

# Exhibit 69



Transcript of the Continued Deposition of  
**Clarissa Glenn**

**Case:** In Re: Watts Coordinated Pretrial Proceedings  
**Taken On:** September 20, 2023

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

IN RE WATTS COORDINATED PRETRIAL )  
PROCEEDINGS, )  
 ) No. 19 CV 1717  
 )

The continued deposition of CLARISSA  
GLENN, taken pursuant to the Federal Rules of Civil  
Procedure of the United States District Courts  
pertaining to the taking of depositions, taken via  
videoconference before KRISTA R. DOLGNER, Registered  
Professional Reporter and Certified Shorthand  
Reporter of the State of Illinois, on Wednesday,  
September 20, 2023, at 10:00 a.m.

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1     ALSO PRESENT:

2             MR. MATTHEW SANDELIN, Video Instanter  
3             MR. LO RAMANUJAM, Hale & Monico, LLC

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10	Glenn Deposition Exhibit	
11	No. 10 .....	13
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<p style="text-align: right;">Page 6</p> <p>1 THE VIDEOGRAPHER: Recording. For the record, 2 my name is Matt Sandelin of Video Instanter. I'm 3 the video recording device operator for this 4 deposition. Our business address is 134 North 5 LaSalle Street, Suite 1400, Chicago, Illinois 60602. 6 This remote deposition is being video recorded 7 pursuant to the Federal Rules of Civil Procedure and 8 all other applicable rules. 9 This is the deposition of Clarissa Glenn 10 being taken in the matter of In Re: Watts 11 Coordinated Pretrial proceedings, Case Number 19 CV 12 1717, in the United States District Court for the 13 Northern District of Illinois, Eastern Division. 14 Today's date is September 20th, 2023, and the time 15 is 10:05 a.m. 16 Will the witness please identify herself 17 for the record by stating your full name and 18 location, please? 19 THE WITNESS: Clarissa Glenn. I'm at 311 North 20 Aberdeen, Chicago, Illinois. 21 THE VIDEOGRAPHER: This deposition is being 22 video recorded at the instance of the defendants and 23 is being taken on behalf of the defendants. 24 Would the attorneys present please</p>	<p style="text-align: right;">Page 8</p> <p>1 and please swear in the witness. 2 THE REPORTER: Hello. My name is Krista 3 Dolgner with Royal Reporting Services. 4 Would you raise your right hand, please, 5 Ms. Glenn? 6 (Witness sworn.) 7 THE REPORTER: Thank you. 8 MS. OLIVIER: Good morning. Let the record 9 reflect that this is Volume 2, the continuation of 10 the deposition of Ms. Clarissa Glenn, that is being 11 taken pursuant to notice and on today's date by 12 agreement of the parties following Judge Finnegan's 13 court ruling regarding this continuation of her 14 deposition. 15 WHEREUPON: 16 CLARISSA GLENN, 17 called as a witness herein, having been first duly 18 sworn, was examined and testified further via video 19 conference as follows: 20 EXAMINATION 21 BY MS. OLIVIER: 22 <b>Q. Ms. Glenn, have you done any preparation</b> 23 <b>for today's deposition?</b> 24 A. Yes.</p>
<p style="text-align: right;">Page 7</p> <p>1 introduce themselves for the record by stating their 2 name, location, and who they represent, please? 3 MR. TEPFER: This is Josh Tepfer. I represent 4 the plaintiff, Clarissa Glenn, and I'm with her at 5 our West Loop office. 6 MR. FLAXMAN: I am Kenneth Flaxman for the 7 Flaxman plaintiffs. I'm in Cook County, Illinois. 8 MS. OLIVIER: Kelly Olivier for the 9 Hale &amp; Monico individual defendants. I am in 10 Chicago, Illinois at 53 West Jackson. 11 MR. GAINER: Brian Gainer -- 12 MR. BURNS: Terrence Burns on behalf of the 13 City of Chicago, Cline, Kirby, and Rowan, and I'm in 14 Chicago. 15 MR. GAINER: Brian Gainer on behalf of Ron 16 Watts. I'm remote in Chicago. 17 MR. DAFFADA: Jim Daffada on behalf of Nick 18 Spaargaren and Matt Cadman. I'm remote in Wilmette, 19 Illinois. 20 MR. PALLES: This is Eric Palles for Kallatt 21 Mohammed. I'm remote from 55 West Monroe in 22 Chicago. 23 THE VIDEOGRAPHER: Okay. Would the court 24 reporter please swear -- please introduce themselves</p>	<p style="text-align: right;">Page 9</p> <p>1 <b>Q. All right. What have you done to prepare?</b> 2 A. Briefly skimmed over some paperwork. 3 <b>Q. Did you note any changes or edits that</b> 4 <b>needed to be made in your view to any of that</b> 5 <b>paperwork?</b> 6 A. No. 7 <b>Q. Okay. Did you note any inaccuracies or</b> 8 <b>anything like that on any of the paperwork that you</b> 9 <b>reviewed?</b> 10 A. From previous, yeah. Yes. 11 <b>Q. Okay. What? What did you note was</b> 12 <b>inaccurate?</b> 13 A. Just some things here and there. It's a 14 pile of sheets. So I just noted like little notes 15 that I felt that was -- that I personally felt that 16 was inaccurate. So those are the same notes that I 17 had taken previously before my first deposition. 18 <b>Q. Okay. So the last time that we met back</b> 19 <b>in August of 2021, we went through an interview that</b> 20 <b>was transcribed or -- transcribed, written down,</b> 21 <b>memorialized by COPA investigators. And at that</b> 22 <b>time -- and subsequent to that deposition, you</b> 23 <b>indicated that you had made changes and notes on the</b> 24 <b>COPA interview. Is that what you're referencing, or</b></p>

6 (Pages 6 to 9)



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Page 10	<p>1 are there additional notes that you've taken since</p> <p>2 our last deposition?</p> <p>3 A. I'm not sure what you're referencing to.</p> <p>4 Well, I know what you said, COPA. I'm not sure if</p> <p>5 these are actually from COPA. It's just a lot. And</p> <p>6 these are prior to. So I have not made any more</p> <p>7 changes from previous for today.</p> <p>8 Q. Okay. So one moment.</p> <p>9 A. Every -- all the paperwork is the same</p> <p>10 from previous, the first time.</p> <p>11 Q. Did you review any additional paperwork</p> <p>12 since your last deposition?</p> <p>13 A. No.</p> <p>14 Q. Okay. Did you make any additional notes</p> <p>15 on any paperwork since your last deposition?</p> <p>16 A. No.</p> <p>17 MS. OLIVIER: Okay. I'm going to be marking</p> <p>18 this as Exhibit 12. And I know that's out of order,</p> <p>19 but I've premarked some exhibits. So I'm just going</p> <p>20 be to be marking this as Exhibit 12. For the</p> <p>21 parties, this is Bates-stamped Plaintiffs' Joint</p> <p>22 54677 through 54698.</p> <p>23 (Glenn Exhibit 12 marked.)</p> <p>24</p>	Page 12	<p>1 A. Yes.</p> <p>2 Q. Page 4?</p> <p>3 A. Yes.</p> <p>4 Q. Page 5?</p> <p>5 A. Yes.</p> <p>6 Q. Page 6?</p> <p>7 A. Yes.</p> <p>8 Q. Page 7?</p> <p>9 A. Yes.</p> <p>10 Q. Page 8?</p> <p>11 A. Yes.</p> <p>12 Q. Page 9?</p> <p>13 A. Yes.</p> <p>14 Q. And then page 10 at the top portion?</p> <p>15 A. Oh, yes.</p> <p>16 Q. All right. And is this the paperwork that</p> <p>17 you reviewed prior to your last deposition, and that</p> <p>18 you're indicating this is the only paperwork that</p> <p>19 exists that you have made notes on since your last</p> <p>20 dep -- well, ever; is that correct?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. Great. I'm next going to be</p> <p>23 sharing my screen and showing you what I have marked</p> <p>24 as Exhibit 10, which are Ben Baker and Clarissa</p>
Page 11	<p>1 BY MS. OLIVIER:</p> <p>2 Q. Ms. Glenn, do you see the document that</p> <p>3 I'm sharing on my screen?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. I'm going to briefly scroll through</p> <p>6 this, just actually the first, I believe, ten pages.</p> <p>7 So do you see at the top how this is titled COPA</p> <p>8 Investigative Report Log Numbers 1087742, 1089229,</p> <p>9 and 1089231?</p> <p>10 A. Yes.</p> <p>11 Q. All right. And the subject is Interview</p> <p>12 of Complainant and Witness Clarissa Glenn dated</p> <p>13 November 28th, 2018; Report by Investigator Greg</p> <p>14 Masters?</p> <p>15 MR. TEPFER: You got to answer the question.</p> <p>16 BY THE WITNESS:</p> <p>17 A. What was the question? Did I see it?</p> <p>18 Yes. Yes. Yes. Yes.</p> <p>19 Q. Is this your handwriting on page 1 of this</p> <p>20 report?</p> <p>21 A. Yes.</p> <p>22 Q. Is this your handwriting on page 2?</p> <p>23 A. Yes.</p> <p>24 Q. Is this your handwriting on page 3?</p>	Page 13	<p>1 Glenn's February 20 -- 22, 2018 Supplemental</p> <p>2 Responses to Defendant Officer Brian Bolton's First</p> <p>3 Set of Interrogatories.</p> <p>4 (Glenn Exhibit 10 marked.)</p> <p>5 BY MS. OLIVIER:</p> <p>6 Q. Ms. Glenn, do you see the document that</p> <p>7 I'm sharing on my screen?</p> <p>8 A. Yes.</p> <p>9 Q. Okay.</p> <p>10 MR. TEPFER: Kelly, is this the version that</p> <p>11 was sent this morning?</p> <p>12 MS. OLIVIER: No, this is the previous one. So</p> <p>13 I'll scroll down, and I'll get there.</p> <p>14 MR. TEPFER: Sorry.</p> <p>15 MS. OLIVIER: No problem.</p> <p>16 BY MS. OLIVIER:</p> <p>17 Q. So this is a nine-page document. I'm</p> <p>18 going to scroll down. Well, first, there's a</p> <p>19 Supplemental Response to Interrogatory Number 11.</p> <p>20 And I'm now scrolling through. And on the</p> <p>21 verification page at page 9, Ms. Glenn, is that your</p> <p>22 electronic signature with the date of November 10th,</p> <p>23 2021?</p> <p>24 A. Yes.</p>

7 (Pages 10 to 13)

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Page 14	<p>1 <b>Q. Okay. Do you recall submitting a</b></p> <p>2 <b>supplemental response to Defendant Bolton's First</b></p> <p>3 <b>Set of Interrogatories in November of 2021?</b></p> <p>4 A. No.</p> <p>5 <b>Q. Okay. You don't recall -- do you have any</b></p> <p>6 <b>disagreement or any dispute with the fact that your</b></p> <p>7 <b>electronic signature is on this document?</b></p> <p>8 A. No.</p> <p>9 MS. OLIVIER: Okay. I'm now going to be</p> <p>10 sharing my screen with what I have previously marked</p> <p>11 as Exhibit 11, which is the supplemental answers to</p> <p>12 interrogatories we received this morning. I'm</p> <p>13 sorry. One moment.</p> <p>14 (Glenn Exhibit 11 marked.)</p> <p>15 BY MS. OLIVIER:</p> <p>16 <b>Q. Ms. Glenn, do you see the document that</b></p> <p>17 <b>I'm sharing on my screen that I'm marking as</b></p> <p>18 <b>Exhibit 11?</b></p> <p>19 A. Yes.</p> <p>20 <b>Q. And this is a Supplemental Answer to</b></p> <p>21 <b>Interrogatory Number 10, which requests your</b></p> <p>22 <b>employment history. I'm just scrolling through.</b></p> <p>23 <b>There's a total of 12 pages. You've also provided a</b></p> <p>24 <b>supplemental response to Interrogatory Number 11.</b></p>	Page 16	<p>1 <b>your attorneys before appearing here today, correct?</b></p> <p>2 A. Yes.</p> <p>3 <b>Q. Okay. I briefly did just want to go over</b></p> <p>4 <b>a couple of your updated responses. And I'll get</b></p> <p>5 <b>into them a little bit more in depth later in</b></p> <p>6 <b>today's deposition; but just initially, one of the</b></p> <p>7 <b>updates was that from January 2022 through April</b></p> <p>8 <b>2023 you've updated your employment with Amazon at</b></p> <p>9 <b>their fulfillment center in Matteson, Illinois,</b></p> <p>10 <b>correct?</b></p> <p>11 A. Correct.</p> <p>12 <b>Q. Okay. And then you had to stop working</b></p> <p>13 <b>due to a work injury that occurred there?</b></p> <p>14 A. Yes.</p> <p>15 <b>Q. Okay. Was there any sort of workers'</b></p> <p>16 <b>compensation claim or any lawsuit that you filed as</b></p> <p>17 <b>a result of that injury?</b></p> <p>18 A. Yes.</p> <p>19 <b>Q. Okay. Is that still ongoing or pending?</b></p> <p>20 A. No.</p> <p>21 <b>Q. Okay. What was the result? What was the</b></p> <p>22 <b>litigation? What -- what transpired?</b></p> <p>23 A. With the outcome?</p> <p>24 <b>Q. Yes. With the injury. Did you file a</b></p>
Page 15	<p>1 <b>I'm continuing to scroll. And there's a</b></p> <p>2 <b>Supplemental Response to Interrogatory Number 13.</b></p> <p>3 <b>Do you recall going over these questions</b></p> <p>4 <b>and answers with your attorneys prior to today,</b></p> <p>5 <b>Ms. Glenn?</b></p> <p>6 A. No.</p> <p>7 <b>Q. Okay. To the extent that your employment</b></p> <p>8 <b>history was updated as of this morning, did you go</b></p> <p>9 <b>over that updated employment history with your</b></p> <p>10 <b>attorney?</b></p> <p>11 A. Yes. We just made that, yes.</p> <p>12 (Glenn Exhibit 11A marked.)</p> <p>13 BY MS. OLIVIER:</p> <p>14 <b>Q. Okay. And this is your -- what I'm</b></p> <p>15 <b>marking as Exhibit 11A, is that your signature with</b></p> <p>16 <b>today's date?</b></p> <p>17 A. Yes.</p> <p>18 <b>Q. Okay. And do you understand that when you</b></p> <p>19 <b>were executing this document, you were verifying</b></p> <p>20 <b>that your responses in Exhibit 11, the supplemental</b></p> <p>21 <b>responses that I just showed you, that you were</b></p> <p>22 <b>verifying to their truthfulness and their accuracy?</b></p> <p>23 A. Yes.</p> <p>24 <b>Q. Okay. And you went through those with</b></p>	Page 17	<p>1 <b>claim through workers' comp? Kind of walk me</b></p> <p>2 <b>through what happened.</b></p> <p>3 A. I contacted the HR department to submit</p> <p>4 doctor information and therapy information, and I</p> <p>5 received Workmen's comp and holiday pay from my</p> <p>6 employment.</p> <p>7 <b>Q. And that was all through Amazon?</b></p> <p>8 A. Yes.</p> <p>9 <b>Q. Okay. And then you -- what type of</b></p> <p>10 <b>injuries did you sustain?</b></p> <p>11 A. Carpal tunnel. Injury to my right,</p> <p>12 dominant hand.</p> <p>13 <b>Q. Did you have to have any sort of surgery</b></p> <p>14 <b>as a result of that?</b></p> <p>15 A. Yes.</p> <p>16 <b>Q. When did you have that surgery?</b></p> <p>17 A. December 2022.</p> <p>18 <b>Q. Okay. All right. And then you stopped</b></p> <p>19 <b>working there after that surgery in April of 2023?</b></p> <p>20 A. Yes.</p> <p>21 <b>Q. Okay. And then you've since returned to</b></p> <p>22 <b>Amazon as of August 20th, 2023?</b></p> <p>23 A. Yes.</p> <p>24 <b>Q. Okay. Are you still suffering from the</b></p>

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<p style="text-align: right;">Page 18</p> <p>1 carpal tunnel or any of the effects of the surgery, 2 or have they been -- 3 A. Not as much. Not like how it was. 4 Q. Okay. 5 A. I was -- not as much. 6 Q. What were you doing -- or were you 7 receiving any sort of income from Amazon or workers' 8 comp from April 2023 through August 2023 or 9 disability, anything like that? 10 A. I did receive compensation through work. 11 Q. All right. Do you know what that was kind 12 of titled as, what type of compensation it was, 13 whether it was -- whether you were on disability, or 14 was it a workers' compensation payment? 15 A. No, I don't know. 16 Q. Okay. You also supplemented in your 17 responses some speaking engagements that you've had 18 of -- or times that you've spoke about your case 19 since our -- your last deposition in August of 2021. 20 For example, you indicated that you spoke to the 21 press in August of 2022, and you also had some 22 engagements in November of 2021. 23 I have a question for you regarding your 24 conversations with Grace Hauck or Hauck -- I'm</p>	<p style="text-align: right;">Page 20</p> <p>1 that she said it was going to be published. I don't 2 recall. So that's why I say I believe it was 3 published, but I don't recall reading it or getting 4 any documents or information from her. 5 Q. Do you know -- do you know what the 6 substance of the article was going to be about? 7 A. Me personally. I think it was more geared 8 towards me and my family. 9 Q. Do you recall kind of what the angle was? 10 MR. TEPFER: Objection to the form of the 11 question. 12 Go ahead. 13 BY THE WITNESS: 14 A. I can't think for her. So I don't know. 15 Q. You mentioned that it was more towards you 16 and your family. Did you discuss your arrest from 17 December of 2005 with her? 18 A. I don't recall that. 19 Q. Okay. Did you discuss with her any of the 20 court proceedings that you went through or your 21 petition for clemency? 22 A. No. 23 Q. Did you discuss your husband -- 24 ex-husband, Mr. Baker?</p>
<p style="text-align: right;">Page 19</p> <p>1 probably mispronouncing that last name -- spelled 2 H-A-U-C-K, a reporter from USA Today. You indicate 3 that you spoke with her at various times in 2022 and 4 2023. Do you know how many times you've spoken with 5 that reporter? 6 A. I do not recall. 7 Q. Okay. Was it over the phone, Zoom, in 8 person? 9 A. I believe -- it was over the phone, I 10 believe. 11 Q. Okay. Do you recall what you discussed 12 with her? 13 A. I believe she asked me -- not offhand, no. 14 Q. Okay. 15 A. No. 16 Q. Has there -- to your knowledge, has any 17 sort of article been drafted or published? 18 A. I think there was an article published. I 19 didn't -- I don't recall reading it or seeing it. 20 Q. What makes you believe that it was, in 21 fact, published? 22 A. I believe that was one of her calls to me, 23 to say that her editor maybe or higher-up was very 24 interested in the -- in her article. And I think</p>	<p style="text-align: right;">Page 21</p> <p>1 A. No. We don't -- no. 2 Q. Okay. 3 A. Not him. 4 Q. Were you discussing your current life? 5 A. I don't recall. 6 Q. Okay. Did she -- do you know if she sent 7 you a copy of the article or a draft? 8 A. No. No. And if she -- I did not get a 9 copy, you know, a physical copy. I think maybe I 10 received something in an e-mail maybe. I just 11 didn't -- I believe I did. I didn't look at it. 12 Q. Is there a reason why? 13 A. I just don't because the memories are not 14 good. So I just don't need to relive it, to relive 15 my situation, so I don't. 16 Q. If you weren't talking with her about your 17 December 2005 arrest, what other memories are you 18 referencing that are not good that you wouldn't want 19 to read? 20 MR. TEPFER: Objection. Mischaracterizes the 21 testimony, form. 22 You can answer the question, if you can. 23 BY THE WITNESS: 24 A. I think that we talked about my boys, how</p>

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<p style="text-align: right;">Page 22</p> <p>1 many kids, my siblings. Like, I don't recall. It's</p> <p>2 kind of vague. So just remembering and thinking</p> <p>3 about my family, period. It wasn't -- it wasn't a</p> <p>4 happy time during that time and what they had to go</p> <p>5 through.</p> <p>6 <b>Q. What time period specifically are you</b></p> <p>7 <b>referencing that you spoke with her about?</b></p> <p>8 A. I don't recall that. It would have to be</p> <p>9 the time that I had a felony. I was given a felony.</p> <p>10 So I'm assuming -- not assuming. It would be in</p> <p>11 that time frame, ten plus years.</p> <p>12 <b>Q. All right. I'm now going to go through</b></p> <p>13 <b>and kind of take -- pick up where we left off from</b></p> <p>14 <b>our last deposition and just ask you some questions</b></p> <p>15 <b>about your knowledge about your -- some of your</b></p> <p>16 <b>ex-husband's arrests and then kind of go from there.</b></p> <p>17 <b>Okay?</b></p> <p>18 A. You're going to ask me -- I'm sorry --</p> <p>19 about my ex -- you're going to ask me about my</p> <p>20 ex-husband?</p> <p>21 <b>Q. Yes. And his arrests and your memories of</b></p> <p>22 <b>his arrests.</b></p> <p>23 MR. TEPFER: I'll just object to the form of</p> <p>24 ex-husband. But go ahead.</p>	<p style="text-align: right;">Page 24</p> <p>1 A. Okay. Yep. Yes.</p> <p>2 <b>Q. So we know who we're talking about.</b></p> <p>3 A. Okay.</p> <p>4 <b>Q. All right. So the last time we went</b></p> <p>5 <b>through your COPA report, which did go kind of in</b></p> <p>6 <b>depth to the events that transpired prior</b></p> <p>7 <b>December 11th, 2005. We also talked a little bit</b></p> <p>8 <b>about what's been termed as the mailbox case from</b></p> <p>9 <b>June of 2004. I want to focus your attention first,</b></p> <p>10 <b>though, on Ben's arrest related to that mailbox case</b></p> <p>11 <b>on July 11th, 2004.</b></p> <p>12 <b>Do you remember or have any, like,</b></p> <p>13 <b>personal knowledge or memories of his arrest on</b></p> <p>14 <b>July 11th, 2004, in relationship to the narcotics</b></p> <p>15 <b>that were recovered from the mailbox?</b></p> <p>16 MR. TEPFER: Objection --</p> <p>17 BY THE WITNESS:</p> <p>18 A. No.</p> <p>19 MR. TEPFER: -- to the form of the last part.</p> <p>20 But go ahead.</p> <p>21 BY THE WITNESS:</p> <p>22 A. No. No, not right offhand.</p> <p>23 <b>Q. Okay. We talked about briefly at your</b></p> <p>24 <b>last deposition, and you noted that you believed</b></p>
<p style="text-align: right;">Page 23</p> <p>1 BY MS. OLIVIER:</p> <p>2 <b>Q. Are you married to Mr. Baker again?</b></p> <p>3 A. We are, unfortunately, divorced due to</p> <p>4 the -- the things that's been going on.</p> <p>5 <b>Q. Okay. What do you prefer me to call</b></p> <p>6 <b>Mr. Baker? Just Mr. Baker? Is that the easiest</b></p> <p>7 <b>thing?</b></p> <p>8 A. Whatever you feel. I know how to answer</p> <p>9 and not know to answer. I'm a big girl.</p> <p>10 <b>Q. Well, I don't want to offend you in any</b></p> <p>11 <b>way or get you upset. So if ex-husband is not</b></p> <p>12 <b>working, tell me what to call him.</b></p> <p>13 A. Honestly -- and thank you for that. I</p> <p>14 would like if you don't say the ex-husband, if you</p> <p>15 don't mind.</p> <p>16 <b>Q. That's fine.</b></p> <p>17 A. And I appreciate that. Thank you.</p> <p>18 <b>Q. Okay. Is Mr. Baker good?</b></p> <p>19 A. Ben is fine, yeah.</p> <p>20 <b>Q. Or Ben? Okay.</b></p> <p>21 A. Yes.</p> <p>22 <b>Q. Well, I don't want to get confused with</b></p> <p>23 <b>Ben, Jr. and Ben, Sr. So I'll just call him</b></p> <p>24 <b>Mr. Baker. Is that fair?</b></p>	<p style="text-align: right;">Page 25</p> <p>1 <b>that you thought that you found out that Ben had</b></p> <p>2 <b>been arrested on July 11th, 2004, that same day. Do</b></p> <p>3 <b>you recall seeing him being physically arrested or</b></p> <p>4 <b>being present when he was physically -- or</b></p> <p>5 <b>physically arrested on July 11th, 2004? It was a</b></p> <p>6 <b>Sunday at approximately 11:46 a.m.</b></p> <p>7 A. For the mailbox case, I think he was at</p> <p>8 home when he was arrested. I believe he was at</p> <p>9 home.</p> <p>10 <b>Q. When you say "at home," are you</b></p> <p>11 <b>referencing Apartment 206 in the 527 building?</b></p> <p>12 A. Yes, uh-huh.</p> <p>13 <b>Q. Was he physically within the apartment at</b></p> <p>14 <b>the time?</b></p> <p>15 A. Most likely, yes.</p> <p>16 <b>Q. Were you also with him physically in the</b></p> <p>17 <b>apartment at that time?</b></p> <p>18 A. Was I with him in the apartment?</p> <p>19 <b>Q. Yes.</b></p> <p>20 A. I was in the apartment, if I'm reflecting</p> <p>21 in my memory right. I was in the apartment, if I'm</p> <p>22 thinking of the same date.</p> <p>23 <b>Q. Okay. And what do you recall about what</b></p> <p>24 <b>occurred that morning with respect to Mr. Baker and</b></p>

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1 **his arrest?**  
 2 A. Oh, yeah. Okay. He had company. If I'm  
 3 recalling it right, he had company in the sitting  
 4 area, living room. We call it the living room,  
 5 which is the family room, sitting room. I was in, I  
 6 believe, the bedroom. There was a knock at the  
 7 door. I got up, answered the door. That's when  
 8 Watts and AJ came in.  
 9 Wait, wait. Yeah. I believe that's when  
 10 Watts and AJ came in. They came so often, I should  
 11 have gave them a room. I think that's when they  
 12 came in, and they arrested Ben and Elgin. That's  
 13 who the company was, I believe, if this is the same  
 14 time. They arrested both of them. That's what I  
 15 believe that happened, yes.  
 16 **Q. Was there any other officers that you**  
 17 **recall being present besides Watts and AJ?**  
 18 A. Because they come so often, those are the  
 19 ones that I really remember coming in. I don't  
 20 recall anyone else because those are the -- one of  
 21 the main key people that always come.  
 22 **Q. Do you remember there being other -- maybe**  
 23 **not remembering who they were, but other officers**  
 24 **being present or just those two officers?**

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1 A. Honestly, I don't recall.  
 2 **Q. Okay.**  
 3 A. I don't recall. It was tunnel -- I have  
 4 tunnel vision.  
 5 **Q. And so there was a knock on the door. You**  
 6 **opened the door upon hearing the knock?**  
 7 A. I believe I did. I believe I just opened  
 8 the door.  
 9 **Q. Okay. And then did they ask to come in,**  
 10 **and you let them in? Or what happened? How did**  
 11 **they enter the apartment?**  
 12 A. They just come in, you know. They don't  
 13 ask. They don't ask. There's no disrespect. They  
 14 don't ask to come in. They just come in.  
 15 **Q. So they just walked in, and then is your**  
 16 **living room or where -- the sitting area where Ben**  
 17 **and Elgin were seated, is that like -- where is that**  
 18 **located once you enter through the door of your**  
 19 **apartment at 206?**  
 20 A. So it's a love seat on one wall and a  
 21 couch on another wall that's facing towards each  
 22 other.  
 23 **Q. Okay.**  
 24 A. So then as you come into the door, you can

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1 look, and you can see both -- or the couch and the  
 2 love seat. So they came in. One of them said,  
 3 "Stand up." Watts or somebody said, "Stand up. Put  
 4 your hands behind your back."  
 5 And I think Ben said, "For what?" And  
 6 something about mailbox or something. And that was  
 7 the extent of that in the apartment.  
 8 **Q. Was it just Ben and Elgin that were**  
 9 **present in that front sitting area that day?**  
 10 A. Yes.  
 11 **Q. Okay.**  
 12 A. Yes.  
 13 **Q. And Elgin, that's Elgin Moore?**  
 14 A. Yes.  
 15 **Q. And you -- Elgin Moore was a friend of**  
 16 **your husband's or an acquaintance?**  
 17 A. Acquaintance and a resident.  
 18 **Q. Okay. Did you know that Mr. Moore worked**  
 19 **for your husband as a drug dealer for him?**  
 20 A. I didn't know that Ben had employees or  
 21 did W-2s, so, no, I'm unaware.  
 22 **Q. So does that make it -- I mean, Ben has**  
 23 **been -- he's testified in this case, and he's**  
 24 **indicated he never filed W-2s because he didn't**

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1 **consider selling drugs to be employment that would**  
 2 **be generating income, so to speak. So --**  
 3 A. Okay.  
 4 **Q. -- what I'm wondering is, just based off**  
 5 **your answer, did you know that Ben and Elgin sold**  
 6 **drugs together?**  
 7 A. I did not know Ben was selling drugs until  
 8 I found out in court, when he testified in court.  
 9 And as far as Elgin, I have no personal dealings  
 10 with Elgin Moore. So I do not know what he does and  
 11 what he does not do.  
 12 **Q. Okay. So at your last deposition in**  
 13 **August of 2021, you indicated that you began to**  
 14 **have -- maybe not suspicions, but you started**  
 15 **assuming and kind of doing your own investigation**  
 16 **about Ben dealing drugs beginning on Mother's Day of**  
 17 **2004, which would be before July of 2004.**  
 18 **But you just told me now that you didn't**  
 19 **find out that Ben was dealing drugs until he**  
 20 **testified in court. So I'm just trying to figure**  
 21 **out, when did you find out in your memory or when**  
 22 **did you know that your ex -- sorry -- Mr. Baker --**  
 23 **Mr. Baker was a drug dealer?**  
 24 MR. TEPFER: Objection to the form,

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<p style="text-align: right;">Page 30</p> <p>1 mischaracterizes testimony, and it's not</p> <p>2 inconsistent.</p> <p>3 But go ahead.</p> <p>4 BY THE WITNESS:</p> <p>5 A. In court, in open court.</p> <p>6 <b>Q. Which case was this in relation to?</b></p> <p>7 A. He had so many. I can't recall. And he</p> <p>8 had so many court cases back to back. I apologize.</p> <p>9 <b>Q. Sure. Did you ever see Elgin Moore</b></p> <p>10 <b>dealing drugs?</b></p> <p>11 A. Again, I'm not Elgin Moore's caretaker,</p> <p>12 so, yeah.</p> <p>13 <b>Q. So my question is a little different. It</b></p> <p>14 <b>was, did you ever see him dealing drugs?</b></p> <p>15 A. No.</p> <p>16 <b>Q. Okay. Did you ever see Mr. Moore</b></p> <p>17 <b>possessing drugs?</b></p> <p>18 A. No.</p> <p>19 <b>Q. Okay. Did you see -- well, was Mr. Moore</b></p> <p>20 <b>arrested on July 11th, 2004, with your husband to</b></p> <p>21 <b>your memory, or was it just -- excuse me. I'm</b></p> <p>22 <b>sorry.</b></p> <p>23 <b>Was Mr. Moore arrested with Mr. Baker on</b></p> <p>24 <b>July 11th, 2004?</b></p>	<p style="text-align: right;">Page 32</p> <p>1 question.</p> <p>2 BY THE WITNESS:</p> <p>3 A. A conversation. What conversation?</p> <p>4 <b>Q. Well, you said that Ben said, "What are</b></p> <p>5 <b>you arresting me for?" Right?</b></p> <p>6 A. Yes.</p> <p>7 <b>Q. Okay. And then who responded? Or did</b></p> <p>8 <b>anyone respond?</b></p> <p>9 A. I believe Watts responded. A mailbox.</p> <p>10 Drugs that we got out the mailbox.</p> <p>11 <b>Q. All right. And then what happened next?</b></p> <p>12 A. I believe Ben said, "That's some</p> <p>13 bullshit." And they were escorted out, Ben and</p> <p>14 Elgin Moore.</p> <p>15 <b>Q. Do you recall which officer escorted Ben</b></p> <p>16 <b>out?</b></p> <p>17 A. Watts.</p> <p>18 <b>Q. Okay. And then would it have been AJ</b></p> <p>19 <b>escorting Mr. Moore out?</b></p> <p>20 A. Yeah. They took him out also, of course,</p> <p>21 yes.</p> <p>22 <b>Q. What did you -- what happened after that?</b></p> <p>23 A. I got in my car. I got in my car and went</p> <p>24 to the -- I call it police station. But I guess a</p>
<p style="text-align: right;">Page 31</p> <p>1 A. When Watts arrested -- when he was in my</p> <p>2 apartment and Watts -- yes.</p> <p>3 <b>Q. Do you know -- do you know what he was</b></p> <p>4 <b>arrested for?</b></p> <p>5 A. Officer Mohammed actually said -- no, no.</p> <p>6 An officer stated that he was arrested for drinking.</p> <p>7 <b>Q. Okay. Was there alcohol in your apartment</b></p> <p>8 <b>at that time?</b></p> <p>9 A. No, ma'am.</p> <p>10 <b>Q. Okay. Which officer was it that told you</b></p> <p>11 <b>that?</b></p> <p>12 A. I can't recall.</p> <p>13 <b>Q. Okay. So this would be -- would this be</b></p> <p>14 <b>an officer in addition to Watts and AJ?</b></p> <p>15 A. It was told to me at the police station,</p> <p>16 at the station, that he was -- that they were taken</p> <p>17 to. Well, Ben was taken to.</p> <p>18 <b>Q. Okay. So after -- so Ben's arrested. You</b></p> <p>19 <b>recall a conversation between Ben and either Watts</b></p> <p>20 <b>or AJ. You're not quite sure which one. Is that</b></p> <p>21 <b>correct?</b></p> <p>22 MR. TEPFER: Objection. Mischaracterizes the</p> <p>23 testimony, form. What -- I didn't under --</p> <p>24 Well, go ahead, if you understood the</p>	<p style="text-align: right;">Page 33</p> <p>1 unit, a housing location where they held officers or</p> <p>2 Chicago employees in this location. So I guess</p> <p>3 detainees can actually go there maybe for whatever</p> <p>4 reason. So I went to that location.</p> <p>5 <b>Q. And what happened once you arrived?</b></p> <p>6 A. Oh, I lit a fire. I said -- I believe I</p> <p>7 cussed and said, "What the hell you guys arresting</p> <p>8 Ben for?" And someone behind the desk said, "Who is</p> <p>9 Ben?" I said, "Ben Baker. He just got arrested.</p> <p>10 Watts and his crew came and took him. He's back</p> <p>11 there."</p> <p>12 And they said, "Give me a second." And</p> <p>13 someone asked, was he by himself? I said, Elgin --</p> <p>14 Elgin Moore was with him. And I said, "This is</p> <p>15 some --" I was cursing loudly. The officers or the</p> <p>16 people that was working there was looking at me.</p> <p>17 And Mohammed came from wherever he came from and</p> <p>18 escorted -- he said, "Let me talk to you" and</p> <p>19 escorted me out the building.</p> <p>20 And we stood outside of the building where</p> <p>21 the Chicago employees worked. And he asked me what</p> <p>22 was wrong. And I said, "Your buddies, your friends,</p> <p>23 they locked -- they locked Ben up on some B.S." And</p> <p>24 he said, "I didn't know --" He changed the subject</p>

