. After you bonded out, did you go see**
21 **Bebe and Twany?**

22 A. No.

23 **Q. Why not?**

24 A. For what? They didn't put me in jail.

63 (Pages 234 to 237)

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

Page 238	<p>1 Q. You actually went to trial on the</p> <p>2 March 23, 2005, arrest, correct?</p> <p>3 A. Yes.</p> <p>4 Q. And you were found guilty, correct?</p> <p>5 A. Yes.</p> <p>6 Q. Who was the judge who found you guilty?</p> <p>7 A. Toomin, Judge Toomin.</p> <p>8 Q. And that was a bench trial?</p> <p>9 A. Yes.</p> <p>10 Q. And so -- And you were there for the entire</p> <p>11 trial, right?</p> <p>12 A. What you mean?</p> <p>13 Q. You were there for the whole trial?</p> <p>14 A. You mean I showed up, came to court?</p> <p>15 Q. Yes.</p> <p>16 A. Yes.</p> <p>17 Q. Why didn't you call Twany and Bebe as</p> <p>18 witnesses?</p> <p>19 MR. TEPFER: Objection. You can answer his</p> <p>20 question as long as -- Well, all right. Just go ahead.</p> <p>21 I'll strike my objection. You can answer the question.</p> <p>22 BY THE WITNESS:</p> <p>23 A. It just never came up. I don't believe they</p> <p>24 would have came anyway because Bebe was still using</p>	Page 240	<p>1 Sergeant Watts's team?</p> <p>2 A. Well, between that time is when Mohammed had</p> <p>3 started that conversation. But we never finished that</p> <p>4 conversation because CK came and stood right there. So</p> <p>5 we never finished that conversation. But other than</p> <p>6 that, it was just in passing if they got people</p> <p>7 downstairs or if they around and I'm just going past.</p> <p>8 But, no, not to be, like, conversations. No.</p> <p>9 Q. All right. So they weren't -- No one on the</p> <p>10 team was harassing you during that time period, correct?</p> <p>11 A. I mean, shit, they had already arrested me. I</p> <p>12 was already fighting a case. So really wasn't no need</p> <p>13 for that.</p> <p>14 Q. Yeah. I'm just saying, from the time you</p> <p>15 bonded out through December 10, 2005, were you harassed</p> <p>16 by any member of Sergeant Watts's team?</p> <p>17 A. I don't know.</p> <p>18 Q. Were you threatened during that same time</p> <p>19 period by any member of Sergeant Watts's team?</p> <p>20 A. I don't know what you consider a threat. I</p> <p>21 mean, if they standing here in the doorway, you</p> <p>22 couldn't -- I couldn't walk through the doorway until</p> <p>23 they felt the need to move. So I guess that could have</p> <p>24 been considered as intimidation. If somebody -- one of</p>
Page 239	<p>1 drugs, like, heavy. So what type of witness would he</p> <p>2 have been? And Twany, I can't recall the last time I</p> <p>3 seen Twany. So I don't know.</p> <p>4 Q. And that trial occurred in 2006, right?</p> <p>5 A. Yes.</p> <p>6 Q. And you were represented by a Mr. Mahoney?</p> <p>7 A. Yes.</p> <p>8 Q. All right. So let's now talk about the time</p> <p>9 period, Mr. Baker, from the time you bond out following</p> <p>10 the March 23rd arrest up to December 10, 2005. I want</p> <p>11 to focus on that time frame. Okay?</p> <p>12 A. Mm-hmm.</p> <p>13 Q. Because, you know, I know you and Clarissa</p> <p>14 were arrested on December 11, '05, right?</p> <p>15 A. If that was a Sunday and the Bears was</p> <p>16 playing, yes, we were. I don't know the actual date.</p> <p>17 But, yeah.</p> <p>18 Q. So I want to -- Did you have interactions with</p> <p>19 any members of Sergeant Watts's team from the time you</p> <p>20 bonded out -- and I'm not talking about when you're</p> <p>21 at -- No. Strike that.</p> <p>22 From the time you bonded out following your</p> <p>23 March 23, 2005, arrest through December 10, 2005, did</p> <p>24 you have any interactions with any member of</p>	Page 241	<p>1 my family members come into the building to visit us in</p> <p>2 the apartment during that time, they would always get</p> <p>3 accosted downstairs, searched and all that. I mean, so,</p> <p>4 yes, I felt that was harassment.</p> <p>5 Q. Who harassed you during that time period from</p> <p>6 the time you bonded out through December 10, 2005?</p> <p>7 A. Watts.</p> <p>8 Q. Anyone else?</p> <p>9 A. Like I said, depending on what you consider</p> <p>10 threats or intimidation. Like, I couldn't just move</p> <p>11 them out their space and walk past. I had to wait. If</p> <p>12 they look and see it was me, then it would take that</p> <p>13 much longer for them to move for me to leave and go</p> <p>14 past. So it depend on your term- -- or my terminology</p> <p>15 of threats and intimidation. I took that as</p> <p>16 intimidation, a form of intimidation.</p> <p>17 Q. From who?</p> <p>18 A. Watts and AJ. Them really was the ones that</p> <p>19 just had a -- I would say a hard-on for me.</p> <p>20 Q. How did -- How did Officer Jones intimidate</p> <p>21 you during the time period of the time you bonded out</p> <p>22 through December 10, 2005?</p> <p>23 A. I just told you, he would stop my progression.</p> <p>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	<p>1 Either you going to go around, or you're going to wait</p> <p>2 for him to decide to move. I took that as a form of</p> <p>3 intimidation.</p> <p>4 Q. Did Jones detain you at any time during that</p> <p>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</p> <p>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</p> <p>22 of these. Thanks.</p> <p>23 THE WITNESS: Okay.</p> <p>24</p>	Page 244	<p>1 Q. -- move --</p> <p>2 A. Like -- Yeah.</p> <p>3 Q. -- was anyone with you during that time?</p> <p>4 A. No. I walked by myself.</p> <p>5 Q. All right. Let's talk about December 11, '05.</p> <p>6 What do you remember about that day?</p> <p>7 A. I remember the Bears was playing. And</p> <p>8 Clarissa had went to take a moving truck back because</p> <p>9 they had moved -- cleared their father's stuff out of</p> <p>10 the house in Olympia Fields. So she went to take a</p> <p>11 moving van back. And then her brother dropped her off</p> <p>12 at her cousin -- well, her auntie's house, Helen. And I</p> <p>13 guess she stayed there for a while. Then she called me</p> <p>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?</p> <p>16 A. I don't know what kind of car I had. I think</p> <p>17 I was -- I think we had -- I don't know. But I know on</p> <p>18 that day, I was in Clarissa's car. She had a Jimmy,</p> <p>19 GMC Jimmy, four-door.</p> <p>20 Q. Is that an SUV? a Jeep? What is it?</p> <p>21 A. Yeah, I guess it would be considered as an</p> <p>22 SUV. But it was old, like them -- the old Blazers.</p> <p>23 Q. What color was it? Do you remember?</p> <p>24 A. Like, brownish, like the color of your pants.</p>
Page 243	<p>1 BY MR. BAZAREK:</p> <p>2 Q. So other than Officer Jones -- and now I'm</p> <p>3 talking about subordinates to Sergeant Watts -- did any</p> <p>4 other subordinate on the team intimidate or threaten</p> <p>5 you?</p> <p>6 A. No.</p> <p>7 Q. And the intimidation and threats that you</p> <p>8 perceived were that Jones would be standing near an area</p> <p>9 where you were?</p> <p>10 A. No. He would be blocking areas. Like, if</p> <p>11 I'm -- If I leave out my house to come out and if they</p> <p>12 in the hallway, I couldn't just proceed past. I had to</p> <p>13 either wait for him to move out the way, or I had to go</p> <p>14 around. I couldn't just go this way. Him and Watts.</p> <p>15 Q. During that time period from the time you</p> <p>16 bonded out through December 10, 2005, did Jones ever say</p> <p>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</p> <p>20 anyone?</p> <p>21 A. I don't know.</p> <p>22 Q. When you say that Jones would be, you know,</p> <p>23 blocking your ability to --</p> <p>24 A. Maneuver past.</p>	Page 245	<p>1 Q. And that was -- that was the vehicle that</p> <p>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</p> <p>8 think at that time my keys was lost and I couldn't get</p> <p>9 into the Chevy or something. So I believe I was driving</p> <p>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</p> <p>16 car different colors?</p> <p>17 A. Yes.</p> <p>18 Q. What were the -- When you first got it, what</p> <p>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: right;">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: right;">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: right;">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: right;">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

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

67 (Pages 250 to 253)

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

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

Page 262

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?

Page 263

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**

Page 264

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?**

Page 265

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.

