

Exhibit 52

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT-CRIMINAL DIVISION**

AFFIDAVIT OF LIONEL WHITE

I, Lionel White, being first duly sworn and under penalties of perjury, swear and state as follows:

1. In the late Winter and early Spring of 2006, I was living with my girlfriend Kimberly Collins at 575 E. Browning, Apartment 507, Chicago, IL.
2. During this time period, Sergeant Ronald Watts and Alvin Jones were well known to me. Indeed, everyone in the area knew them well. It was common knowledge that Watts and Jones were crooked police officers. Specifically, I was aware and it was generally well known that Watts and his crew were taking bribe payments from Wilbert Moore, who conducted drug sales in the next building – 574 E. Browning. Moore would give Watts a cut of his drug sales so Moore could continue selling without arrest or prosecution.
3. Approximately one month prior to my April 24, 2006 arrest in Case No. 06 CR 12092, I was at Kimberly's apartment. Rasaan Brakes and I believe several other people were with me. Kimberly was at her mother's house.
4. While we were there, there was a knock at the door and someone said "police." I opened the door, and Sgt. Ronald Watts, Alvin Jones, and other members of his crew entered. I don't know the names of the other officers.
5. When the officers entered the apartment, Watts immediately said to me: "Give me what you got. Them guys don't want you selling nothing." I understood this to mean that Watts wanted me to give him any drugs that were in the apartment, and I understood him to be referring to Wilbert Moore and his crew when Watts said "them guys."
6. I told Watts that I didn't have any illegal drugs in the apartment. Watts, Jones, and the other officers, however, stayed in the apartment and looked around for what felt like at least an hour. They cuffed me and Rasaan together and put us on the floor. Eventually, the officers left. But before he left, Watts said to me something to the effect of: "If he ever catch me wrong, I was gonnna pay."

7. On April 24, 2016, I was again home at apartment 507 at 575 E. Browning. Rasaan Brakes was again with me that day, but no one else. Rasaan Brakes then left. Almost immediately after he left, there was a knock on the door. I asked who it was and they said, "police."
8. I opened the door. Immediately upon opening the door, Alvin Jones hit me. Watts was the only other officer with him. Jones then said, "If we find one bag, we putting that bitch out." I interpreted that to mean that he was going to report my girlfriend Kimberly Collins to the housing authority and get her kicked out of the apartment.
9. I was really scared. At some point, I ran to the window and screamed for help because I wanted someone to witness what was going on. Jones grabbed me and just started beating me some more.
10. I had no drugs in the apartment. Jones and Watts, nevertheless, cuffed me and told me they were taking me to jail. I asked them what I was being charged with and Jones told me I was being charged with aggravated battery.
11. When I got to the station, Jones was typing up the report. He again told me that I was being charged with aggravated battery.
12. When I got to the lockup, I asked the turnkey guy what I was being charged with. He told me that I was being charged with both aggravated battery and drugs. I later learned they charged me with 100 bags of heroin.
13. Both charges were absolutely false. Jones assaulted me. And I did not have any drugs on me or in the apartment, let alone 100 bags of heroin.
14. After I was placed in lockup, I was taken to the hospital for the injuries Jones inflicted on me when he beat me. I told the lady who was treating me that Chicago police officer Alvin Jones beat me up. I had a cats scan or MRI while I was at the hospital.
15. The first time I went to court was on June 12, 2016. The State offered to reduce the charges in exchange for a five-year sentence. However, no attorney was available to me, so the case was continued for a couple of weeks.
16. On June 26, 2006, I was back in court. The State re-opened the offer for one day only. I was advised by the attorney in the courtroom that due to my background, since I was charged with a Class X felony, if I was found guilty of that offense I would automatically be sentenced to life without parole.
17. Since the State's Attorney said the plea deal was a one-time, one-day offer, I took the deal even though I was innocent. I pled guilty only because I was scared of the possibility of a life sentence.

18. I reviewed page 10 of the court transcript for June 26, 2006 with my current attorney. During the hearing, I tried to explain to the judge that I was innocent but pleading guilty only because I was scared. I was attempting to explain that officers were beating on me in my own home. When I referred to "they" or "people" beating on me, I was speaking of Alvin Jones and Ronald Watts.
19. At some point after my false arrest, I wrote the FBI and the Office of Professional Standards (OPS). I told them the same information that is in this affidavit.
20. After my conviction, I was taken first to Stateville. While at Stateville, I met with the Internal Affairs Division. This likely would have been in July 2006 or sometime that summer. I told Internal Affairs the same information that is in this affidavit. They wrote it down.
21. Not long after my arrival in Stateville, I was transferred to Dixon Correctional Center. While at Dixon, an investigator from OPS named O'Neil came and visited with me. He interviewed me about my complaint, and again, I told him the same things that are in this affidavit. During the interview, the investigator showed me a lineup photo of officers. I picked out Alvin Jones from that lineup as the individual officer that assaulted me and framed me for this case.
22. I was released from the Department of Corrections in 2008. After I was released, I often saw Watts and Jones still in the neighborhood. I avoided Jones. But I did confront Watts one time and said to him: "What you did to me was wrong." Watts simply replied: "You just caught the bad end of the stick."
23. I believe Watts and Jones targeted me for this false arrest and wrongful conviction because I refused to bribe them. They were well known for retaliating against people in the community in this way if people didn't pay them off.

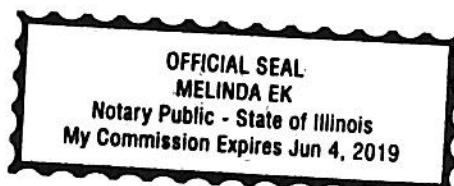
Under penalties as provided by law pursuant to 735 ILCS 5/1-109, the undersigned certifies that the facts set forth in this instrument are true and correct, except as to matters stated to be on information and belief and as to such matters the undersigned certifies that he believes the same to be true.

Lionel White
Lionel White

Subscribed and sworn to me,



On this day 25th day of August, 2016



PL JOINT 050541