12 (Pages 30 to 33)



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Page 34	<p>1 and basically said, "I didn't know that you were in 2 a relationship with Ben. I wanted to talk to you 3 until I heard about you dating Ben or in a 4 relationship with Ben. So I just stepped back." 5 And I'm thinking, like, what the -- what? He was 6 trying to shoot his shot as far as having a private 7 conversation outside of the reason why I'm there. 8 <b>Q. Did he say anything else, or did you say</b> 9 <b>anything to him after he said that to you?</b> 10 A. He said that Ben was being locked up. He 11 has to find out. He has to talk to Watts, something 12 to that effect. And he volunteered and said Elgin 13 was being locked up -- is locked up for drinking. 14 And I said, "Elgin doesn't even drink." So that was 15 the extent of that. I was upset because it was some 16 bull crap, and I left. 17 <b>Q. Do you know what happened with Mr. Baker</b> 18 <b>or Mr. Moore after you left the station?</b> 19 A. Well, Mr. Moore wasn't my concern and 20 still isn't my concern. Mohammed just volunteered 21 that information. And as far as Ben, a guy at the 22 527 came to me. I don't know who he was. I don't 23 know him. I don't even recall ever seeing him. But 24 he did inform me that Ben was going to be okay, and</p>	Page 36	<p>1 into the building -- 2 <b>Q. Did you ever see --</b> 3 A. -- of 527. 4 <b>Q. Did you ever see that individual again?</b> 5 A. I don't recall. 6 <b>Q. Okay. Did you attend Ben's court hearing</b> 7 <b>or for bond or anything like that after this arrest?</b> 8 A. Yes, ma'am. 9 <b>Q. All right. Was that the next day?</b> 10 A. I don't recall. 11 <b>Q. What -- do you recall what occurred at</b> 12 <b>that court hearing for his bond?</b> 13 A. I recall Ben making a -- I recall Ben 14 talking to -- vaguely recall Ben talking to 15 Judge Toomin, saying -- if I'm saying it right, I 16 think he said this is the same officers, and this is 17 the mailbox case that I told my -- my lawyer about. 18 And I told my probation officer. I think he was on 19 probation at the time. He said I told my probation 20 officer about this. I told my lawyer about this and 21 someone else he -- I think he told Toomin that he 22 shared. 23 He said I told them before this even 24 happened. And now I'm in front of you for the</p>
Page 35	<p>1 he'll be out. He's going to beat the case. 2 <b>Q. Was this a resident or a police officer</b> 3 <b>that told you this?</b> 4 A. It was a citizen. 5 <b>Q. A citizen?</b> 6 A. Yes. 7 <b>Q. Was this -- when was this? The same day,</b> 8 <b>like, when you returned?</b> 9 A. The same day when I returned back home. 10 <b>Q. Okay. Did you ask him any questions like</b> 11 <b>how he knew that or anything like that?</b> 12 A. No, because I was just shocked for him to 13 even tell me or -- I didn't even know who he was. 14 So how do he know? 15 <b>Q. Where did this conversation take place?</b> 16 A. I parked my car on the back of the 527. 17 You can actually park in the front. Like they call 18 it the fire lane. Or you can park in the back. So 19 I actually parked in the back of 527, and when I got 20 out my vehicle to go into the building, this guy 21 came. There was a lot of people out there. And 22 this guy came to me and said it would be okay; he'll 23 be out; he's going to beat this case. And I just 24 looked at him and said, okay, and continued to walk</p>	Page 37	<p>1 same -- something, he said. I don't know what he 2 said. I'm in front of you for the same thing that I 3 had told them a month ago or something like that. 4 <b>Q. Do you remember who his lawyer was or</b> 5 <b>probation officer at the time?</b> 6 A. His lawyer, I believe, was Matt Mahoney. 7 I believe that was the lawyer at the time. And his 8 probation officer, no, I do not know who his 9 probation officer was. 10 <b>Q. Did you call Matt Mahoney once Ben was</b> 11 <b>arrested?</b> 12 A. Yes, I believe I did. 13 <b>Q. The same day he was arrested, on</b> 14 <b>July 11th?</b> 15 A. Yes. 16 <b>Q. And you were present in court when</b> 17 <b>Mr. Baker had made these statements to Judge Toomin?</b> 18 A. Yes. 19 <b>Q. Do you recall what Judge Toomin's response</b> 20 <b>was?</b> 21 A. No. No. I do not, no. 22 <b>Q. Do you recall how it was that you or that</b> 23 <b>Mr. Baker became connected with Matt Mahoney as an</b> 24 <b>attorney?</b></p>

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1 MR. TEPFER: Can you repeat the question? I  
2 missed it. Sorry.  
3 BY MS. OLIVIER:  
4 Q. Do you recall how it was -- it came to be  
5 that Mr. Baker was connected with Matt Mahoney as an  
6 attorney?  
7 A. No.  
8 Q. But do you know if Mr. Mahoney was  
9 representing Mr. Baker on the case that he was on  
10 probation for at the time?  
11 A. I don't recall.  
12 Q. Okay. You noted that when you went to  
13 this -- I believe it's called like a substation --  
14 that wasn't -- it wasn't 51st and Wentworth, but it  
15 was a different police station near Ida B. Wells,  
16 correct?  
17 A. Yes.  
18 Q. That Ben and Mr. Moore were taken to?  
19 A. Ben was taken to, yes.  
20 Q. Okay. And you noted that you told the  
21 individuals there that Watts and his crew took Ben.  
22 When you say "crew," who are you referencing with  
23 respect to this specific arrest on July 11th, 2004?  
24 A. Anyone who was under Watts. Anyone who

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1 Watts controlled or a guy in the light -- anyone  
2 Watts can tell what to do.  
3 Q. As we've been talking about this arrest,  
4 are you able to recall seeing any other officers  
5 there besides AJ and Watts?  
6 A. This is the same question from earlier?  
7 Q. As we're talking through this, has your  
8 memory been jogged as to any other officers were  
9 present, or you just remember those two?  
10 A. I just remember those two.  
11 Q. Okay. And also so I'm clear, as of  
12 July 11th, 2004, this specific arrest, you did not  
13 know that Mr. Baker was a drug dealer; is that  
14 correct?  
15 MR. TEPFER: Objection. Asked and answered.  
16 And form.  
17 Go ahead.  
18 BY THE WITNESS:  
19 A. I -- correct.  
20 THE VIDEOGRAPHER: I'm sorry to interrupt.  
21 Ms. Glenn, could you please tilt your laptop screen  
22 down again, please? Just when you -- Thank you.  
23 It's just so then we don't lose the bottom of your  
24 face. Thank you so much.

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1 MR. TEPFER: Thank you.  
2 BY MS. OLIVIER:  
3 Q. And then going back to what you said about  
4 Mohammed and him taking that opportunity to take you  
5 outside and shoot his shot, I believe you said, you  
6 took it as he was expressing to you his interest in  
7 you in like a romantic way?  
8 A. Yes.  
9 Q. Okay. Had he ever done that with you  
10 before?  
11 A. No.  
12 Q. Did he ever bring up this topic to you  
13 again after this?  
14 A. No.  
15 Q. What was going through your head, I guess,  
16 when he started making those statements to you?  
17 Like, did you presume that that's why Ben was  
18 custody, or how were you taking it?  
19 A. No. I definitely did not -- no, not at  
20 all. No.  
21 Q. Did you respond to those comments by him  
22 at all, or did you just kind of ignore it and move  
23 on?  
24 A. Ignored it.

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1 Q. And it never came up with him again,  
2 correct?  
3 A. Correct.  
4 Q. Going to -- well, Ben ultimately, was  
5 he -- did he remain in custody until he ultimately  
6 beat that case, the mailbox case?  
7 A. Yes.  
8 Q. Okay. Did you go -- do you recall going  
9 to court dates for that case for Mr. Baker?  
10 A. Yes.  
11 Q. Okay. Anything stand out to you about any  
12 of those court dates?  
13 A. The pictures that I have taken of the  
14 hallway and the mailbox of 527 and submitted it  
15 to -- submitted the pictures to Ben's attorney, Matt  
16 Mahoney, and the questions that I wrote down that I  
17 would like for the attorney, Matt Mahoney, to ask  
18 the officers on the stand. So those are what stood  
19 out.  
20 Q. Do you remember which specific officers  
21 you were drafting questions for?  
22 A. It was really for Watts and AJ.  
23 Q. Okay. What about Officer Kenny Young? Do  
24 you recall him?



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1 A. So I kind of vaguely remember because I  
2 was there early. So I remember Watts coming through  
3 the courthouse to go to the back. I remember  
4 Mohammed also proceeding to the back; AJ also going  
5 to the back. Oh, yeah, and Kenny, I did see him  
6 there.  
7 **Q. And is Kenny another officer that you**  
8 **associate with, as you've termed it, Watts's crew?**  
9 A. Yes.  
10 **Q. Did you know Officer Young or Kenny in**  
11 **July 2004? Did you know who he was?**  
12 A. No, I just -- no, I know the faces, but  
13 not names to the officers. So I know the faces.  
14 Some stuck out a little more than others. But,  
15 yeah.  
16 **Q. At your last deposition, you testified**  
17 **that the first time that you really had any personal**  
18 **encounters with Watts was when Mr. Baker identified**  
19 **Watts and AJ to you on Mother's Day of 2004. When**  
20 **did you come to know who Mohammed was?**  
21 MR. TEPFER: Can you guys hear all that  
22 background noise, or no, from my office? Okay.  
23 Sorry. It ended up being really loud.  
24

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1 BY THE WITNESS:  
2 A. I don't recall.  
3 **Q. Do you know if it was before or after you**  
4 **found out who Watts and AJ were?**  
5 A. It would most likely be after.  
6 **Q. And then same question for Officer Kenny**  
7 **Young. Do you know if it would have been before or**  
8 **after that you would have come to know or recognize**  
9 **his face and who he was?**  
10 A. It would be after.  
11 **Q. Okay. And then also so I'm clear, the**  
12 **photos that you took of the lobby at the 527**  
13 **building or the mailboxes, were those introduced**  
14 **into evidence at Mr. Baker's trial or the hearing**  
15 **for that July 2004 arrest?**  
16 MR. TEPFER: Objection. Calls for a legal  
17 conclusion.  
18 But you can answer, if you know.  
19 BY THE WITNESS:  
20 A. I think it was a trial because -- I think  
21 there was a trial.  
22 **Q. Okay.**  
23 A. And I believe vaguely Mahoney saying  
24 something about the evidence, bringing it to

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1 evidence maybe. But I knew that the judge,  
2 Judge Toomin, wanted to see the pictures. So it was  
3 handed to Judge Toomin, but it was also shown to the  
4 opposing side too.  
5 **Q. So the photos that you personally took**  
6 **were used in court, and you saw them being used or**  
7 **shown?**  
8 A. Yes.  
9 **Q. Do you recall when it was, what month or**  
10 **season, Mr. Baker was released following this July**  
11 **2004 arrest?**  
12 A. I think it was around Thanksgiving, I  
13 think, but I'm not 100 percent sure.  
14 **Q. Following his release on that case, his**  
15 **next arrest that's become the subject of the lawsuit**  
16 **that you and Mr. Baker have filed was on March 23rd,**  
17 **2005. Do you recall any interactions with Watts and**  
18 **any officers working for him from the time period of**  
19 **Ben's release through the March 23rd, 2005, arrest?**  
20 A. Can you repeat that one more time?  
21 **Q. Sure. Do you recall any interactions with**  
22 **Watts or any officers working for him from the time**  
23 **of Ben's release through his arrest of March 23rd,**  
24 **2005?**

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1 MR. TEPFER: Her own personal interactions?  
2 MS. OLIVIER: I believe my question is if she  
3 recalls any interactions.  
4 MR. TEPFER: Okay. I'm sorry. Objection to  
5 form.  
6 Go ahead.  
7 BY THE WITNESS:  
8 A. I had an interaction with -- I had an  
9 interaction with Watts, and AJ had made a remark,  
10 but I don't know -- and that Ben was incarcerated as  
11 far as at the county. I don't know if it was during  
12 that time, but I had a personal interaction.  
13 **Q. So my question is a little different.**  
14 A. I had a couple of interactions.  
15 **Q. So my question is a little different. I'm**  
16 **wondering if you recall any interactions from the**  
17 **time that Ben was released from custody, which would**  
18 **have been, as you've said, to your memory around**  
19 **Thanksgiving of 2004, through his next arrest, which**  
20 **is the subject of this lawsuit, which is March 23rd,**  
21 **2005.**  
22 A. I don't recall.  
23 **Q. Okay. Do you have any memories, or do you**  
24 **recall being present when Mr. Baker was arrested on**

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1 **March 23rd, 2005?**  
 2 A. What was he arrested for?  
 3 **Q. On this date he was arrested for**  
 4 **possession of a controlled substance with intent to**  
 5 **deliver. It was cocaine and heroin.**  
 6 A. No. Where did he -- I don't recall.  
 7 Okay.  
 8 **Q. So in this -- with respect to this**  
 9 **particular arrest, it took place in the 527**  
 10 **building. He was with Twanie and Bae Bae. Your**  
 11 **husband has said that he was coming down from the**  
 12 **sixth floor and encountered Twanie and Bae Bae; and**  
 13 **when he encountered them, other officers were coming**  
 14 **up the stairs, and then he subsequently ran.**  
 15 The officers' testimony is that they were  
 16 coming up the stairs. They encountered your --  
 17 Mr. Baker with two other individuals and that he was  
 18 holding narcotics and that he fled. And then he was  
 19 subsequently arrested, and they recovered drugs that  
 20 he was holding in his hand and also drugs from his  
 21 pocket. But, again, this would have all taken place  
 22 within the 527 building.  
 23 A. Okay.  
 24 MR. TEPFER: Objection to form.

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1 But go ahead.  
 2 BY THE WITNESS:  
 3 A. So they all ran, and they ran the same  
 4 way. They went down.  
 5 **Q. Just one of --**  
 6 A. I wasn't -- I was not there. I wasn't  
 7 present.  
 8 **Q. Okay. Do you recall seeing Mr. Baker**  
 9 **being led out of the 527 building when he was under**  
 10 **arrest or in handcuffs with respect to the**  
 11 **March 23rd, 2005, arrest?**  
 12 A. I saw Ben being placed in a -- in a car,  
 13 in the -- in one of their cars.  
 14 **Q. Do you know where Ben had been prior to**  
 15 **his arrest on March 23rd?**  
 16 A. No. No.  
 17 **Q. This arrest took place on a Wednesday at**  
 18 **approximately 3:49 p.m.**  
 19 A. That didn't change it, no.  
 20 **Q. Okay. Do you remember seeing which --**  
 21 **what officers were around him or how many?**  
 22 A. When I saw him being placed in a car, I  
 23 seen a few officers. I know one called -- I seen a  
 24 few officers.

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1 **Q. Do you -- when you say "a few," do you**  
 2 **know if it's more or less than two, more or less**  
 3 **than three?**  
 4 A. I'm thinking between at least three -- two  
 5 to three.  
 6 **Q. Do you know who those officers were?**  
 7 A. No, ma'am.  
 8 **Q. Okay. Do you recall anything about them?**  
 9 **How they looked physically? Plainclothes?**  
 10 **Uniformed?**  
 11 A. Plain -- plainclothes. Plainclothes.  
 12 **Q. Did you recognize them to be officers that**  
 13 **worked with Watts or a different team?**  
 14 A. I would assume -- I'm assuming that one  
 15 had to work with Watts. I overheard the  
 16 conversation on his cell phone of calling Watts.  
 17 Watts said that he was in -- in the building, in the  
 18 back building. And he said, "I got him." And then  
 19 the next thing I know -- he said, "I got him." I  
 20 don't know if he said where his location was, as far  
 21 as the officer that was on the phone.  
 22 But less than a split second, he flew --  
 23 he was there, Watts. Watts and one of his  
 24 associates, one of his crew guys were there.

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1 **Q. Do you remember the ethnicity of any of**  
 2 **these officers?**  
 3 A. No.  
 4 **Q. Okay. How was it that you -- walk me**  
 5 **through. You said that you overheard a conversation**  
 6 **an officer was having on his cell phone. Where were**  
 7 **you, and where was this officer when you overheard**  
 8 **this?**  
 9 A. I was on the step, on that last step  
 10 because I was walking to the car where Ben was at  
 11 because they were still parked on the fire lane. So  
 12 I was coming down the stairs. So I was on that last  
 13 step, and I took a step down. And there was an  
 14 officer right there.  
 15 **Q. Ben was already in the car?**  
 16 A. I heard -- yeah, because they put --  
 17 because as I was coming down the steps -- there's  
 18 like three or four steps. And as I was coming down,  
 19 that's when they were putting him in the car. And  
 20 when I hit the landing, the concrete, the fire way,  
 21 he was already in the car, and the door was being  
 22 closed.  
 23 **Q. Were you just coincidentally walking out of**  
 24 **the building at that time, or had you become aware**

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1 **that Mr. Baker was being arrested?**

2 A. No. So I actually -- when they come, when

3 Watts and his people come, they usually get out the

4 car and slam the doors a lot. And I'm on the second

5 floor. So I'm always hearing a door slam. I didn't

6 see Ben at the window. I got up and looked out the

7 window, and I didn't see him at all out the window.

8 So I stayed looking out the window, and I

9 heard the voices because over the door of one --

10 over the door downstairs when you leave out to the

11 outside is a cover, and I heard Ben's voice. So

12 that's when I jumped up and went down the stairs.

13 **Q. When you first looked out the window, what**

14 **do you recall seeing?**

15 A. Just the -- when I first looked, I saw two

16 cars.

17 **Q. Okay. Did you see any officers at that**

18 **point?**

19 A. No.

20 **Q. Okay. And so when you -- then did you**

21 **move away from the window after that and then**

22 **returned once you heard Ben's voice, or just -- I'm**

23 **sorry. I just want to make sure --**

24 A. No, no. That's fine. I believe I stayed

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1 at the window.

2 **Q. Okay. And then you heard Ben's voice, and**

3 **that's when you left your apartment to go down and**

4 **see what was going on?**

5 A. Yes.

6 **Q. Okay. But by the time you got out, he was**

7 **being placed in the car by an officer?**

8 A. Yes.

9 **Q. And was Ben handcuffed at that time?**

10 A. I believe he was, yes.

11 **Q. Besides overhearing this officer on the**

12 **cell phone saying "I got him" and then seeing Watts**

13 **and an associate -- you don't remember who that was?**

14 A. No, ma'am.

15 **Q. Watts and an associate come up. Are there**

16 **any other conversations that you can recall**

17 **overhearing or noticing while you were outside?**

18 A. I believe they took Ben out of that car

19 and put him in Watts' car or the car that Watts

20 pulled up in and something about the handcuffs that

21 Ben had on. And I vaguely remember it being said,

22 "I'll give him to you," or we can -- something about

23 the handcuffs --

24 **Q. Did you -- I'm sorry. Did you say**

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1 **anything to any officers on scene as this was**

2 **happening?**

3 A. I asked what was going on. I asked the

4 officer what was going on, what is he being arrested

5 for. I was interrogating. And he said that you'll

6 find out. I believe it was, "You'll find out," and

7 that was the end of that.

8 **Q. Which officer said, "You'll find out"?**

9 A. I can't recall.

10 **Q. It wasn't Watts, though, that you were**

11 **speaking to?**

12 A. No.

13 **Q. It was one of the other officers?**

14 A. Yes.

15 **Q. After you were told you'll find out, what**

16 **did you do next?**

17 A. Oh, I got in my car and followed them.

18 **Q. Where did they go?**

19 A. To 51st.

20 **Q. And then what did you do once you arrived**

21 **at 51st?**

22 A. Asked what am I -- what is he being

23 arrested for.

24 **Q. You went into the station and asked**

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1 **someone there what was going on. Okay. And what**

2 **were you told?**

3 A. That I would have to talk to a -- I

4 believe a sergeant. I would have to talk to a

5 sergeant. And because he's an adult, they couldn't

6 release that information.

7 **Q. What happened next?**

8 A. I went back to -- I went back to the

9 building, and I called his mom or his sister to let

10 them know that he was arrested and I can't -- they

11 not telling me what's going on. And then I believe

12 I called his lawyer. I believe I called the lawyer

13 at the time.

14 **Q. Was that Mr. Mahoney again?**

15 A. Yes.

16 **Q. Do you recall anything else that took**

17 **place that day?**

18 A. No.

19 **Q. Okay. Did you see any drugs at any point**

20 **on March 23rd, 2005?**

21 A. No.

22 **Q. Okay. And when I say that, I mean when**

23 **you exited the building and saw the officers, did**

24 **you see any officer holding drugs, or did you see**

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Page 54	<p>1 Ben holding drugs or anything like that?</p> <p>2 A. No.</p> <p>3 Q. Did you personally observe the officers --</p> <p>4 what led to the -- you didn't -- strike that.</p> <p>5 You did not personally observe anything</p> <p>6 that took place between the officers and Ben until</p> <p>7 you exited the building and they were putting Ben in</p> <p>8 the car, correct?</p> <p>9 A. Correct.</p> <p>10 Q. Okay. Do you know if Ben was employed in</p> <p>11 March of 2005?</p> <p>12 A. No.</p> <p>13 Q. No, you don't know or, no, he was not?</p> <p>14 A. I don't believe he was.</p> <p>15 Q. Okay. Was he contributing to household</p> <p>16 expenses at all at that time?</p> <p>17 A. I cannot recall. Was he contributing?</p> <p>18 MR. TEPFER: I'm going to object to the form.</p> <p>19 But go ahead.</p> <p>20 BY THE WITNESS:</p> <p>21 A. He contributed a lot.</p> <p>22 Q. Was he -- when I use the word</p> <p>23 "contributing," was he contributing financially to</p> <p>24 the household expenses?</p>	Page 56	<p>1 Q. Do you recall recognizing any of the</p> <p>2 officers that were testifying?</p> <p>3 A. Yes.</p> <p>4 Q. Who do you recall recognizing?</p> <p>5 A. Kenny Young and Mohammed. I believe that</p> <p>6 was Mohammed.</p> <p>7 Q. I'll represent to you that Mohammed did</p> <p>8 not testify at this one.</p> <p>9 A. I could be -- okay. Okay. I apologize.</p> <p>10 That was him being at my -- from another court thing</p> <p>11 for something else. It's -- I apologize. It's so</p> <p>12 much, and they gave him so many cases. It's all</p> <p>13 just -- so I apologize, and I said believe, but...</p> <p>14 Q. No. Understood. Understood.</p> <p>15 A. Okay.</p> <p>16 Q. Just to the extent if I know something is</p> <p>17 incorrect, I want to at least flag that for you.</p> <p>18 A. Thank you.</p> <p>19 Q. So you said Kenny Young. Do you recall</p> <p>20 any other officers -- or being present when any</p> <p>21 other officers testified?</p> <p>22 A. There was two officers that had testified.</p> <p>23 Q. Okay.</p> <p>24 MR. TEPFER: Which? Are we talking about the</p>
Page 55	<p>1 A. Sometimes.</p> <p>2 Q. Do you recall how much monetarily he was</p> <p>3 contributing back in March of 2005?</p> <p>4 A. No.</p> <p>5 Q. Do you know in what form his contributions</p> <p>6 were? For example, was it cash or checks, anything</p> <p>7 like that?</p> <p>8 A. No.</p> <p>9 Q. Okay. Did you attend Mr. Baker's bond</p> <p>10 court hearing for this March 23rd, 2005, arrest?</p> <p>11 A. Yes.</p> <p>12 Q. And what do you remember about that?</p> <p>13 A. Nothing.</p> <p>14 Q. And so I'm clear, besides Sergeant Watts,</p> <p>15 you're unable to specifically identify or recall</p> <p>16 what other officers were involved with Mr. Baker's</p> <p>17 arrest on March 23rd, 2005, correct?</p> <p>18 A. Correct.</p> <p>19 Q. Okay. Do you recall attending Mr. Baker's</p> <p>20 trial, the bench trial, for his March 23rd, 2005,</p> <p>21 arrest?</p> <p>22 A. Yes.</p> <p>23 Q. What do you remember about that trial?</p> <p>24 A. Not a lot. Nothing.</p>	Page 57	<p>1 trial, the bench trial right now?</p> <p>2 MS. OLIVIER: Yes, for the March 23rd, 2005,</p> <p>3 arrest.</p> <p>4 THE WITNESS: The mailbox.</p> <p>5 MR. TEPFER: See, she's -- that's what I</p> <p>6 thought. She's talking about the mailbox.</p> <p>7 BY MS. OLIVIER:</p> <p>8 Q. I'm sorry. So I'm referencing the trial</p> <p>9 for -- we can back up and start over. So with</p> <p>10 respect to Ben's arrest for the March -- this</p> <p>11 March 23rd, 2005, case, do you recall attending the</p> <p>12 trial for that, for that arrest, which would have</p> <p>13 been in March of 2006?</p> <p>14 A. No.</p> <p>15 MR. TEPFER: It's --</p> <p>16 MS. OLIVIER: I should say May of 2006.</p> <p>17 MR. TEPFER: Right. Okay.</p> <p>18 BY THE WITNESS:</p> <p>19 A. No. I know that I attended all his court</p> <p>20 hearings and all his trials. Any bond hearings, I</p> <p>21 was always there. So I attended every appearance</p> <p>22 when it came to court in Watts' cases.</p> <p>23 So I do not remember. I probably need</p> <p>24 some reflection or more information because a couple</p>

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<p style="text-align: right;">Page 58</p> <p>1 of them were like back to back, like he was back in 2 court like for another case maybe like a month apart 3 or two months apart. So it was just constantly 4 ongoing where he was still on probation. So it's 5 just -- no.</p> <p>6 <b>Q. So giving a little bit more context then</b> 7 <b>for this particular trial, it took place in May of</b> 8 <b>2006. So this would have been after both of your</b> 9 <b>arrests in December of 2005, approximately</b> 10 <b>six months later. So do you recall attending the</b> 11 <b>bench trial for that? It was also in front of</b> 12 <b>Judge Toomin.</b></p> <p>13 A. I -- yes, I go to all court, yes. Yes.</p> <p>14 <b>Q. All right. And, again, understanding that</b> 15 <b>there were a lot of court dates and a lot of</b> 16 <b>different cases, are you able to recall specifically</b> 17 <b>any of the specific officers who testified with</b> 18 <b>respect to the March 2005 arrest or no?</b></p> <p>19 A. No. No.</p> <p>20 <b>Q. Okay. Fair enough. That's fine.</b></p> <p>21 A. Okay.</p> <p>22 <b>Q. With respect to Mr. Mahoney, he was</b> 23 <b>your -- or he was your attorney as well, correct?</b></p> <p>24 A. Yes.</p>	<p style="text-align: right;">Page 60</p> <p>1 "found to have had."</p> <p>2 But go ahead.</p> <p>3 BY MS. OLIVIER:</p> <p>4 <b>Q. That's a lot of cash, right?</b></p> <p>5 A. Uh-huh, yes.</p> <p>6 <b>Q. Would that be atypical for -- in your</b> 7 <b>interactions with Ben for him to have that much cash</b> 8 <b>on him, or was that normal?</b></p> <p>9 A. I never thought about it. If he did, I 10 never thought about it.</p> <p>11 <b>Q. Do you know why he would have had that</b> 12 <b>much cash on him that day?</b></p> <p>13 MR. TEPFER: Objection to the form of the 14 question. Assumes facts not in evidence.</p> <p>15 Go ahead.</p> <p>16 BY THE WITNESS:</p> <p>17 A. I would assume -- again, assume -- maybe 18 playing cards. He's a good card player and his 19 family liked playing cards. And we usually have -- 20 we usually play cards. Or was he shooting dice? I 21 don't know. Shooting dice? I don't know.</p> <p>22 <b>Q. Did Mr. Baker ever speak with you about</b> 23 <b>what happened with respect to this March 23rd, 2005,</b> 24 <b>arrest?</b></p>
<p style="text-align: right;">Page 59</p> <p>1 <b>Q. And but he had been acting as Mr. Baker's</b> 2 <b>attorney for some time when he was also retained to</b> 3 <b>represent you, correct?</b></p> <p>4 A. Yes.</p> <p>5 <b>Q. How -- what was the arrangement between</b> 6 <b>Mr. Baker and Mr. Mahoney or you and Mr. Mahoney in</b> 7 <b>terms of how he was paid? Was he on retainer, or</b> 8 <b>would you just pay him per case? How did that work?</b></p> <p>9 A. Paid him per case, I believe. But we -- 10 we were always paying in a lot of cases. So we were 11 always paying.</p> <p>12 <b>Q. Was it solely you contributing to those</b> 13 <b>payments, or was Mr. Baker assisting with those</b> 14 <b>payments as well?</b></p> <p>15 A. Me and family.</p> <p>16 <b>Q. Whose family, yours or his?</b></p> <p>17 A. Sometimes mine and his both.</p> <p>18 <b>Q. Mr. Baker was arrested and found to have</b> 19 <b>\$819 of cash on him with respect to the March 23rd,</b> 20 <b>2005 arrest. Do you consider that to be a good</b> 21 <b>amount of cash for Mr. Baker to have on him?</b></p> <p>22 A. I'm learning now. I'm learning as you 23 communicate. So it's a lot.</p> <p>24 MR. TEPFER: I'm going to object to the form of</p>	<p style="text-align: right;">Page 61</p> <p>1 A. I don't remember.</p> <p>2 <b>Q. You don't recall having any conversations</b> 3 <b>with him about the circumstances that led to him</b> 4 <b>being arrested?</b></p> <p>5 A. Is this the one where he ran down the 6 stairs or was with Twanie and --</p> <p>7 <b>Q. Yes. And Bae Bae.</b></p> <p>8 A. He said he didn't have shit. I believe 9 that's what he said, he didn't have shit. I said, 10 what did you get arrested for? He's, like, I didn't 11 have shit. Somebody else -- somebody -- one of the 12 officers picked up some drugs. I guess guys were in 13 the hallway or something, and they must have had 14 drugs, I'm assuming; and they picked it up and gave 15 it to Ben. I wasn't there. I wasn't present.</p> <p>16 <b>Q. So that's what Ben informed you?</b></p> <p>17 A. He say he didn't have anything, that that 18 was some bullshit.</p> <p>19 <b>Q. Do you know who Twanie and Bae Bae are, or</b> 20 <b>did you know then?</b></p> <p>21 A. I knew who Bae Bae was.</p> <p>22 <b>Q. And who was Bae Bae?</b></p> <p>23 A. He's a guy that live in the building, him 24 and his wife and his kid, always doing like odd</p>