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

Page 266	<p>1 Q. So you -- All right. But when you exited the</p> <p>2 vehicle and then Clarissa gets out of the vehicle, she's</p> <p>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</p> <p>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</p> <p>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</p> <p>15 guy, he just stood there. And they was right -- They</p> <p>16 pulled up. They was just right there. I don't know why</p> <p>17 they right there. So we going to walk to the building.</p> <p>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 --</p> <p>21 when she shut her door, she just started walking toward</p> <p>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>	Page 268	<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</p> <p>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</p> <p>7 now back on the record.</p> <p>8 BY MR. BAZAREK:</p> <p>9 Q. Okay. Mr. Baker, as you and Clarissa are</p> <p>10 walking back towards your apartment, what happened next?</p> <p>11 A. AJ said, "No. Y'all come here." And when I</p> <p>12 turned back -- When we turned back around, he proceeded</p> <p>13 to search me, looked down my pants, patted my pockets.</p> <p>14 Then he took the key out my hand and went and opened the</p> <p>15 car. And then Watts said, "Can y'all stand over by that</p> <p>16 officer?"</p> <p>17 Q. Okay. And did you do what Watts told you to</p> <p>18 do?</p> <p>19 A. Yeah, as I'm asking, like, "For what?" And he</p> <p>20 said, "Stand over by the officer." Okay. We stood by</p> <p>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>
Page 267	<p>1 but not by much.</p> <p>2 Q. And then did you park in a parking space, or</p> <p>3 you just -- Where did you park?</p> <p>4 A. We -- There was no parking spaces up there.</p> <p>5 People that lived in the building would just park in the</p> <p>6 playground up there because there was no -- nothing for</p> <p>7 the kids to play on. So we would just park.</p> <p>8 Q. Tell me, in that parking lot at that time</p> <p>9 after you got out of the car, was anyone else present</p> <p>10 other than you, Clarissa, the tall, bald officer, and</p> <p>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</p> <p>16 after you got out of the car, did Clarissa say anything</p> <p>17 to you?</p> <p>18 A. No. The last thing Clarissa said to me was,</p> <p>19 "That's AJ and Watts."</p> <p>20 Q. But she said that to you while you were inside</p> <p>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. TEPPER: Let's take a little break. Can we</p>	Page 269	<p>1 A. No.</p> <p>2 Q. Did you say anything to that officer in the</p> <p>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,"</p> <p>7 pointed at AJ and Watts. But he didn't say which one</p> <p>8 specifically said pull you over. But I figured since</p> <p>9 Watts was the sergeant.</p> <p>10 Q. You're saying that that officer had a blue</p> <p>11 shirt on, in uniform?</p> <p>12 A. Yes.</p> <p>13 Q. He told you that they told him to pull you</p> <p>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</p> <p>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: right;">Page 270</p> <p>1 the car, in the front, in the back. They let up the</p> <p>2 hatchback back there. They searching back there. Then</p> <p>3 they let up the hood of the car, and they looking up</p> <p>4 under the hood. And then for -- they standing in front</p> <p>5 of the hood out of our view. We can't see them. But I</p> <p>6 heard somebody out the window say, "I saw that shit."</p> <p>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</p> <p>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</p> <p>15 back to the building and said, "If anybody plan on</p> <p>16 testifying for Ben and Clarissa, their ass going to</p> <p>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 --</p> <p>22 Winky said it, that I recall.</p> <p>23 And then next thing you know, they came from</p> <p>24 around the truck, around the front of the truck, the</p>	<p style="text-align: right;">Page 272</p> <p>1 MR. TEPFER: Sorry. Could you hear all that?</p> <p>2 THE WITNESS: Okay.</p> <p>3 MR. TEPFER: Was everyone hearing the testimony?</p> <p>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</p> <p>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,</p> <p>15 and the two -- and the officer.</p> <p>16 Q. And it's your testimony when Watts said, "I</p> <p>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</p> <p>21 direction was Jones facing?</p> <p>22 A. Jones was facing towards 527. He was actually</p> <p>23 standing right there with us. We were all facing 527</p> <p>24 because the car was parked in front of 5- -- facing 527.</p>
<p style="text-align: right;">Page 271</p> <p>1 hood of the truck, and they walked back toward us. And</p> <p>2 then Watts just turned back around, walked to the door,</p> <p>3 and said, "I got it. Put his ass in cuffs. You can put</p> <p>4 her in cuffs, too. I don't give no fuck." And he</p> <p>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</p> <p>8 grabbed. But I know me and the officer looked at each</p> <p>9 other like, this door been open all the time y'all was</p> <p>10 searching. If it was something sitting right there to</p> <p>11 where you could just walk right there and say, "I got</p> <p>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</p> <p>15 seat, front driver door.</p> <p>16 Q. That's where -- And you had been seated there</p> <p>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</p> <p>23 the driver's seat.</p> <p>24 THE WITNESS: Oh, shit.</p>	<p style="text-align: right;">Page 273</p> <p>1 Q. Okay. But from where you're looking toward</p> <p>2 the 527 and the car, what portion of the car would be</p> <p>3 closest to you?</p> <p>4 A. The back of the car. The hatchback part would</p> <p>5 be closer. But we was, like -- This is the car, and we,</p> <p>6 like, over here. But the car was up some more. But we,</p> <p>7 like, over here.</p> <p>8 Q. So from where you stood with Clarissa and</p> <p>9 Officer Jones and the officer with the blue shirt, you</p> <p>10 would not be able to see inside of the driver's side of</p> <p>11 the car?</p> <p>12 A. Yes. You could see the driver's side of the</p> <p>13 car.</p> <p>14 Q. Could you --</p> <p>15 A. But he didn't go inside the car. He just</p> <p>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</p> <p>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</p> <p>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: right;">Page 274</p> <p>1 be, like, the armrests or something like that. But the</p> <p>2 door, you know, there's an arm little thing on the door</p> <p>3 for, like, when you open the door.</p> <p>4 Q. Was there a console or some type of</p> <p>5 compartment on the driver's side door?</p> <p>6 A. You know the thing where you let the window</p> <p>7 down, let the window up, lock the doors, that's on the</p> <p>8 door. And that handle to open the door is on the door.</p> <p>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.</p> <p>12 Once AJ opened the car door, we could see the driver's</p> <p>13 door. It's open. We can see what color it is. We can</p> <p>14 see the handle. We can see the lever you let the window</p> <p>15 up and down, the lock. We see all that.</p> <p>16 So for them to search the car for 30 minutes</p> <p>17 or more and then go to the front of the car and look</p> <p>18 under the hood and then come back to where we was at,</p> <p>19 and then he didn't say nothing. He come back to where</p> <p>20 we was at, him and AJ. Then he walked back towards the</p> <p>21 car. As he passing the car, he said, "I got it. Put</p> <p>22 his ass in handcuffs. You can put her in cuffs, too. I</p> <p>23 don't give a fuck." And he proceeded to walk through</p> <p>24 527, leaving me, AJ, Clarissa, and the blue-and-white</p>	<p style="text-align: right;">Page 276</p> <p>1 A. At the police station.</p> <p>2 Q. All right. So when -- So he just walks away</p> <p>3 to the 527 building?</p> <p>4 A. He walks through there. And I later found out</p> <p>5 that they was over in one of the back buildings. I</p> <p>6 think it was 574. They had did a sting over there.</p> <p>7 Q. Who would sell narcotics out of the 574</p> <p>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</p> <p>11 575 -- I'm sorry -- 574 building?</p> <p>12 A. I don't want to guess. I don't know who sold</p> <p>13 drugs over there.</p> <p>14 Q. Okay. No. My question, though, is, could --</p> <p>15 Strike that.</p> <p>16 Did individuals sell cocaine and heroin out of</p> <p>17 the 574 building?</p> <p>18 A. It's logical. But if I say yeah, then you</p> <p>19 going to say, "Who?" I don't know who.</p> <p>20 Q. Okay. But you agree that narcotics were sold</p> <p>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</p> <p>24 competition?</p>
<p style="text-align: right;">Page 275</p> <p>1 officer standing there.</p> <p>2 So the blue-and-white officer put his cuffs on</p> <p>3 me. AJ put his cuffs on Clarissa. Then they called a</p> <p>4 lady officer, and she came. And she got Clarissa, took</p> <p>5 her to the car, searched Clarissa. Then she took AJ's</p> <p>6 cuffs off Clarissa, put her cuffs on Clarissa, gave AJ</p> <p>7 his cuffs. She transported Clarissa to the police</p> <p>8 station. And this officer -- I don't know his name --</p> <p>9 transported me to the police station.</p> <p>10 Q. During the time period when Sergeant Watts</p> <p>11 walked toward the 527 building, did Officer Jones say</p> <p>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</p> <p>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</p> <p>23 he said, "Click."</p> <p>24 Q. When was the next time you saw Watts?</p>	<p style="text-align: right;">Page 277</p> <p>1 A. No. You're only your own --</p> <p>2 MR. TEPFER: Objection to form.</p> <p>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</p> <p>8 serving drugs. You shouldn't care about what somebody</p> <p>9 else doing.</p> <p>10 Q. Yeah. But wouldn't you want -- wouldn't you</p> <p>11 want to sell the narcotics -- Strike that.</p> <p>12 Wouldn't you want to have more people come to</p> <p>13 you to buy narcotics than go to, say, the 574 building</p> <p>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</p> <p>17 no information of any sort who engaged in narcotics</p> <p>18 activity at the 574 building?</p> <p>19 A. It would all be hearsay. I can't tell you</p> <p>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

<p style="text-align: right;">Page 278</p> <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 style="text-align: right;">Page 280</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: right;">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: right;">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

<p style="text-align: right;">Page 282</p> <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 stickup 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 style="text-align: right;">Page 284</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: right;">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: right;">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>

75 (Pages 282 to 285)

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

<p style="text-align: right;">Page 286</p> <p>1 AJ left. This was the guy -- I think it was Fred told</p> <p>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</p> <p>6 Robinson?</p> <p>7 A. I don't know.</p> <p>8 Q. Anyone named Moore, last name Moore?</p> <p>9 A. I don't know.</p> <p>10 Q. Okay. So you were told at the police station</p> <p>11 that Watts and Jones received information about you?</p> <p>12 A. Yeah.</p> <p>13 Q. And they heard that when they were at the 574</p> <p>14 building?</p> <p>15 A. Yeah.</p> <p>16 Q. What was the information that was said to</p> <p>17 them?</p> <p>18 A. That I would be -- That I would be pulling up.</p> <p>19 That I would be pulling up to the building.</p> <p>20 Q. Did -- And his -- Who -- His first name was --</p> <p>21 Who told you that?</p> <p>22 A. Fred, I believe it was.</p> <p>23 Q. Okay. And you said that these guys were</p> <p>24 pitching at the 574 building; is that right?</p>	<p style="text-align: right;">Page 288</p> <p>1 up for me and Clarissa. And then it was a group effort</p> <p>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</p> <p>5 remember correctly. Little plastic bag full of</p> <p>6 individual bags.</p> <p>7 Q. So other than that bag of narcotics, did you</p> <p>8 see any other narcotics that day at the station?</p> <p>9 A. No.</p> <p>10 Q. What kind of narcotics was it?</p> <p>11 A. Heroin.</p> <p>12 Q. Do you remember the amount?</p> <p>13 A. No.</p> <p>14 Q. The number of bags?</p> <p>15 A. No.</p> <p>16 Q. Street value?</p> <p>17 A. No.</p> <p>18 Q. Okay. So let's take a step back. You get</p> <p>19 back to the -- You -- You're driven to the station by</p> <p>20 the officer in a blue-and-white shirt?</p> <p>21 A. Yes.</p> <p>22 Q. And then that's the 2nd District, right?</p> <p>23 A. 51st and Wentworth.</p> <p>24 Q. Okay. And then is Clarissa already there when</p>
<p style="text-align: right;">Page 287</p> <p>1 A. Yeah. He said he was serving in the 527</p> <p>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</p> <p>5 those guys. I'm not sure of the correct number. But I</p> <p>6 want to say it was about eight because they had the</p> <p>7 whole -- I was able to sit on the bench. Clarissa had</p> <p>8 to stand up. So they had it -- It might have been more</p> <p>9 than eight. But they had from here to the end of the</p> <p>10 bench.</p> <p>11 Q. And did you know any of those individuals to</p> <p>12 engage in narcotics activity at the 574 building?</p> <p>13 A. If he wouldn't have told me he was over there</p> <p>14 pitching, I wouldn't -- I wouldn't know.</p> <p>15 Q. Okay. So Fred told you he got arrested</p> <p>16 because he was pitching --</p> <p>17 A. Yeah.</p> <p>18 Q. -- at the 574 building, right?</p> <p>19 A. Yeah. And he also told me when they put the</p> <p>20 bundle down and said this what he got out the car, he</p> <p>21 said, "That's one of our bundles."</p> <p>22 Q. Do you remember what -- Did you see any</p> <p>23 bundles at the police station?</p> <p>24 A. Just the one that they told Mohammed to write</p>	<p style="text-align: right;">Page 289</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;</p> <p>4 Clarissa is taken out of the car that she's in, right?</p> <p>5 A. Yeah.</p> <p>6 Q. By the female officer?</p> <p>7 A. Yeah.</p> <p>8 Q. You're walked into the 51st and Wentworth</p> <p>9 building?</p> <p>10 A. Yeah.</p> <p>11 Q. And then you're taken to a processing room?</p> <p>12 A. Well, back there where they write their</p> <p>13 reports at. I guess this was the tactical office. So</p> <p>14 they take us back there and handcuff us to the wall.</p> <p>15 And then when Watts came in, he asked, "Has she been</p> <p>16 searched," talking about Clarissa. And the lady said,</p> <p>17 "Well, I did the pat-down." And he said, "No. Search</p> <p>18 her." So she took Clarissa behind the door and was</p> <p>19 searching.</p> <p>20 Q. Is this the same female officer that was at</p> <p>21 the scene?</p> <p>22 A. Yes. And then after a while, Watts went to</p> <p>23 the door. And she said, "Searching a female." And he</p> <p>24 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