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<p>1 jobs, washing cars, and things like that. He had</p> <p>2 this little boy that used to come upstairs, and I</p> <p>3 was helping him spell his name and doing little</p> <p>4 things. And his wife is really nice, yeah.</p> <p>5 <b>Q. Bae Bae -- Bae Bae is a nickname, correct?</b></p> <p>6 A. Yeah, I assume. Yes.</p> <p>7 <b>Q. Do you know his -- do you know his real</b></p> <p>8 <b>name?</b></p> <p>9 A. No.</p> <p>10 <b>Q. Okay. And you don't know who Twanie is?</b></p> <p>11 A. No.</p> <p>12 <b>Q. Do you know if Bae Bae and Twanie got</b></p> <p>13 <b>arrested on March 23rd, 2005?</b></p> <p>14 A. I wouldn't even know. They should have,</p> <p>15 if they ran down with Ben, right? Or they just took</p> <p>16 Ben and let them go? I don't know.</p> <p>17 MS. OLIVIER: All right. I'm looking at the</p> <p>18 time. We've been going for about an hour and a</p> <p>19 half, and I know that the videographer has to sub</p> <p>20 out the tape. So why don't we take a break at this</p> <p>21 point?</p> <p>22 Josh and Ms. Glenn, how long would you</p> <p>23 like to take?</p> <p>24 THE WITNESS: We're on your time.</p>	<p>1 <b>apartment. Do you remember being present on that</b></p> <p>2 <b>date at your apartment?</b></p> <p>3 A. Yes.</p> <p>4 MS. OLIVIER: Okay. I'm going to now share my</p> <p>5 screen, and I'm going to mark this as Exhibit 13,</p> <p>6 which for the parties is Bates-stamped Baker Glenn</p> <p>7 9968.</p> <p>8 (Glenn Exhibit 13 marked.)</p> <p>9 BY MS. OLIVIER:</p> <p>10 <b>Q. All right. Ms. Glenn, do you see the</b></p> <p>11 <b>document that I'm sharing on my screen?</b></p> <p>12 A. Yes.</p> <p>13 <b>Q. Okay. Do you recognize your signature on</b></p> <p>14 <b>this page?</b></p> <p>15 A. Yes.</p> <p>16 <b>Q. Okay. Do you recall the circumstances</b></p> <p>17 <b>under which you signed off on this document, which</b></p> <p>18 <b>is a consent to search dated October 12th, 2005?</b></p> <p>19 A. Yes.</p> <p>20 <b>Q. Okay. Walk me through what occurred that</b></p> <p>21 <b>led to this.</b></p> <p>22 A. The officer actually told me that I need</p> <p>23 to sign this document or I would be going to jail</p> <p>24 and my kids will be taken away from me.</p>
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<p>1 MR. TEPFER: Yeah. Let's take five minutes.</p> <p>2 Is that enough for everyone?</p> <p>3 MS. OLIVIER: Sure. It's 11:22. Why don't we</p> <p>4 come back at 11:30, just to make it even.</p> <p>5 MR. TEPFER: Okay.</p> <p>6 THE WITNESS: Okay. Thank you.</p> <p>7 THE VIDEOGRAPHER: The time is 11:22 a.m. We</p> <p>8 are now going off the record.</p> <p>9 (Recess taken.)</p> <p>10 THE VIDEOGRAPHER: The time is 11:34 a.m. We</p> <p>11 are now back on the record.</p> <p>12 BY MS. OLIVIER:</p> <p>13 <b>Q. Ms. Glenn, are you ready to continue?</b></p> <p>14 A. Yes.</p> <p>15 <b>Q. Next I'm just kind of going</b></p> <p>16 <b>chronologically in order. So we've gone over -- in</b></p> <p>17 <b>fact, you didn't really see what happened on</b></p> <p>18 <b>March 23rd, 2005, when Ben was arrested until he was</b></p> <p>19 <b>already being placed in the police officers' car.</b></p> <p>20 <b>I'm now going to go to October 12th of</b></p> <p>21 <b>2005. This was a Wednesday at approximately</b></p> <p>22 <b>7:25 p.m. And Ben was arrested for unlawful use of</b></p> <p>23 <b>a weapon by a felon. It was possession of -- I</b></p> <p>24 <b>believe it was your father's bullets within your</b></p>	<p>1 <b>Q. Okay. What specific officer do you recall</b></p> <p>2 <b>telling you that?</b></p> <p>3 A. I do not recall.</p> <p>4 <b>Q. Okay. Do you see here, going to the</b></p> <p>5 <b>second paragraph, it says, "Having been advised of</b></p> <p>6 <b>and fully understanding these rights, I hereby</b></p> <p>7 <b>authorize and give my consent to McDonald and</b></p> <p>8 <b>Connolly, who have identified themselves as police</b></p> <p>9 <b>officers assigned to Unit 153, to conduct a complete</b></p> <p>10 <b>search at the time of the premises/vehicle under my</b></p> <p>11 <b>lawful control as described as 527 West Browning,</b></p> <p>12 <b>Apartment 206."</b></p> <p>13 A. I'm -- I'm reading with you, yes.</p> <p>14 <b>Q. Do you -- do those officers' name jar a</b></p> <p>15 <b>bell at all? Ring a bell at all? Excuse me.</b></p> <p>16 A. No.</p> <p>17 <b>Q. Okay. Do you associate these officers as</b></p> <p>18 <b>being officers working for Sergeant Watts, or were</b></p> <p>19 <b>these different people in terms of your memory?</b></p> <p>20 A. I don't recall.</p> <p>21 <b>Q. Okay. I am noting on this document,</b></p> <p>22 <b>actually for the first time as we're looking at it,</b></p> <p>23 <b>is that your date of birth and Social Security</b></p> <p>24 <b>number listed?</b></p>

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Page 66	<p>1 A. Yes.</p> <p>2 MS. OLIVIER: Okay. I will make sure that</p> <p>3 those are redacted.</p> <p>4 Any objection by anyone to redacting those</p> <p>5 when I submit them to the court reporter?</p> <p>6 MR. TEPFER: No. Thank you. Now, I don't know</p> <p>7 if the date of birth needs to be, but the Social</p> <p>8 Security number.</p> <p>9 MS. OLIVIER: I'll do the Social Security</p> <p>10 number.</p> <p>11 BY MS. OLIVIER:</p> <p>12 <b>Q. So you were home, then, on October 12,</b></p> <p>13 <b>2005?</b></p> <p>14 A. Yes.</p> <p>15 <b>Q. All right. And what can you recall</b></p> <p>16 <b>occurring on that date in terms of -- yeah, just</b></p> <p>17 <b>walk me through what happened.</b></p> <p>18 A. From that, what I remember, it was a lot</p> <p>19 of officers. I would say more than five to seven --</p> <p>20 <b>Q. Okay.</b></p> <p>21 A. -- I believe, officers that was present in</p> <p>22 the home. They started searching my home, the</p> <p>23 apartment. Is this the bullet case? Right?</p> <p>24 <b>Q. Correct.</b></p>	Page 68	<p>1 Someone sent him, from what I got or what he did</p> <p>2 say, "sent," someone sent them to our apartment; and</p> <p>3 because there's nothing there, they were upset of</p> <p>4 wasting their time.</p> <p>5 They were searching the family -- the</p> <p>6 sitting room, because this is 527. They were</p> <p>7 searching the sitting room. And on -- it's a couch</p> <p>8 and a love seat against the wall. And in front of</p> <p>9 the window -- because when you come in, there's the</p> <p>10 window. It is an entertainment system stand. It's</p> <p>11 all open. There's no back to it. And it's shelves.</p> <p>12 And on the shelves it was the keepsake</p> <p>13 box. On the outer is pictures. Inside was my dad's</p> <p>14 badge, four bullets, the flower from his ceremony,</p> <p>15 hero ceremony. So they took the bullets. And I</p> <p>16 said, "That's my dad's." Because they had put --</p> <p>17 and it was a picture of my dad and his badge.</p> <p>18 Because they put it on the floor, and I said,</p> <p>19 "That's my dad. He's passed away." I got a little</p> <p>20 upset about that.</p> <p>21 And they said that "he" -- because Ben was</p> <p>22 there. They said "he" -- he's not supposed to be</p> <p>23 around -- I guess because of his background or</p> <p>24 something, he wasn't supposed to be around weapons.</p>
Page 67	<p>1 A. Okay. So they -- okay. So they started</p> <p>2 searching the home. And one of the officers went in</p> <p>3 the fridge and started messing with items that was</p> <p>4 on the door of the fridge, in the inside of the</p> <p>5 fridge. And I made a comment of, what are you in</p> <p>6 the fridge for? And the officer said, you're --</p> <p>7 something about you're not in hand like the</p> <p>8 West Side people -- like the West Side. So, yeah.</p> <p>9 That's what was said.</p> <p>10 They continued to search, took items,</p> <p>11 pulled items off the cabinet, went into the</p> <p>12 cabinets, went in the boys' room, my kids' room,</p> <p>13 because they shared a room at the time. And I said,</p> <p>14 "Can you guys just be mindful that my kids are back</p> <p>15 there?" And they said, "Yes."</p> <p>16 I did hear -- because I'm in mom mode now.</p> <p>17 So I did hear the officer say, "Hi, how are you?"</p> <p>18 You know, "Hello." They did speak. "We're looking</p> <p>19 for bad guys, making sure nobody ran in here to mess</p> <p>20 with you guys." So they were -- they were</p> <p>21 respectful of that. So I really appreciated that.</p> <p>22 An officer said something about, It's</p> <p>23 nothing up here. He sent us on a bull -- some bogus</p> <p>24 or bullshit. This is some bullshit or bogus.</p>	Page 69	<p>1 They considered it a weapon, the bullets a weapon.</p> <p>2 So it was not actually a gun. It was the bullets.</p> <p>3 So they handcuffed him, and they took him</p> <p>4 out. And then they -- the guy took me in the</p> <p>5 kitchen and said, "Can I talk to you?" The officer</p> <p>6 took me in the kitchen. They were plain-clothed,</p> <p>7 mind you. And he took me in the kitchen, and said,</p> <p>8 "can I talk to you? Here, I need you to sign this,"</p> <p>9 after the fact.</p> <p>10 And I said, "I'm not signing." And he</p> <p>11 said, "If you're not signing, you're going to jail.</p> <p>12 And your kids is going to go to -- your kids is</p> <p>13 going to be taken away from you, and you're going to</p> <p>14 have to fight to get your kids back."</p> <p>15 And I said, "There is nothing in here.</p> <p>16 This is some bullshit. You guys already searched."</p> <p>17 If you don't want to go to jail -- and</p> <p>18 that's why the signature was all over. I didn't</p> <p>19 know where they -- they did not ask for no I.D., and</p> <p>20 they did not ask for my social or for my date of</p> <p>21 birth. They did not ask for that. The guy, not</p> <p>22 they. The guy did not.</p> <p>23 So that's how my signature came on that</p> <p>24 document. It was after the fact. I went</p>

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1 downstairs -- they left. I went downstairs to check  
2 on Ben. And there was an altercation in the back of  
3 the building. Watts and one of the guys that came  
4 from our apartment got into an altercation, and one  
5 of the Watts' crew members came over and said, "He's  
6 an officer. He's an officer."  
7 I think they were fussing about Ben. I  
8 think Watts -- they were fussing about Ben. I  
9 walked up to the car where Ben was in handcuffs. I  
10 walked up to the car, and Ben said, "Go back  
11 upstairs. They're in the apartment."  
12 I said, "Nobody is there." He said, like,  
13 "They're back in the apartment." So I went back  
14 upstairs. And I said, "What are you doing in here?"  
15 He said, "Oh, we forgot to check  
16 something." And I asked the boys, like, "Why did  
17 you guys let them in?"  
18 And he said, "Oh, they --" He said that he  
19 came to get -- he left his flashlight. I said, "Did  
20 he leave his flashlight?" They said no. I said,  
21 "See, they're liars. You can't trust them."  
22 And so they -- the one officer, he left.  
23 Because there was only one, and he left. That's the  
24 whole ordeal that happened that day.

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1 **Q. So I've pulled what I marked as Exhibit 13**  
2 **back up, this consent to search form. So is your**  
3 **signature the only portion of this that has your**  
4 **handwriting on this document?**  
5 A. Yes. Yes.  
6 **Q. Okay. Do you know where or who wrote in**  
7 **your date of birth or your Social Security number?**  
8 A. No.  
9 **Q. Okay. Did you give that information to**  
10 **them?**  
11 A. No, I don't recall giving that  
12 information.  
13 **Q. Okay. How did it come to be that they**  
14 **entered your apartment? Walk me through that. Did**  
15 **they knock on the door?**  
16 A. They most likely knocked on the door. I  
17 usually -- I mean, I always -- when Watts always  
18 come, I always let them in. Whoever is knocking, I  
19 let them in. Here, come in. Enter. It's like --  
20 it's nothing. Come in.  
21 **Q. Okay.**  
22 A. So I -- most likely I opened the door to  
23 let them in.  
24 **Q. Okay. And when you opened the door to let**

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1 **them in, were you letting in the five to seven**  
2 **officers? Did you realize you were letting in five**  
3 **to seven officers?**  
4 A. No, I did not. I just -- of course,  
5 you -- I just saw, like, one standing against the  
6 wall when I opened the door. One is in the doorway.  
7 And then maybe like three feet there's a wall. So  
8 one was leaned back on the wall. So when I was  
9 letting them in, then the others came. So I guess  
10 they were like on the side of the door where your  
11 vision was --  
12 **Q. Did you have any conversation with them**  
13 **before they entered into your home?**  
14 A. With the police?  
15 **Q. Yes.**  
16 A. "Can I help you?"  
17 "We came to search."  
18 "Anybody here with you?"  
19 "My -- my boys."  
20 So that's how that went.  
21 **Q. Did you say that they were --**  
22 A. I apologize.  
23 **Q. No, I'm sorry. I interrupted you. Go**  
24 **ahead.**

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1 A. Because my boys were -- like I said, that  
2 was my concern. Because they were in the back in  
3 their room, and it was bedtime. It was bedtime.  
4 Because this is a weekday, right? This happened on  
5 a weekday? Yeah. It was bedtime. Yeah. Yeah,  
6 school. It was bedtime. They had school.  
7 **Q. Did you let the officers know that**  
8 **Mr. Baker was present as well?**  
9 A. No, he was sitting -- no, Ben was in the  
10 room. I think he was back there in the room. No.  
11 I think I mentioned him. I believe I did. I'm not  
12 100 percent sure. My concern was the boys.  
13 **Q. When the officers told you that they were**  
14 **there to search, did you tell them, "Sure, go**  
15 **ahead"?**  
16 A. I don't recall that.  
17 **Q. Did you ever tell the officers to leave at**  
18 **any point or to stop what they were doing?**  
19 A. Of course not, no. No.  
20 **Q. You just don't remember if you actually**  
21 **verbally said, "Sure, do what you have to do"?**  
22 **Like --**  
23 A. No. Honestly, I do not recall. I never  
24 saw these -- I don't recall seeing these officers in



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<p style="text-align: right;">Page 74</p> <p>1 the neighborhood or around. But no.</p> <p>2 <b>Q. You said that you observed an altercation</b></p> <p>3 <b>between Watts and one of the officers. Do you</b></p> <p>4 <b>remember which -- what that officer looked like?</b></p> <p>5 A. No, ma'am.</p> <p>6 <b>Q. When you say "altercation," what did you</b></p> <p>7 <b>observe happening?</b></p> <p>8 A. It was a little shoving and loud, vocal, a</p> <p>9 little loud. Where one of Watts crew came from a --</p> <p>10 kind of trotted or slightly jogged from another</p> <p>11 building. Wait, wait, wait. That's an officer. He</p> <p>12 an officer. He an officer or sergeant or whatever.</p> <p>13 He was letting the other officer know that he's also</p> <p>14 an officer.</p> <p>15 <b>Q. Which Watts team member trotted over? Do</b></p> <p>16 <b>you remember what that officer looked like?</b></p> <p>17 A. African American.</p> <p>18 <b>Q. But you don't know that officer's name?</b></p> <p>19 A. No, I don't recall that.</p> <p>20 <b>Q. Now, you said you had noted the names of</b></p> <p>21 <b>Mohammed, AJ, and Kenny Young. Do you know if it</b></p> <p>22 <b>was one of those three?</b></p> <p>23 A. I don't recall. I don't recall.</p> <p>24 <b>Q. The officer that went back up to your</b></p>	<p style="text-align: right;">Page 76</p> <p>1 <b>before I start showing you some of those that we</b></p> <p>2 <b>have, do you -- how many times do you recall making</b></p> <p>3 <b>complaints to the Office of Professional Standards</b></p> <p>4 <b>with respect to behavior by Chicago Police</b></p> <p>5 <b>Department officers?</b></p> <p>6 A. Maybe -- I would say only two. One --</p> <p>7 only two.</p> <p>8 <b>Q. And do you remember approximately,</b></p> <p>9 <b>time-period wise, when you made these complaints?</b></p> <p>10 A. No, ma'am.</p> <p>11 <b>Q. Okay. Do you remember why you made those</b></p> <p>12 <b>complaints?</b></p> <p>13 A. One, I feel it was because an officer put</p> <p>14 a board -- when I moved into the apartment, there</p> <p>15 was gates on the -- on the door. So you have this</p> <p>16 frame. And the officer jammed a board between the</p> <p>17 gate and the door. So if there was a fire, it would</p> <p>18 have been terrible. But he jammed this board</p> <p>19 between the gate and a door.</p> <p>20 And then another time would be, of course,</p> <p>21 when -- I believe when Watts used the key and came</p> <p>22 into my apartment not knowing if I was clothed or</p> <p>23 not. He just helped himself and came in. I believe</p> <p>24 those would be the two times that I made a</p>
<p style="text-align: right;">Page 75</p> <p>1 <b>apartment looking for, as he said, a flashlight, was</b></p> <p>2 <b>that one of the officers that was from this new team</b></p> <p>3 <b>of individuals that was performing the search of</b></p> <p>4 <b>your home, or was it someone different?</b></p> <p>5 A. From the new team.</p> <p>6 <b>Q. Do you remember what that person looked</b></p> <p>7 <b>like?</b></p> <p>8 A. No, ma'am.</p> <p>9 <b>Q. Are you able to say ethnicity, anything</b></p> <p>10 <b>like that?</b></p> <p>11 A. No.</p> <p>12 <b>Q. With respect to the officer that had the</b></p> <p>13 <b>altercation with Watts, do you remember what he</b></p> <p>14 <b>looked like?</b></p> <p>15 A. No.</p> <p>16 <b>Q. Did you ever file a complaint regarding</b></p> <p>17 <b>what took place on October 12, 2005?</b></p> <p>18 A. I had made a complaint with Operations</p> <p>19 [sic] of Professional Standards, but I don't know</p> <p>20 the time frame or if it was for this particular</p> <p>21 incident or previous or after.</p> <p>22 <b>Q. Okay. All right. I'm now actually going</b></p> <p>23 <b>to pull up some of your complaints that you've made</b></p> <p>24 <b>with the Office of Professional Standards, and</b></p>	<p style="text-align: right;">Page 77</p> <p>1 complaint. Something said I made a third complaint.</p> <p>2 But then I know that Watts and AJ had words with me,</p> <p>3 so I never followed through. But I know two for</p> <p>4 sure.</p> <p>5 <b>Q. Is there a reason why you didn't file a</b></p> <p>6 <b>complaint against this new team of officers that, as</b></p> <p>7 <b>you said, basically forced your hand in signing that</b></p> <p>8 <b>consent to search?</b></p> <p>9 A. No. I didn't even know who they were. So</p> <p>10 when you go to OPS, Operations, when you go there,</p> <p>11 they ask for that particular information, like the</p> <p>12 officer's name or do you know the badge information,</p> <p>13 because people told me about it and where to go.</p> <p>14 And I didn't have any of that information. So it</p> <p>15 wouldn't have made a difference anyway.</p> <p>16 <b>Q. And why do you say that?</b></p> <p>17 A. Because what -- what they have done. They</p> <p>18 don't do anything. You just make a complaint, and</p> <p>19 it's a waste of time. Nobody cares.</p> <p>20 <b>Q. So these officers that came in to perform</b></p> <p>21 <b>the search of your home, they didn't leave you with</b></p> <p>22 <b>any paperwork acknowledging that they had come in?</b></p> <p>23 A. No, ma'am.</p> <p>24 <b>Q. They didn't leave you with a copy -- or a</b></p>

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<p style="text-align: right;">Page 78</p> <p>1 <b>copy of your consent that you signed?</b></p> <p>2 A. No, ma'am.</p> <p>3 <b>Q. Okay. No card, anything like that?</b></p> <p>4 A. No.</p> <p>5 MS. OLIVIER: Okay. I'm now going to share my</p> <p>6 screen and show you what I'm marking as Exhibit 14,</p> <p>7 which for the attorneys, is Bates-stamped COPA Watts</p> <p>8 1563 through 1572. This is C.R. Number 270177.</p> <p>9 (Glenn Exhibit 14 marked.)</p> <p>10 BY MS. OLIVIER:</p> <p>11 <b>Q. Ms. Glenn, do you see the document that I</b></p> <p>12 <b>am sharing on my screen?</b></p> <p>13 A. Yes.</p> <p>14 <b>Q. Okay. It's a ten-page document. The</b></p> <p>15 <b>first page is dated April 10th, 2001. And this</b></p> <p>16 <b>appears to be a letter sent to you. If you could</b></p> <p>17 <b>just read through it briefly. Do you recall</b></p> <p>18 <b>receiving this letter ever?</b></p> <p>19 A. No, I have not.</p> <p>20 <b>Q. Okay. I'm going to actually scroll down</b></p> <p>21 <b>to the second page.</b></p> <p>22 A. Can I read the first page?</p> <p>23 <b>Q. Sure, sure, sure, sure.</b></p> <p>24 A. Thank you.</p>	<p style="text-align: right;">Page 80</p> <p>1 this.</p> <p>2 <b>Q. Okay. I'm going to actually scroll down</b></p> <p>3 <b>right now and go --</b></p> <p>4 A. Okay.</p> <p>5 <b>Q. -- to the second page of this document.</b></p> <p>6 <b>So you'll see here at the top the title of this</b></p> <p>7 <b>document is "Complaint Against Department Member."</b></p> <p>8 <b>Do you see that?</b></p> <p>9 A. Yes. I'm looking at the hard copy.</p> <p>10 <b>Q. Sure. Perfect. I'm going to leave this</b></p> <p>11 <b>screen up just to the extent for some of the other</b></p> <p>12 <b>attorneys and also if this deposition is played</b></p> <p>13 <b>later on, it's just clear to everyone what we're</b></p> <p>14 <b>reading.</b></p> <p>15 <b>So do you see your name about midway down</b></p> <p>16 <b>through the page?</b></p> <p>17 A. Yes.</p> <p>18 <b>Q. Okay. And that's your correct name and</b></p> <p>19 <b>date of birth along with your address at the time?</b></p> <p>20 A. Yes.</p> <p>21 <b>Q. All right. And so I'm clear on the time,</b></p> <p>22 <b>you'll note in the upper right-hand corner this</b></p> <p>23 <b>complaint was made on March 28th, 2001, at 18:35 or</b></p> <p>24 <b>6:35 p.m. Do you see that?</b></p>
<p style="text-align: right;">Page 79</p> <p>1 <b>Q. Let me know when you're done.</b></p> <p>2 A. Okay.</p> <p>3 MR. TEPFER: I have a printout. Can I show</p> <p>4 her, just so it's easier?</p> <p>5 MS. OLIVIER: Sure.</p> <p>6 MR. TEPFER: If you want to read it on here,</p> <p>7 that's fine. But whatever you want.</p> <p>8 BY THE WITNESS:</p> <p>9 A. So they're saying that I'm under</p> <p>10 investigation?</p> <p>11 MR. TEPFER: I can't answer questions.</p> <p>12 THE WITNESS: Oh.</p> <p>13 BY MS. OLIVIER:</p> <p>14 <b>Q. So this letter is essentially --</b></p> <p>15 <b>THE WITNESS: Thank you.</b></p> <p>16 BY MS. OLIVIER:</p> <p>17 <b>Q. -- stating that you filed a complaint.</b></p> <p>18 <b>They've been trying to follow up with you. They</b></p> <p>19 <b>would like you to contact them as soon as possible</b></p> <p>20 <b>so they can make arrangements to meet with you</b></p> <p>21 <b>regarding the incident that you reported that</b></p> <p>22 <b>they're investigating.</b></p> <p>23 A. Oh. Watts followed up with me. That's</p> <p>24 fine. Well, I never received -- I never received</p>	<p style="text-align: right;">Page 81</p> <p>1 A. Yes.</p> <p>2 <b>Q. Okay. So this specific C.R. Number 270177</b></p> <p>3 <b>is related to a complaint that was -- according to</b></p> <p>4 <b>this document, was made by you on March 28th of</b></p> <p>5 <b>2001. So we're talking years before all the other</b></p> <p>6 <b>arrests we've been discussing today. Okay?</b></p> <p>7 A. Okay.</p> <p>8 <b>Q. All right. And here the narrative</b></p> <p>9 <b>portion -- I'll just read it and then ask you a few</b></p> <p>10 <b>questions about it.</b></p> <p>11 A. Okay.</p> <p>12 <b>Q. So the narrative portion, which is the</b></p> <p>13 <b>bottom half of the page, states, "The complainant,"</b></p> <p>14 <b>which is you, "alleged that several Chicago Police</b></p> <p>15 <b>Officers are harassing her and her family. The</b></p> <p>16 <b>complainant, who did not witness the incident,</b></p> <p>17 <b>alleged that two male white officers placed a board</b></p> <p>18 <b>across her front door blocking her children inside</b></p> <p>19 <b>the above location. The complainant alleged that on</b></p> <p>20 <b>a different occasion, several plainclothes officers</b></p> <p>21 <b>used a key to enter her apartment and searched it</b></p> <p>22 <b>without a warrant. The complainant further alleged</b></p> <p>23 <b>that the officers returned later that evening. When</b></p> <p>24 <b>she refused to let them in, they turned off her</b></p>

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<p style="text-align: right;">Page 82</p> <p>1 electricity."</p> <p>2 And then it states, "No arrest," like</p> <p>3 meaning no arrests were made. So with respect to</p> <p>4 the board incident, is that what you just relayed to</p> <p>5 me?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. Now, in 2001, do you know which</p> <p>8 officers these people were?</p> <p>9 A. These -- so these are two separate</p> <p>10 incidents, two different days.</p> <p>11 Q. Okay.</p> <p>12 A. Okay. And you said the board incident.</p> <p>13 No. I don't know the officer's name. I do not know</p> <p>14 the officer's name.</p> <p>15 Q. Okay. So, again, at your last deposition,</p> <p>16 and I think even today, you had indicated that the</p> <p>17 first time that you became aware or who knew who --</p> <p>18 or had personal interactions with Watts was Mother's</p> <p>19 Day of 2004. So to the extent that this complaint</p> <p>20 was submitted in March of 2001, do you -- are you</p> <p>21 associating the officers that are the subject of</p> <p>22 this complaint to be with Watts, or are these</p> <p>23 completely different people?</p> <p>24 A. Watts. For the plainclothes officers,</p>	<p style="text-align: right;">Page 84</p> <p>1 me. And I vaguely remember saying "my boys." I</p> <p>2 don't -- I kind of remember, but not for sure.</p> <p>3 And that was it. He just asked who was</p> <p>4 there. I left my -- he said that I left my keys in</p> <p>5 my door, and I said that doesn't give you the right</p> <p>6 to open my door.</p> <p>7 Q. In here it says that these several</p> <p>8 plainclothes officers used a key to enter your</p> <p>9 apartment and searched it without a warrant. What</p> <p>10 were they -- where did they search?</p> <p>11 A. I don't recall.</p> <p>12 Q. Okay. Was Mr. Baker home at that time, or</p> <p>13 was he incarcerated?</p> <p>14 A. When that happened, I don't recall where</p> <p>15 they searched, but I also called -- because it was</p> <p>16 landlines back then too -- phones. So I actually</p> <p>17 called 911.</p> <p>18 Q. Okay.</p> <p>19 A. While they were there, I called 911.</p> <p>20 Q. And was --</p> <p>21 A. And they --</p> <p>22 Q. Go ahead.</p> <p>23 A. No, go ahead.</p> <p>24 Q. No. I'm sorry. Keep going with what you</p>
<p style="text-align: right;">Page 83</p> <p>1 Watts.</p> <p>2 Q. Okay. So then did you know who Watts was</p> <p>3 before Mother's Day of 2004?</p> <p>4 A. No.</p> <p>5 Q. Okay. Why is it, then, that you're</p> <p>6 associating Watts with this complaint that you made</p> <p>7 with OPS in 2001?</p> <p>8 A. Because of when I found out his name -- so</p> <p>9 when this happened, him coming into my apartment --</p> <p>10 him and a couple more officers came into my</p> <p>11 apartment -- I didn't know who he was. I had no</p> <p>12 clue who he was, no name, or I wasn't able to turn</p> <p>13 to my left or right or behind me to say who is this</p> <p>14 guy. And he did not, of course, introduce himself</p> <p>15 to me.</p> <p>16 Q. Okay. Do you remember, was there any</p> <p>17 conversation that took place between you and these</p> <p>18 officers when they entered your apartment and</p> <p>19 searched it on this occasion that you're addressing</p> <p>20 here?</p> <p>21 A. Yes. He actually just said that I left my</p> <p>22 keys in the door. I said I did not leave my keys in</p> <p>23 the door. And he asked, I believe, who was here</p> <p>24 with me. And I believe he asked who was here with</p>	<p style="text-align: right;">Page 85</p> <p>1 were saying. You called 911.</p> <p>2 A. Yeah, I called 911.</p> <p>3 Q. What did the operator say to you when you</p> <p>4 called 911?</p> <p>5 A. Hi, this is 911. How can I help you?</p> <p>6 Some officers came into my apartment</p> <p>7 without knocking. They had a key. Or something to</p> <p>8 that effect. And I could have been naked. And I</p> <p>9 think that they just heard me saying no clothing.</p> <p>10 And I think maybe like a couple of minutes later, it</p> <p>11 was a female officer and a male officer in uniform</p> <p>12 came to my apartment because the door was still</p> <p>13 open -- ajar, open. And they came to my --</p> <p>14 uniformed, and said -- what she -- I don't -- I</p> <p>15 think I had an interaction like, hi, or something to</p> <p>16 that effect with the officers, whoever else was with</p> <p>17 Watts. Because there was a couple of them. One</p> <p>18 stayed and the other one or two left.</p> <p>19 And she asked me, the officer in uniform</p> <p>20 did ask me what's going on. I heard or thought you</p> <p>21 were unclothed. I said I could have been, you know,</p> <p>22 undressed, and they used a key to come in my</p> <p>23 apartment. They had to get it from management.</p> <p>24 And she asked me -- she did ask was I</p>