<p style="text-align: right;">Page 290</p> <p>1 and to the right. So he went in anyway. But Clarissa</p> <p>2 said she had on her clothes at the time. So -- But he</p> <p>3 went in when the lady hollered out that she was</p> <p>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</p> <p>7 jogging pants was down. So if she didn't have on</p> <p>8 layers, then he probably would have seen her in her</p> <p>9 underwear or something.</p> <p>10 Q. The room where you were handcuffed where they</p> <p>11 do the paperwork, were you in that same room following</p> <p>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</p> <p>16 did the paperwork at the substation. No. That was</p> <p>17 the -- when -- the mailbox case. So, yeah, I was in</p> <p>18 there.</p> <p>19 Q. Okay. So when you get to -- When you and</p> <p>20 Clarissa get to the police station, you're brought into</p> <p>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 style="text-align: right;">Page 292</p> <p>1 Q. Anyone else?</p> <p>2 A. Not that I can recall right off. But whoever</p> <p>3 was on their team working that day was there. I can't</p> <p>4 remember specifically.</p> <p>5 Q. Okay. Did -- I know you've said that Watts</p> <p>6 asked the female officer to search Clarissa. Did Watts</p> <p>7 say anything else in the -- in that room?</p> <p>8 A. He was saying -- because people was saying,</p> <p>9 "Hey, Watts, man, let me out of here." He was like, "I</p> <p>10 ain't talking to nobody." And he said that as he was</p> <p>11 going to the door to go through. And the lady hollered,</p> <p>12 "Searching a female," and he went on through anyway.</p> <p>13 Q. All right. Did -- But did you ever hear Watts</p> <p>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</p> <p>17 station, Gonzalez, Bolton, and Officer Jones, did they</p> <p>18 say anything at any time while you were in that tac</p> <p>19 office?</p> <p>20 A. Well, to each other, I don't know what they</p> <p>21 was saying because they was doing the paperwork. But I</p> <p>22 know Mohammed was telling the other officers -- I mean,</p> <p>23 the other guys, like, "I don't know what's going on</p> <p>24 here, but all y'all be telling on each other. This the</p>
<p style="text-align: right;">Page 291</p> <p>1 That's where they was at. That's where they was</p> <p>2 sectioned at.</p> <p>3 Q. Okay. What officers were inside the tac</p> <p>4 office when you arrived?</p> <p>5 A. Well, I guess it was -- Mohammed was there,</p> <p>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</p> <p>9 sure, though. When they locked me and Clarissa up in</p> <p>10 December, they did have some other officers that was --</p> <p>11 I don't know where they at now. It was a guy that used</p> <p>12 to have a little red afro. I don't know where he went.</p> <p>13 Cadman was no longer there. Kenneth Young was no longer</p> <p>14 there, I don't believe. It was a tall guy used to have</p> <p>15 on a -- he used to wear a Starter jersey. I don't know</p> <p>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</p> <p>20 Mohammed, Gonzalez, Bolton. You're not 100 percent on</p> <p>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 style="text-align: right;">Page 293</p> <p>1 only guy right here that ever took his own weight," you</p> <p>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</p> <p>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</p> <p>12 wall.</p> <p>13 Q. Those were the guys that were arrested at the</p> <p>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</p> <p>19 Mohammed, did anyone else say anything inside that tac</p> <p>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,</p> <p>23 not -- You already talked about Watts. I'm talking</p> <p>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</p> <p>2 me there and put me on the wall.</p> <p>3 Q. Okay. Tac -- Maybe I -- Tac officer. I'm</p> <p>4 talking about the members of Watts's team. Did any of</p> <p>5 them, other than Mohammed, say something while you were</p> <p>6 in the tac office?</p> <p>7 A. I told you, they was talking amongst each</p> <p>8 other as they was filling out the report. I don't know</p> <p>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</p> <p>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</p> <p>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</p> <p>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</p> <p>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</p> <p>5 know the results? Was there some type of hearing that</p> <p>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</p> <p>10 testified like he was the arresting officer when he</p> <p>11 wasn't.</p> <p>12 Q. So there was a finding made against Clarissa</p> <p>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</p> <p>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</p> <p>6 wasn't there at the actual arrest but he was there to</p> <p>7 testify and get Clarissa's vehicle taken. Come on now.</p> <p>8 Y'all got to do better.</p> <p>9 Q. When did Mohammed testify about the vehicle</p> <p>10 impoundment?</p> <p>11 A. They went somewhere. I think it was on</p> <p>12 Superior or something. But Clarissa to better tell you</p> <p>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</p> <p>18 other than Mohammed was at the impoundment hearing?</p> <p>19 A. No. She just told me Mohammed was there, like</p> <p>20 he was the one that arrested us or something. But he</p> <p>21 wasn't.</p> <p>22 Q. And what happened to ultimately -- Strike</p> <p>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</p> <p>4 to pay?</p> <p>5 MR. TEPFER: Objection: form, calls for</p> <p>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</p> <p>11 hearing was the hearing officer said, "Destroy that</p> <p>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</p> <p>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</p> <p>23 learned of that?</p> <p>24 A. I guess -- I'm guessing. I don't know. But</p>

78 (Pages 294 to 297)

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

Page 298

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

Page 299

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?**

Page 300

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?**

Page 301

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.

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

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

80 (Pages 302 to 305)

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

<p style="text-align: right;">Page 306</p> <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 style="text-align: right;">Page 308</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: right;">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: right;">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>
Page 311	Page 313
<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>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: right;">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: right;">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: right;">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: right;">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	<p>1 Because the guys was running. I don't know who was</p> <p>2 shooting at them, none of that. I just know when I</p> <p>3 turned to get out the way, I heard another shot. Pow.</p> <p>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</p> <p>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</p> <p>14 circumstance. And they actually -- They had arrested my</p> <p>15 friend for shooting me, the guy that I was with, because</p> <p>16 they -- he was running, which both of us was trying to</p> <p>17 run, but I got shot. And he made it up to 35th. And</p> <p>18 they arrested him on 35th Street because they thought he</p> <p>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</p> <p>24 by College Boy.</p>	Page 320	<p>1 Q. So do you think whoever was shooting was</p> <p>2 shooting at someone else and they just shot you, or they</p> <p>3 were trying to shoot you?</p> <p>4 A. It was some guys running, so I believe that's</p> <p>5 who they was shooting at. I don't think nobody was</p> <p>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</p> <p>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</p> <p>13 badly injured thigh?</p> <p>14 A. Yeah, because I had to go through therapy.</p> <p>15 And then my right leg now is shorter than my left leg,</p> <p>16 so it cause me back pain every now and then. I gotta</p> <p>17 wear a boot with the extension on it when I'm not trying</p> <p>18 to look fashionable.</p> <p>19 Q. What impact did that shooting have on your</p> <p>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</p> <p>24 with my kids because I couldn't, like, run right because</p>
Page 319	<p>1 Q. When is the last time you had any interactions</p> <p>2 with College Boy?</p> <p>3 A. It's been a long time. Maybe -- Well, I think</p> <p>4 the last time I seen College Boy was -- They have a</p> <p>5 Father's Day picnic out south. I think I seen him</p> <p>6 there. But I think it was like -- 2021 I believe was</p> <p>7 the last time I was there, either 2021 or 2020,</p> <p>8 Father's Day.</p> <p>9 Q. When you got shot, did you have a gun with</p> <p>10 you?</p> <p>11 A. No.</p> <p>12 Q. Had you been in any type of fights,</p> <p>13 altercations, or anything at any time prior to you being</p> <p>14 shot?</p> <p>15 A. No, I wasn't into it with nobody, that I knew</p> <p>16 of.</p> <p>17 Q. Did -- Was anything being said by anyone when</p> <p>18 the gunfire erupted?</p> <p>19 A. I don't know. I just saw the guys running.</p> <p>20 They came from behind 527 running, and I'm coming</p> <p>21 towards. So when I see them running, I hear the shot.</p> <p>22 (Verbally indicating.) So I turned to get really out</p> <p>23 their path. And the other shot went off, like I said,</p> <p>24 and I went down.</p>	Page 321	<p>1 I got the rod in my leg. I couldn't -- I had lost some</p> <p>2 of the motion as far as bending it. I couldn't bend it</p> <p>3 as far as I could do this one. You know, so this one</p> <p>4 really is like a kickstand. That's how I describe it.</p> <p>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</p> <p>11 deposition, is it your memory that -- you do recall</p> <p>12 selling heroin after you were shot?</p> <p>13 MR. TEPFER: Objection to the form of the question.</p> <p>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</p> <p>17 question.</p> <p>18 Mr. Baker, after you were shot, I understand</p> <p>19 you're going to recuperate from your injury. But you</p> <p>20 sold heroin at Ida B. Wells after you had suffered that</p> <p>21 gunshot wound, correct?</p> <p>22 A. Correct.</p> <p>23 Q. Okay. And then the heroin that you would</p> <p>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

1 where would you get the heroin from?

2 A. After I got shot, I used to get heroin from

3 Bernard Harvey.

4 Q. Bernard Harvey?

5 A. Yeah.

6 Q. Is he still alive?

7 A. Yeah.

8 Q. Is he still supplying heroin to people?

9 A. I don't know.

10 Q. And where did Bernard Harvey live?

11 A. I don't know where he lived.

12 Q. Okay. And how would you get the heroin from

13 him to sell?

14 A. I would go get it.

15 Q. Where would you get it from?

16 A. Wherever he said meet him at.

17 Q. Okay. Did he live in Ida B. Wells?

18 A. No.

19 Q. Do you know where he lived?

20 A. No.

21 Q. Was he a Gangster Disciple?

22 A. I don't know.

23 Q. Was he older than you?

24 A. I think we about the same age.

Page 323

1 Q. Did Bernard Harvey ever have a nickname?

2 A. Bird.

3 Q. Bird?

4 A. Yes.

5 Q. Anyone else you would receive heroin from

6 other than Bernard Harvey after you had been shot?

7 A. No.

8 Q. Who would help you sell the heroin during the

9 time period when you sold heroin after you had been

10 shot?

11 A. Bryant Patrick and Elgen Moore.

12 Q. Were you still selling crack cocaine as well

13 after you were shot?

14 A. Yeah.

15 Q. And Bryant Patrick and Elgen would continue to

16 sell those narcotics for you?

17 A. Yes.

18 Q. And then they would enlist other people to

19 help facilitate in the narcotics operation?

20 MR. TEPFER: Objection: asked and answered.

21 Go ahead.

22 BY THE WITNESS:

23 A. I don't know who they would get because I

24 would leave. I wouldn't be there.

Page 324

1 Q. During the time -- Let's go with the 2000s.

2 A. 2000 what?

3 Q. Just during that decade. Well, here. I'll do

4 this: Between --

5 A. Because half of that decade, I was in jail.

6 Q. Between -- Between -- Right. So after you get

7 out of jail -- Or strike that. No.

8 You get probation in 2002, right? You didn't

9 go to jail? You were on probation?

10 A. I believe.

11 Q. Right?

12 A. Yeah.

13 Q. And then when you got shot, were you on

14 probation?

15 A. I don't think so.

16 Q. Okay. So let's focus on this period: 2002

17 through 2005, did you receive heroin from anyone other

18 than Bernard Harvey to sell?

19 A. In 2005?

20 Q. Let me -- Let's break it down. You're right.

21 I'll stop -- Let me go back.

22 From 2002 to -- through 2004, did you receive

23 heroin to sell from anyone other than Bernard Harvey?

24 A. Yeah. I used to get heroin from my cousin

Page 325

1 Eddie.

2 Q. During that time period, too?

3 A. I believe.

4 Q. And would you get it from both Eddie and

5 Bernard?

6 A. No. I would get it from Eddie first. And

7 then when I got shot, I had stopped. Then when I

8 started back, I would get it from Bernard.

9 Q. Okay. When you started back selling heroin

10 again?

11 A. Yeah. After I -- Yeah.

12 Q. Okay. And then after you got shot and you

13 started back selling narcotics, who would you get the

14 crack cocaine from?

15 A. I wasn't really selling the crack cocaine

16 then. I was trying to focus on the heroin. So really,

17 if somebody was in there selling crack, they really was

18 selling it for theirself. But people just assumed it

19 was mine.

20 Q. After the probation that you received in 2002,

21 when would you have gotten your next conviction?

22 A. After the probation, enter Watts. So I guess

23 I went back to prison in 2006.

24 Q. All right. So it's your testimony, then, that

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

<p style="text-align: right;">Page 326</p> <p>1 your next conviction following your 2002 probation was</p> <p>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</p> <p>5 we didn't talk about earlier in the deposition. There</p> <p>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</p> <p>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</p> <p>19 not sure.</p> <p>20 Q. Tell me about the circumstances of the gun</p> <p>21 task force visiting your apartment.</p> <p>22 A. We're in the house. Me, Clarissa, and our</p> <p>23 three boys, we're in the house. She had cooked dinner,</p> <p>24 so we sitting at the table to eat. Then you hear boom,</p>	<p style="text-align: right;">Page 328</p> <p>1 that she consented for them to search. I said, "Don't</p> <p>2 sign nothing. They ain't find nothing in here. They</p> <p>3 don't need you signing nothing." So they said, "Well,</p> <p>4 we gonna take you to jail for them bullets, and you can</p> <p>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.</p> <p>14 Were they my bullets? No. But they took me for it. So</p> <p>15 we leave. They leave. We go downstairs. So they put</p> <p>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</p> <p>21 he was a sergeant for that gun task force. And while</p> <p>22 I'm in the car, Watts and AJ walk up. So he was like,</p> <p>23 "Man, y'all sent us up there, and ain't nothing up</p> <p>24 there."</p>
<p style="text-align: right;">Page 327</p> <p>1 boom, boom, boom, boom. Police knocking on the door.</p> <p>2 We're like, "Who is it?" It's like, "The police." And</p> <p>3 my favorite thing to say, "I ain't call the police." So</p> <p>4 they knock on the door again. Boom, boom, boom, boom,</p> <p>5 boom. So I open the door. But we had the gate on the</p> <p>6 door so they couldn't just get in. And they like --</p> <p>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</p> <p>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</p> <p>13 like, "Ain't no guns up in here." So we let them in</p> <p>14 because we know ain't no guns in there. They come in.</p> <p>15 They put me in handcuffs for my safety and theirs. Then</p> <p>16 they start searching. They searching. They searching.</p> <p>17 They don't find nothing. So they -- Well, they found</p> <p>18 some bullets on top of the snake tank, which was</p> <p>19 Clarissa's dad's bullets. His badge was in there and</p> <p>20 some other things, his ID because he used to be a</p> <p>21 sheriff. So all of us in there stating that it, you</p> <p>22 know, was his, but she kept it, like, I guess as a</p> <p>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: right;">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</p> <p>5 he was a lieutenant because him and Watts, like, got</p> <p>6 into a, like, hands-on altercation where they grab each</p> <p>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</p> <p>10 the car. And then they -- the sarge was like, "Take him</p> <p>11 away." So they drove me down to 37th Street, and we sat</p> <p>12 there. And then they called and said, "Come back." So</p> <p>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</p> <p>16 arguing.</p> <p>17 So we go -- Now they racing to get to</p> <p>18 51st Street. They trying to beat each other to</p> <p>19 51st Street. And this was when the Sox was playing in</p> <p>20 the World Series because it was a lot of officers with</p> <p>21 gold badges and white shirts came to 51st Street. I'm</p> <p>22 guessing they came from the game. But when we get</p> <p>23 there, the white shirts, they come in. They ask me what</p> <p>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