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<p style="text-align: right;">Page 86</p> <p>1 okay. And I said no, because this is not okay. And</p> <p>2 they -- Watts and whoever wind up leaving. And</p> <p>3 she -- I believe she did say that I can make a</p> <p>4 complaint if I wanted to. And that was the extent</p> <p>5 of that.</p> <p>6 <b>Q. Did this incident become -- come before or</b></p> <p>7 <b>after the board on your door?</b></p> <p>8 A. I don't recall.</p> <p>9 <b>Q. To the extent that you made this complaint</b></p> <p>10 <b>on March 28th, 2001, were you reporting an incident</b></p> <p>11 <b>that had happened that day, or were you calling</b></p> <p>12 <b>after these things had all happened?</b></p> <p>13 A. With the board, I remember that it was in</p> <p>14 the evening time. So they were -- it was not open.</p> <p>15 The OPS would not have been open. So that would</p> <p>16 have had to have been another day. And as far as</p> <p>17 the key being used, that was during the daytime or</p> <p>18 afternoon-ish, I believe. So I don't think it was</p> <p>19 the same day of the incidents happening.</p> <p>20 <b>Q. And then this also states that you alleged</b></p> <p>21 <b>that on the same day as the key, officers returned</b></p> <p>22 <b>later that evening, and when you refused to let them</b></p> <p>23 <b>in, they turned off your electricity.</b></p> <p>24 A. Oh, yes. Yes.</p>	<p style="text-align: right;">Page 88</p> <p>1 <b>Q. Well, it says that they alleged they</b></p> <p>2 <b>returned later that evening when you refused to let</b></p> <p>3 <b>them in. So what happened in terms of that</b></p> <p>4 <b>interaction of officers returning and you refusing</b></p> <p>5 <b>to let them in your apartment?</b></p> <p>6 A. It means, again, assuming why would I let</p> <p>7 them in for them being rude as far as just helping</p> <p>8 theyself coming in. I never had an incident of not</p> <p>9 letting an officer in when they knock on my door or</p> <p>10 whoever they say they are. I had no problem. And</p> <p>11 nobody can say that I never opened my door to say</p> <p>12 come in if they wanted to come in.</p> <p>13 <b>Q. Well, here's the problem --</b></p> <p>14 A. So I probably -- I was most likely upset</p> <p>15 at the situation from earlier or when it happened.</p> <p>16 <b>Q. Were these the same officers, the same</b></p> <p>17 <b>three to four officers including Watts, that</b></p> <p>18 <b>returned later the same evening?</b></p> <p>19 A. Honestly, I don't -- I don't know because</p> <p>20 I didn't open the door at all.</p> <p>21 <b>Q. Okay. If they were able to get in through</b></p> <p>22 <b>their own key before --</b></p> <p>23 A. Uh-huh.</p> <p>24 <b>Q. -- how was it that they were unable to</b></p>
<p style="text-align: right;">Page 87</p> <p>1 <b>Q. You mentioned Watts. What other officers</b></p> <p>2 <b>were with him when they first came into your</b></p> <p>3 <b>apartment with the key?</b></p> <p>4 A. I don't recall.</p> <p>5 <b>Q. Okay. Do you remember exactly how many,</b></p> <p>6 <b>if it was more or less than one, two, three?</b></p> <p>7 A. Watts and another person definitely. So</p> <p>8 I'm thinking maybe three. Three or four, I'm</p> <p>9 assuming. But I know that it was more than two. So</p> <p>10 I would say three to four.</p> <p>11 <b>Q. Do you remember what the other officers</b></p> <p>12 <b>looked like?</b></p> <p>13 A. African American.</p> <p>14 <b>Q. All of them?</b></p> <p>15 A. Something is saying three, and I know</p> <p>16 three was African American.</p> <p>17 <b>Q. And if there was a fourth, you're unsure?</b></p> <p>18 A. Yes. If there was, yes.</p> <p>19 <b>Q. With respect to the officers that returned</b></p> <p>20 <b>later that evening, who returned later that evening?</b></p> <p>21 A. I don't know because the fuse box that</p> <p>22 controls the electricity, and I'm assuming, like,</p> <p>23 the gas or whatever, it's an electrical room that</p> <p>24 you can control the lights.</p>	<p style="text-align: right;">Page 89</p> <p>1 <b>just use that same key to enter again that evening?</b></p> <p>2 A. Well, I can't --</p> <p>3 MR. TEPFER: Objection. Hold on. Hold on.</p> <p>4 Objection. Calls for speculation.</p> <p>5 Go ahead.</p> <p>6 BY THE WITNESS:</p> <p>7 A. I can't think for them, and I was informed</p> <p>8 that Watts was having a relationship, and, again, I</p> <p>9 cannot think for them, but he supposedly had a</p> <p>10 relationship within management that -- that was</p> <p>11 running the Ida B. Wells Extensions. So I don't</p> <p>12 know their -- if he got the key from her or what</p> <p>13 type of relationship they had.</p> <p>14 The rumors were that they gambled together</p> <p>15 or went out to gamble. I'm not for sure. I never</p> <p>16 been there. I have not witnessed. But those were</p> <p>17 rumors. So it could be from there. Why would they</p> <p>18 want to use a key again if I called 911 the first</p> <p>19 time? But I can't speak for -- I don't know.</p> <p>20 <b>Q. If you didn't see who it was, how did you</b></p> <p>21 <b>know that it was officers returning?</b></p> <p>22 A. Because I said, "Who is it?" And they</p> <p>23 said, "Police."</p> <p>24 <b>Q. But you don't know if it was the same</b></p>

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Page 90	<p>1 officers as earlier in the day?</p> <p>2 A. Correct, I don't. I don't know.</p> <p>3 Q. And then with respect to your electricity</p> <p>4 going off, are you assuming that it was the officers</p> <p>5 that turned it off? Because --</p> <p>6 A. No.</p> <p>7 Q. -- did you actually see who turned off the</p> <p>8 electricity?</p> <p>9 A. No, I did not see who actually turned it</p> <p>10 off. I did get a call from a resident stating</p> <p>11 that -- they just said the police is in the</p> <p>12 electricity room. They didn't even say electricity</p> <p>13 room, but in the whatever room they -- word they</p> <p>14 used turning off your -- your lights. That's how I</p> <p>15 got a call. I also got a call saying that a</p> <p>16 board -- the officer was jamming a board in the</p> <p>17 door. So I couldn't even -- yeah.</p> <p>18 Q. Who was -- which resident was telling you</p> <p>19 this information?</p> <p>20 A. I don't -- I can't recall.</p> <p>21 Q. How did you get your electricity back on?</p> <p>22 A. One of the residents. Or I don't even</p> <p>23 know if they're a resident. Someone that was</p> <p>24 lingering in the building. I finally opened the</p>	Page 92	<p>1 via telephone to contact the complainant to no</p> <p>2 avail. Do you recall receiving phone calls from an</p> <p>3 OPS sergeant trying to follow up with you?</p> <p>4 A. No avail. No.</p> <p>5 Q. Okay. And then also a certified letter</p> <p>6 was sent to you, according to Sergeant McCoy, on</p> <p>7 April 10th, 2001. Do you recall receiving a</p> <p>8 certified letter in the mail from the Chicago Police</p> <p>9 Department following up with your complaint?</p> <p>10 A. No, ma'am.</p> <p>11 Q. Okay. And then, lastly, on April 26th,</p> <p>12 2001, the reporting sergeant attempted to conduct an</p> <p>13 in-person interview at your residence, and it states</p> <p>14 that this attempt also was met with negative</p> <p>15 results. Do you recall a sergeant attempting to</p> <p>16 come to your apartment on April 26th, 2001, to</p> <p>17 further investigate your complaint?</p> <p>18 A. No.</p> <p>19 Q. After reporting what -- these incidents in</p> <p>20 2001, is there a reason why you didn't follow up</p> <p>21 with that initial phone call?</p> <p>22 A. I never received a phone call or knew that</p> <p>23 a phone call was made to me; just like I never</p> <p>24 received a letter, certified or uncertified, to my</p>
Page 91	<p>1 door. I called my mother-in-law, and she came over.</p> <p>2 And that's when I opened the door, and there was</p> <p>3 some people outside in the hall. When I say</p> <p>4 "outside," I should have said in the hallway on the</p> <p>5 second floor. And they said, "You want me to turn</p> <p>6 your lights back on?" And they turned them back on</p> <p>7 for me.</p> <p>8 Q. Do you know if anyone else lost</p> <p>9 electricity that night?</p> <p>10 A. No, I do not.</p> <p>11 Q. Okay. I'm just going to scroll down to</p> <p>12 page 4 of Exhibit 14. Here this is a to/from dated</p> <p>13 April 26th, 2001. And so it's from Sergeant</p> <p>14 Vernetta McCoy, who is one of the individuals that</p> <p>15 was investigating this, and, to Commander Ernest T.</p> <p>16 Brown, Public Housing Section.</p> <p>17 And here I just want to kind of go through</p> <p>18 some of the information in this narrative portion</p> <p>19 where it states that the complainant, Ms. Clarissa</p> <p>20 Glenn, resides at the location of the alleged</p> <p>21 incidents, which has your address of 527</p> <p>22 East Browning, Number 206, Chicago, Illinois 60653.</p> <p>23 And it states that on 10 April, 16 April,</p> <p>24 and 26 April 2001, the reporting sergeant attempted</p>	Page 93	<p>1 apartment, and also because I was approached by</p> <p>2 Watts making the remark of me making a complaint to</p> <p>3 OPS about him. And then that's when AJ walked past,</p> <p>4 because I was sitting in my vehicle. AJ walked past</p> <p>5 and saying, Don't talk to that bitch. She's going</p> <p>6 to Dwight or she's going to jail. No. She's going</p> <p>7 to jail, whatever, prison, jail, with her man.</p> <p>8 Q. So I think we're talking about different</p> <p>9 incidents. So, again, I really want to focus on --</p> <p>10 A. No, they -- no. And no. I think we're</p> <p>11 talking about the same incident. I'm thinking we're</p> <p>12 speaking about did anyone follow up regarding the</p> <p>13 complaint. And the person who follows up was Watts</p> <p>14 because Watts the only one that came to me face to</p> <p>15 face regarding a complaint that I made to OPS.</p> <p>16 Q. So --</p> <p>17 A. So that's why I thought you were talking</p> <p>18 about the complaint. That's the only one that had</p> <p>19 verbally started off a communication, and his</p> <p>20 partner walked past and disrespected me, called me</p> <p>21 out my name and also stated that I was going to</p> <p>22 prison. So those are the only ones that</p> <p>23 communicated with me regarding this -- regarding any</p> <p>24 OPS, anything.</p>

27 (Pages 90 to 93)



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1       **Q.** So I'm pulling up again what I've marked  
2 as Exhibit 14, which is C.R. Number 207177. Going  
3 to the final paragraph of this page, which is,  
4 again, the OPS records related to the complaint you  
5 made, it indicates that the complainant, which would  
6 be you, gave no incident date and/or time  
7 identifiers for her numerous complaints.  
8       However, the reporting sergeant conducted  
9 an event inquiry utilizing a time span extending  
10 30 days prior to the complainant registering her  
11 complaint. The results of the query were negative.  
12 Thus the reporting sergeant was unable to ascertain  
13 whether or not any officers rendered police service  
14 at the given location. As well the reporting  
15 sergeant was unable to identify any accused  
16 officers.  
17       So with respect to this C.R. Number 270177  
18 that was made in 2001, there was no -- there was  
19 never any officers tied to this complaint. Do you  
20 understand what I'm saying?  
21       MR. TEPFER: Objection to form.  
22       Go ahead.  
23 BY THE WITNESS:  
24       A. Uh-huh.

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1       **Q.** So --  
2       A. I understand what you're saying.  
3       **Q.** Okay. So I -- and we have talked about  
4 that you've made multiple complaints to OPS,  
5 correct?  
6       A. Yes. We did, yes.  
7       **Q.** Okay. So in 2001 -- and you've also told  
8 me that you did not know who Watts was prior to  
9 Mr. Baker identifying him to you on Mother's Day  
10 2004, correct?  
11       A. Correct.  
12       **Q.** Okay. So this incident that you're  
13 telling me about with Watts and AJ threatening you,  
14 are you still thinking that this occurred after you  
15 made this complaint in 2001, or are you thinking --  
16 are you thinking it was later on?  
17       A. I believe that it was -- in my opinion, I  
18 feel that it's later on.  
19       **Q.** Okay. So after -- so my question is,  
20 again, just focused on this 2001 complaint. You  
21 made -- you called OPS initially. You made the  
22 complaint. Why did you not follow up --  
23       A. I didn't actually call. I didn't mean to  
24 interrupt. I didn't call. I physically went down

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1 to -- to OPS and went and spoke with someone.  
2       **Q.** Okay. So the complaint was initiated. I  
3 will scroll up to -- I will scroll up to page 8 of  
4 10, which is Bates-stamped COPA-Watts 1570. I'm  
5 going to just highlight a portion here. It says the  
6 complaint was initiated -- I've highlighted this  
7 portion that states, "The complaint was initiated on  
8 28 March, 2001 at 18:35 hours by the complainant and  
9 was recorded with the Office of Professional  
10 Standards by Investigator D. Young, Number 527742."  
11 So it's indicating that you made this complaint on  
12 March 28th at 6:35 p.m. Would you agree?  
13       A. No, I'm not going to agree to that.  
14       **Q.** Okay.  
15       A. And why is because I am unaware of the  
16 time. I'm not going to just go by what's on the  
17 typed letter by a human. And secondly is, I'm not  
18 for sure. Do OPS -- I thought OPS closed at five  
19 o'clock, 5:00 p.m., not 6:00. So -- and all my  
20 response or communication was with a person behind a  
21 desk.  
22       That's the only response. I've never sat  
23 down with anyone. So I don't know if she or he took  
24 the information down correctly or was this typed up

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1 the same day that I came or was it days later that I  
2 had came.  
3       **Q.** Okay.  
4       A. I put -- respectfully, I actually put a  
5 real face and knew from me hearing, like, Watts'  
6 name here and there. There were people just  
7 communicating from Mother's Day. If you're asking  
8 me about this here documentation prior to, he wasn't  
9 that big of a mumble around my household or outside,  
10 in the building, me passing through. So, no. If  
11 someone said Watts, it's like, okay, who is -- it's  
12 no need for me. But because I kept hearing Watts  
13 name around before -- prior to Mother's Day, then  
14 it's like, oh, that's him.  
15       So, yeah, that's how all that happened.  
16 But, no, I did not -- I'm not going to agree to the  
17 time or anything like that.  
18       **Q.** Okay. Well, I do want to make sure -- to  
19 the extent that this memorializes the allegations  
20 you made, I want to make sure that they were  
21 memorialized correctly in your mind. It's stating  
22 that Allegation Number 1 is that two male white  
23 officers placed a board across your front door  
24 blocking your children inside; is that correct?

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Page 98	<p>1 A. Yes.</p> <p>2 <b>Q. Okay. Allegation Number 2 is that several</b></p> <p>3 <b>civilian-dressed officers using a key or -- using a</b></p> <p>4 <b>key to enter and search her residence without a</b></p> <p>5 <b>warrant; is that correct?</b></p> <p>6 A. Yes.</p> <p>7 <b>Q. And then Allegation Number 3, several</b></p> <p>8 <b>civilian-dressed officers turned off her electricity</b></p> <p>9 <b>after she refused to let them into her home; is that</b></p> <p>10 <b>correct?</b></p> <p>11 A. Officers did turn off my electricity. I</p> <p>12 don't know if it was one or several. It doesn't</p> <p>13 take several, but I don't know the count because I</p> <p>14 didn't allow anyone to come in.</p> <p>15 <b>Q. But it would have -- the electricity was</b></p> <p>16 <b>turned off by an officer or multiple officers --</b></p> <p>17 A. Yes.</p> <p>18 <b>Q. -- after you refused to let one person or</b></p> <p>19 <b>multiple into your home?</b></p> <p>20 A. It was turned off before the knock on the</p> <p>21 door to come in, yes.</p> <p>22 <b>Q. Okay. So to the extent that this -- this</b></p> <p>23 <b>complaint has reflected that the electricity was</b></p> <p>24 <b>turned off after you refused to let them in --</b></p>	Page 100	<p>1 heard that I had made a complaint. He heard that I</p> <p>2 made a complaint. He said something else. A.J.</p> <p>3 walked past behind him, called me a bitch and that I</p> <p>4 was going to prison with my man -- I don't even</p> <p>5 think he said Ben's name -- or something to that</p> <p>6 effect.</p> <p>7 Watts said okay. I felt that he was</p> <p>8 talking to me because he was -- his face was still</p> <p>9 in my direction, and then he walked away.</p> <p>10 <b>Q. When was this -- these threats made to</b></p> <p>11 <b>you?</b></p> <p>12 A. I don't recall.</p> <p>13 <b>Q. How long after you made this complaint in</b></p> <p>14 <b>March of 2001 did you receive those threats?</b></p> <p>15 A. I don't recall.</p> <p>16 <b>Q. Okay. So to the extent that OPS</b></p> <p>17 <b>investigators attempted to call you and visit your</b></p> <p>18 <b>home, were you avoiding them, or you just don't</b></p> <p>19 <b>recall receiving any contact from them?</b></p> <p>20 MR. TEPFER: Objection. Argumentative, form,</p> <p>21 misstates the evidence.</p> <p>22 Go ahead.</p> <p>23 BY THE WITNESS:</p> <p>24 A. Again, I did not receive a call, nor did</p>
Page 99	<p>1 A. I believe -- or whatever. But go ahead.</p> <p>2 I'm sorry.</p> <p>3 <b>Q. I'm just trying to clarify with what's the</b></p> <p>4 <b>sequence of events. Was the electricity turned off</b></p> <p>5 <b>before they knocked on your door or after they --</b></p> <p>6 <b>after you refused to let them in?</b></p> <p>7 MR. TEPFER: Asked and answered.</p> <p>8 You can answer again, if you remember.</p> <p>9 BY THE WITNESS:</p> <p>10 A. No, I'm not going to -- no, I don't</p> <p>11 remember.</p> <p>12 <b>Q. Okay. So with respect to this third</b></p> <p>13 <b>allegation, you can't say whether it's correct or</b></p> <p>14 <b>incorrect when it says that the electricity was</b></p> <p>15 <b>turned off after you refused to let them in?</b></p> <p>16 A. Correct.</p> <p>17 <b>Q. Okay. Again, why was it that after you</b></p> <p>18 <b>made this complaint you did not follow up either at</b></p> <p>19 <b>the police station or via telephone to determine</b></p> <p>20 <b>what was going to come of it?</b></p> <p>21 MR. TEPFER: Objection. Asked and answered.</p> <p>22 BY THE WITNESS:</p> <p>23 A. Watts approached my vehicle where I was</p> <p>24 sitting and informed me that I had made a -- he</p>	Page 101	<p>1 I -- from OPS, nor did I get a letter, certified or</p> <p>2 uncertified, in the mail. And the only visit that I</p> <p>3 had was from Watts.</p> <p>4 <b>Q. And again, also too, you did not learn</b></p> <p>5 <b>Watts's name -- well, strike that.</b></p> <p>6 <b>You previously testified that on Mother's</b></p> <p>7 <b>Day 2004, it was Watts and AJ that approached</b></p> <p>8 <b>Mr. Baker, correct?</b></p> <p>9 A. I did not say that.</p> <p>10 <b>Q. Okay. What -- what's your memory, then,</b></p> <p>11 <b>of what happened on Mother's Day 2004?</b></p> <p>12 A. Ben and myself and our boys were walking</p> <p>13 out, going towards our car. Two plain -- two guys</p> <p>14 were coming around the building.</p> <p>15 A guy said, I'm broke. I been up all -- I</p> <p>16 lost my money. I'm broke. I been up all night</p> <p>17 gambling. It's Mother's Day or -- it's Mother's</p> <p>18 Day. And something else he said.</p> <p>19 And then I believe Ben said, "What are you</p> <p>20 telling me for?" But we were still walking. And</p> <p>21 they were still walking in our direction. But we</p> <p>22 were walking towards the car.</p> <p>23 And I asked Ben, "Who was that?" And he</p> <p>24 said, "Oh, that's Watts." And I turned to get a</p>

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<p style="text-align: right;">Page 102</p> <p>1 clear visual of who he actually is or was because I</p> <p>2 had heard his name so often here and there. It was</p> <p>3 like, oh.</p> <p>4 <b>Q. So this is where I'm confused is because</b></p> <p>5 <b>you're testifying today when I'm showing you this</b></p> <p>6 <b>complaint that you made in 2001, saying that you</b></p> <p>7 <b>know that it was Watts and his officers that did</b></p> <p>8 <b>this. But now you're describing for me that you had</b></p> <p>9 <b>to ask who Watts was on Mother's Day 2004.</b></p> <p>10 <b>So did you know who Watts was on Mother's</b></p> <p>11 <b>Day in 2004 because you recognized him from what</b></p> <p>12 <b>happened in 2001 and the threats that ensued or</b></p> <p>13 <b>just --</b></p> <p>14 A. So don't be confused. In 2001 when I made</p> <p>15 the complaint against Watts, I asked people in the</p> <p>16 building who was that officer. They said, "Watts."</p> <p>17 I had not never heard his name. He was not the</p> <p>18 movie star on television. He never came on</p> <p>19 Channel 9. Ben wasn't around or his sergeant --</p> <p>20 nobody was around to say this is actually who he was</p> <p>21 for me to ask at that particular moment. He did not</p> <p>22 introduce himself. I didn't bother to introduce</p> <p>23 myself either.</p> <p>24 There was no need. It was officers.</p>	<p style="text-align: right;">Page 104</p> <p>1 killer. That's -- that's how I -- yeah. So --</p> <p>2 <b>Q. So --</b></p> <p>3 A. -- don't be confused.</p> <p>4 <b>Q. Right. But so, again, I just want to make</b></p> <p>5 <b>sure I'm not misunderstanding your testimony.</b></p> <p>6 <b>Watts, I believe you told me that after you made</b></p> <p>7 <b>this complaint to OPS in 2001, again, you didn't</b></p> <p>8 <b>know his name when you made the complaint, so that's</b></p> <p>9 <b>why it's not in the report. But after this 2001</b></p> <p>10 <b>complaint was made, Watts and AJ threatened you?</b></p> <p>11 MR. TEPFER: Objection to form. Asked and</p> <p>12 answered.</p> <p>13 Go ahead.</p> <p>14 BY MS. OLIVIER:</p> <p>15 <b>Q. With respect to this 2001 complaint?</b></p> <p>16 A. I can't say if they were just speaking on</p> <p>17 that one complaint, that one case or when. I have</p> <p>18 no idea when it happened. I don't know the date. I</p> <p>19 don't know at all. The only thing I know is that</p> <p>20 Watts came to me while I'm minding my business,</p> <p>21 sitting in my vehicle to inform me that he's aware</p> <p>22 that I made a complaint against him.</p> <p>23 How do he know? I have no clue. I never</p> <p>24 spoke with anyone at OPS to give me the heads-up to</p>
<p style="text-align: right;">Page 103</p> <p>1 That's it. That's all. When it comes to officers,</p> <p>2 you just listen to what they say, do what they say,</p> <p>3 and go your separate ways hoping that nothing</p> <p>4 negative comes about because that's why we're here</p> <p>5 today.</p> <p>6 Moving forward, when I did go to OPS, it's</p> <p>7 because the name was given to me about who he was as</p> <p>8 far as his name, not anything negative, not he did</p> <p>9 this to this person. He's a good American citizen.</p> <p>10 I know nothing of him.</p> <p>11 After that, me making this complaint,</p> <p>12 nothing happened. I don't -- it's out of my mind.</p> <p>13 I'm still living my life. Moving forward, Watts,</p> <p>14 Watts, Watts, Watts, Watts. Like, let's put him a</p> <p>15 billboard out here. Like, who the heck is Watts?</p> <p>16 But I care less. He's not bothering me.</p> <p>17 On Mother's Day when this guy is coming</p> <p>18 around the corner, I still did not put his face to</p> <p>19 when he came into my apartment because I care less,</p> <p>20 and he's not that nice looking to look at anyway.</p> <p>21 So when I asked Ben who he was, and it's like, oh,</p> <p>22 that's who my kids talk about. That's who the dog</p> <p>23 barks at. That's who this person is. Oh, that's</p> <p>24 him. That's the Good Samaritan or that's the</p>	<p style="text-align: right;">Page 105</p> <p>1 say, hey, we have to inform the person you</p> <p>2 complaining about or whatever it may be so that I</p> <p>3 can make sure that I'm safe and covered if I need to</p> <p>4 move or wherever it may be. I had no idea that he</p> <p>5 was aware of a complaint that I made until he told</p> <p>6 me.</p> <p>7 <b>Q. I'm just trying to understand -- I'm just</b></p> <p>8 <b>trying to understand to make sure I'm understanding</b></p> <p>9 <b>correctly that it's because you received this threat</b></p> <p>10 <b>that you didn't follow up with OPS with respect to</b></p> <p>11 <b>the 2001 complaint?</b></p> <p>12 MR. TEPFER: Objection to form, asked and</p> <p>13 answered, and misstates the evidence.</p> <p>14 BY MS. OLIVIER:</p> <p>15 <b>Q. You can answer, Ms. Glenn.</b></p> <p>16 A. That's -- yes.</p> <p>17 MS. OLIVIER: Okay. I'm now going to show you</p> <p>18 what I'm going to mark as Exhibit 15.</p> <p>19 For the attorneys, this is Bates-stamped</p> <p>20 City-BP 3326 through 3350.</p> <p>21 (Glenn Exhibit 15 marked.)</p> <p>22 BY MS. OLIVIER:</p> <p>23 <b>Q. Ms. Glenn, do you see the document that</b></p> <p>24 <b>I'm sharing on my screen?</b></p>



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<p style="text-align: right;">Page 106</p> <p>1 A. Yes.</p> <p>2 <b>Q. This is for Complaint Register</b></p> <p>3 <b>Investigation Number 309282. As you see, your name</b></p> <p>4 <b>is highlighted here, and then it has your address,</b></p> <p>5 <b>telephone number, and the date of birth. Is that</b></p> <p>6 <b>information all correct?</b></p> <p>7 A. That's not -- that's not my current</p> <p>8 number.</p> <p>9 <b>Q. Okay. And then I also see it actually has</b></p> <p>10 <b>you as Number 204. So that would be the wrong</b></p> <p>11 <b>apartment number for you, correct?</b></p> <p>12 A. Yes.</p> <p>13 <b>Q. Was there a Sambo that you knew in</b></p> <p>14 <b>Apartment 204?</b></p> <p>15 A. No.</p> <p>16 <b>Q. The Allegation Number 1 here for this</b></p> <p>17 <b>complaint is accused, who's listed as Ronald Watts,</b></p> <p>18 <b>so identified with respect to this complaint, which</b></p> <p>19 <b>was made -- hold on. I'll scroll down. This</b></p> <p>20 <b>complaint was made on August 24th, 2005. Do you see</b></p> <p>21 <b>that here?</b></p> <p>22 A. Yes.</p> <p>23 <b>Q. I'm going to go up to the allegations</b></p> <p>24 <b>again. Allegation Number 1, accused searched her</b></p>	<p style="text-align: right;">Page 108</p> <p>1 <b>the date, which is October 24th, 2005.</b></p> <p>2 A. So --</p> <p>3 <b>Q. And here you'll see your name, your date</b></p> <p>4 <b>of birth.</b></p> <p>5 A. Okay.</p> <p>6 <b>Q. And then the correct apartment number.</b></p> <p>7 A. Okay.</p> <p>8 <b>Q. And then here in the narrative portion, it</b></p> <p>9 <b>states the complainant alleges that on the above</b></p> <p>10 <b>date, which is October 24th, 2005, two male black</b></p> <p>11 <b>casually dressed officers entered and searched her</b></p> <p>12 <b>residence without a warrant or her permission. It</b></p> <p>13 <b>is further alleges -- that's a typo -- alleges that</b></p> <p>14 <b>on 23 October 2005 at approximately 13:30 or</b></p> <p>15 <b>1:30 p.m., one of the accused officers gave the</b></p> <p>16 <b>witness a threatening message for the complainant.</b></p> <p>17 <b>According to the complainant, the accused officer,</b></p> <p>18 <b>whose name is possibly Ronald Watts, threatened her</b></p> <p>19 <b>with bodily harm and arrest for no reason.</b></p> <p>20 <b>All right. And is it your testimony that</b></p> <p>21 <b>this whole narrative portion and these allegations</b></p> <p>22 <b>are incorrect or didn't happen?</b></p> <p>23 A. Well, first, you just said it was a typo.</p> <p>24 So that's --</p>
<p style="text-align: right;">Page 107</p> <p>1 <b>residence without a warrant or her permission on</b></p> <p>2 <b>August [sic] 20th, 2005. Allegation Number 2, that</b></p> <p>3 <b>the accused had the witness tell the victim that the</b></p> <p>4 <b>accused would cause her bodily and that he would</b></p> <p>5 <b>arrest her for no reason. This allegation was to</b></p> <p>6 <b>have happened on 23 October, 2005.</b></p> <p>7 <b>Do you recall making this complaint to the</b></p> <p>8 <b>Office of Professional Standards on October 24th,</b></p> <p>9 <b>2005?</b></p> <p>10 A. No.</p> <p>11 <b>Q. Okay.</b></p> <p>12 A. No. No. They never -- they as Watts or</p> <p>13 his team never threatened me with any bodily harm,</p> <p>14 so no.</p> <p>15 <b>Q. Okay. So, again, I'm going to go to</b></p> <p>16 <b>page 3 of this --</b></p> <p>17 A. Is this mine? Is this supposed to be</p> <p>18 regarding me? Because I know it's the wrong phone</p> <p>19 number -- I mean the wrong address, apartment</p> <p>20 number. So is that actually referring to me?</p> <p>21 <b>Q. So I'm now directing -- I'm now having you</b></p> <p>22 <b>go to page -- I'm directing you to page 3 of</b></p> <p>23 <b>Exhibit 15, which is also for C.R. Number 309282, so</b></p> <p>24 <b>the same C.R. number. I'm here going to highlight</b></p>	<p style="text-align: right;">Page 109</p> <p>1 <b>Q. The typo I'm referring to is it should</b></p> <p>2 <b>probably say it further is -- it is further alleged</b></p> <p>3 <b>versus "it is further alleges." So nothing</b></p> <p>4 <b>substantive, but just to clear that up.</b></p> <p>5 A. Again, they never said any threatening</p> <p>6 about bodily harm. So I don't -- I don't feel that</p> <p>7 this is referring to me at all because I don't know</p> <p>8 Sambo. I don't know anything about -- no.</p> <p>9 <b>Q. I'm now going to go to what's Bates</b></p> <p>10 <b>stamped 3341.</b></p> <p>11 A. Okay.</p> <p>12 <b>Q. This is on page 16 of Exhibit 15. All</b></p> <p>13 <b>right. Is this your handwriting, Ms. Glenn?</b></p> <p>14 A. Yes, yes.</p> <p>15 MR. TEPFER: I have got a copy in front of her,</p> <p>16 just so you know.</p> <p>17 BY MS. OLIVIER:</p> <p>18 <b>Q. Okay. Great. So this is a two-page</b></p> <p>19 <b>letter that is drafted by you, correct?</b></p> <p>20 A. Yes.</p> <p>21 <b>Q. Okay. I'm just going to read it into the</b></p> <p>22 <b>record. "Thank you for taking time out to read my</b></p> <p>23 <b>letter. My name is Clarissa Glenn, an old resident</b></p> <p>24 <b>of the Ida B. Wells Extension, a mother of three</b></p>

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<p style="text-align: right;">Page 110</p> <p>1 boys, currently a wife of five months and an 2 administrative assistant." I would like to pause 3 right there. You and Mr. Baker, were you married in 4 2006? 5 A. Yes. 6 Q. Okay. So to the extent that you're 7 indicating that you're currently a wife of five 8 months, would you have drafted this -- there's no 9 date on this letter, but would you have drafted this 10 sometime -- or five months after you were married in 11 2006? 12 A. I don't recall. 13 Q. Okay. Do you know why you would have put 14 that you were a wife of five months if you hadn't 15 been married for five months? 16 A. No. No. 17 Q. Okay. So would it be safe to assume that 18 while you maybe don't remember when you drafted 19 this, that if you wrote that you were a wife for 20 five months, it was five months after you had been 21 married? 22 A. I don't recall. 23 Q. Okay. "On October 28, 2005, I made a 24 complaint on two officers of the law, Ronald Watts</p>	<p style="text-align: right;">Page 112</p> <p>1 highlight the portion I want. 2 A. Uh-huh. 3 Q. Is that incorrect? 4 A. I don't remember. I'm not going to say 5 it's incorrect because I actually wrote it -- 6 Q. Okay. 7 A. -- with my hand. So when I was asked by 8 you a few minutes ago, I said that they did not 9 physically -- that he did not physically threaten me 10 at any time. So at that time, no. But, now reading 11 this here from my own writing, I'm a little -- 12 vaguely, yes. It's not incorrect. No, it's 13 correct. 14 Q. Okay. So before I think you were 15 questioning whether the Office of Professional 16 Standards memorialized your complaint accurately. 17 And your belief was no. However, seeing this in 18 your own writing -- 19 A. Yes. 20 Q. -- you're now inclined to believe that, 21 okay, that was what you told OPS? 22 A. Yes. 23 Q. Okay. 24 A. Yes.</p>
<p style="text-align: right;">Page 111</p> <p>1 and Alvin Jones. I was physically threatened and 2 abused. I was shoved against the wall by Alvin 3 Jones and verbally threatened by Ronald Watts. 4 Later I did receive a follow-up call about my 5 complaint, but I did not react on it because of more 6 threats I received from the officers, which later on 7 December 9th, 2005, led to my arrest a few weeks 8 after my complaint was made. 9 "I've recently moved on June '06, and now 10 I can follow up on my complaint. Please reopen my 11 case. My family and I are dealing with the 12 embarrassment from this ordeal for no reason at all. 13 This is very painful and stressful and a high cost 14 which I should not have to pay. Thank you again for 15 reading my letter. Clarissa Glenn." 16 And then you list out a series of phone 17 numbers, and then you end it with, "Sorry I didn't 18 leave my address, but I don't want the officers to 19 know where I've moved. Thank you." Did I read that 20 correctly? 21 A. Yes. 22 Q. Okay. So where you state -- and I'll 23 highlight this portion -- that you were physically 24 threatened and abused -- and this is not letting me</p>	<p style="text-align: right;">Page 113</p> <p>1 Q. Okay. I'm going to go back to page 3. It 2 states, "The complainant complained that the accused 3 officer, (whose name is possibly Ronald Watts)..." 4 Do you know if you were still unsure about who 5 Ronald Watts was as of October of 2005? 6 A. I don't recall for that parentheses. I 7 don't recall. 8 Q. Okay. And, again, going back to your 9 letter where you're referencing these threats that 10 you received. And would you agree that your letter 11 is essentially explaining why you did not follow up 12 with this complaint that you made? Correct? 13 A. Yes. That would be one, yes. 14 Q. Okay. So to the extent that this is a 15 letter that you would have drafted after -- we know 16 after you were arrested in December of 2005, do 17 you -- is that refreshing your memory at all about 18 when you received these threats in terms of if it 19 was in relation to the 2001 complaint or this 2005 20 complaint? 21 A. No, I -- no, it was -- I do not recollect 22 the date, remember the date. 23 Q. Okay. 24 A. At all.</p>

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Page 114	<p>1 MS. OLIVIER: I'm now going to show you what</p> <p>2 I'm marking as Exhibit 16.</p> <p>3 (Glenn Exhibit 16 marked.)</p> <p>4 MS. OLIVIER: Which for the attorneys is Bates</p> <p>5 stamped City-BG 12928 through 12936.</p> <p>6 MR. TEPFER: Can you say that one more time?</p> <p>7 I'm sorry.</p> <p>8 MS. OLIVIER: Sure. City-BG 12928 through</p> <p>9 12936.</p> <p>10 BY MS. OLIVIER:</p> <p>11 Q. All right. Ms. Glenn, do you see the</p> <p>12 document that I'm showing on my screen?</p> <p>13 A. Yes.</p> <p>14 Q. This is C.R. Number 309359. So this is a</p> <p>15 third complaint register that we have. Again, this</p> <p>16 first page has your wrong apartment number, but</p> <p>17 we'll -- I'm going to go through a couple pages with</p> <p>18 you for this. Okay?</p> <p>19 A. Uh-huh.</p> <p>20 Q. Here it states, "Allegation Number 1,</p> <p>21 accused searched her residence without a warrant or</p> <p>22 her permission on unknown date and time. Allegation</p> <p>23 Number 2, complainant states that the accused is</p> <p>24 harassing her, and on today's's date, 28 October</p>	Page 116	<p>1 Q. Okay. And with respect to this complaint</p> <p>2 register, it does not have that letter attached to</p> <p>3 it. But, you know -- so I'm actually going to go</p> <p>4 back to Exhibit 15. You do note here on</p> <p>5 October 28th, 2005, that you made a complaint,</p> <p>6 correct?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. And to the extent, again, that this</p> <p>9 letter was drafted afterwards, do you think you</p> <p>10 could have been referring to both of these</p> <p>11 complaints that you made with OPS in terms of why</p> <p>12 you didn't follow up?</p> <p>13 MR. TEPFER: Objection. Calls for speculation.</p> <p>14 BY THE WITNESS:</p> <p>15 A. I don't recall.</p> <p>16 Q. Okay. And again, having gone through</p> <p>17 these two complaints that were made with respect to</p> <p>18 being harassed by Sergeant Watts in October of 2005</p> <p>19 and then later being arrested in December of 2005,</p> <p>20 you're still unable to pinpoint for me the time</p> <p>21 period when you would have been threatened by Watts</p> <p>22 and AJ?</p> <p>23 MR. TEPFER: Objection. Asked and answered.</p> <p>24</p>
Page 115	<p>1 2005, the accused threatened to take her to jail."</p> <p>2 And, again, the accused here is -- I will highlight</p> <p>3 this here -- Ronald Watts.</p> <p>4 Do you recall making this complaint to OPS</p> <p>5 just four days after your October 24th complaint?</p> <p>6 A. No.</p> <p>7 Q. Okay.</p> <p>8 A. I don't recall.</p> <p>9 Q. Okay. And here you'll see on this date --</p> <p>10 I'm going to highlight the date. So it indicates</p> <p>11 the date that you made the complaint, which is</p> <p>12 October 28, 2005. I'll highlight here your</p> <p>13 information, where they do get your address correct.</p> <p>14 And then in the narrative portion it states, "The</p> <p>15 complainant alleges that an officer, Ronald Watts,</p> <p>16 has entered and searched her house on several dates</p> <p>17 without justification. The complainant states that</p> <p>18 the officer is harassing her, and on today's date</p> <p>19 the officer threatened to take her to jail."</p> <p>20 Does that refresh your memory at all as to</p> <p>21 what occurred that led you to make this additional</p> <p>22 complaint to the Office of Professional Standards on</p> <p>23 October 28th?</p> <p>24 A. No.</p>	Page 117	<p>1 BY THE WITNESS:</p> <p>2 A. Correct.</p> <p>3 Q. So, Ms. Glenn, at this point I'm actually</p> <p>4 going to be switching gears and asking you some</p> <p>5 specific questions about the officers that you and</p> <p>6 Mr. Baker have sued in this lawsuit. So I'm looking</p> <p>7 at the time. It's now 12 -- approximately 12:45.</p> <p>8 Did you want to take a little bit of a longer break</p> <p>9 for lunch, or what would you like to do?</p> <p>10 A. I'm on your time. But what would you --</p> <p>11 I'm fine with what you do.</p> <p>12 MS. OLIVIER: Actually, we're on -- well, we're</p> <p>13 on each other's time. So what would you like to do?</p> <p>14 I want to make sure that -- I know this is going to</p> <p>15 be a long day. So what do you think, Josh?</p> <p>16 MR. TEPFER: I'm not sure. Why don't we -- why</p> <p>17 don't we take half an hour?</p> <p>18 MS. OLIVIER: Okay. Why don't we come back at</p> <p>19 then 1:15? We'll start then, and then I should be</p> <p>20 hopefully wrapping up my portion to pass you to the</p> <p>21 other attorneys afterwards.</p> <p>22 THE WITNESS: Okay.</p> <p>23 MR. TEPFER: Okay.</p> <p>24 MS. OLIVIER: Thank you.</p>

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<p style="text-align: right;">Page 118</p> <p>1 THE VIDEOGRAPHER: The time is 12:47 p.m. We</p> <p>2 are now going off the record.</p> <p>3 (Recess taken.)</p> <p>4 THE VIDEOGRAPHER: The time is 1:16 p.m. We're</p> <p>5 now back on the record.</p> <p>6 BY MS. OLIVIER:</p> <p>7 Q. Hi, Ms. Glenn. Are you ready to continue?</p> <p>8 A. Yes.</p> <p>9 Q. You and your husband -- or excuse me. You</p> <p>10 and Mr. Baker have sued a number of officers in this</p> <p>11 case. And I'm going to be asking you a series of</p> <p>12 questions regarding the officers that my law firm is</p> <p>13 representing in your lawsuit. Okay?</p> <p>14 A. Okay.</p> <p>15 Q. I'm going to start with AJ, who -- you</p> <p>16 also know him by Alvin Jones?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. Last time we did talk about his</p> <p>19 involvement a bit in your December of 11th, 2005,</p> <p>20 arrest with Ben, but I had a couple questions to</p> <p>21 follow up on what you remember about his involvement</p> <p>22 in that specific arrest. Namely, you testified</p> <p>23 before that on that date, Sergeant Watts -- you saw</p> <p>24 as him and AJ were searching your car,</p>	<p style="text-align: right;">Page 120</p> <p>1 Q. Okay. And was that passenger door open at</p> <p>2 the time?</p> <p>3 A. Yes, I believe it was.</p> <p>4 Q. Okay. So where was AJ in relationship to</p> <p>5 you and Mr. Baker when you saw Watts pull the drugs</p> <p>6 out of his sleeve?</p> <p>7 A. I don't recall. Around the vehicle. He</p> <p>8 was in -- around that facility [sic]. I don't</p> <p>9 recall exactly where.</p> <p>10 Q. Do you know where he was -- do you know</p> <p>11 where he was in reference to Watts?</p> <p>12 A. No, ma'am.</p> <p>13 Q. Okay. So you can't tell me if he was at</p> <p>14 the front of the vehicle, the back of the vehicle,</p> <p>15 anywhere specific?</p> <p>16 A. No.</p> <p>17 Q. Have you ever observed AJ falsely arrest</p> <p>18 anyone other, obviously than your allegations with</p> <p>19 respect to you and Ben from 2005?</p> <p>20 A. I can't answer that.</p> <p>21 Q. Why not?</p> <p>22 A. I don't know what a person have or do not</p> <p>23 have on their body or outside, you know, their body.</p> <p>24 So I can't. That's not my concern.</p>
<p style="text-align: right;">Page 119</p> <p>1 Sergeant Watts pulled a bag of drugs from his</p> <p>2 sleeve, correct?</p> <p>3 A. Yes.</p> <p>4 Q. All right. And you previously testified</p> <p>5 that was his left -- left sleeve, correct?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. Where was AJ when that happened?</p> <p>8 A. Around the vehicle also.</p> <p>9 Q. So you indicated that Watts was near the</p> <p>10 front driver's side door, which was open when he did</p> <p>11 this, correct?</p> <p>12 A. Correct.</p> <p>13 Q. And it was your memory that you and Ben</p> <p>14 were located at the front of the vehicle?</p> <p>15 A. Ben was more towards the front headlight</p> <p>16 part on the passenger's side.</p> <p>17 Q. All right. And where were you located?</p> <p>18 A. More closer to the -- the mirror, the</p> <p>19 passenger's side mirror.</p> <p>20 Q. Okay. On -- but the front -- the front</p> <p>21 passenger's side. Like the rearview mirror? Not</p> <p>22 the rearview mirror, but the side mirror on the</p> <p>23 passenger's side?</p> <p>24 A. Yes.</p>	<p style="text-align: right;">Page 121</p> <p>1 Q. Okay. Have you ever observed AJ plant</p> <p>2 drugs on anyone?</p> <p>3 A. I also cannot answer that.</p> <p>4 Q. Why not?</p> <p>5 A. Again, I have no knowledge of what a</p> <p>6 person have or don't have on their body, that they</p> <p>7 are not my concern for me to --</p> <p>8 Q. Correct. So I'm just wondering. Have you</p> <p>9 ever seen AJ take drugs and say to someone, these</p> <p>10 are yours? I'm putting these on you?</p> <p>11 A. Again, I can't answer that question.</p> <p>12 Q. Why not?</p> <p>13 A. Because I don't know what the next person,</p> <p>14 what his relationship or non-relationship is with</p> <p>15 the next person.</p> <p>16 Q. Has AJ ever stolen money from you?</p> <p>17 A. From me personally, no.</p> <p>18 Q. Has Mr. Baker ever told you that he's</p> <p>19 stolen money from him?</p> <p>20 MR. TEPFER: Objection to form.</p> <p>21 BY MS. OLIVIER:</p> <p>22 Q. I can clean that up. Has Mr. Baker ever</p> <p>23 told you that AJ stole money from Mr. Baker?</p> <p>24 A. I don't recall a conversation like that</p>

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1 right now.

2 **Q. Besides your and Mr. Baker's December 11,**

3 **2005, arrest, has Mr. Baker ever told you that AJ's**

4 **planted drugs on him before?**

5 A. I don't recall. I don't recall.

6 **Q. You've also sued an Officer Robert**

7 **Gonzalez. Do you know who that is?**

8 A. Gonzalez, maybe if I see his face. It's

9 been a while.

10 **Q. Do you know why you've included him in**

11 **this lawsuit?**

12 A. Gonzalez is part of Watts' crew.

13 **Q. Can you tell me the first time that you**

14 **would have ever interacted with Officer Gonzalez?**

15 A. No. I have no recollection.

16 **Q. Okay. Do you know if you've ever**

17 **interacted with Officer Gonzalez?**

18 A. What do you mean by interact?

19 **Q. Talked to, communicate, been in the same**

20 **room with him, yeah. Basically spoken with**

21 **Officer Gonzalez, been arrested by him, seen**

22 **Mr. Baker be arrested by him, whether he was one of**

23 **the officers that entered your apartment, anything**

24 **like that?**

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1 A. Not at this time. I'm not reflecting

2 anything right now.

3 **Q. Are you able to -- Officer Gonzalez was**

4 **not a part of your December 11th, 2005 arrest,**

5 **correct?**

6 MR. TEPFER: Objection. Calls for speculation.

7 BY THE WITNESS:

8 A. I would -- arrest or report?

9 **Q. The arrest.**

10 A. What are you referring to?

11 **Q. The arrest.**

12 A. I don't recall seeing him on the scene --

13 **Q. Okay.**

14 A. -- when I was -- when I was arrested.

15 **Q. Okay. Have you ever seen Officer Gonzalez**

16 **plant drugs on anyone?**

17 A. I don't know about anyone.

18 **Q. Okay. He's never planted drugs on you,**

19 **correct?**

20 A. Correct.

21 **Q. Have you ever observed him -- or he's**

22 **never stolen money from you, correct?**

23 A. Correct.

24 **Q. All right. He's never falsely arrested**

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1 **you, correct?**

2 A. Correct.

3 **Q. Has Mr. Baker ever told you that**

4 **Officer Gonzalez falsely arrested him?**

5 A. Again, I don't recall a conversation.

6 **Q. And if I were to ask you any questions**

7 **about any misconduct that Officer Gonzalez may have**

8 **performed with respect to someone else, would your**

9 **answer be what you've told me before? You can't**

10 **speak to anything that he would have done with**

11 **respect to anyone else?**

12 A. Correct, yes.

13 **Q. Okay. You've also included Officer Manuel**

14 **Leano or Manny. Do you know who that is?**

15 A. Vaguely.

16 **Q. Okay. Why have you included him in this**

17 **lawsuit?**

18 A. Part of Watts' crew.

19 **Q. Okay. Was -- he was not involved with the**

20 **situation on the scene with your December 11, 2005,**

21 **arrest when Officer Watts pulled drugs from his**

22 **sleeve, correct?**

23 A. I don't recall seeing him there on the

24 scene.

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1 **Q. Okay. Do you know the first time that you**

2 **ever interacted with him?**

3 A. I don't recall.

4 **Q. Okay. Do you know the last time?**

5 A. No, ma'am.

6 **Q. Okay. Officer Leano never planted drugs**

7 **on you, correct?**

8 A. No.

9 **Q. He never stole from you?**

10 A. No, ma'am.

11 **Q. Okay. Those improper and unlawful**

12 **searches of your apartment, do you associate**

13 **Officer Leano with any of those?**

14 A. I can't recall.

15 **Q. Okay. With respect to Officer Gonzalez,**

16 **do you associate him with any of those unlawful**

17 **searches or those complaints you made regarding your**

18 **apartment?**

19 A. I cannot recall on those.

20 **Q. Has Mr. Baker ever indicated to you that**

21 **Officer Leano planted drugs on him, falsely arrested**

22 **him, or otherwise engaged in misconduct with him?**

23 A. I can't recall that.

24 **Q. And if I were to ask you, you would not be**

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1 able to offer me any testimony with respect to any  
2 actions or misconduct that Officer Leano may or may  
3 not have performed with respect to other  
4 individuals?  
5 A. Correct.  
6 Q. Okay. You've also sued Officer Jerome  
7 Summers. Do you know who that is?  
8 A. Jerome Summers?  
9 Q. Correct.  
10 A. That's the name that he uses or is --  
11 Q. That's an officer's name that you've sued.  
12 That's an officer that you sued.  
13 A. Do he go by that name in the streets?  
14 Q. I'm just asking if you know who an  
15 Officer Summers is.  
16 A. Oh, I can't recall right now.  
17 Q. Okay. You wouldn't know the first or last  
18 time you would have interacted with Officer Summers?  
19 A. Again, I can't recall.  
20 Q. Okay. Are you making any allegations that  
21 an Officer Summers planted drugs on you?  
22 A. I'm going to say that I can't recall.  
23 Q. Okay. Well, let me ask it this way: Is  
24 Officer -- the only time you've been arrested was

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1 the December 11th, 2005, correct?  
2 A. Yes.  
3 Q. And the charges that you were charged with  
4 stemmed from drugs that you're stating that you saw  
5 Officer -- or Sergeant Watts pull from his sleeve,  
6 correct?  
7 A. I didn't -- I'm saying that -- that Ronald  
8 Watts came from his sleeve with a bundle of drugs.  
9 I'm saying that.  
10 Q. And you were subsequently charged in  
11 relation to those drugs, correct?  
12 A. Yes.  
13 Q. Okay. You are not claiming any officer  
14 other than Sergeant Watts took drugs and accused you  
15 of possessing them or dealing them, correct?  
16 MR. TEPFER: Objection to form.  
17 But go ahead.  
18 BY THE WITNESS:  
19 A. I'm accusing whoever signed my arrest  
20 paperwork of planting -- also part of planting those  
21 drugs on me.  
22 Q. Okay. But are you able to testify that  
23 Officer Summers planted drugs on you?  
24 MR. TEPFER: Objection. Asked and answered.

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1 BY THE WITNESS:  
2 A. Again, I cannot answer that.  
3 Q. Okay. Has Officer Summers ever stolen  
4 money from you?  
5 A. Again, I cannot answer that.  
6 Q. And is the reason why you can't answer  
7 questions with respect to Officer Summers because  
8 you don't recall who that is?  
9 A. That would be one, yes.  
10 Q. Okay. Is there any other reason why?  
11 A. Right now -- I don't know who that is  
12 right now.  
13 Q. Okay. Do you know if Officer Summers is  
14 one of the officers that ever unlawfully entered  
15 into your apartment or committed any of the other  
16 misconduct allegations you've complained about to  
17 OPS?  
18 A. Again, I can't answer that question right  
19 now.  
20 Q. Is that because you don't know who he is?  
21 A. That's because I have no recollection  
22 right now.  
23 Q. Okay. Do you recall Mr. Baker ever  
24 telling you that Officer Summers falsely arrested

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1 him, planted drugs on him, or otherwise committed  
2 any misconduct against him?  
3 A. And, again, I'm going to say I cannot  
4 recall right now.  
5 Q. Okay. Officer Brian Bolton, why have you  
6 included him in this lawsuit?  
7 A. Watts' crew.  
8 Q. Do you remember who he is?  
9 A. I vaguely remember him.  
10 Q. Okay. Do you know the first time you  
11 would have interacted with him?  
12 A. No, ma'am.  
13 Q. What specific misconduct are you claiming  
14 that he committed in your lawsuit?  
15 A. Anyone who's a part of Watts' team is a  
16 part of the misconduct that he carried on towards  
17 me.  
18 Q. Did Officer Bolton ever plant drugs on  
19 you?  
20 A. No.  
21 Q. Did he ever steal money from you?  
22 A. No, he has not.  
23 Q. Has he ever arrested -- falsely arrested  
24 you?



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1 A. No, he did not.  
2 Q. Okay. Has Mr. Baker ever complained to  
3 you that Officer Bolton planted drugs on him,  
4 falsely arrested him, or otherwise committed any  
5 misconduct against him?  
6 A. I can't recall.  
7 Q. Okay. Is Officer Bolton one of the  
8 officers that would be the subject of the complaints  
9 that you made to OPS in terms of unlawfully entering  
10 into your apartment and committing other misconduct?  
11 A. I can't recall.  
12 Q. Kenny Young, we've talked about him a bit.  
13 Has he ever planted drugs on you?  
14 A. Can you -- what was the name? I'm sorry.  
15 Q. Officer Kenny Young.  
16 A. No, ma'am. No.  
17 Q. Has he ever stolen money from you?  
18 A. No.  
19 Q. Has he ever falsely arrested you?  
20 A. No.  
21 Q. Has Mr. Baker ever indicated to you that  
22 Officer Young falsely arrested him, planted drugs on  
23 him, or otherwise committed misconduct against him?  
24 A. I can't recall any conversation --

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1 Q. Are you able to offer any --  
2 A. -- right now.  
3 Q. Okay. Are you able to offer any testimony  
4 as to any misconduct that Officer Young committed  
5 against anyone other than you and Mr. Baker?  
6 A. No, ma'am.  
7 Q. Okay. And, actually, I'll go back. Are  
8 you able to offer any testimony with respect to  
9 Officer Bolton as to whether or not he committed any  
10 misconduct against anyone other than you and  
11 Mr. Baker?  
12 A. No, I cannot.  
13 Q. And then I apologize if I already asked  
14 you this. But with respect to Officer Summers, are  
15 you able to offer any testimony as to whether or not  
16 he committed misconduct against individuals other  
17 than you and Mr. Baker?  
18 A. Not at this time.  
19 Q. Okay. You've also sued an Officer David  
20 Soltis. Do you recognize the name Officer David  
21 Soltis?  
22 A. Not at this time.  
23 Q. Okay. Do you know why you've included him  
24 in this lawsuit?

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1 A. Because he might be part of Watts' crew or  
2 on my arrest record.  
3 Q. Has Officer Soltis ever planted drugs on  
4 you?  
5 A. I can't recall.  
6 Q. Okay. Has Officer Soltis ever stolen  
7 money from you?  
8 A. I would -- no, I can't recall.  
9 Q. Has Officer Soltis ever falsely arrested  
10 you?  
11 A. I'm going to also say I can't recall.  
12 Q. And that's because you're not sure who  
13 Officer Soltis is; is that correct?  
14 A. Correct.  
15 Q. All right. Do you have any knowledge of  
16 your husband making complaints that Officer Soltis  
17 falsely arrested him, planted drugs on him, or  
18 otherwise committed misconduct against him? And I'm  
19 sorry. Mr. Baker.  
20 A. I can't recall right now.  
21 Q. Okay. Can you offer any testimony as to  
22 whether or not Officer Soltis has committed any  
23 misconduct against individuals other than you and  
24 Mr. Baker?

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1 A. Not to my knowledge.  
2 Q. Do you associate Officer Soltis with any  
3 of the complaints that you made to OPS regarding  
4 unlawful searches and other misconduct?  
5 A. I can't answer that right now.  
6 Q. Okay. Again, because you're not sure who  
7 he is, correct?  
8 A. Correct.  
9 Q. With respect to Officer Young, do you  
10 associate him with any of the complaints -- the  
11 misconduct that led to the complaints that you made  
12 to OPS about unlawful searches and other behavior?  
13 A. I can't recall right now.  
14 Q. Officer Edwards, Darrell Edwards, do you  
15 recognize that name?  
16 A. What was the first name?  
17 Q. Darrell.  
18 A. No, I can't recall.  
19 Q. To the extent he's included in this  
20 lawsuit, is that because he could be associated with  
21 Watts's crew?  
22 A. Yes, ma'am.  
23 Q. Okay. But you do not know who he is as  
24 you're sitting here today, correct?

37 (Pages 130 to 133)

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1 A. Right now I do not know who he is.  
2 **Q. Okay. Has Officer Edwards ever planted**  
3 **drugs on you?**  
4 A. I don't recall.  
5 **Q. Has Officer Edwards ever stolen money from**  
6 **you?**  
7 A. Again, no.  
8 **Q. Has Officer Edwards ever falsely arrested**  
9 **you?**  
10 A. I'm going to say I don't recall.  
11 **Q. Okay. Do you recall an Officer Edwards**  
12 **being present when you were arrested on**  
13 **December 11th, 2005?**  
14 A. I can't recall.  
15 **Q. Do you recall Officer Soltis being present**  
16 **when you were arrested on December 11th, 2005?**  
17 A. I can't recall that either.  
18 **Q. All right. Was Kenny Young present,**  
19 **Officer Young present when you were arrested on**  
20 **December 11th, 2005?**  
21 A. I can't -- I have no knowledge. I can't  
22 recall right now.  
23 **Q. Okay. Has Mr. Baker ever stated to you**  
24 **that he was falsely arrested by or had drugs planted**

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1 **on him by Officer Edwards or any other misconduct**  
2 **that Officer Edwards committed against him?**  
3 A. I can't recall a conversation right now.  
4 **Q. Okay. Would it be fair to say that you**  
5 **are unable to offer any testimony with respect to**  
6 **any misconduct that Officer Edwards may have**  
7 **committed against individuals other than you and**  
8 **Mr. Baker?**  
9 A. Say it one more time. I apologize.  
10 **Q. Sure. Is it fair to say that you are**  
11 **unable to offer any testimony with respect to any**  
12 **misconduct that Officer Edwards may have committed**  
13 **against individuals that are not you and Mr. Baker?**  
14 A. Yes.  
15 **Q. Do you associate an Officer Edwards with**  
16 **any of the behavior and allegations that led to your**  
17 **complaints to OPS?**  
18 A. Do I --  
19 **Q. Do you associate him with respect to any**  
20 **of the complaints that you -- with the behavior that**  
21 **led to your complaints to OPS, the unlawful searches**  
22 **and things like that?**  
23 A. I can't recall right now because -- yeah,  
24 I can't recall.

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1 **Q. You also sued Officer Lamonica Lewis or**  
2 **Coco. Do you know who that is?**  
3 A. Oh, yeah. Yeah.  
4 **Q. Do you know the first time --**  
5 A. Vaguely. Vaguely.  
6 **Q. Do you know the first time you would have**  
7 **interacted with her?**  
8 A. No.  
9 **Q. Was she involved in your December 11th,**  
10 **2005, arrest?**  
11 A. I don't recall.  
12 **Q. Okay. Has Coco ever planted drugs on you?**  
13 A. No.  
14 **Q. Has she ever stolen money from you?**  
15 A. No.  
16 **Q. Has she ever falsely arrested you?**  
17 A. No.  
18 **Q. Has Mr. Baker ever told you that Coco**  
19 **falsely arrested him, planted drugs on him, or**  
20 **otherwise committed misconduct against him?**  
21 A. I don't recall a conversation.  
22 **Q. Do you associate Coco with any of those**  
23 **complaints that you made to OPS?**  
24 A. No, I would not.

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1 **Q. And then are you able to offer any**  
2 **testimony with respect to any misconduct Coco may**  
3 **have committed against individuals that are not you**  
4 **and Mr. Baker?**  
5 A. No, ma'am.  
6 **Q. Okay. Douglas Nichols is another officer**  
7 **that you've sued. Do you know who Douglas Nichols**  
8 **is or Doug?**  
9 A. Yes.  
10 **Q. Was he involved in your December 11th,**  
11 **2005, arrest?**  
12 A. I don't recall.  
13 **Q. Do you know the first time you would have**  
14 **interacted with Officer Nichols?**  
15 A. No, ma'am.  
16 **Q. And did Officer Nichols ever plant drugs**  
17 **on you?**  
18 A. No.  
19 **Q. Did he ever steal from you?**  
20 A. No.  
21 **Q. Did he ever falsely arrest you?**  
22 A. No.  
23 **Q. Has Mr. Baker ever told you that**  
24 **Officer Nichols falsely arrested him, planted drugs**



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1 on him, or otherwise committed misconduct against  
2 him?  
3 A. I don't recall.  
4 Q. Do you associate Officer Nichols with any  
5 of the complaints that you've made to OPS?  
6 A. I don't also -- I don't recall.  
7 Q. And are you able to offer any testimony  
8 with respect to whether or not Officer Nichols  
9 performed or committed any misconduct against  
10 individuals that are not you and Mr. Baker?  
11 A. I am unable to.  
12 Q. Okay. Officer Elsworth Smith or Smitty,  
13 do you know who that is?  
14 A. Vaguely, yes.  
15 Q. Okay. Do you know when the first time  
16 that you would have interacted with him would have  
17 been?  
18 A. No, ma'am.  
19 Q. Okay. Was he involved in your  
20 December 11th, 2005, arrest?  
21 A. I can't recall that.  
22 Q. Has Officer Smith ever planted drugs on  
23 you?  
24 A. No.

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1 Q. Has he ever stolen money from you?  
2 A. No.  
3 Q. Has he ever falsely arrested you?  
4 A. No.  
5 Q. Do you associate Officer Smith with any of  
6 the complaints that you made to OPS regarding  
7 misconduct and unlawful searches by Chicago Police  
8 officers?  
9 A. I can't recall.  
10 Q. Okay. Has Mr. Baker ever informed you  
11 that Officer Smith falsely arrested him, planted  
12 drugs on him, or otherwise committed misconduct  
13 against him?  
14 A. I don't recall a conversation.  
15 Q. Are you able to offer any testimony as to  
16 whether or not Officer Smith ever committed any  
17 misconduct against individuals that are not you and  
18 Mr. Baker?  
19 A. No, ma'am. I have no knowledge.  
20 Q. Okay. I'm almost through. Officer Calvin  
21 Ridgell? Officer Calvin Ridgell, do you recognize  
22 that name?  
23 A. Vaguely.  
24 Q. Okay. Do you know who that is?

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1 A. I think I have an idea.  
2 Q. Do you know when the first time you would  
3 have interacted with him would have been?  
4 A. No.  
5 Q. Did he -- did Officer Ridgell ever plant  
6 drugs on you?  
7 A. No.  
8 Q. Did he ever steal from you?  
9 A. No.  
10 Q. Did he ever falsely arrest you?  
11 A. No.  
12 Q. Did Mr. Baker ever tell you that  
13 Officer Ridgell planted drugs on him, falsely  
14 arrested him, or otherwise committed misconduct  
15 against him?  
16 A. I don't recall a conversation.  
17 Q. Do you associate Officer Ridgell with any  
18 of the complaints that you made to OPS regarding  
19 misconduct by Chicago Police Department officers?  
20 A. I'm also going to not recall -- I don't  
21 recall.  
22 Q. Okay. And then with respect to any  
23 misconduct that Officer Ridgell may or may not have  
24 committed against other individuals, can you offer

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1 any testimony as to whether or not he did perform  
2 misconduct with anyone other than you and Mr. Baker?  
3 A. I have no knowledge, no.  
4 Q. I shouldn't say "other than." You  
5 don't -- have no knowledge of any misconduct he's  
6 committed against others, correct?  
7 A. That would -- that's not my concern,  
8 correct.  
9 Q. Okay. Lastly, you sued an Officer Miguel  
10 Cabrales. Do you recognize that name?  
11 A. No, I do not.  
12 Q. Okay. Do you know why you've included him  
13 in this lawsuit?  
14 A. Because once upon a time he probably was  
15 part of Watts' crew or associated with Watts.  
16 Q. And so again, to the extent that -- with  
17 respect to all the officers that you've named in  
18 this lawsuit, at one point or another, they're  
19 included because they're associated with  
20 Sergeant Watts, correct?  
21 A. Yes.  
22 MR. TEPFER: Objection. Misstates the  
23 testimony.  
24 But go ahead.