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

<p style="text-align: right;">Page 334</p> <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." 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. 14 Q. Was Watts with anyone? 15 A. Watts was alone. 16 Q. Did you see any members of Watts's team on 17 Mother's Day 2004? 18 A. At that time, Watts was alone. 19 Q. Did you see any other officers at any time 20 during that day -- 21 A. I don't -- I don't know. 22 Q. -- Mother's Day? 23 A. I know at that time, Watts was alone. 24 Q. So it was just you and him?</p>	<p style="text-align: right;">Page 336</p> <p>1 the van. And Gonzalez and Bolton and Cadman were part 2 of that team. 3 Q. All right. But you don't -- As you sit here 4 at this deposition, you don't know -- 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. 11 Q. Do you know what year that was? 12 A. No. Not right off, no. 13 Q. All right. So any other negative interactions 14 you had with -- 15 A. Other than -- Other than -- 16 Q. -- any of the officers, you know, when they 17 were working in uniform? 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. 21 Q. But any negative interactions you had with 22 individuals who worked on Watts's team would have 23 occurred -- Strike that. 24 Other than that incident with the door, any</p>
<p style="text-align: right;">Page 335</p> <p>1 A. Yeah. 2 Q. Prior to Mother's Day 2004, had you ever had 3 contact with the officers who worked for Sergeant Watts? 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. 10 Q. Okay. So prior to -- Or strike that. 11 During those times where Officer Jones would 12 work in uniform, Officer Bolton in uniform -- 13 A. Kenneth Young. 14 Q. -- Officer Gonzalez in uniform, did you have 15 any negative interactions with them? 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. 22 Q. Who did? 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 style="text-align: right;">Page 337</p> <p>1 negative interactions you would have had with the 2 individuals who worked for Sergeant Watts's team would 3 have occurred after Mother's Day of 2004, correct? 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 -- 11 Q. Okay. I missed this one. Who came in with 12 Sergeant Ramirez? 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. 19 Q. And that -- What you're describing -- 20 A. This is when they was with Sergeant Ramirez. 21 Q. Okay. But that's the same incident you're 22 talking about with the board -- 23 A. No. 24 Q. -- on your door?</p>

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

<p style="text-align: right;">Page 338</p> <p>1 It's a different incident?</p> <p>2 A. Yeah.</p> <p>3 Q. Okay. When did that incident occur?</p> <p>4 A. That happened I want to say after the board</p> <p>5 incident, because it's like when they jumped out the</p> <p>6 van, I'm looking out the window. And then my son came</p> <p>7 in, and he was like, "My wheel popped off" on his</p> <p>8 scooter. So I'm standing in the doorway putting it on.</p> <p>9 And it's like they came right up there. But I guess</p> <p>10 they could have been going through the building. But it</p> <p>11 was people all downstairs. They was having dice games</p> <p>12 and everything. And they came. Now all the officers</p> <p>13 that's in the building is now inside of 206. And they</p> <p>14 was all uniformed officers. They searching. They</p> <p>15 searching. And only thing they found was a bag of</p> <p>16 reefer that my cousin's boyfriend had in his pocket.</p> <p>17 And they took him to jail for that.</p> <p>18 Q. Do you know an individual who goes by the name</p> <p>19 Danny Hopkins?</p> <p>20 A. Danny Hopkins? Probably by face.</p> <p>21 Q. Was there -- Or a guy -- Same guy with the</p> <p>22 nickname of Chewbacca?</p> <p>23 A. Chewbacca. I haven't heard that name.</p> <p>24 Q. Or the dumpster guy?</p>	<p style="text-align: right;">Page 340</p> <p>1 Q. Who was Shock?</p> <p>2 A. Shock used to -- He was over there. And they</p> <p>3 say he used to pay Watts. That's what they say.</p> <p>4 Q. Who said that?</p> <p>5 A. A lot of people.</p> <p>6 Q. Did anyone say Roy Bennett -- Or strike that.</p> <p>7 Did anyone -- Did you ever hear anyone say</p> <p>8 that Shock paid anyone else?</p> <p>9 A. I don't know. I heard a story about -- Well,</p> <p>10 it's just all hearsay. So I don't know. I didn't see</p> <p>11 him --</p> <p>12 Q. What's the hearsay you heard?</p> <p>13 A. -- pay him.</p> <p>14 I'd rather not say because I didn't see it. I</p> <p>15 didn't witness it.</p> <p>16 Q. Well, is it involving the members of Watts's</p> <p>17 team?</p> <p>18 A. Maybe.</p> <p>19 Q. Okay. So which ones?</p> <p>20 A. It was Watts, and then it was a lieutenant.</p> <p>21 It was a lieutenant in the car with Watts. And word has</p> <p>22 it that they -- the lady brought a bag of money out to</p> <p>23 the car and said, "Here, Watts. This from Shock." And</p> <p>24 Watts was like, "Uh-uh. I don't -- What is you talking</p>
<p style="text-align: right;">Page 339</p> <p>1 A. The dumpster guy?</p> <p>2 Q. Did you ever hear anyone called the dumpster</p> <p>3 guy?</p> <p>4 A. No. Not -- No. But probably if I see the</p> <p>5 person, I might know him. But by that name, Danny,</p> <p>6 dumpster guy, Chewbacca, no.</p> <p>7 Q. Did you know someone named Wilbert Moore?</p> <p>8 A. Yeah.</p> <p>9 Q. Who is Wilbert Moore?</p> <p>10 A. Well, his cousin has a baby by my sister.</p> <p>11 Q. Who is the cousin?</p> <p>12 A. Frank Lee.</p> <p>13 THE REPORTER: I'm sorry.</p> <p>14 THE WITNESS: Frank Lee.</p> <p>15 Wilbert dead now.</p> <p>16 BY MR. BAZAREK:</p> <p>17 Q. How about Patrick Nooner? Did you know him?</p> <p>18 A. Yeah.</p> <p>19 Q. Was he a supplier for narcotics?</p> <p>20 A. I mean, he never supplied me.</p> <p>21 Q. How about Roy Bennett? You know Roy Bennett?</p> <p>22 A. No.</p> <p>23 Q. Did you know anyone named Shock?</p> <p>24 A. Yeah. Shock.</p>	<p style="text-align: right;">Page 341</p> <p>1 about? I don't want that," I guess because the</p> <p>2 lieutenant was in the car.</p> <p>3 Q. Oh, so he didn't take the money?</p> <p>4 Who was the person who had the bag of money?</p> <p>5 A. All I knew was they say it was a lady.</p> <p>6 Q. Okay. Do you know anyone named Harold Seales?</p> <p>7 A. If that's Harry that's dead now.</p> <p>8 Q. How about Harold Owens? Do you know him?</p> <p>9 A. Yeah. He dead, too.</p> <p>10 Q. Do you know anyone named Charlene Campbell?</p> <p>11 A. Probably by face.</p> <p>12 Q. How about Francine Osborn? Do you know that</p> <p>13 name?</p> <p>14 A. Francine Osborn. I can't say.</p> <p>15 Q. Yeah. Was there -- Did you know any of the</p> <p>16 people who managed the 527 building?</p> <p>17 A. Oh, Ms. Osborn?</p> <p>18 Q. Yes.</p> <p>19 A. Yeah. She was the manager, and she used to be</p> <p>20 the office in 511 when I used to take the rent over</p> <p>21 there sometimes for Clarissa. That was the lady they</p> <p>22 say used to give Watts keys to people's apartment.</p> <p>23 Q. Did you ever see that or ...</p> <p>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	<p>1 they went over there asking for my key, but they didn't</p> <p>2 have a key because we had -- she had the -- she had the</p> <p>3 janitor change our locks for us because I think a key</p> <p>4 got broke up in there. And when he changed the locks,</p> <p>5 he gave us the copies of the keys. So it was never a</p> <p>6 set in the office.</p> <p>7 Q. How about -- You know someone named</p> <p>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</p> <p>13 name?</p> <p>14 A. No.</p> <p>15 Q. Okay.</p> <p>16 A. Charles -- It was another Charles that used to</p> <p>17 work with Watts. He was, like, an informant through</p> <p>18 there, I guess. And when the mailbox case happened, he</p> <p>19 came to the house early in the morning one time at</p> <p>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>	Page 344	<p>1 I really, like, probably went to school with his</p> <p>2 brother. But we all went to Doolittle.</p> <p>3 Q. Okay. And so you talked about someone showing</p> <p>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</p> <p>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</p> <p>23 June of '04 and the -- Does it have anything to do with</p> <p>24 the mailbox case?</p>
Page 343	<p>1 Charles Lawrence. But when they showed me that picture,</p> <p>2 I said, "No, this ain't Charles right there. That's not</p> <p>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</p> <p>6 at -- And we can just make it an -- We'll make it an</p> <p>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</p> <p>13 marked for identification.)</p> <p>14 MR. BAZAREK: Okay. I'm going to show you -- I'll</p> <p>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,</p> <p>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>	Page 345	<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</p> <p>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</p> <p>8 believe, July.</p> <p>9 Q. Okay.</p> <p>10 A. It was either the end of June or beginning of</p> <p>11 July.</p> <p>12 Q. And you knew this individual to be an</p> <p>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</p> <p>18 lived?</p> <p>19 A. He lived in 574 with his girlfriend Vicky. I</p> <p>20 think that was her name. But he came to the building</p> <p>21 early in the morning, knocked on the door. I'm like,</p> <p>22 "Who is it?" It's Charles. I'm like, "What's up?" He</p> <p>23 like, "Hey, Benny, man, Watts want to talk to you." I'm</p> <p>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
<p>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 -- 6 Q. Charles -- 7 A. Yes. 8 Q. -- calls the number? 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. 15 Q. Can you hear anything -- 16 A. No, I can't hear. 17 Q. -- on the other end of the conversation? 18 A. No, I can't hear. 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,</p>	<p>1 and 23 seconds. We are now off the record. 2 (Deposition concluded at 6:53 p.m.) 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p>
Page 347	
<p>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,</p>	

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
3 EASTERN DIVISION

4)
5)
6)
7)
8)
9)
10 In re: WATTS COORDINATED) No. 19 CV 1717
11 PRETRIAL PROCEEDINGS)
12)
13)
14)
15)
16)

17
18
19 I, BEN BAKER, state that I have read the
20 foregoing transcript of the testimony given by me at my
21 video-recorded deposition on August 9, 2023, and that
22 said transcript constitutes a true and correct record of
23 the testimony given by me at the said deposition except
24 as I have so indicated on the errata sheets provided
 herein.

BEN BAKER

SUBSCRIBED AND SWORN to
before me this _____ day
of _____, 2023.

NOTARY PUBLIC

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

Page 350

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

1 Witness my signature as a Certified Shorthand
2 Reporter in the State of Illinois, on August 28, 2023.

3
4
5
6
7 *Brianna Uhlman*
8



9 _____
10 BRIANNA UHLMAN, CSR, RPR
11 161 North Clark Street
12 Suite 3050
13 Chicago, Illinois 60601
14 Phone: 312.361.8851

15 CSR No. 084-004886
16
17
18
19
20
21
22
23
24

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

Page 352

A	50:9 117:20	advising 95:23	109:23 110:9	229:18,20
a.m 1:18 6:12	118:3,17	affect 9:12 181:1	110:21 112:5	234:14 241:18
42:13,16	119:11 120:17	affidavit 69:5,6	112:16 116:7	256:7 261:16
350:15	121:1 122:5,13	affiliated 218:12	117:1 120:20	262:14,18
Aberdeen 2:3	122:16,19	218:13	121:8 123:5,16	265:1,5 266:11
100:23	123:1,11,19	afield 98:11	127:17 128:13	266:18 267:19
ability 9:12	124:2 125:22	afoot 280:5	130:23 132:17	268:11 269:7
12:24 243:23	126:11,19	afro 291:12	143:23 151:22	274:12,20,24
able 17:4 103:2	130:4,17 131:3	afternoon	158:22 166:18	275:3,6 283:19
103:16 203:17	132:13 133:15	215:16	168:19 172:16	283:20,22,23
257:8 273:10	156:18 166:4	age 29:21 52:6	174:18 181:11	284:19 285:4
287:7	185:10 187:9	213:8 254:4,4	207:23,23	286:1 291:24
able-bodied	237:18 246:12	322:24	209:14 216:21	300:8 328:22
165:13	249:15,18	ages 254:5	217:12 220:18	330:4 335:6
acceptable 10:1	250:6,16	ago 59:2 184:14	220:22 234:5	AJ's 275:5
access 60:19	277:18 279:14	249:22 308:21	238:20 249:10	aka 19:13 183:9
61:11,13	282:17 287:12	309:4,5,10	252:2 260:4	albeit 299:16
129:18 164:17	302:5	316:15,24	266:23 267:15	alive 226:15
247:20	actual 11:11	agree 10:13,16	277:3 280:14	308:2 322:6
accommodati...	33:7 91:11,16	10:24 102:3	281:18,20	all-inclusive
91:14	190:20 209:16	104:20 108:20	282:9 296:18	91:18 98:4
accosted 241:3	239:16 295:6	112:9 113:24	297:7 298:20	allegations
account 159:12	ad-libbing 235:7	118:15 130:3,6	300:15 310:19	105:8
accurate 76:9	add 10:6	138:1 173:22	314:10 323:21	Allen 2:7
accurately 9:13	addict 54:7	229:2 257:5	343:24	alley 279:16
107:24	adding 232:3	259:1 276:20	ain't 28:2 70:10	alligator 197:23
acknowledge	additional 57:15	Agreed 88:21	163:22 190:23	335:5
233:11	address 16:5	agreement	197:13 199:11	altercation
acquaintances	20:17 39:21	350:22	206:8 225:16	329:6
172:5	40:1,4 42:21	Ah 113:12 120:3	233:22 292:10	altercations
action 350:20	47:5 48:11,15	ahead 7:10 12:5	307:23 308:2	319:13
active 164:11	56:5,9 57:1	12:11 13:13	327:3,13,14	Alvin 3:6 143:6
320:23	68:12 115:21	14:4 20:2 22:7	328:2,23 330:1	146:13,15,17
actively 180:21	116:22 253:11	22:7 25:10	330:7 331:24	146:18 147:3
activities 107:16	253:13	26:1 27:24	333:24 334:2	147:16,17
107:19,20	ADE 13:5	28:20 29:2	343:2	148:13,18
111:24 112:9	Administrative	34:9 35:8 38:2	airfare 91:16	153:20 190:10
112:10,14,20	192:3	41:15 43:15	AJ 142:4,12,21	190:13 196:5
112:23 115:21	admissions	48:19 51:5	186:13 188:23	210:7,10,18
116:1,18,21	34:13	57:20 77:7,17	191:6,8 193:21	232:14
124:23 125:18	admit 76:15	78:7 79:22	196:5,6,15,18	AMERICA
126:14,23	adult 161:6	86:23 98:11	203:2,21	350:1
activity 28:17,24	176:9	104:7,22 105:9	209:23,24	amount 66:11
47:7 49:6 50:1	advice 96:11	105:17,18	210:4 228:17	66:17 71:16
	119:2	106:16 108:10	228:18,19	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	289:1,1,2
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 59:8 62:13 65:12,17 66:19 67:4 72:11 80:20 102:3 104:5 105:14 107:10,15 111:16 112:1 113:2,6 117:17 121:7 123:21 124:3 125:17 130:19 137:16 139:21 143:14 144:4,9,16 148:15 159:4 171:7 183:8 189:16 214:2 220:10,21 248:19 280:12 289:15 292:6 305:20,23 307:21 308:6 323:20 333:8 asking 8:17 27:3 27:20 42:3 55:8 69:22 77:6,13,15 78:14 93:13 100:7 104:21 114:11 115:19 115:24 116:1 116:12 120:13 123:18 124:21 142:9,19 146:16 171:1,6 172:12 210:16 210:18 242:7 255:2 268:19 284:5 307:4,5 309:22 342:1 asks 71:13 102:12 112:22 116:6 117:22 ass 231:18 270:16 271:3	274:22 334:1,3 347:7 assert 95:18 assigned 156:7 278:19 331:16 331:23 332:1 332:16 assist 311:1 associate 89:3 associated 105:7 association 8:2 142:14 assumed 110:12 117:10,15 325:18 342:24 346:14 Atanise 88:12 ate 177:13 attached 106:18 140:18 303:9 attempt 303:3,5 303:13,15,23 304:9 attempted 116:14 157:8 157:15 158:15 attempting 305:18 attend 49:14 attending 16:21 49:20 attention 175:3 attorney 36:24 48:1,3 64:24 77:14 95:8 96:4 119:6,16 129:14,16 350:17,18 attorney's 96:11 119:2 attorney-client 61:15 118:7 attorneys' 10:16 ATV'ing 97:19 audio 60:5,13,19	audiotapes 129:18 August 1:18 6:11 9:5 42:23 43:3 106:1 107:3 108:3 349:12 350:14 351:2 auntie 160:22 auntie's 195:10 244:12 253:2 301:9 authorities 59:13 90:19 129:2 Avenue 2:12 aware 159:12 167:15,17 231:8 <hr/> B B 5:11 19:7 51:12 62:17 114:21 124:23 125:19 150:15 150:21,23 151:12 153:17 158:20 159:3 167:16 173:9 174:8 175:12 202:10 205:11 210:19,23 211:4,21 217:6 218:8 249:15 249:18 250:17 282:4,6,17,21 306:12,14 307:3 309:2,7 310:11 311:2 311:14 312:5 315:5,22 316:2 316:16,19 321:20 322:17 B-A-K-E-R 8:13 B-E-N 8:13	baby 339:10 back 16:17,22 24:16 25:4 27:15 30:7 31:3 32:12,13 32:19 33:6,8 33:16 41:4 42:17 65:8,23 68:10 70:6 72:14 73:2,8 73:10 75:23 79:16 82:8,12 82:18,21 89:11 89:12,15 97:4 99:14 108:2 109:16 111:6 127:16,24 128:4,22 131:11 132:10 138:12,21 139:10,17,24 140:8 149:6 163:8 164:4 167:23 168:3,4 168:5,20,23 169:6 171:18 172:6 173:8,19 174:11,13,14 175:15 176:11 176:17 177:1,2 177:12 178:6 178:10,13 179:20,21,23 180:1 186:4 197:10 198:15 205:11 208:22 218:4 228:23 228:24 231:1,5 231:15 233:23 244:8,11 247:23 251:3 251:18,21 252:9,14 255:15 256:7 259:15 261:16	261:19,19,20 262:17,20 264:11 265:14 268:7,10,12,12 270:1,2,2,15 271:1,2 273:4 274:18,19,20 275:13 276:5 278:13 283:1,5 284:11 285:15 288:18,19 289:12,14 296:22 297:19 302:1 304:24 305:2,3 306:18 315:13 320:16 321:10 324:21 325:8,9,13,23 329:9,12,13 330:19 332:4,9 332:10 333:3 333:20,21 334:6,8 347:22 backed 228:15 badge 327:19 badges 329:21 badly 320:13 bag 38:15 55:14 55:18 135:19 223:10,11 224:16 227:20 288:5,7 310:3 310:4,6 338:15 340:22 341:4 baggies 309:19 bags 55:14 133:16,19 134:13,21 136:2,7 223:9 223:10,11 227:10 288:4,6 288:14 Bahamas 91:23 92:1 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 6:15,22 8:6,11 8:13,14 10:4 11:6 13:3 16:11,11,11 18:23,24 19:2 19:9,13 20:12 20:14 21:11 27:4 34:8,17 42:19 61:5 64:21,23 65:6 78:15 79:12,18 95:22 96:3 98:16 100:9 103:2,11,16,19 106:5,17 108:18,20 114:8 121:16 124:17 127:19 132:12 140:17 141:1 170:4 171:19,22 172:1,4,7,23 173:5 182:11 182:13,17 183:3,3,4,5,9 183:11,18,20 183:24 184:1 186:6 200:19 226:6 239:9 242:19 268:9 300:20 321:18 343:12 349:10 349:19 350:7 350:21 Baker's 106:8 140:18 bald 267:10 baldhead 261:11 Bali 18:22 19:10 19:11,13 22:9 22:9,11,11,13 22:17,19 23:5 23:6,7,8,10,11	24:16,17,18,19 25:1,2,8 27:20 30:8,13,24 31:3,15 32:10 32:11,13,18 33:5 34:2,8,11 34:12,21,23 35:3 36:8,11 37:5,9,20,22 38:5 42:2,3,4 43:18,23 44:12 44:13,15,19,20 44:22 45:6,20 46:3,9,12 50:10,20 51:1 58:21 59:9,11 59:12,14,16,17 59:18,20,23 60:1 62:3 66:19 69:10 70:14 74:1,14 75:3,10,24 76:4,7,16,21 77:2 113:5,11 122:13 130:7,7 130:9 138:4,10 138:14 139:9 139:13 183:3,9 183:10 ball 308:10 ballpark 183:9 254:5,7 balls 308:8,14 309:9,12,14,18 bar 195:10,12 282:12,13 BARONI 3:13 based 109:3 basically 150:19 205:17,17 230:9 275:20 basis 68:4 125:8 Bates 171:13 bathroom 176:13	Bazarek 3:3 5:5 7:1,1 8:10,15 10:21 14:23 15:16 16:14,18 20:3 23:3 26:15 27:2 31:6 34:10 40:9,11 42:11 42:18 44:1 48:13 50:23 61:4,20 64:9 64:12,19 65:3 65:9 68:23 69:2 77:15,20 79:7,17 89:19 92:9 95:19,21 96:2 98:1,12 98:23 99:2,4 102:1 103:8,14 104:23 105:10 106:4 109:15 111:7 112:3,4 113:3,17 114:7 114:13 115:15 115:17 116:4,8 116:11 118:14 119:1 120:10 120:21 123:4 123:15 124:11 124:14,16 125:2 127:10 127:18 128:3,6 131:1 132:2,4 132:11 135:3 135:23 143:22 144:5 145:16 155:8 158:23 168:10,18 169:15,17,20 169:24 170:2,3 170:9,12 171:3 171:5,8,10,12 171:16 172:17 172:20,22 173:1,4 179:7	183:17,19,21 185:21,23 186:5 199:15 202:3 215:5 220:11,18 226:10 235:13 243:1 251:6 257:21 268:2,8 272:7 280:13 281:19 284:7 306:1 307:6 311:12 314:9 321:15 331:8 339:16 343:5,9 343:11,14,17 344:21 347:17 be- 326:9 Bear 252:10 Bears 239:15 244:7 253:6 beat 329:18 347:4 beating 180:2 Bebe 212:21 213:1,3,6,8,11 213:12,22 222:19,21,22 223:3,4 224:14 224:19 225:10 225:12,15 227:17 236:22 237:21 238:17 238:24 beginning 29:21 42:20 181:1 201:16 253:5 307:11 345:10 347:13 behalf 2:6,15,23 3:6,12,17,22 6:18 7:5 117:21 behold 164:13 belief 299:2 believe 9:6	16:22 20:13 24:18 33:3 35:14,17,19 38:4 39:9 42:23 43:1 44:4,13 45:22 47:20 49:23 52:20 53:15 57:12 66:6 71:15 76:11,13 81:21 82:10,14 83:11 87:2,2 90:17 91:9 92:18 93:21 94:19 128:15 130:13,15 135:5,8 138:20 139:24 146:10 146:22,23 155:24 158:13 160:5,21 167:21 176:5 178:20 184:13 186:13 192:20 194:9,20,22 197:4 199:3,22 203:4,4,5 205:4,4 212:2 212:3 213:4,21 215:18,18 216:7,10 220:6 220:9 224:18 226:19 234:15 237:4,5 238:23 245:9,14 248:3 253:14 255:20 282:9 286:22 290:22 291:6 291:14 299:1 301:18 302:17 304:19 305:13 305:16 306:20 306:21 307:12 312:16,20 314:6,11 316:4
---	--	--	---	--