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<p style="text-align: right;">Page 142</p> <p>1 BY MS. OLIVIER:</p> <p>2 Q. Ms. Glenn, was your answer yes?</p> <p>3 A. Yes.</p> <p>4 Q. Do you know when the first time you would</p> <p>5 have interacted with an Officer Cabrales would have</p> <p>6 been?</p> <p>7 A. I have no recollection, no.</p> <p>8 Q. Are you able to say whether or not</p> <p>9 Officer Cabrales -- well, did Officer Cabrales ever</p> <p>10 plant drugs on you?</p> <p>11 A. I can't say.</p> <p>12 Q. Steal money from you?</p> <p>13 A. No.</p> <p>14 Q. Falsely arrest you?</p> <p>15 A. No.</p> <p>16 Q. Did Mr. Baker ever tell you that an</p> <p>17 Officer Cabrales falsely arrested him, planted drugs</p> <p>18 on him, or otherwise committed misconduct against</p> <p>19 him?</p> <p>20 A. I don't remember a conversation.</p> <p>21 Q. Do you associate an Officer Cabrales with</p> <p>22 any of the complaints that you made to OPS regarding</p> <p>23 misconduct by Chicago Police Department officers?</p> <p>24 A. I can't recall that right now.</p>	<p style="text-align: right;">Page 144</p> <p>1 MS. OLIVIER: You're right. Sorry. This is</p> <p>2 17.</p> <p>3 MR. TEPFER: All right. Plaintiff Joint what?</p> <p>4 MS. OLIVIER: 25811 through 812.</p> <p>5 (Glenn Exhibit 17 marked.)</p> <p>6 BY MS. OLIVIER:</p> <p>7 Q. Ms. Glenn, do you see the document I'm</p> <p>8 sharing on my screen?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. This is from the Internal Affairs</p> <p>11 Division, Confidential Investigation Section of the</p> <p>12 Chicago Police Department. And this is a to/from</p> <p>13 memorandum that's dated June 28th, 2005.</p> <p>14 MR. TEPFER: Kelly, I have a printed-out</p> <p>15 version, but it has a different Bates-stamp number.</p> <p>16 Is it okay if I use it?</p> <p>17 MS. OLIVIER: Sure. Do you have Baker-Glenn</p> <p>18 10947?</p> <p>19 MR. TEPFER: No. I have Baker-Glenn 005046.</p> <p>20 MS. OLIVIER: Okay. This is -- yeah, that's</p> <p>21 fine. I know there's lots of duplicates.</p> <p>22 MR. TEPFER: Okay.</p> <p>23 BY MS. OLIVIER:</p> <p>24 Q. As long as it's the -- is the document</p>
<p style="text-align: right;">Page 143</p> <p>1 Q. Okay. All right. I'm going to be</p> <p>2 switching gears a little bit. We have records from</p> <p>3 a September -- or notes from a September 27th, 2007,</p> <p>4 interview that you had with Patrick Smith, who was a</p> <p>5 special agent with the FBI. Do you know when it was</p> <p>6 that you were first connected with the FBI?</p> <p>7 A. I -- I'm assuming from my first</p> <p>8 conversation, which was with, I assume, another</p> <p>9 agent, Holliday.</p> <p>10 Q. So Calvin Holliday, that conversation</p> <p>11 would have been at the -- that's at 26th and</p> <p>12 California, correct?</p> <p>13 A. No. You say is he from 26th and</p> <p>14 California?</p> <p>15 Q. That conversation you had with Calvin</p> <p>16 Holliday was at 26th and California?</p> <p>17 A. No. The FBI agent?</p> <p>18 Q. Was there an FBI agent named Holliday?</p> <p>19 A. Yes.</p> <p>20 MS. OLIVIER: I'll mark this as Exhibit -- hold</p> <p>21 on -- 16. For the attorneys, this is Bates-stamped</p> <p>22 Plaintiff Joint 25811 through 25812.</p> <p>23 THE REPORTER: Could you check? I think maybe</p> <p>24 we have a 16 already.</p>	<p style="text-align: right;">Page 145</p> <p>1 that you're looking at in front of you, Ms. Glenn,</p> <p>2 the same that I'm sharing on my screen?</p> <p>3 A. Yes, it appears to be.</p> <p>4 MS. OLIVIER: I'll go to the second page, 2.</p> <p>5 MR. TEPFER: I don't have page 2. So I screwed</p> <p>6 up. So forget it.</p> <p>7 THE WITNESS: I have page 1.</p> <p>8 MR. TEPFER: Yeah, I screwed up. We'll use the</p> <p>9 screen. Bring that up.</p> <p>10 BY MS. OLIVIER:</p> <p>11 Q. I'll scroll down to -- I'm scrolling down</p> <p>12 to page 2. Do you see a signature above Police</p> <p>13 Agent Calvin Holliday?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. Is this the Agent Holliday that</p> <p>16 you're recalling; do you believe? Or were there</p> <p>17 multiple Agent Hollidays that you met with?</p> <p>18 A. I met with just one Holliday.</p> <p>19 Q. Okay. So here I'll go to the second</p> <p>20 paragraph. I'm going to highlight this portion. So</p> <p>21 the undersigned who -- in this case, the undersigned</p> <p>22 is Agent Holliday. It says, "The undersigned in May</p> <p>23 2005 met with Assistant State's Attorney David</p> <p>24 Navarro; Private Attorney Matthew Mahoney; his</p>

40 (Pages 142 to 145)

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<p style="text-align: right;">Page 146</p> <p>1 client, gang member and drug dealer Ben Baker; his 2 wife; and Sergeants Ray Broderdorf and Kenneth Bigg 3 at 2650 South California." 4 Do you remember, is this the meeting that 5 you're referring to or remembering? 6 A. I don't know your -- your question. 7 Q. Sure. I was trying to figure out when you 8 believe the first time is that you meet with FBI 9 agents, and you referenced an Agent Holliday. So 10 Agent Holliday is actually with the police 11 department, not the FBI. So I'm just wondering if 12 this -- to the extent that this meeting took place 13 in May 2005, is this the -- what you're remembering 14 in terms of, like, your first interaction with maybe 15 a law enforcement person? 16 A. No. So Holliday I met after a meeting I 17 had on 26th and California. Holliday, I met him at 18 a coffee shop somewhere around 20-something and 19 State. I don't know. I met him at a coffee shop, 20 and it was just Holliday and myself. 21 Q. Was it before -- do you remember attending 22 a meeting at 26th and California with Ben, Matt 23 Mahoney, and then two other -- oh, Assistant State's 24 Attorney Dave Navarro and those two other</p>	<p style="text-align: right;">Page 148</p> <p>1 BY THE WITNESS: 2 A. Did I -- did I -- I met Holliday after, 3 and I was under the impression that he worked for 4 the FBI. 5 MS. OLIVIER: Okay. 6 MR. TEPFER: Do you need to take a break? 7 THE WITNESS: Uh-huh. 8 MR. TEPFER: Okay. Can we go off the record 9 for a second? 10 MS. OLIVIER: Sure. 11 THE VIDEOGRAPHER: The time is 1:51 p.m. We 12 are now going off the record. 13 (Recess taken.) 14 THE VIDEOGRAPHER: The time is 1:54 p.m. We 15 are now back on the record. 16 BY MS. OLIVIER: 17 Q. We just took a quick break. Ms. Glenn, 18 did you need to clarify any of your prior responses 19 based on that break? 20 A. I needed to talk to Josh. 21 Q. Okay. Did you have to -- do you need to 22 change any of your testimony based off that 23 conversation with Josh? 24 A. I don't think so.</p>
<p style="text-align: right;">Page 147</p> <p>1 individuals? 2 A. I remember I met with multiple individuals 3 at the same time. 4 Q. Do you remember Agent Holliday being 5 present at that meeting? 6 A. I don't recall. 7 Q. Okay. And, again, so do you know if this 8 meeting you had with Agent Holliday at a coffee shop 9 was before or after this May 2005 meeting at 10 26th Street? 11 A. It was after. 12 Q. After. Okay. Did he represent to you 13 that he was with the FBI, or is that just -- what's 14 your memory of that meeting? 15 A. That he was a -- oh, can I put it on 16 pause? 17 MR. TEPFER: Well, I mean, if you -- 18 MS. OLIVIER: Ms. Glenn, there's a question 19 pending. I would like you to answer the question. 20 MR. TEPFER: I was going to say. 21 THE WITNESS: Oh, okay. I didn't know. I 22 apologize. 23 MR. TEPFER: Answer the question. Then we can 24 take a break.</p>	<p style="text-align: right;">Page 149</p> <p>1 Q. Okay. Besides a meeting at -- at a coffee 2 shop with Agent Holliday, did you have any other 3 interactions with him besides that one 4 interaction -- additional interaction? 5 A. Yes. 6 Q. Okay. And you made a face. Why? 7 A. Because there was too many interactions 8 that was not related to the case. 9 Q. What were the -- what were those 10 interactions related to? 11 A. He lived with his mom. He's making 12 cookies. He have to cook for her. He's not in a 13 relationship. That type of interaction. 14 Q. Did you take it that he was, like, trying 15 to build some sort of relationship with you? 16 A. Yes. 17 Q. Okay. How long did that continue for? 18 A. It continued till -- 19 MR. TEPFER: Are you okay? 20 THE WITNESS: Yeah. 21 BY THE WITNESS: 22 A. It continued until I realized that he 23 could not help me. 24 Q. When did you realize that?</p>

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1 A. When I was informed that Watts was going  
2 to receive a payment, and I called him before the  
3 payment was going to be made, prior to. And he  
4 informed me that it doesn't work like that.  
5 **Q. Were you in contact with the FBI at this**  
6 **point?**  
7 A. I thought he was the FBI.  
8 MS. OLIVIER: Okay. I'm going to be marking as  
9 Exhibit 18 -- excuse me. One moment -- what's been  
10 Bates stamped as FBI 251 to 252.  
11 (Glenn Exhibit 18 marked.)  
12 BY MS. OLIVIER:  
13 **Q. Ms. Glenn, do you see the document I'm**  
14 **sharing on my screen?**  
15 A. Yes.  
16 MS. OLIVIER: Okay.  
17 MR. PALLES: I think -- excuse me, Kelly.  
18 MS. OLIVIER: Sure.  
19 MR. PALLES: I think we may have to go  
20 confidential, if I'm not mistaken.  
21 MS. OLIVIER: Yes, it is. Yes. Can we go --  
22 mark this portion with respect to Exhibit 18  
23 confidential.  
24 Thank you, Eric.

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1 MR. TEPFER: So I have it printed out in front  
2 of her as well too.  
3 MS. OLIVIER: Okay. Two pages?  
4 MR. TEPFER: Yes, ma'am.  
5 (Proceedings deemed confidential  
6 and transcribed under separate  
7 cover, pages 152 to 154  
8 inclusive.)  
9  
10  
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23  
24

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1 BY MS. OLIVIER:  
2 **Q. Okay. I'm going to ask you some questions**  
3 **about the damages that you and your husband are**  
4 **seeking in this case, in this lawsuit. Okay? So we**  
5 **have in your discovery responses that one of the**  
6 **things that you lost as a result of being falsely**  
7 **arrested and having this conviction is the loss of a**  
8 **grant for a nonprofit?**  
9 A. Yeah.  
10 **Q. Okay. What -- can you explain to me the**  
11 **background of that situation? What was the**  
12 **nonprofit? When were you trying to do this?**  
13 A. So I was working at a home health -- at a  
14 home health agency, and my manager -- we actually  
15 send out nurses, therapists, et cetera, to seniors  
16 for better living, improvement on health and living.  
17 And we decided that it would be nice to bring  
18 something into the community of awareness of blood  
19 pressures and just an outreach type, but more on the  
20 medical field, for people who are not able to afford  
21 or do not know where to turn to.  
22 We actually did our LLC, the whole nine  
23 yards, to start up the business and had a -- I  
24 couldn't make it, but she had a meeting. She, my

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1 partner at the time, Deborah Lee, had a meeting with  
2 our alderman regarding space, rental space. Because  
3 they were building up the community, we were getting  
4 a really good deal for this space.  
5 When the government or the state offers  
6 you so much for a grant, they have to do a  
7 background check.  
8 (Exit Mr. Lo Ramanujam.)  
9 BY THE WITNESS:  
10 A. And due to my background, my felony that  
11 was given to me, I was not able to participate with  
12 that project. And because we were partners, she  
13 decided -- I told her to move forward, and we will  
14 do paperwork to take me off as a partner. But we  
15 just decided not to move forward at all.  
16 **Q. Was this when you were working for**  
17 **Comprehensive Quality Care or what --**  
18 A. Yes, ma'am.  
19 **Q. -- or who were you --**  
20 A. I was.  
21 **Q. And so I'm just looking at your discovery**  
22 **responses now, and it indicates that you worked**  
23 **there from 2004 to 2014 as a marketing and medical**  
24 **records associate, correct?**

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1 A. Yes, ma'am.

2 **Q. Okay. What was the name of the individual**

3 **that you were going to start this business with?**

4 A. Deborah Lee.

5 **Q. Are you still in contact with her to this**

6 **day?**

7 A. No.

8 **Q. Okay. Do you have any plans to restart**

9 **that nonprofit at this point?**

10 A. No, not right now. That's not in the --

11 no plans right now.

12 **Q. Approximately -- so 2004 to 2014, that's,**

13 **you know, a decade-long time period. Do you**

14 **remember when within that time period you created**

15 **this plan and tried to go through the process of**

16 **applying to create the nonprofit?**

17 A. I believe -- and don't quote me. I have a

18 couple of documents still left at home. I believe

19 it might have been like -- I'm not for sure. '08,

20 '07, somewhere around there. But I'm not

21 100 percent sure.

22 **Q. You do still have those documents?**

23 A. I have a couple of things. I know I have

24 my business card, and I think I have the partnership

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1 agreement. I believe.

2 THE REPORTER: I noticed Mr. Flaxman is going

3 in and out. Do we need to wait for him?

4 MR. TEPFER: No.

5 MS. OLIVIER: I see Mr. Lipschultz here. Let

6 me just make sure. Mr. Lipschultz, are you here on

7 behalf of Mr. Flaxman?

8 MR. LIPSCHULTZ: I am. Thank you.

9 MS. OLIVIER: Okay, yes. So we're okay. Thank

10 you for catching that.

11 BY MS. OLIVIER:

12 **Q. So, Ms. Glenn, I would ask that you**

13 **just -- to the extent you do still have some records**

14 **or documents related to the creation of this**

15 **nonprofit, please hold on to those. We'll be always**

16 **speaking with your attorney, because we'll want to**

17 **request those and get copies. Okay?**

18 A. Okay.

19 **Q. Just to try to kind of pin down the time**

20 **frame for that. During the course of all of your**

21 **jobs, it looks like -- and correct me, again, if I'm**

22 **wrong -- the most that you have ever made -- well,**

23 **strike that.**

24 **Have you ever been a salaried employee, or**

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1 **is the bulk -- or has your employment all been as an**

2 **hourly employee?**

3 A. Most is hourly.

4 **Q. Okay. Do you recall any employment where**

5 **you had -- you were hired on a salary basis?**

6 A. I believe -- after a while, I believe

7 Comprehensive --

8 **Q. Okay.**

9 A. -- Quality Care.

10 **Q. Do you know what the most amount of money**

11 **you made in one year at Comprehensive was?**

12 A. Not offhand, no, ma'am.

13 **Q. Do you know if it was more or less than**

14 **\$30,000?**

15 A. Again, not offhand.

16 **Q. Okay. In terms of your hourly pay, is the**

17 **most amount of money that you've ever made when you**

18 **worked most recently at Amazon at \$19.80 an hour?**

19 A. Yes. At Amazon, yes, ma'am.

20 **Q. Okay. And then it looks like prior to**

21 **that, at Comprehensive Quality Care you indicate you**

22 **worked there from 2004 to 2014, and you earned**

23 **\$18.50 per hour there. Does that sound correct?**

24 A. Yes. At one time, yes, ma'am.

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1 **Q. Okay. And do you think once you became**

2 **salary, you made more than that?**

3 A. Yes.

4 **Q. Okay. So I'm just doing some math on my**

5 **phone. So \$18.50 per hour times 40 hours per week**

6 **times 52 weeks in a year, that is \$38,400.**

7 **Obviously, that would be before taxes or anything**

8 **like that. So to the extent -- when you went to**

9 **salary, do you think you made more than that sum,**

10 **\$38,000?**

11 A. Yes.

12 MR. TEPFER: Objection to form.

13 But go ahead.

14 BY THE WITNESS:

15 A. Yes.

16 **Q. Okay. Do you know if it was more or less**

17 **than \$45,000?**

18 A. I -- not off the top of my head. I don't

19 recall.

20 **Q. Do you still have -- you filed taxes those**

21 **years that you worked for Comprehensive, correct?**

22 A. Correct, yes.

23 **Q. All right. Did you file W-2s?**

24 A. Yes.

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1       **Q.** Okay. Do you know the year that your  
2 records were -- that your felony record was  
3 expunged?  
4       A. Not offhand. Not offhand.  
5       **Q.** Okay. You indicate that from the years of  
6 2014 to 2016 when you were applying for jobs but  
7 were unable to secure employment that you believe  
8 it's because of your felony. Do you -- were you  
9 ever told that you were not receiving calls back or  
10 interest because employers could see a felony on  
11 your record?  
12       A. Was I ever told? No, ma'am.  
13       **Q.** Okay. At the time of your December 11th,  
14 2005, arrest, where were you working at that time?  
15 Was that at Comprehensive Quality Care still?  
16       A. Yes.  
17       **Q.** Okay. Were you working full time at that  
18 time?  
19       A. Yes.  
20       **Q.** And was full time 40 hours per week?  
21       A. Yes.  
22       **Q.** Did you ever work overtime?  
23       A. No.  
24       **Q.** Okay. Do you recall the name of your

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1 supervisor?  
2       A. Ms. Lee. Deborah Lee was my supervisor.  
3       **Q.** Oh, she was the supervisor as well. Okay.  
4 So you remained employed at Comprehensive Healthcare  
5 following -- even following the conviction, correct?  
6       A. Yes.  
7       **Q.** Okay. And your supervisor being Ms. Lee,  
8 you still went so far as to try to create a business  
9 together, correct?  
10       A. Yes.  
11       **Q.** You also indicated that you lost your  
12 Chicago Housing Authority voucher?  
13       A. Yes.  
14       **Q.** When did you receive notice that you lost  
15 that?  
16       A. Probably in, like, 2007, somewhere around  
17 there. I'm not for sure.  
18       **Q.** If your conviction came down in 2006, why  
19 was it in 2007 that you lost the voucher, to your  
20 understanding?  
21       A. You would have to ask the system.  
22       **Q.** Were you -- it was my understanding that  
23 you left the Wells public housing --  
24       A. Yes.

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1       **Q.** -- after your conviction in 2006, correct?  
2       A. Yes.  
3       **Q.** Did you move into a different public  
4 housing site?  
5       A. No, ma'am. I had a Chicago Housing  
6 voucher, Section 8.  
7       **Q.** Okay.  
8       A. And I was in this program, a home  
9 ownership program, and I moved into a house.  
10       **Q.** When you moved into a house, was there an  
11 option to buy the house through Section 8?  
12       A. Yes.  
13       **Q.** Okay.  
14       A. There was an option -- it's an option to  
15 buy. I didn't fill out the -- move forward with it  
16 because if you have a felony, you lose your voucher,  
17 you lose everything. And when the lease was up,  
18 when I completed the paperwork, that's how it caught  
19 up with me, and I was dropped from the program.  
20       **Q.** Okay. So when you essentially went to  
21 reapply -- it was a year-to-year lease. When you  
22 went to reapply, were you no longer allowed to be in  
23 that home under the Section 8 program?  
24       A. Or any Section 8 program at all, yes.

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1       **Q.** Did you receive any paperwork with respect  
2 to that, notifying you that that was being rescinded  
3 or revoked?  
4       A. Yes. That's how I knew that I was no  
5 longer in the program, yes.  
6       **Q.** Do you still have any of that paperwork?  
7       A. No, ma'am.  
8       **Q.** Okay. How much were you paying for your  
9 lease or for rent as part of that program in  
10 Section 8 after you left the Wells?  
11       A. I think it was like -- between eleven and  
12 twelve hundred while I was still on the program.  
13       **Q.** Eleven to twelve hundred dollars a month?  
14       A. Yes, ma'am.  
15       **Q.** Okay. And were you paying that through  
16 your salary at Comprehensive Quality Care?  
17       A. Yes.  
18       **Q.** All right. And were you working  
19 consistently full time at Comprehensive Quality Care  
20 from 2004 to 2014?  
21       A. Yes.  
22       **Q.** You did note that you had periods of  
23 unemployment after your December 11th, 2005, arrest.  
24 Is that referencing that time period of 2014 to 2016



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1 where you were having difficulty finding a job?

2 A. Say that one more time.

3 **Q. Sure. In your discovery responses you**

4 **indicated that you had some periods of unemployment**

5 **following your December 2005 arrest. Is that time**

6 **period in terms of a period of unemployment that you**

7 **are referencing from 2014 to 2016?**

8 A. Yes, I believe.

9 **Q. Is that the only time period that you were**

10 **unemployed following your December 11th, 2005,**

11 **arrest?**

12 A. No. I was -- no. I was unemployed for a

13 while. I don't have a -- for a while.

14 **Q. So you were arrested on December 11th,**

15 **2005. But we just went through how you were**

16 **employed at Comprehensive Quality Care from 2004, so**

17 **predating the arrest, consistently through 2014.**

18 **Are you saying -- so at what point were you also**

19 **experiencing unemployment besides 2014 when you**

20 **stopped working at Comprehensive Quality Care until**

21 **you were re-employed in July of 2016 at Dental**

22 **Dreams?**

23 A. So maybe like a year, a year or so, give

24 or take. I don't have a definite number right now.

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1 Yeah. '14. They had did a background check. Yeah.

2 Probably a year or so. I don't have a definite time

3 frame right now.

4 **Q. All right. But that year that we're**

5 **talking about in terms of this -- that you were**

6 **unemployed is beginning in 2014 until you were**

7 **employed in July of 2016 through Dental Dreams?**

8 A. Yes.

9 **Q. Why did you stop your employment at**

10 **Comprehensive Quality Care?**

11 A. Because they were doing a lot of new hires

12 and because they need to -- it's a non-for-profit

13 organization, I believe, and they had to do

14 background -- update their records for -- they had

15 to update records, and you had to do background

16 checks, and when they did my background check, then,

17 yeah.

18 **Q. Didn't they already know that you had had**

19 **that arrest, though, at that point, since you had**

20 **been working there for so long?**

21 A. It's only two people that knew, which was

22 Ms. Lee, Deborah Lee -- I told her -- and another --

23 one more person. So those are the only two. So it

24 wasn't like out there. But they had to follow, I

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1 guess, the rules of the government or however it

2 worked.

3 **Q. Weren't your records related to your**

4 **arrest and conviction expunged in 2010?**

5 A. I am not for sure.

6 MR. TEPFER: Objection. Misstates the record.

7 BY THE WITNESS:

8 A. I'm not for sure, but it still was

9 popping --

10 **Q. Go ahead.**

11 A. It still -- it still pops up even as of

12 today. Like, it still -- my felony still pops up.

13 So the response was to carry my letter or

14 certification with me as an ID, but it still pops

15 up.

16 **Q. When you say "your certification," are you**

17 **referencing your certificate of innocence that**

18 **you've been granted?**

19 A. Yes, ma'am.

20 **Q. Were you told explicitly by Comprehensive**

21 **Quality Care that the reason why your employment was**

22 **stopping is because you had a felony in your**

23 **background?**

24 A. They -- that was part of the reason and

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1 because of something with the funding of their --

2 the money or how they're -- how they receive their

3 money or something for the company.

4 **Q. They were losing funding?**

5 A. No. I think -- because I'm not in the

6 office as far as that portion. I think that their

7 funding -- and I'm assuming -- that their funding

8 was like through a lot of grants also because they

9 were servicing basically like the community of

10 seniors. So I don't know how their funding worked,

11 but you have to abide by the laws of the people or

12 the government or state, whoever is funding them.

13 That's what I'm assuming.

14 **Q. Did you receive anything in writing in**

15 **terms of why you were being terminated from your**

16 **employment with Comprehensive Quality Care?**

17 A. I believe I did.

18 **Q. Do you still have that paperwork?**

19 A. No.

20 **Q. Okay. When you were living in the Wells**

21 **with Ben, did you ever -- you've mentioned that, you**

22 **know, you would always answer the door whenever**

23 **people were knocking. Do you recall people coming**

24 **to your door looking for Ben so he could sell them**

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1 drugs?  
2 A. No.  
3 Q. Okay. So Ben has testified in this case  
4 now, and he testified that he has passed and sold  
5 drugs out of Apartment 206 before and that people  
6 would come to the door asking for him. Is it your  
7 testimony that you don't recall that ever happening?  
8 MR. TEPFER: Objection to the form.  
9 But go ahead.  
10 BY THE WITNESS:  
11 A. For me, no.  
12 Q. You were -- that never happened when you  
13 answered the door when you were home?  
14 A. Let me think. Did -- did someone come,  
15 knock on the door, ask me can they speak to Ben so  
16 that they can buy drugs? No, that -- no.  
17 Q. Maybe not explicitly, but did you ever  
18 have random people coming to knock on the door? Not  
19 even random people. Anyone coming to knock on the  
20 door looking for Ben, and you, being a smart,  
21 intelligent person, recognizing why they were there,  
22 which was to get drugs?  
23 A. I'm --  
24 MR. TEPFER: Hold on. Objection to form and

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1 calls for speculation.  
2 But go ahead.  
3 BY THE WITNESS:  
4 A. No.  
5 Q. Did you know that Ben was receiving heroin  
6 through an individual named -- nicknamed Bird or  
7 Bernard Harvey?  
8 A. No.  
9 Q. Do you know who Bernard Harvey or Bird is?  
10 A. Yes.  
11 Q. Okay. And who is that?  
12 A. Bernard, a guy that lives -- I don't know  
13 where the heck he lives. Someone who grew up in the  
14 Ida B. Wells Extensions, and I have a child by  
15 Bernard Harvey.  
16 Q. Okay. Have you ever spoken with Bernard  
17 Harvey about the fact that he -- or did you know  
18 that Bernard Harvey sold drugs?  
19 A. No.  
20 Q. Or supplied drugs?  
21 A. No, that's not -- that wasn't my -- a  
22 concern of mine, no.  
23 Q. Did Bernard Harvey ever provide support  
24 for the son that you shared together, financially?

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1 A. Like, did he give me money? No. He  
2 didn't give me money, no.  
3 Q. Okay. Do you know how Ben became  
4 connected with him as -- or was Ben connected to  
5 Bernard Harvey through you in terms of him becoming  
6 his supplier for heroin?  
7 A. I have no answer for that, what you're  
8 asking.  
9 Q. Why not?  
10 A. Because I have no knowledge of what  
11 you're -- none of that.  
12 Q. Okay. Ben also testified that he would do  
13 his own packaging for his drug sales and that he  
14 would purchase, like, small plastic baggies for  
15 the -- that the drugs would go in at the store. So  
16 do you, first and foremost, recall Ben ever  
17 packaging drugs within your apartment at the Wells?  
18 A. No. And are you talking about Ziploc  
19 bags? Because I remember not having sandwich bags  
20 when I was making my lunch for -- but, no.  
21 Q. Do you think that you didn't have Ziploc  
22 bags because Ben was using those for drug packaging  
23 instead of your lunch?  
24 A. No.

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1 MR. TEPFER: Objection. Calls for speculation.  
2 BY THE WITNESS:  
3 A. I don't know. I'm just thinking. No.  
4 Q. Was there always a lot of sandwich bags  
5 missing from your house that you think Ben may have  
6 been taking to sell drugs?  
7 MR. TEPFER: Objection. Calls for speculation,  
8 form.  
9 BY THE WITNESS:  
10 A. No.  
11 Q. Okay. Did you ever see Ben purchasing  
12 sandwich bags or even just like small, tinier  
13 versions of Ziploc bags and having them in your  
14 home?  
15 A. No. Where we -- I didn't, no.  
16 Q. At some point, though, you did become  
17 aware that Ben was dealing drugs, right? We've  
18 talked about that. At some point you did, correct?  
19 A. Okay.  
20 Q. Well, is that correct?  
21 A. Oh, yes, we -- we talked about that.  
22 Q. And is -- well, do you -- is that a  
23 correct statement, that you did learn that he was a  
24 drug dealer?

46 (Pages 169 to 172)

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<p style="text-align: right;">Page 173</p> <p>1 MR. TEPFER: Objection. Asked and answered.</p> <p>2 BY THE WITNESS:</p> <p>3 A. No. That's not what I've learned.</p> <p>4 <b>Q. Okay. What did you learn?</b></p> <p>5 A. That he is a father, family man, and is</p> <p>6 the person who I am in love with. That's what</p> <p>7 I even more -- that's what I learned. Everything</p> <p>8 else, I hear the negativity, but I don't see that.</p> <p>9 So, no, as far as a drug dealer, I don't call him a</p> <p>10 drug dealer or associate him as a drug dealer.</p> <p>11 <b>Q. So what I'm hearing is that you're -- when</b></p> <p>12 <b>I use the term drug dealer, you're taking it as,</b></p> <p>13 <b>like, kind of like an offensive term, like it's</b></p> <p>14 <b>something negative. Is that what I'm hearing?</b></p> <p>15 A. Because I don't see him personally as a</p> <p>16 negative person.</p> <p>17 <b>Q. So no, there's -- I'm not trying to pass</b></p> <p>18 <b>any judgment by using that term. I'm just trying</b></p> <p>19 <b>to -- that's the best I can think of of how to</b></p> <p>20 <b>describe someone that sells -- like takes illegal</b></p> <p>21 <b>narcotics and sells them to other people. Is there</b></p> <p>22 <b>something -- is there a way for me to describe it</b></p> <p>23 <b>that would be -- that you would be more comfortable</b></p> <p>24 <b>with?</b></p>	<p style="text-align: right;">Page 175</p> <p>1 guy behind him, AJ, or someone in the window. I</p> <p>2 don't know.</p> <p>3 When I asked Ben, and Ben made a comment</p> <p>4 to him, what are you telling me for, it's like -- so</p> <p>5 when I asked who that was, that's when I realized</p> <p>6 who that was. So as far as drugs or anything, no,</p> <p>7 he seemed like he was broke and wanted some money or</p> <p>8 just informing people that he's upset.</p> <p>9 <b>Q. So I'm not asking really about Watts. I'm</b></p> <p>10 <b>really just --</b></p> <p>11 A. Okay.</p> <p>12 <b>Q. -- trying to understand your knowledge</b></p> <p>13 <b>about Mr. Baker's selling of narcotics for money.</b></p> <p>14 <b>When did you -- did you ever -- is it your testimony</b></p> <p>15 <b>you never became aware that he was doing that?</b></p> <p>16 A. I had learned that Ben, when he was at</p> <p>17 court on the stand --</p> <p>18 <b>Q. Okay.</b></p> <p>19 A. -- he said that, yeah.</p> <p>20 <b>Q. Okay.</b></p> <p>21 A. That's when.</p> <p>22 <b>Q. And that was the first time you had any</b></p> <p>23 <b>inkling that he was involved in the drug trade?</b></p> <p>24 MR. TEPFER: Objection to form.</p>
<p style="text-align: right;">Page 174</p> <p>1 A. No, your description is fine for you in</p> <p>2 the record.</p> <p>3 <b>Q. Okay. So then I guess just to be clear,</b></p> <p>4 <b>you did at some point become aware that Ben was</b></p> <p>5 <b>selling drugs to other people, correct, for a</b></p> <p>6 <b>profit?</b></p> <p>7 A. No, no.</p> <p>8 <b>Q. You didn't?</b></p> <p>9 A. No.</p> <p>10 <b>Q. So then why did you think -- at your last</b></p> <p>11 <b>deposition you testified that when Watts was coming</b></p> <p>12 <b>for him and trying to -- talking about needing</b></p> <p>13 <b>money, that that started kind of your brain thinking</b></p> <p>14 <b>something is going on, and at some point in time --</b></p> <p>15 <b>you couldn't really pinpoint it down -- you did</b></p> <p>16 <b>realize that Ben was selling drugs. Is that</b></p> <p>17 <b>incorrect?</b></p> <p>18 A. Yeah, because you said "my thinking." I</p> <p>19 didn't know -- that's not my thinking. I was</p> <p>20 thinking that it is a grown man that's yelling in</p> <p>21 the morning about being broke and gambling and</p> <p>22 losing his money, knowing that me and my kids and</p> <p>23 Ben was walking towards the car. Who he was</p> <p>24 referring to or talking to, it could have been the</p>	<p style="text-align: right;">Page 176</p> <p>1 BY THE WITNESS:</p> <p>2 A. Drug trade, I -- I have no answer for</p> <p>3 that. I have no answer for that. I thought that I</p> <p>4 answered your question.</p> <p>5 <b>Q. What do you mean you have no answer for</b></p> <p>6 <b>it? I guess what's the --</b></p> <p>7 A. Like -- like when a person say "I don't,"</p> <p>8 that means they do not have a response. I have</p> <p>9 nothing to say. I have no response for that. I</p> <p>10 felt that I answered. I think that you're looking</p> <p>11 for an answer that I am not giving because I have no</p> <p>12 knowledge.</p> <p>13 You want -- I feel that you want me to say</p> <p>14 something, and I just told you, respectfully, of how</p> <p>15 I feel. And that's not going to change. I</p> <p>16 understand, and I hear what -- your verbiage, but I</p> <p>17 want my verbiage also to be heard. So I have</p> <p>18 nothing to -- I have nothing else to say.</p> <p>19 <b>Q. So you're saying that you have no</b></p> <p>20 <b>knowledge about Ben being a drug dealer or dealing</b></p> <p>21 <b>drugs. Is that what I'm hearing?</b></p> <p>22 MR. TEPFER: Objection. Asked and answered.</p> <p>23 BY THE WITNESS:</p> <p>24 A. I don't know what you're hearing.</p>