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

Page 356

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

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	273:2,2,4,5,6
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		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	231:16 242:11	157:1
344:12 345:20	80:14 83:3	329:12 332:9	242:13 244:15	carrier 128:22
buildings	84:7,9,13,21	339:2 346:13	244:16,18	cars 196:3
141:15 151:7,8	Cadman 3:17	calling 122:3	245:10,16	262:19,21
151:10 276:5	7:17 198:1	185:11 207:19	246:18 247:2,9	Carter 2:15
bull 157:9	291:13 336:1	225:5	247:20 255:5	Cartwright
194:14,19	337:13	calls 25:12 43:13	255:20,21,23	73:21,22
199:10 233:11	Cal 49:22	46:13 47:9	255:24 256:3,6	case 6:9 9:6
256:16	California	61:2,8 71:13	258:10,11,12	47:15 49:2,16
bullet 317:2	236:17,21	74:19 81:23	258:14,16	110:12 111:10
328:5 332:8	call 18:5 22:10	84:14 92:8	259:2,2,16,17	111:11 113:9
bullets 327:18	24:19,20 25:6	93:14 105:5	259:18 260:17	113:22 117:7
327:19 328:4	25:7,14,16,18	132:15 135:2	260:21,23	117:11,16
328:13,14	29:16 30:7,12	169:1 173:11	261:9,13,14,18	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	100:15 170:2	229:14 230:5
138:4,8 140:20	188:23 198:1	321:9	Dave 237:11	230:22 244:6
142:23 145:4	203:11	CSR 351:9,13	David 18:23,24	244:18 245:5
146:21 148:24	course 189:23	cuffs 190:23	19:2,9,13	246:18 247:2
155:18 156:22	court 1:1 6:10	191:1,3,5,6,8	20:12,14 21:11	249:5 251:16
165:20,22,24	7:24 9:7 49:14	191:12 227:6	183:3,3,4,5,9	252:23,23
166:13,16	77:21 148:3	228:9 271:3,4	183:11,18,20	261:2 262:22
170:2,9 171:8	158:12 200:7	272:12 274:22	day 21:12 22:19	264:12,15
187:13 189:15	236:20 237:1	275:2,3,6,6,7	29:11 31:21	284:20 288:8
190:14 193:1	238:14 298:5	curb 258:17	32:14 42:22	292:3,14
197:3 204:11	331:11,15,16	curfew 156:12	45:10,13,15	307:20 319:5,8
204:23 208:19	332:12,18,18	currency 121:22	46:23 47:1	331:2 333:13
211:7,21,22	332:20,24	122:1,4	52:16 53:8	333:14,16,20
221:20,21	333:1 349:1	current 11:13	54:23 56:2,4	334:1,17,20,22
229:4 230:2	courthouse	currently 20:14	61:24 86:17	335:2 337:3
238:2,4 240:10	49:21	cursing 199:10	87:4,9 89:11	344:20 347:15
246:16 255:6,7	Courts 1:13	Curtis 2:15	89:12,15 93:20	349:21
257:20 259:19	cousin 182:9	custody 137:18	93:21 102:7	days 23:2 33:7
263:22,23	183:4 244:12	200:20 237:3	135:16 138:12	87:6 93:22
271:19 282:17	301:9,10	customer 22:13	138:16,24	180:7 182:17
284:22 287:5	324:24 339:10	86:16,22	139:16,19,24	331:22
291:21 298:6	339:11	cut 41:1,2,7,12	140:1,3 146:14	DEA 69:6 129:3
298:10 302:5,9	cousin's 182:10	41:19	146:16 147:2,4	dead 201:19
316:20 321:21	338:16	cuts 41:17	147:6,7,19,21	226:15 308:3
321:22 337:3	covert 262:6	cutting 220:15	148:10,13,18	339:15 341:7,9
349:13	CPR 205:22,24	CV 1:5 6:9	159:8,10,16,21	deaf 195:1
Corrections	206:4,7,9,13	349:5	159:24 160:18	deal 31:4,7
137:19	206:22 207:24		160:20 161:15	158:2
correctly 70:9	crack 301:5,6	D	161:23 163:2,9	dealer 14:1,20
125:24 172:16	313:3 323:12	D 5:1	163:19 165:24	15:2,8,14,18
288:5	325:14,15,17	dad 178:2	169:6 170:22	25:23 104:12
corso 194:17	creative 206:21	327:23	175:7 176:19	114:17 121:17
cosigning 198:8	crib 187:21	dad's 327:19	177:18 179:16	121:21 122:3
cost 31:9 211:12	criminal 47:15	DAFFADA 3:13	179:19 184:21	143:8 158:20
Cottage 196:24	49:14 68:17,22	daily 150:9,10	186:7,10,20	182:19 202:13
couch 193:8	68:23 156:17	Damn 225:7	188:1,3,5,6	250:12 282:7
could've 65:19	237:18 300:13	Danny 338:19	192:17 195:15	dealers 41:11,14
counsel 5:20	cross 259:9	338:20 339:5	200:19 203:2	219:1
125:15 298:15	cruise 88:5,9,10	dark 246:3	204:3 205:17	dealing 41:4
350:17,18,22	88:23 90:3,7	date 6:11 11:8	205:18 208:10	110:15 120:7
count 34:18	90:10,14,15,18	11:11 18:14	209:8 215:20	281:5
County 116:14	91:8,15,16	124:21 125:20	215:22 216:1	deals 113:4,11
331:13,13	92:2,13,17	146:22 212:19	218:4 219:22	Debra 3:23
350:3	93:4,8,9 96:15	239:16 344:18	222:5,24 223:2	decade 324:3,5
couple 40:9 58:6	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	detained 242:13	directly 37:23	349:1,1 350:1
201:16 204:23	dep 22:10 183:2	detaining 242:6	65:2 119:10	Division 1:2
205:1 209:9	Department	242:8	120:16 121:22	6:11 349:2
239:10,14,23	137:18 161:6	detectives	124:22 125:21	350:2
240:15 241:6	depend 22:23	165:13	165:1,3 350:19	divorce 24:7
241:22 243:16	241:14	detergent 21:16	dirty 142:16	divorced 24:3,5
244:5 246:5,24	depending	76:24	disappointed	document 109:4
247:8 249:14	12:16,17 224:7	device 6:3	49:12	documents
249:21 250:6	241:9	dharris@reite...	disbanded	109:10,10
250:15 254:3	deposed 9:17	3:21	218:11	Dodge 160:5
257:20,22	deposition 1:10	Dhaviella 3:19	disc 129:20	dog 194:9,11
263:3,5,7,9,15	5:13 6:3,5,7,16	7:5	Disciple 19:2,6	195:8,9,9,12
263:22 264:1,2	8:20 9:13,16	Diamond	29:18,19,20,24	195:15 337:5
264:4,14 283:3	10:24 30:11	194:22,23	149:8 213:22	dogs 194:5,6,7
291:10 298:6	46:2 76:3	195:1,7,9,13	214:3,5 306:2	194:11,12
299:12	78:23 79:12	dice 221:9,14	306:13 322:21	doing 37:15,16
decide 15:8	87:4 96:1	338:11	Disciples 30:4	73:6 110:15
242:2 307:17	99:18 116:10	dictating 295:3	158:5 215:1	113:11 120:5
decided 171:23	125:6 129:19	dictation 294:15	218:9,10,11,13	135:20 136:2
dedicated	137:13 143:5	die 202:4 213:20	218:19 219:7	142:17,18
281:14	148:12,23	279:4,9	219:10 306:10	160:22 175:24
deeper 256:2	163:23 172:23	died 184:22	Disciples' 306:4	195:11 197:11
defendant 1:11	189:10,13	261:7 279:3	discuss 226:17	199:5 205:23
2:23 3:12 6:17	204:7 263:21	difference 12:14	discussed 201:4	205:23 208:17
6:18 98:17	321:11 326:5	49:7	discussion 205:2	224:7 235:5
100:10 106:9	336:4 343:12	different 53:12	205:14	265:7 277:9
106:18 137:14	347:23 348:2	53:12 56:8	discussions 75:1	292:21 294:17
140:18	349:12,14	58:14 69:7	dismissed 201:5	310:1
defendants 3:6	350:9,12,14	83:13 94:24	205:10 208:22	dollars 76:15
3:17,22 7:2,17	depositions 1:14	143:2 155:20	209:5 332:14	221:2 346:22
Defense 99:16	describe 107:20	177:21,23	dismissing	346:24 347:5
DeKalb 16:21	145:22 190:18	179:10 181:17	333:2	dolph- 97:20
deliver 36:10	321:4	183:5 194:15	dispute 165:21	Dominican 97:4
69:19 173:18	described 46:2	205:20 209:17	disputing	97:9,18
delivered 31:15	86:9 117:18	210:2 245:16	165:15,18	Donuts 248:18
72:8 163:22	202:24	338:1 342:12	distance 39:10	248:23 251:7
Dells 178:8	describing	344:8	39:13	Doolittle 344:2
demand 210:11	337:19	differently	distinguish 20:4	door 18:20
210:18,22	desk 199:7	120:5	distinguishing	22:20,21 23:12
211:3	233:24	dilute 40:17,24	38:22	32:21,21,22
demanded	Destroy 297:11	dime 77:9 96:14	Distribution	58:22 152:11
210:8 211:19	destroyed 296:1	dinner 97:20,22	154:11	152:13,14,15
den 173:18	296:2,20	326:23	District 1:1,1,13	162:7,14,20,22
dental 35:15,22	297:20,21	direction 272:21	6:9,10 198:11	162:24 167:8
Deon 16:11	detain 242:4,7	350:11	200:1,2 288:22	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	280:15,16,24	either 75:16
240:22 337:9	175:22 245:5,9	27:21 29:5,6	281:2,21 282:7	86:10 128:24
338:8	247:2 257:16	30:8,16,19,24	301:10 313:23	136:12 163:15
dope 14:1	260:9,15	32:19 33:1,2	dude 157:24	163:19 197:5
221:11 278:21	263:11 271:18	33:15,17 34:1	167:11 285:20	201:10 204:13
278:21,23	271:20	34:8,11,12,21	285:21	214:7 236:13
281:15	dropped 244:11	37:4,8,13,14	duly 8:7 350:7	242:1 243:13
Douglas 230:13	drove 27:11	37:16,23 41:17	dumpster	249:23 305:24
downstairs	84:7 88:16	41:19 42:3,5	338:24 339:1,2	312:20 319:7
152:6 156:2	160:3 172:9	43:21,23 52:17	339:6	337:18 345:10
162:16,23	175:20 176:2,2	54:14 57:12	Dunkin' 248:18	elementary
172:6 187:18	176:3,5 189:20	62:11,13 66:24	248:23 251:7	254:4
195:23 215:15	196:23 197:15	72:6,13 76:16		elevator 169:10
222:9 240:7	245:2 247:23	78:11 83:11	E	169:11 251:24
241:3 248:17	255:9,10 259:1	84:17 85:24	E 3:3 5:1,11	Elgen 150:17
254:18 255:3	264:7 329:11	93:4 105:12	E-mail 2:5,14,22	153:20 168:1
285:22 328:15	drug 14:20 15:2	114:20,21	3:5,11,16,21	176:12 177:13
333:17 338:11	15:8,14,18	120:7 121:23	earlier 129:19	181:7 186:18

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		123:9 130:14
323:11,15	130:18 131:6	1:11 5:5 8:9	F	Fay's 62:15
Elgen's 191:13	151:19 187:9	examined 8:8	F 68:3	67:10
eloquently	277:17	example 192:7	face 73:24	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	105:23 106:6,8	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 firearm 156:24 157:10	328:5 five-minute 79:7 185:20	18:11,17 19:17 21:13 22:2,15 25:24 27:23	238:4,6 247:6 276:4 285:14 299:7 301:9
figh ts 319:12	firearms 156:23 157:1	fixing 337:9	28:18 29:1 31:5,11 33:13	327:17 338:15
figure 121:21 200:24	firm 95:3,4 100:20	flashing 256:4 Flaxman 2:11 2:11 7:19,19	35:7 40:19 41:13 43:12 44:1,8 45:2	foundation 17:3 18:12 23:1 26:24 36:12
figured 195:2 251:13 269:8	first 7:10 8:7 9:16 16:16	7:20 flew 88:17	46:4,14 47:10 48:16 49:8 50:2 51:3	40:19 52:12 61:2 113:14 344:19
file 11:9 91:4 104:19 105:1	18:9 23:5,8,11 23:13 24:16	floor 2:4 151:2,2 151:3,4 222:14	55:11 57:19 59:21 60:7 61:1 63:10	four 40:8 93:20 93:21,22 164:19 203:12
filed 11:6,16 24:9 90:15 200:14	27:10 28:23 29:5,10,11	222:14 225:15 225:18 252:1	64:4,11 68:21 70:15 71:1 72:10 74:4	266:20 299:9 299:11,18,22
Filipino 203:1	60:18 67:22,23 71:7 75:24	floors 151:19 Florida 92:17	75:12 76:19 78:5 79:3,3,20 81:24 96:17	four-door 244:19
fill 232:4	81:15 88:15 94:11 98:18	fly 88:19 focus 189:22 208:21 239:11	104:4,11 107:9 109:21 111:16 114:5 116:2	fourteen 300:6,9 fourth 222:13 222:17 225:1,1
filled 235:10,15 294:10	99:21 100:11 103:1,10,10	324:16 325:16 FOID 328:8,10	120:9,19 121:2 123:21 129:20 132:15 138:18	frame 42:19 53:14 117:7,18 118:19 137:22
filling 234:10 236:5 294:8,12	106:9 151:3 155:24 170:13	follow 96:10 119:2 237:14 293:3	139:5 151:21 155:10 158:21 168:8,17 169:2	208:22 239:11 framed 120:4 121:10,15
final 24:11	222:24 223:1 225:18 227:1	followed 334:6 following 239:9 239:22 290:11	173:13 181:10 215:4 228:1 235:12 241:16	Francine 341:12 341:14
finalized 24:7	237:2 245:18 245:20 248:4	302:7 315:4,16 326:1 333:4	242:2 277:2 281:17 282:8 282:22 297:5	Frank 2:8 339:12,14
finally 180:1	248:11 253:5 256:17 286:20	follows 8:8 food 91:20 176:14,15,17	306:5 309:16 310:18 314:7 321:13	Frazier 162:6 Fred 285:21 286:1,22
financially 350:19	300:20 301:19 303:24 305:4	176:20 177:12 force 326:6,21 328:18,21	317:9 318:23 327:4 328:23	287:15 293:16 Fred's 286:3
find 52:17 63:8 63:8 64:3	307:13 316:5 317:24 325:6	329:1,15 331:1 331:15 332:12	327:4 328:23 329:1 330:16 330:17 331:13	free 10:6 96:16 207:12
180:4 190:3,4	335:6 337:16 350:7	foregoing 100:10 349:11	331:13 332:13 333:13	freely 241:24
246:21 327:17 328:2	First-name 68:4 firsthand 12:22	forever 127:5 forget 69:1 179:1	former 11:13 Forney 2:16 forth 69:6 179:20,22	friend 17:21 25:19 28:6,9 28:15 37:17,18
finding 296:12	five 25:3 30:13 33:3,7 55:9,10	form 10:18 12:3 12:10 14:2,15 14:22 15:10,15	fought 298:24 found 163:4 177:4 180:23	88:20,24 89:2 162:3 184:22 212:23 219:11 317:9 318:15
fine 61:15 297:3	55:14,19 57:7 78:12,21 86:12	15:19 17:3		
fingerprints 328:13	86:12 93:20,20 93:22 102:4,5			
finish 19:20 22:5 115:16,16	102:14 172:7 179:1 268:1			
123:3,14 148:4 161:5 171:4				
179:6 193:16 199:12 220:16				
234:8 295:16 296:17				
finished 240:3,5				
finna 225:19 260:16 267:22 346:2				
fire 201:11,12				

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
	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	332:12
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	
197:17,20	70:4 98:2,6	49:13	guilty 34:14,17	H
198:15 204:20	101:9 157:23	guarantee	34:21 47:18,23	H 5:11
204:22 206:6	310:17	299:23	158:11,14	H-O-L-L-I-M...
211:11 215:11	google 135:15	guess 12:7,23	238:4,6 298:8	185:8
219:15,17	gotta 193:16	18:15 24:9	298:12,17,22	hair 330:5
225:16,17	220:16 295:16	26:3 37:15	299:2,7,18	Hale 3:2 7:3

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

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

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

Page 369

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

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

Page 370

Jordan 278:24 279:1	K	215:20 216:16	12:8,14,20	82:3 84:15,17
Josh 6:22 95:8 112:3 279:23	K 3:13	216:19 248:6	14:18 15:22	84:18,21,22
josh@loevy.co... 2:5	Kallatt 2:23 7:12 106:1,9 211:9	254:6 267:7 299:4 320:22 320:24 336:7	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	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
Joshua 2:3,15 Jr 2:9,17 3:7 Juan 81:15 judge 34:13,22 77:5,11,18,22 77:24 164:10 200:16,18 236:15 238:6,7 298:12 300:5 300:12 331:15 331:19,24 332:13 333:1 July 146:9,20 147:1 170:5 180:4,15 185:14 186:7 187:9,12 194:7 203:23 204:1,2 204:11 305:14 305:16 345:7,8 345:11 347:10 347:13 jump 262:21 jumped 157:18 335:24 338:5 jumping 206:8 June 158:17 159:7,14,20 163:16 165:20 167:16 168:24 170:6,13,14,15 170:24 174:7 175:12 180:16 181:1,15 344:23 345:6 345:10 347:12 junkie 19:15 20:5 54:9	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 97:7 152:13 161:8 163:13 175:18 176:3,7 176:9,21 177:24 179:10 188:9,11,12	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 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		

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	
84:9,19 85:20	330:15 337:14	lockup 200:1,3	115:18 161:22	M
87:15 89:21	337:15 346:10	236:11,12,14	171:23 173:6,7	machine 13:5
96:14 123:11	live 39:16 40:3	Loevy 2:2,2 6:23	173:10,17	mad 196:9,12
131:2,5 132:13	47:4 56:5	100:21,21	177:15 179:8	Madden 136:5
136:14 138:12	63:19 149:12	logical 276:18	180:17 181:1	252:18
139:3 214:3	183:7 216:17	logically 204:21	185:14 186:23	Madison 56:20
Lewis's 29:12	216:18 304:22	long 17:24 32:4	225:16 231:10	56:21
56:24 87:11	322:10,17	32:6 51:14,16	270:3 273:1	Mahoney 239:6
lie 191:17	lived 16:8,23	51:20 55:22	338:6 343:5	mail 163:22
lieutenant 329:5	20:18,23 39:10	82:20 86:11	looks 343:16	165:6
330:6 340:20	39:19,19 40:1	93:18 97:9	Lords 306:8,9	mailbox 153:23
340:21 341:2	42:20 48:14,15	135:6 136:6,10	306:12	153:24 159:13
life 320:12	56:10,14 63:23	180:4 184:14	lose 203:10	161:24 163:2,4
light 31:22	115:6 149:13	200:13 207:13	246:23	163:8,17 164:8

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

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

Page 375

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

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		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
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 69:8 100:3,3,7 101:2,12,14,15 102:17 103:2 103:16 106:13 106:16 107:14 107:24 108:13 109:16 119:11 125:3,4,24 128:3,5 130:1 140:15,22 169:12,18,20 169:21 170:19 171:3,17 172:15 220:20 343:15 349:10 reading 103:7 103:11 113:10 113:15 236:2 ready 153:23,24 real 318:22,23	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
pulling 285:24 285:24 286:18 286:19	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		
punch 330:11,17 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				

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	relation 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
reword 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
	116:13 120:15	343:22 344:1	63:13 64:7	341:23
S	137:23 148:13	SCOLARO	66:13 69:5	seeing 156:1
S 2:19 5:11 68:3	157:23 161:24	2:19	70:4 93:9	233:4 304:5
S001437 169:13	164:16 165:4,5	scooter 338:8	98:18 103:13	seen 23:8,10
S016405 343:15	167:11 170:13	Scott 2:8	103:20 107:22	53:10 55:4,5
safety 192:22	173:17,23	sea 92:20	108:7,12	56:4 59:1,14
327:15	174:14 176:16	Seales 341:6	115:16,22	59:15 62:23
sale 22:14 46:2	188:15 192:7	search 190:18	117:24 118:10	63:15 69:9
57:9 139:4	192:13 193:9	190:20 192:24	118:12 119:18	72:24 136:16
sales 57:10 78:3	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

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

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

Page 386

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

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

Page 387

supplied 65:13	184:10 191:22	31:19 69:16	289:3,4,11	214:15 229:15
171:12 183:22	191:24 195:5	86:8 326:24	295:7 350:13	229:20 235:4,5
184:2 200:17	204:5 205:12	tac 290:24 291:3	Talawrence	239:20 243:3
308:23 339:20	207:15 210:14	292:18 293:19	201:19	257:21 281:8
supplier 36:8,13	212:3,7,19	294:3,3,6	talk 26:6,7,9	289:16 292:10
37:1,6,7,11	214:21 215:19	tactical 289:13	47:21 48:22	293:22,23
48:8 87:18,21	215:24 222:3	290:21	55:5 59:4	294:4,7 308:13
137:3,8 181:16	226:16 232:23	take 10:9 31:4,9	61:16 65:5,5,7	308:18 334:10
182:7,13,21	234:16 236:7	40:7,10 42:11	90:22 148:3	337:22 340:24
247:14,16	237:7,11,19	55:22 76:4	153:23,24	346:14,14,19
339:19	246:9 247:1	79:7 82:20	175:8 193:13	tall 261:10
supply 18:9	253:15 254:11	98:13 99:23	199:18 211:23	265:11 267:10
40:18 45:11	257:23 263:19	101:18 102:19	219:14 226:11	284:9,9 291:14
85:11 89:14	277:23 282:3	105:23 106:12	228:18 239:8	Tameka 270:19
129:22 183:12	283:16 284:15	107:13 110:24	244:5 300:18	270:20,21
184:11 202:17	287:5 291:9	115:13 117:17	326:5 345:23	tank 327:18
308:17	302:14,21	119:8 124:8,17	346:23	task 326:6,21
supplying 37:2	312:21 314:15	127:10 132:5	talked 36:6	328:18,21
37:16 73:13	315:18,19	137:13 140:9	38:19 40:7	329:1,15 331:1
132:14 133:2	316:24 326:11	141:16 145:8	67:11 94:23	331:15 332:12
184:15 322:8	326:14,19	152:19 155:3	129:17 174:21	Taurus 2:9
supposed	331:12 332:7	158:17 163:6	184:21 209:4	tax 14:18 217:20
212:13,14	343:5 345:7	167:24 173:5	293:23 308:16	217:23 219:1
237:14 297:3	surname 68:1,2	174:12 178:7	344:3	taxes 14:19
suppress 200:15	surprised 47:12	195:2 196:15	talking 16:12	104:19,24
sure 9:22,24	SUV 244:20,22	199:24 215:11	22:23 27:1	105:1 144:24
11:8 16:20	swam 97:20,21	234:2 241:12	31:7,8 34:4	312:7,10
23:6 24:8	176:11	244:8,10	37:18,19 39:2	Taylor 154:21
27:19 32:5	SWAP 174:1,2	247:22 251:24	40:20 42:2	team 110:13
35:3,17 38:24	swear 8:1	254:9,12	52:13 61:3,6	141:21,23
42:22 45:22,22	swearing 196:13	260:12 262:19	110:3,11 111:9	142:16 155:18
45:24 47:16,24	swimming 161:9	265:14,23	111:11,20	156:4 167:4,6
50:13 52:19,20	162:10,11	266:19 267:24	113:9,15,16,17	198:3 199:4,8
53:6,7,13,18	176:4,4,8	268:1 280:1	114:15 117:7	205:16 208:9
53:19 56:7,18	sworn 8:4,8	282:13 288:18	117:10,15	209:11 210:9
58:4,5,6 63:23	349:20 350:7	289:14 299:14	118:18 146:6	210:12,14,21
66:12 78:9,16	swung 274:9	299:22 302:1	146:16 151:15	211:2,3,19
81:21 82:5,22	330:18,19	310:5 328:4,6	151:15 164:4	232:3,6 239:19
82:23 85:5,7	system 26:11	329:10 341:3	167:11,22	240:1,10,16,19
85:19 88:8,8		341:20 347:17	173:16 181:19	243:4 290:24
89:16 93:21	T	taken 1:11,14	183:2 190:9,16	292:3 294:4,12
94:23 125:4	T 5:11	6:7,18 155:15	190:24 193:13	326:2 334:16
129:1 132:2	T-Mobile 129:1	195:17 236:15	193:14,15,17	336:2,19,22
139:6 150:13	T-shirt 59:8	237:1 242:15	193:19 198:22	337:2,18
150:14 184:8	table 17:7,8,9,15	242:17 285:3	211:2,14	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
themselves 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
Token 201:18	44:12 46:8	270:24,24	Twany 222:20	
told 29:19 55:24	71:22 72:6	271:1	222:23 223:3	U
59:19 65:10	transactions	trucks 127:9	223:22,23	U-Haul 264:9
76:2 137:2,6	36:7 52:11	true 12:15,20,23	224:1,14,17,18	Uh-uh 340:24
141:4 153:1,5	57:16 58:12	66:19,20 77:23	225:22,24	346:23
163:3 164:6,10	60:6,15,20	100:12 106:19	226:1,3,11,14	Uhlman 1:15
166:9,9,10,15	64:21 67:8	114:17 140:20	226:17,20	350:5 351:9
166:15,20	69:7 70:23	211:20 276:21	227:8 236:22	Uhlman-Jones
167:19,19	72:2,3 75:2	311:14 349:13	237:21 238:17	8:2
176:24 179:20	83:15 92:23	trunks 161:9	239:2,3	ultimately 200:7
188:12 198:10	93:16 108:22	162:10,11	Tweet 29:13,16	220:5 295:22
205:4,4 214:4	111:13 119:23	176:4,4	twelve 251:19	295:24 298:5
214:7 225:9	122:22 131:6	truth 12:1 347:1	two 25:6 32:20	300:9 301:13
228:20 241:23	150:20,24	347:3,6 350:8	32:23 35:24	understand 9:8
247:22 258:11	151:6,12,18	truthful 9:9	59:2 72:1,8	9:18,23 10:1
265:3,9 268:17	transcript	11:20 101:16	80:4 122:23	10:17,19 11:1
269:6,13,13	349:11,13	103:24 114:4,8	124:12 165:13	11:4 21:14
270:18,19	transferred	114:11 126:5	186:15 189:10	22:18 29:2,4
275:13 286:1	123:7	197:18	189:14 190:23	36:14 38:24
286:10,21	transpired 38:8	truthfully 9:13	194:15 203:13	40:20 41:14
287:13,15,19	transport 79:19	try 106:23	204:7 212:13	45:3,5 52:14
287:24 293:6	80:16 84:6	173:14 317:14	212:15 227:10	70:16 96:6,19