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<p style="text-align: right;">Page 177</p> <p>1 Q. Okay. So then I'll just say, do you --</p> <p>2 yes or no, was Ben a drug dealer?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. Did you know that Ben was a drug</p> <p>5 dealer when you were both arrested on December 11th,</p> <p>6 2005?</p> <p>7 A. I don't recollect that. I don't recall.</p> <p>8 I don't know. I'm not -- I didn't think that or I</p> <p>9 don't know.</p> <p>10 Q. Did you know that Ben was a drug dealer</p> <p>11 when you both pled guilty in 2006?</p> <p>12 A. I don't recall.</p> <p>13 Q. Did you know that Ben was contributing</p> <p>14 financially to your family and supporting your</p> <p>15 family financially with proceeds from drug dealing?</p> <p>16 MR. TEPFER: Objection.</p> <p>17 BY THE WITNESS:</p> <p>18 A. I don't recall.</p> <p>19 MR. TEPFER: Objection. Form, misstates the</p> <p>20 evidence.</p> <p>21 Go ahead.</p> <p>22 BY THE WITNESS:</p> <p>23 A. I don't recall.</p> <p>24 Q. At Ben's deposition he acknowledged that</p>	<p style="text-align: right;">Page 179</p> <p>1 BY THE WITNESS:</p> <p>2 A. Because I don't know.</p> <p>3 Q. You can't say just objectively if \$10,000,</p> <p>4 which is a quarter of your income in one year, would</p> <p>5 be a substantial contribution to your family's</p> <p>6 finances?</p> <p>7 MR. TEPFER: Objection to form. Misstates the</p> <p>8 testimony in the record.</p> <p>9 Go ahead.</p> <p>10 BY THE WITNESS:</p> <p>11 A. No.</p> <p>12 Q. Ben also said it was possible that he</p> <p>13 could -- could have made up to \$20,000 in a day.</p> <p>14 Would you consider that to be a substantial</p> <p>15 contribution to your family's financial situation?</p> <p>16 A. I don't know.</p> <p>17 MR. TEPFER: Objection to form.</p> <p>18 Go ahead.</p> <p>19 BY THE WITNESS:</p> <p>20 A. I don't know.</p> <p>21 Q. When Ben was rearrested for dealing drugs</p> <p>22 on federal charges in 2018, he -- and he indicated</p> <p>23 in his testimony that he was selling drugs out of</p> <p>24 your family home, do you -- did you have knowledge</p>
<p style="text-align: right;">Page 178</p> <p>1 it was possible that he was making as much as his</p> <p>2 friend Jamar Lewis, who we've talked about, and</p> <p>3 Jamar has indicated that he's made five to ten</p> <p>4 thousand dollars a day.</p> <p>5 A. Huh.</p> <p>6 Q. Did you ever see that type of money in</p> <p>7 Ben's possession?</p> <p>8 MR. TEPFER: Objection to form.</p> <p>9 Go ahead.</p> <p>10 BY THE WITNESS:</p> <p>11 A. I don't recall.</p> <p>12 Q. Would you agree with me that five to -- to</p> <p>13 the extent that -- if your salary is \$40,000, that</p> <p>14 making \$10,000 in one day would be a significant</p> <p>15 contribution to your family's -- your family unit?</p> <p>16 MR. TEPFER: Objection to form.</p> <p>17 BY THE WITNESS:</p> <p>18 A. I can't agree or disagree with you.</p> <p>19 MR. TEPFER: Let me finish.</p> <p>20 BY MS. OLIVIER:</p> <p>21 Q. Why not?</p> <p>22 MR. TEPFER: Objection to form.</p> <p>23 Go ahead.</p> <p>24</p>	<p style="text-align: right;">Page 180</p> <p>1 that he was doing that during that time period?</p> <p>2 MR. TEPFER: Objection. Definitely misstates</p> <p>3 the evidence.</p> <p>4 But go ahead.</p> <p>5 BY THE WITNESS:</p> <p>6 A. No, I don't recall.</p> <p>7 Q. He indicated that he was storing at times</p> <p>8 narcotics within the family home in a cocktail</p> <p>9 table. Do you recall ever seeing any narcotics</p> <p>10 being present in your home?</p> <p>11 MR. TEPFER: Objection. Misstates the</p> <p>12 evidence.</p> <p>13 Go ahead.</p> <p>14 BY THE WITNESS:</p> <p>15 A. No.</p> <p>16 Q. Okay. Ben indicated that he would use</p> <p>17 money that he earned from selling drugs to buy you</p> <p>18 and the kids gifts. What type of gifts can you</p> <p>19 recall yourself and your children receiving from Ben</p> <p>20 during the time period of 1998 through 2004?</p> <p>21 MR. TEPFER: Objection to the form of the</p> <p>22 question.</p> <p>23 Go ahead.</p> <p>24</p>

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<p style="text-align: right;">Page 181</p> <p>1 BY THE WITNESS:</p> <p>2 A. I do not recall any because Ben does not</p> <p>3 even go to the store or -- so I honestly do not</p> <p>4 recall. He do not -- okay. No, I don't recall him</p> <p>5 doing any of that.</p> <p>6 <b>Q. Hypothetically -- hypothetically, if Ben</b></p> <p>7 <b>was making \$20,000 -- \$5,000 a day selling drugs,</b></p> <p>8 <b>would it upset you to know that he was just keeping</b></p> <p>9 <b>that money for himself versus contributing to the</b></p> <p>10 <b>family?</b></p> <p>11 MR. TEPFER: Objection. Form, incomplete</p> <p>12 hypothetical, calls for speculation, irrelevant.</p> <p>13 Go ahead.</p> <p>14 BY THE WITNESS:</p> <p>15 A. I don't have no knowledge if it happened</p> <p>16 or didn't happen. So I'm fine.</p> <p>17 <b>Q. I just said hypothetically would that be</b></p> <p>18 <b>upsetting to you?</b></p> <p>19 MR. TEPFER: Same --</p> <p>20 BY THE WITNESS:</p> <p>21 A. I don't want do hypothetically on -- I</p> <p>22 don't want to do that.</p> <p>23 <b>Q. If Ben was making that much money, would</b></p> <p>24 <b>you have continued -- if Ben was sharing that money</b></p>	<p style="text-align: right;">Page 183</p> <p>1 <b>have worked so matter what, no matter how much money</b></p> <p>2 <b>Ben was making?</b></p> <p>3 MR. TEPFER: Objection. Misstates the</p> <p>4 testimony. It's entirely speculative. Form of the</p> <p>5 question.</p> <p>6 BY THE WITNESS:</p> <p>7 A. I didn't say that. I don't know.</p> <p>8 <b>Q. I have just a few additional questions</b></p> <p>9 <b>regarding the copy of the COPA report that you have</b></p> <p>10 <b>put your notes on, which I previously marked as</b></p> <p>11 <b>Exhibit --</b></p> <p>12 <b>MR. TEPFER: 12.</b></p> <p>13 MS. OLIVIER: -- 12, yes. Thank you.</p> <p>14 THE WITNESS: Okay.</p> <p>15 BY MS. OLIVIER:</p> <p>16 <b>Q. I'm going to share my screen. And do you</b></p> <p>17 <b>have that document in front of you, Ms. Glenn?</b></p> <p>18 A. Yes.</p> <p>19 <b>Q. I will represent to you I went back</b></p> <p>20 <b>through our transcript from your last deposition in</b></p> <p>21 <b>August of 2021, and when -- you recall being deposed</b></p> <p>22 <b>on that date, correct?</b></p> <p>23 A. I don't recall the date.</p> <p>24 <b>Q. But do you recall you and I doing this?</b></p>
<p style="text-align: right;">Page 182</p> <p>1 <b>with you, would you have continued working full</b></p> <p>2 <b>time?</b></p> <p>3 MR. TEPFER: Objection to form, calls for</p> <p>4 speculation, improper hypothetical.</p> <p>5 BY THE WITNESS:</p> <p>6 A. I don't know.</p> <p>7 MR. TEPFER: Impossible to answer.</p> <p>8 Go ahead.</p> <p>9 BY THE WITNESS:</p> <p>10 A. I don't know what money or anything like</p> <p>11 that, no. I don't have an answer.</p> <p>12 <b>Q. If Ben could make in four days or within a</b></p> <p>13 <b>matter of weeks the amount of money that you were</b></p> <p>14 <b>making in an entire year, would you have continued</b></p> <p>15 <b>to work for as long and as hard as you did?</b></p> <p>16 MR. TEPFER: Same objections.</p> <p>17 BY THE WITNESS:</p> <p>18 A. I have no answer.</p> <p>19 <b>Q. Why not?</b></p> <p>20 A. Because I always work. So for a person</p> <p>21 that is financially stable, I don't know if they</p> <p>22 would be working or if they invest. So I don't</p> <p>23 know. I don't have that privilege.</p> <p>24 <b>Q. So is it your testimony that you would</b></p>	<p style="text-align: right;">Page 184</p> <p>1 A. A deposition, yes, ma'am. Yes.</p> <p>2 <b>Q. Okay. I -- we started by going over -- we</b></p> <p>3 <b>went through each and every page of this COPA</b></p> <p>4 <b>report, correct?</b></p> <p>5 A. It's been a minute. I know we were here</p> <p>6 for a long -- a long day.</p> <p>7 <b>Q. Yes. We did go through this COPA report</b></p> <p>8 <b>page by page, line by line; and when I had you look</b></p> <p>9 <b>at page 1, at the time you didn't have your notes in</b></p> <p>10 <b>front of you. But today we've subsequently received</b></p> <p>11 <b>the copy of the notes that you made. And you</b></p> <p>12 <b>indicated that you didn't have any changes to</b></p> <p>13 <b>page 1, but here I do see a few pages -- or excuse</b></p> <p>14 <b>me -- a few changes.</b></p> <p>15 So I just wanted to ask you a couple</p> <p>16 questions about some of those changes. Okay? So I</p> <p>17 am at Plaintiffs' Joint 54677 through 54698,</p> <p>18 specifically on page 1 of this 22-page document.</p> <p>19 Midway down through the page, there's some notations</p> <p>20 by you where you crossed out "did not" and also</p> <p>21 crossed out "upper floors or outside of building."</p> <p>22 So the sentence reads, "Glenn recalls</p> <p>23 seeing a few transactions of drug dealing in the</p> <p>24 lobby." So I just want to clarify. To the extent</p>

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<p style="text-align: right;">Page 185</p> <p>1     <b>you crossed out "upper floors or outside of</b>  2     <b>building," are you indicating that you did recall</b>  3     <b>seeing drug dealing but those were a few</b>  4     <b>transactions just in the lobby, nowhere else?</b>  5         A. Ask your question one more time.  6         <b>Q. Sure. Well, can you -- maybe the easiest</b>  7     <b>way is to do it this way: Why did you make that</b>  8     <b>change to that paragraph?</b>  9         A. I'm reading. Hold on one second.  10        <b>Q. Sure.</b>  11        A. Oh, because I seen people in the building  12        selling drugs a few times. And then it says "upper  13        floors," but I wasn't going on the upper floors. So  14        I don't know what the upper floors are. And outside  15        of the building, I don't recall seeing any -- or I  16        don't recall passing through, seeing someone outside  17        the building selling drugs. Or why would they in  18        the open?  19        <b>Q. Okay.</b>  20        A. So that's why I believe I scratched it  21        out.  22        <b>Q. To the extent that Ben testified that he</b>  23     <b>was selling drugs on the second floor of your</b>  24     <b>building and that drug sales were taking place on</b></p>	<p style="text-align: right;">Page 187</p> <p>1           <b>Q. Okay. Did you see drug transactions</b>  2     <b>taking place on the second floor where your</b>  3     <b>apartment was of your building?</b>  4         MR. TEPFER: Objection to form.  5     BY THE WITNESS:  6         A. Yes. In the building, like, yes.  7         <b>Q. What about the second floor where you</b>  8     <b>resided?</b>  9         MR. TEPFER: Objection to form. Are you just  10        asking on the second floor or in her --  11        BY THE WITNESS:  12        A. Because on the second -- in the stairwell  13        I saw the drug -- a few times drug transactions.  14        <b>Q. Anywhere on the second -- anywhere else on</b>  15     <b>the second floor that you saw drug transactions?</b>  16        A. No. No. Not that I recall.  17        <b>Q. Another change that you made is at the</b>  18     <b>bottom of page 1 -- that we didn't discuss at your</b>  19     <b>last deposition -- where you indicate two</b>  20     <b>plainclothes officers, male, African-American, came</b>  21     <b>from the side of the 527 building. Is this the</b>  22     <b>instance that you've already described to me of AJ</b>  23     <b>and Watts approaching you and Ben?</b>  24        A. I'm going to skim through it right quick.</p>
<p style="text-align: right;">Page 186</p> <p>1     <b>the second floor of your building where your</b>  2     <b>apartment was located, is it your testimony that you</b>  3     <b>did not see drug transactions taking place on the</b>  4     <b>floor that you lived on?</b>  5         A. I'm -- I'm not understanding your  6         question.  7         <b>Q. Do you -- Ben testified that there were</b>  8     <b>drug sales happening on the second floor of the</b>  9     <b>building because that's where he lived; that's where</b>  10    <b>he was selling drugs; that's where drug sales took</b>  11    <b>place. Do you -- is it your testimony that you did</b>  12    <b>not see what Ben was seeing --</b>  13        MR. TEPFER: Objection to the form.  14    BY MS. OLIVIER:  15        <b>Q. -- or engaged in?</b>  16        MR. TEPFER: Objection to form.  17    BY THE WITNESS:  18        A. I don't know what Ben was seeing or  19        what -- what he was seeing or being engaged in. I  20        didn't -- I didn't -- I don't -- I don't know what  21        he seen.  22        <b>Q. Did you ever see drug transactions taking</b>  23     <b>place in the stairwells of the 527 building?</b>  24        A. Yes.</p>	<p style="text-align: right;">Page 188</p> <p>1     Okay?  2         <b>Q. Sure.</b>  3         A. Okay. Now, I just got done. What was  4         your question? What's your questions one more time,  5         please?  6         <b>Q. It was is that the -- this situation that</b>  7     <b>you're describing and these two plain-clothes</b>  8     <b>officers or plain-clothes individuals, is that Watts</b>  9     <b>and AJ?</b>  10        A. Yes.  11        <b>Q. Okay. To the extent that Ben testified</b>  12     <b>that it was just Watts by himself, do you disagree</b>  13     <b>with his memory of what happened on Mother's Day?</b>  14        MR. TEPFER: Objection to form.  15    BY THE WITNESS:  16        A. No, that's his memory.  17        <b>Q. Okay. Your memory is that it was Watts</b>  18     <b>and AJ; is that correct?</b>  19        A. Yes.  20        <b>Q. And then I have another question about a</b>  21     <b>notation you made on page 9 of this report, midway</b>  22     <b>down where you write "4th or 5th, Katrina McBride."</b>  23     <b>I'm just wondering -- you can read that paragraph</b>  24     <b>preceding it. I'm just wondering if that's the name</b></p>



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<p style="text-align: right;">Page 189</p> <p>1 of the friend that you went to help.</p> <p>2 A. I'm going to skim right quick.</p> <p>3 Q. Sure. Just that paragraph. Just that</p> <p>4 paragraph.</p> <p>5 A. Okay. What was your question?</p> <p>6 Q. Is Katrina McBride the friend that you</p> <p>7 were helping that had been arrested?</p> <p>8 A. Yes.</p> <p>9 Q. All right. And what does the 4th or 5th</p> <p>10 indicate?</p> <p>11 A. I'm not for sure, and I don't want to</p> <p>12 assume. But I'm not for sure.</p> <p>13 Q. Okay. Are you still in touch with Patrick</p> <p>14 Frazier?</p> <p>15 A. I wasn't -- I wasn't in touch with him.</p> <p>16 Q. You know who he is, though, correct?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. But was he more of Ben's friend,</p> <p>19 associate?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. Is there a reason why you never --</p> <p>22 you or Ben never called him as a witness at your</p> <p>23 trial for the December 11th, two thousand -- or</p> <p>24 sorry -- strike that.</p>	<p style="text-align: right;">Page 191</p> <p>1 Q. Right. You knew how to find him if you</p> <p>2 needed him?</p> <p>3 A. Yes.</p> <p>4 Q. Is there a reason why, then, you didn't</p> <p>5 seek him out to help you and Ben?</p> <p>6 A. I believe because I -- I believe that I</p> <p>7 had mentioned it to Ben, but because he is -- from</p> <p>8 what Ben was telling me, that he was a college</p> <p>9 student and never been in trouble and work, he</p> <p>10 didn't want to get him involved.</p> <p>11 Q. Do you remember when you had this</p> <p>12 conversation with Ben?</p> <p>13 A. No.</p> <p>14 Q. Was Ben in Cook County Jail at the time?</p> <p>15 A. Ben was locked up. I believe he was, but</p> <p>16 I'm not 100 percent sure. But I did tell him.</p> <p>17 Q. Did you ever at any point attempt to bring</p> <p>18 Mr. Frazier to the state's attorney's office or</p> <p>19 introduce him to Matt Mahoney or the state's</p> <p>20 attorney or the FBI?</p> <p>21 A. Oh, no.</p> <p>22 Q. Lastly, do you know who Alvin Waddy is?</p> <p>23 A. Who?</p> <p>24 Q. Alvin Waddy.</p>
<p style="text-align: right;">Page 190</p> <p>1 Is there a reason why you never had him</p> <p>2 testify with respect to your and Mr. Baker's arrests</p> <p>3 on December 11th, 2005?</p> <p>4 MR. TEPFER: Objection to the form.</p> <p>5 Go ahead.</p> <p>6 BY THE WITNESS:</p> <p>7 A. It was his decision. It was Patrick's</p> <p>8 decision and probably due to retaliation.</p> <p>9 Q. Did you ever ask him?</p> <p>10 A. Me assuming. Me assuming.</p> <p>11 Q. Did you ever have any conversations with</p> <p>12 Mr. Frazier about what he observed with respect to</p> <p>13 your arrests on December 11th, 2005?</p> <p>14 A. He came -- he had a conversation with me.</p> <p>15 I was leaving or coming in to 527, one or the other,</p> <p>16 and I don't remember if he walked up to the building</p> <p>17 or if he was standing on the stairs. But what he</p> <p>18 said was he saw what happened. He saw what happened</p> <p>19 from the window and if Skud, which he's referring to</p> <p>20 Ben, needed him, that he was there. That was the</p> <p>21 remark that he made to me.</p> <p>22 Q. You knew where Mr. Frazier lived, correct,</p> <p>23 at this time?</p> <p>24 A. I knew he lived at 511.</p>	<p style="text-align: right;">Page 192</p> <p>1 A. No.</p> <p>2 Q. Okay. Are you aware that he's been --</p> <p>3 A. I don't recall.</p> <p>4 Q. Okay. Are you aware that he's been listed</p> <p>5 as a potential witness in a case that's going to</p> <p>6 trial in state court on October -- beginning</p> <p>7 October 16th, so in a few weeks?</p> <p>8 A. Oh, no. I probably have to work. For</p> <p>9 what? No, I did not know. I don't know who that</p> <p>10 is.</p> <p>11 MS. OLIVIER: Okay. I will go ahead and look</p> <p>12 over my notes briefly, if we can take a five-minute</p> <p>13 break. But I think I am done and can pass Ms. Glenn</p> <p>14 to the others lawyers. But I just need five</p> <p>15 minutes. So back at 3:05.</p> <p>16 THE VIDEOGRAPHER: The time is 3:00 p.m. We</p> <p>17 are now going off the record.</p> <p>18 (Recess taken.)</p> <p>19 THE VIDEOGRAPHER: The time is 3:06 p.m. We</p> <p>20 are now back on the record.</p> <p>21 BY MS. OLIVIER:</p> <p>22 Q. Ms. Glenn, in the entire -- for the entire</p> <p>23 duration of your relationship with Ben up to the</p> <p>24 point that you were divorced, did Ben ever have a</p>

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<p style="text-align: right;">Page 193</p> <p>1 <b>job?</b></p> <p>2 A. As far as employment, no.</p> <p>3 <b>Q. No. Okay.</b></p> <p>4 A. Not that I recall.</p> <p>5 MS. OLIVIER: Okay. That's the only</p> <p>6 question -- the only remaining question I had. I'm</p> <p>7 going to go ahead and pass you to the other</p> <p>8 attorneys. Thank you very much. I'm sure you will</p> <p>9 be happy to not see me again.</p> <p>10 THE WITNESS: Congratulations.</p> <p>11 EXAMINATION</p> <p>12 BY MR. GAINER:</p> <p>13 <b>Q. Ms. Glenn, are you able to hear me okay?</b></p> <p>14 A. Yes.</p> <p>15 <b>Q. Great. My name is Brian Gainer.</b></p> <p>16 <b>Thankfully, Kelly did most of the work. So I have</b></p> <p>17 <b>some questions, but not nearly as many as she had.</b></p> <p>18 <b>So hopefully we can move through this.</b></p> <p>19 A. Okay.</p> <p>20 <b>Q. Just in response to the last question she</b></p> <p>21 <b>asked you, she asked you if Ben ever had a job, and</b></p> <p>22 <b>you said, "As far as employment, no."</b></p> <p>23 <b>What did you mean? What does that mean,</b></p> <p>24 <b>"As far as employment, no"?</b></p>	<p style="text-align: right;">Page 195</p> <p>1 connected to the Chicago, you know, Housing,</p> <p>2 actually or separate.</p> <p>3 <b>Q. And just to be clear, to the extent that I</b></p> <p>4 <b>wasn't, I'm specifically talking about management of</b></p> <p>5 <b>that building, the 527 building, not people who</b></p> <p>6 <b>generally work for the CHA, but that building. Is</b></p> <p>7 <b>your answer still the same?</b></p> <p>8 A. It was a manager that I knew at the</p> <p>9 time -- I actually forgot her name -- that was</p> <p>10 working there as the manager of the Ida B. Wells</p> <p>11 Extensions.</p> <p>12 <b>Q. Do you know the name Francine Osborne?</b></p> <p>13 A. Yes.</p> <p>14 <b>Q. Did I just ring a bell for you there? Is</b></p> <p>15 <b>that who you were talking about?</b></p> <p>16 A. Yes.</p> <p>17 <b>Q. All right. Earlier today you testified</b></p> <p>18 <b>about information you had regarding a possible</b></p> <p>19 <b>relationship between Watts and someone who worked</b></p> <p>20 <b>for the CHA. Do you remember that testimony?</b></p> <p>21 A. Yes.</p> <p>22 <b>Q. Who were you referring to as far as Watts</b></p> <p>23 <b>having a relationship with?</b></p> <p>24 A. Ms. Osborne.</p>
<p style="text-align: right;">Page 194</p> <p>1 A. His job was to make sure that the boys get</p> <p>2 to school, picked up, make sure that they're eating,</p> <p>3 doing their homework. That's his job.</p> <p>4 <b>Q. Okay. And --</b></p> <p>5 A. That's what I was --</p> <p>6 <b>Q. I'm sorry. I didn't mean to --</b></p> <p>7 A. No, no. Uh-uh. No, no. Go ahead.</p> <p>8 <b>Q. So during the time that you were living in</b></p> <p>9 <b>the 527 building with Ben, it was his primary</b></p> <p>10 <b>responsibility to take care of the kids. Is that</b></p> <p>11 <b>what you're staying?</b></p> <p>12 A. One of his responsibilities, main</p> <p>13 responsibilities, yes.</p> <p>14 <b>Q. Okay. And that's because you were</b></p> <p>15 <b>working, and he was there with the kids, and the</b></p> <p>16 <b>kids were there with him, right?</b></p> <p>17 A. Correct.</p> <p>18 <b>Q. Okay. Do you -- did you know the names or</b></p> <p>19 <b>do you know the names of anyone who worked in CHA</b></p> <p>20 <b>management of that building when you lived there?</b></p> <p>21 A. That is a hard question to answer, only</p> <p>22 because there were programs in -- in Chicago</p> <p>23 Housing. And some of the ladies that I have met</p> <p>24 worked for the program. So I don't know was that</p>	<p style="text-align: right;">Page 196</p> <p>1 <b>Q. All right. And when did you first receive</b></p> <p>2 <b>that information?</b></p> <p>3 A. I actually didn't receive it like someone</p> <p>4 came to me. It was just people communicating,</p> <p>5 saying that he was involved with Ms. Osborne.</p> <p>6 <b>Q. So would you characterize it as a rumor</b></p> <p>7 <b>that you heard?</b></p> <p>8 A. Yes.</p> <p>9 <b>Q. Do you remember who you heard it from?</b></p> <p>10 A. No.</p> <p>11 <b>Q. Do you remember specifically what you</b></p> <p>12 <b>heard about that relationship?</b></p> <p>13 A. Just little things. They go gambling. He</p> <p>14 goes over there to the building and communicates</p> <p>15 with her. Those are the only things that really --</p> <p>16 that sticks out right now.</p> <p>17 <b>Q. All right. Did you -- did you ever see</b></p> <p>18 <b>the two of them together?</b></p> <p>19 A. I saw him at the office building</p> <p>20 communicating with her. I saw that.</p> <p>21 <b>Q. And do you remember when you saw that?</b></p> <p>22 A. No, sir.</p> <p>23 <b>Q. Do you remember how many times you saw</b></p> <p>24 <b>that?</b></p>

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<p style="text-align: right;">Page 197</p> <p>1 A. I think it was just once.</p> <p>2 <b>Q. And when you say "communicating," I assume</b></p> <p>3 <b>you mean talking?</b></p> <p>4 A. Yes.</p> <p>5 <b>Q. And could you hear what they were saying?</b></p> <p>6 A. No.</p> <p>7 <b>Q. Was anyone with you when you saw that?</b></p> <p>8 A. No, sir.</p> <p>9 <b>Q. Do you recall ever talking to anyone who</b></p> <p>10 <b>worked for the CHA about Ronald Watts?</b></p> <p>11 A. No.</p> <p>12 <b>Q. Earlier -- strike that.</b></p> <p>13 <b>I have one other question about that. Did</b></p> <p>14 <b>you ever see Ronald Watts and Francine Osborne</b></p> <p>15 <b>gambling together?</b></p> <p>16 A. No.</p> <p>17 <b>Q. Did you ever see Watts gambling with</b></p> <p>18 <b>anyone?</b></p> <p>19 A. No.</p> <p>20 <b>Q. And then just to make sure that I'm very</b></p> <p>21 <b>clear about this, did you ever see Watts gambling at</b></p> <p>22 <b>all?</b></p> <p>23 A. I did not see him with dice in his hand</p> <p>24 this particular time that I'm -- that I recall.</p>	<p style="text-align: right;">Page 199</p> <p>1 <b>remember saying that?</b></p> <p>2 A. Yes.</p> <p>3 <b>Q. Okay. So I want to talk about these</b></p> <p>4 <b>interactions. So first of all, I guess the best way</b></p> <p>5 <b>to do it is for you to tell me how many interactions</b></p> <p>6 <b>like that did you have.</b></p> <p>7 A. I would say that on the top of my head,</p> <p>8 the ones that I remember right now would be two</p> <p>9 personal interactions that I had with him.</p> <p>10 <b>Q. Right. And do you remember -- I guess, as</b></p> <p>11 <b>a way to frame it with time, do you remember what</b></p> <p>12 <b>arrest Ben was in the county jail for when you had</b></p> <p>13 <b>these interactions?</b></p> <p>14 A. No. I can assume, but, no.</p> <p>15 <b>Q. Okay. Maybe to do it a little differently</b></p> <p>16 <b>then, do you remember what year these interactions</b></p> <p>17 <b>occurred in?</b></p> <p>18 A. No.</p> <p>19 <b>Q. But you do remember that these</b></p> <p>20 <b>interactions occurred when Ben was at the -- in the</b></p> <p>21 <b>Cook County Jail?</b></p> <p>22 A. One was for sure. And the other that I'm</p> <p>23 thinking of, I don't recall if he was in jail or if</p> <p>24 he was out, but I believe that he was, and that's me</p>
<p style="text-align: right;">Page 198</p> <p>1 <b>Q. Okay. Can you be a little more specific</b></p> <p>2 <b>about what you're talking about?</b></p> <p>3 A. In another building someone sells candy or</p> <p>4 snacks, things of that nature, and Ben allows our</p> <p>5 boys to go out into the community. I went to go</p> <p>6 get -- get the boys, and there was a group of people</p> <p>7 inside of a building shooting dice. Money was</p> <p>8 present on the floor and in people's hands, and I</p> <p>9 recall seeing Watts standing over there in that</p> <p>10 group of people that was gambling. But, again, I</p> <p>11 didn't see him personally with the dice in his hand.</p> <p>12 <b>Q. Okay. Do you remember when this was?</b></p> <p>13 A. No, sir.</p> <p>14 <b>Q. Do you remember what building it was?</b></p> <p>15 A. I just know it was one of the back</p> <p>16 buildings. No, not -- not the number, no.</p> <p>17 <b>Q. Do you remember the names of any of the</b></p> <p>18 <b>people who were there other than you?</b></p> <p>19 A. No, sir.</p> <p>20 <b>Q. Okay. You've testified earlier today --</b></p> <p>21 <b>it was sort of a passing comment in response to an</b></p> <p>22 <b>unrelated question -- that you had a couple of</b></p> <p>23 <b>personal interactions with Watts while Ben was --</b></p> <p>24 <b>while Mr. Baker was in the Cook County Jail. Do you</b></p>	<p style="text-align: right;">Page 200</p> <p>1 assuming.</p> <p>2 <b>Q. All right. Well, let's talk about the one</b></p> <p>3 <b>that you know for sure occurred when Ben was in the</b></p> <p>4 <b>Cook County Jail. Where did that interaction take</b></p> <p>5 <b>place?</b></p> <p>6 A. On the side of 511 but directly in front</p> <p>7 of 527. I was in my vehicle on the driver's side.</p> <p>8 <b>Q. And what -- who was there other than you</b></p> <p>9 <b>and Ronald Watts?</b></p> <p>10 A. Inside the vehicle, it was just myself.</p> <p>11 <b>Q. Was there anyone standing around where</b></p> <p>12 <b>Watts was standing?</b></p> <p>13 A. Where Watts was standing?</p> <p>14 <b>Q. Yes.</b></p> <p>15 A. When I noticed Watts, he was walking</p> <p>16 towards my direction, towards the direction of the</p> <p>17 parking lot.</p> <p>18 <b>Q. Tell me what happened during that</b></p> <p>19 <b>interaction.</b></p> <p>20 A. My window was rolled down, and he stopped</p> <p>21 at my vehicle on the driver's side, and he made a</p> <p>22 comment about me making a report to OPS. He said</p> <p>23 something about me making the report. There's</p> <p>24 something else he said that I cannot remember.</p>

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1 That's -- he was acknowledging me -- informing me  
2 that he knew about a complaint I had made against  
3 him to OPS.  
4 **Q. Do you remember the exact words he used?**  
5 A. No, sir.  
6 **Q. Did you say anything in response to that?**  
7 A. No.  
8 **Q. Did you know what complaint he was**  
9 **referring to?**  
10 A. No.  
11 **Q. Had you made a complaint to OPS in --**  
12 **around this time?**  
13 A. For him to approach me, I had to make a  
14 complaint.  
15 **Q. Okay. But as you sit here, you're not**  
16 **sure what complaint it was?**  
17 A. Correct.  
18 **Q. Have you told me everything that he said?**  
19 MR. TEPFER: Objection to form.  
20 Go ahead.  
21 BY THE WITNESS:  
22 A. I told you his initial stop was to inform  
23 me that he knew about the complaint I made against  
24 him.

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1 **Q. Did he say anything else?**  
2 A. And I don't recall.  
3 **Q. All right. So have you told me everything**  
4 **you remember that he said to you?**  
5 A. Yes.  
6 **Q. And do you remember anything you said**  
7 **back?**  
8 A. No, I was listening. No, it was brief.  
9 **Q. Do you know if anyone in the vicinity**  
10 **heard what he said to you?**  
11 A. I don't know what someone else knows,  
12 but...  
13 **Q. Yeah. And you shouldn't probably know**  
14 **what someone else knows, but did anyone ever tell**  
15 **you that they heard what he said?**  
16 A. No.  
17 **Q. Was -- and -- and after making these**  
18 **comments to you, did he leave the area?**  
19 A. After he said what he had to say, yes. He  
20 walked away from my car.  
21 **Q. And what did you do after that?**  
22 A. I rolled my window up and grabbed my  
23 belongings and went into the building to my  
24 apartment.

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1 **Q. Now, there's a second interaction that you**  
2 **said you're not quite sure if it happened when**  
3 **Mr. Baker was in the county or out of the county,**  
4 **but you said that it stuck out to you. Tell me,**  
5 **where did this interaction occur?**  
6 A. In my apartment at 527, Apartment 206.  
7 **Q. When did this interaction occur?**  
8 A. I cannot recall the date and time or year.  
9 **Q. All right. Tell me what happened during**  
10 **that interaction.**  
11 A. He knocked on the door, and I let him come  
12 in. I invited him in. He was with one of his  
13 officers. He sat at the wood table, dining table.  
14 His officer sat on my couch that's against the wall.  
15 Basically, he was telling -- well, what I do  
16 remember is that he has a daughter, a son; he grew  
17 up in the Darrow homes in Chicago Housing. He named  
18 someone he had a relationship with growing up.  
19 He was telling me about his personal life,  
20 and he also said that he did not know that I was  
21 with Ben. He didn't say relationship. I didn't  
22 know that you were with Ben. He can't tell me who  
23 to be with. I can't tell you who to be with. But I  
24 didn't know you was with Ben.

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1 That was really the extent. I think  
2 he stayed -- I think they stayed maybe at least --  
3 it seemed like forever, but probably maybe, like,  
4 15 minutes.  
5 **Q. And did he ever tell you the reason for**  
6 **his visit to your apartment?**  
7 A. No.  
8 **Q. What did you say to him while he was**  
9 **telling you these things or after he told you these**  
10 **things?**  
11 A. I didn't say anything to him. There's  
12 nothing to be said. I just listened to him.  
13 **Q. Do you remember anything else that he said**  
14 **during the course of this visit?**  
15 A. About his kids. I think he had a sister.  
16 No, no.  
17 **Q. Who was the other officer; do you know?**  
18 A. AJ.  
19 **Q. Did AJ say anything during the course of**  
20 **this interaction?**  
21 A. Not at all.  
22 **Q. After Watts finished talking about these**  
23 **things, did they leave?**  
24 A. Yes.

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1       **Q. And have you told me everything they did**  
2 **while they were in your apartment?**  
3       A. Which was sat down -- AJ said nothing.  
4 And Watts was communicating, did all the  
5 communication, sitting at the dining room table.  
6       **Q. So did they do anything else that you**  
7 **remember while they were in your apartment?**  
8       A. No, they did not do anything but sit and  
9 talk.  
10       **Q. Okay. This specific visit, was this after**  
11 **or before the Mother's Day when you saw that**  
12 **exchange between Watts and Mr. Baker?**  
13       A. I would say after and -- I would say  
14 after.  
15       **Q. Okay. And was it after or before the**  
16 **mailbox arrest?**  
17       A. I can't recall.  
18       **Q. I probably know the answer to this, but**  
19 **was it after or before you were arrested with**  
20 **Mr. Baker in 2005?**  
21       A. I believe it was before.  
22       **Q. Was anyone else present other than you,**  
23 **AJ, and Sergeant Watts?**  
24       A. In my apartment, no.