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

Page 391

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

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	148:9,15,16	wound 157:21
319:24 325:23	221:24 270:22	121:9,14,20	234:19 340:21	165:12 321:21
329:13 331:22	Winky's 222:12	122:8 123:23	words 204:19	write 287:24
333:17 342:1	winter 92:13	124:5 128:14	208:10	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	138:23 160:17	written 131:13
289:8	12:6,12 13:14	144:17 145:15	161:5 197:22	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	335:3 336:22	X
245:12,20	33:14 34:19	217:13 220:23	337:2	X 5:1,11
261:10 283:14	35:9 36:16	226:8 229:7	workers 181:6	
283:16 284:10	38:3 40:22	234:6 238:22	working 13:4	Y
291:17 329:21	41:16 43:16	239:1 242:20	32:3 35:13,14	y'all 203:8
329:23 330:5	44:3,9 45:4	242:23 249:7	160:20,21	205:23 225:4,6
333:9 335:5	46:6,16 47:11	249:11 250:10	178:14 188:1,4	225:7 256:15
whoo 197:13,13	48:20 49:9	251:5 258:1	188:5 205:22	265:9 266:11
wife 63:4 142:23	50:5 51:6	271:24 272:2	205:24 221:18	266:18 268:11
170:5,17	52:15 55:12	277:4 282:10	223:23 292:3	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	
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		1:05 121:13
101:6 103:1,21	225:6 226:22	329:2 334:3	Z	1:11 127:12
105:2 107:23	227:5 228:6,21	335:1,7 338:2	Zach 57:13 58:4	1:52 127:15
113:17 115:15	229:15 231:3	339:8,18,24	58:5 59:1 75:3	1:57 132:6
115:23 119:19	232:11,15,17	341:9,15,19	138:14	10 101:19
120:4 122:9	232:21 233:10	342:9 343:5,5	Zachary 51:9,10	102:12 105:13
124:14,14,19	236:1,16	344:9 345:7,14	51:15 52:3,5	239:10,23
128:1 129:17	239:17 240:14	345:16	52:11 53:17,21	240:15 241:6
129:20 131:10	244:2,21	year 11:9 80:7,8	54:2 55:3,7,20	241:22 243:16
134:1 135:22	246:17,20	82:16 94:17,20	55:24 57:6,11	254:7 263:22
137:23 142:1	247:18 248:17	107:17,19	57:16 58:24	264:4 305:14
142:12,24	248:17 249:3	119:9 120:15	62:3 74:2,14	305:16
144:22 145:2	251:5,23	120:22,24	78:3 79:2	10,000 82:14
147:6 149:6	252:13 256:10	135:9,17	83:10 117:14	10:13 1:18 6:12
151:3,9 152:3	261:10,14	145:20,21	122:16 138:4	350:15
155:2,21	264:13 265:16	146:11 154:13	138:11 139:13	10:56 42:13
158:10,12	265:19,22	213:12 300:20	zip-lined 97:19	100 291:20
159:19 160:8	266:11,14,24	301:23 302:20	Zoom 6:21 7:19	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	0	204:1,2,11
164:24 165:17	272:6 276:18	years 18:2 38:7	001437 169:14	239:14 244:5
171:3,3,12,14	277:10 279:2,4	51:19 67:12	03 195:4	246:5,24 247:8
172:22 173:5	279:7,7 280:4	80:5 102:4,5	04 146:9 147:1	249:21 254:7
174:3,16,20	280:7,23	102:14 107:6	159:14 170:6	257:22 263:3,5

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

Page 395

264:1,2 283:3 298:6 299:12 11:22 42:16 12 254:7 12:00 215:19 252:11,12 253:10 12:05 79:9 12:16 79:15 12:52 111:2 12:53 111:5 12:58 115:14 120 3:14 130th 13:5 14 159:7,20 163:16 167:16 14th 165:20 168:24 170:13 170:14 15 11:7 1600 2:20 161 351:9 17 108:3 170:6 170:24 174:7 180:15,16 1717 1:5 6:9 349:5 172 5:17 17th 170:15 175:12 18 29:21 19 1:5 6:9 349:5 19- 127:6 1990 300:24 301:7,20 302:1 302:8 1990s 308:13,18 308:23 309:2 309:13 310:11 310:23 311:2,8 311:11,14 312:5,9 316:17 1996 218:11,20 1997 108:17 306:18 312:16	1998 108:19 114:1,10,18 115:1,9 144:13 307:11,15 311:20 1999 18:1 311:23 <hr/> 2 2 5:15 105:23 106:6,8 107:14 115:19 117:19 169:24 171:17 2- 23:15 2,000 221:4 2:00 132:9 20 76:6,15,21,22 100:15 20- 61:5 200 2:12 2000 3:14 314:5 324:2 2000- 181:14 2000s 19:12 29:7 41:5 120:13 315:23 316:2 316:20 324:1 2001 312:21 314:5,11 2002 312:21 314:11 315:4 315:16 316:23 324:8,16,22 325:20 326:1 2003 194:19 2004 108:19 114:1,10,18 115:1,9 144:13 146:20 154:1,4 154:8 158:18 159:2,7,20 160:4 163:16 167:16 170:17 170:24 174:7 180:16 181:1	181:15 182:7 182:12 183:22 184:3,6,12,16 186:7 187:9 194:7,23 200:22 203:3 203:23 204:2 204:11 208:23 209:9 324:22 326:18 333:13 334:17 335:2 337:3 347:10 2005 125:13 126:2,11,15,19 126:24 208:19 209:1,10 212:11 215:7 216:3,5,8,13 216:13 221:20 226:12,18 230:20 237:2 238:2 239:10 239:23,23 240:15 241:6 241:22 243:16 249:14,17,21 250:6 254:3 257:20,22 263:3,22 264:1 264:4,14 290:12,15 298:6 300:3 324:17,19 326:10,15 2006 24:13 194:17 212:19 239:4 325:23 2008 80:9 201 2:12 2010 20:13 2012 30:1 2014 24:6 2016 11:7,11 15:9,18 23:10 23:15 24:2	38:21 74:3,11 75:1 94:19 2017 13:3,4,8,16 13:18 14:1,10 15:2,9,14,23 16:14 17:1,18 18:8 21:20 22:14,24 23:1 23:5,8 24:18 27:3,4,17 34:3 34:5 35:13,16 37:3 38:9,20 38:21 39:7,14 39:22 42:9 43:2 50:20 51:2 53:14,21 56:6,13 57:1 58:18 61:5 62:4,19 65:14 67:8 68:10 79:18 80:2 83:15 84:24 85:21 86:16 87:12,20 88:5 99:6,14 100:15 102:10 105:12 106:1 107:3 108:22 109:19 110:15 111:13 111:22 112:11 112:20 113:11 113:16,17 119:18,24 120:24 121:16 122:12 128:9 128:22 129:24 130:4,18 131:2 132:12 133:4 136:13 140:12 2018 39:24 40:2 42:9,10,20,24 46:22 47:8 53:17 56:13 57:1 58:18 61:5 62:4,19	63:18 67:8 79:18 80:2 83:16 84:24 85:22 86:16 87:12,20 108:23 109:19 110:16 128:9 128:23 129:24 130:5,18 131:2 132:12 133:4 136:13 170:2 170:23 2020 319:7 2021 319:6,7 2022 9:2,3,5 2023 1:18 6:11 349:12,21 350:14 351:2 206 152:2,5 162:21 305:9 338:13 344:14 22 209:1,10 216:13 22nd 176:4 216:4 23 208:19 211:23 212:11 215:7 226:12 226:18 230:20 237:2 238:2 239:23 290:12 300:3 348:1 23rd 215:24 219:15 222:2,6 239:10 246:6 300:10 24 331:7 24th 24:13 25 223:11 26th 49:22 236:17,21 2700 3:9 28 170:2,23 351:2 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	151:20 162:18	60603 2:21 3:10	92 302:22,22
3	258:7,15 259:6	162:21 171:19	60604 2:13 3:4	93 302:21,22
3 5:16 79:13	259:9,10,20,24	172:3 201:10	60606 3:20	93rd 178:22
117:17 137:14	262:11	201:12 213:7	60607 2:4	97 127:6 305:14
140:8	37th 196:24	216:5,9,14,17	60th 21:10	305:16 312:17
3,000 75:15	255:17 256:20	217:18 222:16	62- 21:1	98 127:6
221:6	257:4,6 260:8	247:16 249:4	6200 21:5	
3,200 75:16,21	329:11	249:21 271:5	6215 16:7 20:22	
3,600 75:16 76:9	3rd 2:4	272:22,23,24	21:3 23:14,15	
3:00 161:7	4	273:2 274:24	39:11 66:6	
162:13	4 5:17 51:19	275:11 276:3	117:4	
3:03 185:24	119:8,22 124:2	278:15 284:21	6251 16:8 20:20	
3:13 186:3	172:19,20,23	285:2 287:1,2	21:1	
3:30 251:3	4/20/2017 98:21	305:6 307:8,14	63rd 59:14,17	
30 274:16	4:54 268:3	307:18 308:9	6540 40:5,13	
30-something	47th 346:3	313:15 319:20	41:23 42:6	
331:21	5	334:6 341:16	117:8	
3050 351:10	5 5:18 51:19	344:12	7	
311 1:16 2:3	343:10,11,12	53 3:3	7 106:1 107:3	
3:19 6:4	343:19	540 333:22	140:12	
312.243.5900	5- 256:9 272:24	55 2:20	7:00 156:16,16	
2:5	5:11 268:6	559 333:22	161:4 178:16	
312.341.9646	50 52:7 253:16	56 347:24	79 5:14,15,16	
3:5	51 20:24 52:7	574 276:6,7,9,11	79th 213:13,14	
312.361.8851	511 162:19	276:17,21	7th 46:22	
351:11	201:10 255:19	277:13,18	8	
312.372.0770	256:9 258:9	278:6,10	8 5:5	
3:10	283:3 341:20	285:16,19,22	8:00 161:1,3	
312.422.9999	51st 155:7	286:13,24	178:17 248:14	
2:21	176:14 189:21	287:2,12,18	800 56:15	
312.427.3200	197:16 200:2,5	293:14 345:19	819 220:1	
2:13	236:16,16,17	575 276:11	866.786.3705	
312.982.0090	285:7 288:23	58th 253:14	3:15	
3:21	289:8 329:18	6	9	
33 3:9	329:19,21	6 137:16 138:2	9 1:18 6:11	
337 3:4	332:19,22	331:6 347:24	124:20,20	
343 5:18	333:3	6:00 180:9	125:17 264:14	
35th 257:13,15	5200 1:17 3:20	342:20 344:4	349:12 350:14	
257:17 258:2,4	6:4	6:15 180:10	9:00 248:14	
318:17,18	527 89:9 116:22	6:50 347:18	251:13	
360 31:9 32:24	117:12 125:19	6:53 347:21,24	90 300:23	
33:1 55:21	126:24 145:19	348:2	90s 120:14	
57:6	149:13 150:12	60601 351:10		
365 23:2		60602 3:15 6:5		