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1       **Q. And do you know where Mr. Baker was when**  
2 **this visit occurred?**  
3       A. No, I don't recall.  
4       **Q. But he wasn't there?**  
5       A. No, he was not.  
6       **Q. And are those the two interactions you**  
7 **were referring to earlier that you recall --**  
8 **personal interactions you recall having with Ronald**  
9 **Watts?**  
10       A. More vivid, yes. One on one.  
11       **Q. Was there any -- I'm sorry. I didn't mean**  
12 **to interrupt you.**  
13       A. No, no, no. It was a one-on-one  
14 conversation.  
15       **Q. Okay. And we've talked about a lot of**  
16 **interactions you had with Ronald Watts, these two**  
17 **things and then all of the stuff you've talked about**  
18 **over the two courses of your deposition. And can**  
19 **you think of any personal interaction you had with**  
20 **Ronald Watts that you haven't already talked about**  
21 **in your deposition?**  
22       A. Not that I recall right now.  
23       **Q. All right. Not to belabor the point about**  
24 **Mr. Baker's activities while you lived in that**

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1       building, but when you heard in court -- well,  
2 strike that.  
3       I think you testified that you heard in  
4 court for the first time -- you learned for the  
5 first time that Mr. Baker was selling drugs in the  
6 527 building when you heard it in court, right?  
7       A. When I heard him say out of his mouth,  
8 right.  
9       **Q. And when you heard that, when you heard**  
10 **him say that, what did you think about that?**  
11       A. I hope they let your ass home.  
12       **Q. And why did you have that thought?**  
13       A. Because I want him to come home, and he  
14 was already in the county too long for me.  
15       **Q. Okay. Were you angry when you heard him**  
16 **say that?**  
17       A. I was angry for the whole situation.  
18       **Q. Specifically, were you angry when you**  
19 **heard that he had been selling drugs in the 527**  
20 **building?**  
21       A. I would say no, I wasn't dwelling on that.  
22       **Q. When you -- when he -- when you had a**  
23 **chance to talk to him after you heard that, did you**  
24 **discuss it with him?**

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1       A. No. No.  
2       **Q. Have you ever discussed that with him, the**  
3 **fact that he acknowledged that he was selling drugs**  
4 **in the 527 building when you lived there with him?**  
5       A. Not that I recall.  
6       **Q. Did you ever learn where he stored the**  
7 **drugs that he was selling in the 527 building?**  
8       A. No.  
9       **Q. Did you ever discuss that with him,**  
10 **specifically, where did you store the drugs or where**  
11 **did he store the drugs he was selling when you lived**  
12 **together in the 527 building?**  
13       A. No.  
14       **Q. When the two --**  
15       A. I can't recall, no.  
16       **Q. Okay. Sorry. I didn't mean to cut you**  
17 **off.**  
18       A. No problem.  
19       **Q. So you know now that when Mr. Baker was**  
20 **living in your apartment with your sons and with**  
21 **you, he was selling drugs in the building, right?**  
22       A. Yes.  
23       **Q. Did you ever talk to him about the fact**  
24 **that that was a problem because of your children?**

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Page 209	<p>1 A. No.</p> <p>2 <b>Q. You testified a little bit in response to</b></p> <p>3 <b>some questions from Ms. Olivier about losing your</b></p> <p>4 <b>housing voucher in 2007. Do you remember that</b></p> <p>5 <b>testimony?</b></p> <p>6 A. Yes.</p> <p>7 <b>Q. Did you and Ben Baker have that housing</b></p> <p>8 <b>voucher together?</b></p> <p>9 A. No.</p> <p>10 <b>Q. Did he have a housing voucher to live in</b></p> <p>11 <b>that building?</b></p> <p>12 A. No.</p> <p>13 <b>Q. Was he on the lease for Apartment 206?</b></p> <p>14 A. No.</p> <p>15 <b>Q. Did anyone ever tell you why you lost the</b></p> <p>16 <b>housing voucher in 2007?</b></p> <p>17 A. It's on -- I believe, vaguely, that the</p> <p>18 letter stated due to the background check. I don't</p> <p>19 even think it said felony. I think it just said</p> <p>20 background check. Vaguely I remember that.</p> <p>21 <b>Q. Did you learn that part of the reason you</b></p> <p>22 <b>lost your housing voucher is because of Mr. Baker's</b></p> <p>23 <b>drug activity in Apartment 206?</b></p> <p>24 A. I felt that I lost my voucher because I</p>	Page 211	<p>1 <b>Q. Okay. So you're saying that I have the</b></p> <p>2 <b>time off? It didn't happen right away? Is that</b></p> <p>3 <b>the -- is that your testimony?</b></p> <p>4 A. You had the time off?</p> <p>5 <b>Q. Yeah. My question is, when he got out of</b></p> <p>6 <b>prison in 2014 --</b></p> <p>7 A. Yes.</p> <p>8 <b>Q. -- did the two of you start living</b></p> <p>9 <b>together again?</b></p> <p>10 A. Yes. We did eventually, yes.</p> <p>11 <b>Q. So that was my point.</b></p> <p>12 A. Okay.</p> <p>13 <b>Q. So when did you start living together</b></p> <p>14 <b>again?</b></p> <p>15 A. I can't recall right now.</p> <p>16 <b>Q. Do you remember the address of the place</b></p> <p>17 <b>you lived with him in 2017?</b></p> <p>18 A. Yes.</p> <p>19 <b>Q. What was it?</b></p> <p>20 A. I believe it was 6215 South Rhodes in</p> <p>21 Chicago, Illinois.</p> <p>22 <b>Q. Who lived there with you and Mr. Baker?</b></p> <p>23 A. Our boys.</p> <p>24 <b>Q. Anyone else?</b></p>
Page 210	<p>1 was given from the Chicago tactical unit in the</p> <p>2 whole a case.</p> <p>3 <b>Q. So did you learn -- I understand that</b></p> <p>4 <b>testimony. Did you learn that there was any other</b></p> <p>5 <b>reason other than what you just described for you</b></p> <p>6 <b>losing your housing voucher?</b></p> <p>7 A. My boys were still in school, and they're</p> <p>8 on the lease, and myself, and I have no criminal</p> <p>9 activities or background, negative background. No,</p> <p>10 I think that would be it.</p> <p>11 <b>Q. Okay. So no one ever informed you that</b></p> <p>12 <b>part of the reason you lost that voucher is because</b></p> <p>13 <b>of the activity of Ben Baker who was living in the</b></p> <p>14 <b>apartment with you?</b></p> <p>15 A. Correct.</p> <p>16 <b>Q. All right. Now, do you remember what year</b></p> <p>17 <b>Mr. Baker got out of prison?</b></p> <p>18 A. Oh, 2014 or something.</p> <p>19 <b>Q. And the two of you, when he got out of</b></p> <p>20 <b>prison, started living together again, correct?</b></p> <p>21 A. Incorrect.</p> <p>22 <b>Q. Incorrect? Did you ever live together</b></p> <p>23 <b>again after he got out of prison?</b></p> <p>24 A. Yes.</p>	Page 212	<p>1 A. No.</p> <p>2 <b>Q. Did you learn at some point or have you</b></p> <p>3 <b>learned that while you were living at that address</b></p> <p>4 <b>in 2017, Mr. Baker was acting as a drug courier?</b></p> <p>5 MR. TEPFER: Objection to form.</p> <p>6 But go ahead.</p> <p>7 BY THE WITNESS:</p> <p>8 A. He was a courier?</p> <p>9 <b>Q. Yeah. We'll start with that. Have you</b></p> <p>10 <b>ever learned that he was a drug courier?</b></p> <p>11 A. Oh, no.</p> <p>12 MR. TEPFER: Same objection.</p> <p>13 Go ahead.</p> <p>14 BY THE WITNESS:</p> <p>15 A. No.</p> <p>16 <b>Q. Did you learn or have you learned that in</b></p> <p>17 <b>2017 when you were living at that address, Mr. Baker</b></p> <p>18 <b>was involved in narcotics transactions with Jamar</b></p> <p>19 <b>Lewis?</b></p> <p>20 A. No.</p> <p>21 <b>Q. Have you learned that he was involved in</b></p> <p>22 <b>any kind of narcotics activity while you lived at</b></p> <p>23 <b>that address in 2017?</b></p> <p>24 A. No, I did not.</p>

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1       **Q. Okay. Do you know if he was keeping**  
2       **narcotics in the house on Rhodes when you lived**  
3       **there with him in 2017?**  
4       A. No.  
5       **Q. Did you ever learn that he was bagging up**  
6       **narcotics or packaging narcotics in that house where**  
7       **your children lived in 2017?**  
8       A. And I was living there also. No.  
9       **Q. In 2017, when you lived together on**  
10       **Rhodes, was he contributing to the family**  
11       **financially?**  
12       A. Not that I recall.  
13       **Q. Was he working?**  
14       A. He started working. I don't know. I  
15       believe it was 2017. I'm not for sure, but, yeah,  
16       he was working.  
17       **Q. Do you remember when he started working?**  
18       A. I just -- no.  
19       **Q. Do you remember what he was doing?**  
20       A. Working at a plant. Operating machines,  
21       machineries.  
22       **Q. During that time, 2017, when you were**  
23       **living on Rhodes, was Jamar Lewis someone who**  
24       **visited your home?**

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1       A. Yes.  
2       **Q. Did Jamar Lewis visit your home to see Ben**  
3       **when you weren't there that you know of?**  
4       MR. TEPFER: Objection. Calls for speculation.  
5       Go ahead.  
6       BY THE WITNESS:  
7       A. I don't have no knowledge.  
8       **Q. Okay. How long did you live in**  
9       **Apartment 206 in the 527 building?**  
10       A. Maybe like between eight to ten years, I  
11       believe.  
12       **Q. I missed that.**  
13       A. I apologize. Between eight to ten years  
14       maybe.  
15       **Q. All right. Thanks.**  
16       A. Give or take.  
17       **Q. Would you agree that when you lived there,**  
18       **drugs were sold in that building every day?**  
19       A. No, I'm not going to agree.  
20       **Q. Did you -- did you frequently see people**  
21       **lined up to buy drugs when you lived in the**  
22       **building?**  
23       A. No.  
24       **Q. Did you ever see that?**

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1       A. Yes.  
2       **Q. How often would you see that?**  
3       A. I seen it a few times.  
4       **Q. So a few times over the course of the**  
5       **eight to ten years you lived there?**  
6       A. No. I don't have a number for that, but  
7       no.  
8       **Q. Do you think you saw that more than ten**  
9       **times during the eight to ten years that you lived**  
10       **there?**  
11       A. Again, I have no -- yeah, I don't have no  
12       knowledge of a count right now.  
13       **Q. All right. So there's no way that you can**  
14       **give me a range?**  
15       A. No, sir.  
16       **Q. Did you ever see, while you lived there,**  
17       **people running up and down the stairwells with**  
18       **drugs?**  
19       A. They were running with drugs? No. No, I  
20       have no knowledge.  
21       **Q. Would you agree that while you lived**  
22       **there, police officers were making arrests every day**  
23       **at that building?**  
24       A. No, I don't have no knowledge of that.

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1       **Q. Did you ever, while you lived there, hear**  
2       **people calling out the names of drug lines that were**  
3       **being sold at that building?**  
4       A. Yes.  
5       **Q. And how often did that happen?**  
6       A. I'm not for sure.  
7       **Q. Do you remember the names of the drug**  
8       **lines that were -- that you heard being called out?**  
9       A. No.  
10       **Q. Did you ever become aware of what the drug**  
11       **line Mr. Baker was selling, what the name of that**  
12       **was?**  
13       A. I hope it wasn't Clarissa.  
14       **Q. I don't think it was. Did you ever hear**  
15       **any other one?**  
16       A. No, sir.  
17       **Q. All right. And did you ever become aware**  
18       **or hear that Mr. Baker was in charge of drug sales**  
19       **in that building?**  
20       A. No, I did not.  
21       **Q. Did you ever -- or were you ever present**  
22       **for a conversation between Mr. Baker and Watts about**  
23       **money?**  
24       A. A conversation that they personally had,

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<p style="text-align: right;">Page 217</p> <p>1 no.</p> <p>2 <b>Q. Did you ever pay Watts any money?</b></p> <p>3 A. No.</p> <p>4 <b>Q. Did you ever see Mr. Baker do that?</b></p> <p>5 A. No.</p> <p>6 <b>Q. Did you ever see anyone do that?</b></p> <p>7 A. No.</p> <p>8 <b>Q. There was some confusing testimony. It's</b></p> <p>9 <b>probably me, not you. But there was some confusing</b></p> <p>10 <b>testimony earlier about testimony related to whether</b></p> <p>11 <b>or not Watts ever threatened you physically. There</b></p> <p>12 <b>was some testimony originally that that never</b></p> <p>13 <b>happened. And then you read a letter that was used</b></p> <p>14 <b>as an exhibit indicating that there was some</b></p> <p>15 <b>physical threats. Do you remember that back and</b></p> <p>16 <b>forth?</b></p> <p>17 A. Yes.</p> <p>18 <b>Q. Okay. Did Watts ever physically harm you?</b></p> <p>19 A. No.</p> <p>20 <b>Q. Did he ever touch you?</b></p> <p>21 A. Not that I can recall.</p> <p>22 <b>Q. Did he ever threaten you?</b></p> <p>23 A. Not directly.</p> <p>24 <b>Q. Tell me what he that means, "not</b></p>	<p style="text-align: right;">Page 219</p> <p>1 Ben's name or my name -- that the men is going --</p> <p>2 the men are going to Menard and the women are going</p> <p>3 to Dwight.</p> <p>4 <b>Q. Who heard him say that?</b></p> <p>5 A. Myself.</p> <p>6 <b>Q. Okay. And where were you when that</b></p> <p>7 <b>happened?</b></p> <p>8 A. In Apartment 206.</p> <p>9 <b>Q. So where was he when he said that?</b></p> <p>10 A. In the stairwell.</p> <p>11 <b>Q. So you could hear him in the stairwell</b></p> <p>12 <b>from your apartment?</b></p> <p>13 A. Yes, sir.</p> <p>14 <b>Q. When did this happen?</b></p> <p>15 A. I don't recall the year and the time.</p> <p>16 <b>Q. What was the petition that you were</b></p> <p>17 <b>seeking to have signed?</b></p> <p>18 A. Regarding the wrong -- a charge. Ben</p> <p>19 was -- a charge that was given to Ben.</p> <p>20 <b>Q. Do you remember -- I'm sorry. Go ahead.</b></p> <p>21 A. No. That was the petition, to help with</p> <p>22 him to get released.</p> <p>23 <b>Q. And what was the charge? Do you remember?</b></p> <p>24 A. I don't recall, no.</p>
<p style="text-align: right;">Page 218</p> <p>1 <b>directly."</b></p> <p>2 A. He did not come to me personally face to</p> <p>3 face and made a threat to me. That's directly, in</p> <p>4 my opinion.</p> <p>5 <b>Q. Okay. Do you feel as though you were</b></p> <p>6 <b>threatened indirectly by Watts?</b></p> <p>7 A. Yes.</p> <p>8 <b>Q. And explain how that happened.</b></p> <p>9 A. I was doing a petition for -- Ben was in</p> <p>10 the county for one of Watts's cases. And he was --</p> <p>11 I had the details. I was going to write it out,</p> <p>12 whatever one of the cases were. And Watts -- I</p> <p>13 asked people would they sign my petition. But we</p> <p>14 would have to go to the currency exchange to get it</p> <p>15 notarized also because I wanted to have a legal</p> <p>16 document. People actually had no problems with</p> <p>17 that.</p> <p>18 I'm assuming that that information of me,</p> <p>19 my petition, got back to Watts. Me assuming. And</p> <p>20 Watts came to the building. I don't know if it was</p> <p>21 the same day or a day later or a month later. I</p> <p>22 don't know when it was. But he came to the building</p> <p>23 and said -- made the statement that if anyone signs</p> <p>24 the petition -- I don't remember or recall him using</p>	<p style="text-align: right;">Page 220</p> <p>1 <b>Q. And how do you know it was Watts who was</b></p> <p>2 <b>saying that in the stairwell?</b></p> <p>3 A. Because I knew -- I recognized his voice.</p> <p>4 <b>Q. So is it -- is it fair for me to</b></p> <p>5 <b>understand from your testimony that you couldn't</b></p> <p>6 <b>actually see him saying this, but you heard a voice</b></p> <p>7 <b>that you recognized to be his?</b></p> <p>8 A. Yes.</p> <p>9 <b>Q. Did anyone tell you -- anyone else tell</b></p> <p>10 <b>you that they heard that?</b></p> <p>11 A. I had two people that came to me to inform</p> <p>12 me that they could not sign due to Watts' statement.</p> <p>13 <b>Q. And who were those people?</b></p> <p>14 A. One person was Renee. I don't know her</p> <p>15 last name. She stayed in the building. And another</p> <p>16 lady, Justine, she passed away. I don't know her</p> <p>17 last name either. But she passed away.</p> <p>18 <b>Q. Do you still have any materials related to</b></p> <p>19 <b>this petition?</b></p> <p>20 A. No.</p> <p>21 <b>Q. Did the petition accuse Watts of doing</b></p> <p>22 <b>anything illegal or incorrect?</b></p> <p>23 A. My petition would have included Ben's</p> <p>24 name, the date, and the time of his arrest and the</p>

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Page 221	<p>1 incident that was given to him, the case that was</p> <p>2 given to him and most likely the people who were</p> <p>3 involved. That's what my petition would...</p> <p>4 <b>Q. Have you finished your answer?</b></p> <p>5 A. Yes.</p> <p>6 <b>Q. Okay. The petition that you're referring</b></p> <p>7 <b>to, did you -- was it typed up?</b></p> <p>8 A. Yes.</p> <p>9 <b>Q. What happened to it?</b></p> <p>10 A. I don't know. I'm not for sure.</p> <p>11 <b>Q. Did you have any signatures on it before</b></p> <p>12 <b>you stopped your efforts?</b></p> <p>13 A. No.</p> <p>14 <b>Q. And what makes you assume that Watts heard</b></p> <p>15 <b>about your petition?</b></p> <p>16 A. From him coming into the building, making</p> <p>17 a comment about the petition, and then also one</p> <p>18 resident and one nonresident coming to me saying</p> <p>19 that they heard what he said and that they could</p> <p>20 not. The one actually said she -- one of them</p> <p>21 actually said that she would still sign. But I told</p> <p>22 her that was okay.</p> <p>23 <b>Q. So that -- we just spent a little bit of</b></p> <p>24 <b>time talking on -- about your belief that that was</b></p>	Page 223	<p>1 MR. TEPFER: And this really is asked and</p> <p>2 answered from the prior dep, but...</p> <p>3 BY MR. GAINER:</p> <p>4 <b>Q. Well, let's put it this way: Were these</b></p> <p>5 <b>notes made before or after your first deposition?</b></p> <p>6 A. I believe it was before.</p> <p>7 <b>Q. Okay. That's what I believe too. And the</b></p> <p>8 <b>purpose of these notes, as you've testified, was to</b></p> <p>9 <b>make corrections where you think COPA got things</b></p> <p>10 <b>wrong based on the statement that you gave to them,</b></p> <p>11 <b>right?</b></p> <p>12 A. Or what I felt, yes.</p> <p>13 <b>Q. Or where you feel like there's more</b></p> <p>14 <b>clarification or something like that, right?</b></p> <p>15 A. Yes, sir.</p> <p>16 <b>Q. All right. I want to call your attention</b></p> <p>17 <b>to the first full paragraph on page 9. It starts</b></p> <p>18 <b>with "Glenn" and ends with "2005." There's a line</b></p> <p>19 <b>there. It looks like you're underlining something.</b></p> <p>20 <b>Do you know what the purpose of that line is?</b></p> <p>21 A. It says that I knew the names of many of</p> <p>22 Watts' team. I do not know all the names of Watts'</p> <p>23 team.</p> <p>24 <b>Q. All right. And that's why you drew that</b></p>
Page 222	<p>1 <b>an indirect threat made to you by Watts. Are there</b></p> <p>2 <b>any other instances of anything like that happening,</b></p> <p>3 <b>indirect threats?</b></p> <p>4 A. Not that I can recall.</p> <p>5 <b>Q. Okay. I want to share my screen with you</b></p> <p>6 <b>momentarily to show you something that you've seen a</b></p> <p>7 <b>number of times already. Just give me a second.</b></p> <p>8 <b>All right. Hopefully, you can see this. Are you</b></p> <p>9 <b>looking at this, the COPA memo with your notes on</b></p> <p>10 <b>it?</b></p> <p>11 A. Yes, sir.</p> <p>12 MR. TEPFER: Exhibit 12, right?</p> <p>13 MR. GAINER: Exhibit 12, yeah. Thanks.</p> <p>14 BY MR. GAINER:</p> <p>15 <b>Q. And I'm specifically going to ask you some</b></p> <p>16 <b>questions about page 9, which is PL Joint 54685.</b></p> <p>17 MR. TEPFER: I'm going to put it in front of</p> <p>18 her, if that's okay.</p> <p>19 MR. GAINER: That's fine.</p> <p>20 BY MR. GAINER:</p> <p>21 <b>Q. Yeah, I'm just -- I'm just going to ask</b></p> <p>22 <b>you some questions about 9, page 9. So I apologize</b></p> <p>23 <b>if this came up already. But when did -- when did</b></p> <p>24 <b>you make these notes?</b></p>	Page 224	<p>1 <b>line there?</b></p> <p>2 A. Yes.</p> <p>3 <b>Q. All right. Now, aside from that line,</b></p> <p>4 <b>there's nothing else on this paragraph that you</b></p> <p>5 <b>needed to correct, right?</b></p> <p>6 A. Okay. Yes.</p> <p>7 <b>Q. And if there had been something that you</b></p> <p>8 <b>had noticed that you thought was wrong or needed</b></p> <p>9 <b>clarification, you would have written it there,</b></p> <p>10 <b>right?</b></p> <p>11 A. At that time, yes.</p> <p>12 <b>Q. All right. Going down to this paragraph,</b></p> <p>13 <b>the second to the last paragraph here that starts</b></p> <p>14 <b>with "Glenn remembered," do you see that?</b></p> <p>15 A. Yes.</p> <p>16 <b>Q. Can you just take a minute to read that</b></p> <p>17 <b>paragraph? I want to ask you a couple questions</b></p> <p>18 <b>about it. Tell me when you're done.</b></p> <p>19 A. I'm ready.</p> <p>20 <b>Q. Okay. Who is Arthur Kirksey?</b></p> <p>21 A. I would say an associate of mine.</p> <p>22 <b>Q. One of your associates?</b></p> <p>23 A. Yes.</p> <p>24 <b>Q. So not quite a friend, but someone who you</b></p>

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1     **knew?**  
 2         A. That I know, yes.  
 3     **Q. When's the last time you spoke to Arthur**  
 4     **Kirksey?**  
 5         A. Probably like May 20th or May 21st of  
 6     2022. No. 2023. This year.  
 7     **Q. And did you see him, or did you talk to**  
 8     **him on the phone?**  
 9         A. I saw him.  
 10    **Q. Where did you see him?**  
 11         A. At the restaurant.  
 12    **Q. Which restaurant?**  
 13         A. It's called Fuentes.  
 14    **Q. Where is that?**  
 15         A. 119th or 115th and Pulaski.  
 16    **Q. Was it a coincidence that you saw him, or**  
 17    **did you meet him there?**  
 18         A. Met him there.  
 19    **Q. And what was the purpose of that meeting?**  
 20         A. Dinner.  
 21    **Q. Did you discuss your case or the Watts**  
 22    **cases with him during that meeting?**  
 23         A. No.  
 24    **Q. Have you ever discussed the subject matter**

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1     **of these lawsuits with Mr. Kirksey?**  
 2         A. No.  
 3     **Q. How did you become aware that Mr. Kirksey**  
 4     **had allegedly been paying Sergeant Watts federal**  
 5     **money as part of an undercover federal**  
 6     **investigation?**  
 7         A. Because I was there when the money was --  
 8     federal money was given to Arthur Kirksey.  
 9     **Q. And where were you?**  
 10         A. Many places.  
 11    **Q. When was the last time you were present**  
 12    **when that happened?**  
 13         A. Probably -- it was either Jewel's parking  
 14     lot or Michael Reese Hospital.  
 15    **Q. Who was there when you were present when**  
 16    **the money was given to Arthur Kirksey?**  
 17         A. Myself, Arthur Kirksey, and Patrick Smith.  
 18     On -- on what occasion?  
 19    **Q. Well, so my next question was going to be**  
 20    **how many different occasions did this happen.**  
 21         A. Many. Multiple.  
 22    **Q. Does that mean more than ten?**  
 23         A. Yes.  
 24    **Q. More than 20?**

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1         A. I would say -- I would say it was more  
 2     than 15, maybe more than 20. But I know it was more  
 3     than 15.  
 4     **Q. And explain. I mean, I know that there**  
 5     **were multiple occasions, but generally how did it**  
 6     **work when you were with Patrick Smith and Arthur**  
 7     **Kirksey and money was given to Arthur Kirksey?**  
 8         A. How would what work?  
 9     **Q. Well, so explain the scenario. Where**  
 10    **would you be? Would you be in a car? Would you be**  
 11    **out on the street when Arthur Kirksey was given**  
 12    **money?**  
 13         A. I would be in a car.  
 14    **Q. And who would give him the money?**  
 15         A. Patrick Smith.  
 16    **Q. How much money?**  
 17         A. It varies.  
 18    **Q. What's the most that you ever saw Arthur**  
 19    **Kirksey get from Patrick Smith?**  
 20         A. I can't recall.  
 21    **Q. Do you know what the purpose of that was?**  
 22         A. It was a payment.  
 23    **Q. For what?**  
 24         A. That never got into details as far as for

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1     what. I can assume, but that part never went in --  
 2     it never went into detail about for what.  
 3     **Q. Did you ever hear Smith tell Kirksey what**  
 4     **he wanted him to do with the money?**  
 5         A. No. No.  
 6     **Q. Do you ever remember hearing Smith say**  
 7     **anything to Kirksey about the money?**  
 8         A. Yes.  
 9     **Q. And what do you remember hearing him say?**  
 10         A. Don't mix this money up with your money.  
 11    **Q. Did you ever hear Kirksey say anything**  
 12    **about any efforts to get -- to do anything with the**  
 13    **money?**  
 14         A. Can you repeat that one more time?  
 15    **Q. Yeah. So I just asked you about what you**  
 16    **heard Smith say about the money.**  
 17         A. I answered that.  
 18    **Q. Yeah, right. And so now I'm trying to**  
 19    **find out what you heard Kirksey say about the money**  
 20    **or what he was going to do with it or anything like**  
 21    **that.**  
 22         A. What me and Kirksey said about the money?  
 23    **Q. What Kirksey said about the money.**  
 24         A. I didn't hear him say anything about the

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<p style="text-align: right;">Page 229</p> <p>1 money.</p> <p>2 <b>Q. And what was your role in these scenarios?</b></p> <p>3 A. Support.</p> <p>4 <b>Q. And how did you provide support?</b></p> <p>5 A. By being there for Arthur for when he met</p> <p>6 with the agent and calling him for when Arthur</p> <p>7 needed the money to pay.</p> <p>8 <b>Q. Did you ever see Kirksey and Watts</b></p> <p>9 <b>together?</b></p> <p>10 A. When?</p> <p>11 <b>Q. Ever.</b></p> <p>12 A. Ever? Not that I -- not that I can recall</p> <p>13 right now.</p> <p>14 <b>Q. Did you ever see Kirksey give any of that</b></p> <p>15 <b>money to Watts?</b></p> <p>16 A. No. No.</p> <p>17 <b>Q. Did you ever see Kirksey give that money</b></p> <p>18 <b>to anyone?</b></p> <p>19 A. No.</p> <p>20 <b>Q. Did Patrick Smith ever give you any money?</b></p> <p>21 A. No.</p> <p>22 <b>Q. Did anyone from the FBI ever give you any</b></p> <p>23 <b>money?</b></p> <p>24 A. Not that -- no. No, not that I recall.</p>	<p style="text-align: right;">Page 231</p> <p>1 something?"</p> <p>2 He said, "Fives and ones. A couple of</p> <p>3 tens is fine."</p> <p>4 <b>Q. Did Kirksey ever tell Smith that he</b></p> <p>5 <b>successfully got anyone to take the money in your</b></p> <p>6 <b>presence?</b></p> <p>7 A. I can't recall the whole verbiage right</p> <p>8 now. But yes, it did happen.</p> <p>9 <b>Q. All right. And what do you remember about</b></p> <p>10 <b>that?</b></p> <p>11 A. That Mohammed wanted a piece. I think the</p> <p>12 money was going to -- and this is vaguely -- going</p> <p>13 to one individual, but Mohammed wanted some money on</p> <p>14 the side, some -- a piece of the money.</p> <p>15 <b>Q. All right. Well, let's -- let's restrict</b></p> <p>16 <b>this next question just to Ronald Watts. Did</b></p> <p>17 <b>Kirksey ever say anything to Smith about Watts and</b></p> <p>18 <b>the money in your presence?</b></p> <p>19 A. No.</p> <p>20 <b>Q. Okay. Did you --</b></p> <p>21 A. Not that I recall.</p> <p>22 <b>Q. Thank you. Sorry about that. Did you</b></p> <p>23 <b>ever hear any recordings of Ronald Watts made by</b></p> <p>24 <b>anyone? Sorry about that.</b></p>
<p style="text-align: right;">Page 230</p> <p>1 <b>Q. During the course of these -- can you tell</b></p> <p>2 <b>me over how long of a period these meetings took</b></p> <p>3 <b>place between you and Kirksey and Patrick Smith?</b></p> <p>4 A. I believe it was at least a year -- on a</p> <p>5 year or so, but a year.</p> <p>6 <b>Q. Did you ever hear Kirksey tell Smith about</b></p> <p>7 <b>any of his attempts to get anyone to take that</b></p> <p>8 <b>money, about what happened?</b></p> <p>9 A. I don't understand your question.</p> <p>10 <b>Q. Yeah. So you're meeting with Patrick</b></p> <p>11 <b>Smith and Arthur Kirksey when Patrick Smith is</b></p> <p>12 <b>giving Arthur Kirksey money, and you said you can</b></p> <p>13 <b>assume what the money was for, right?</b></p> <p>14 A. Yes.</p> <p>15 <b>Q. Did you ever hear Kirksey tell Smith what</b></p> <p>16 <b>was happening with the money at any point?</b></p> <p>17 A. What was happening with the money?</p> <p>18 <b>Q. Yeah, whether he was trying to get someone</b></p> <p>19 <b>to take it, whether he was giving it to somebody,</b></p> <p>20 <b>anything like that?</b></p> <p>21 A. Oh. I know that he told -- I know that</p> <p>22 Kirksey told Smith not to come with large bills.</p> <p>23 Don't come with large bills. And Patrick said,</p> <p>24 "What do you prefer? Twenties or tens or</p>	<p style="text-align: right;">Page 232</p> <p>1 A. I heard one -- it wasn't a whole</p> <p>2 recording. I just heard part of it, to make sure it</p> <p>3 was recorded. I don't know who was on the recorder</p> <p>4 or anything like that after Kirksey came back from</p> <p>5 his dropoff.</p> <p>6 <b>Q. So am I understanding you correctly, that</b></p> <p>7 <b>you heard a recording, but you're not sure who was</b></p> <p>8 <b>on the recording?</b></p> <p>9 A. It was -- yes.</p> <p>10 <b>Q. Okay. So you don't know if Watts was on</b></p> <p>11 <b>the recording or not?</b></p> <p>12 A. I was not sure who was on the recording.</p> <p>13 <b>Q. Okay. Did you ever see any videos of any</b></p> <p>14 <b>FBI operations that had Watts on them?</b></p> <p>15 A. No.</p> <p>16 <b>Q. Okay. This last sentence here of this</b></p> <p>17 <b>paragraph, "Glenn also learned that Kirksey had been</b></p> <p>18 <b>paying Sergeant Watts with his own (Kirksey's) money</b></p> <p>19 <b>prior to the federal operation." Is that -- is that</b></p> <p>20 <b>true? Is that something you learned?</b></p> <p>21 A. Yes.</p> <p>22 <b>Q. How did you learn that?</b></p> <p>23 A. Word of mouth.</p> <p>24 <b>Q. From whom?</b></p>

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1 A. From people.  
2 **Q. Okay. What people?**  
3 A. People that hung around the Ida B. Wells  
4 Extensions.  
5 **Q. Can you tell me the names of any of the**  
6 **people who told you that?**  
7 A. Not offhand.  
8 **Q. Can you tell me when you heard that?**  
9 A. No.  
10 **Q. All right. So I want to talk to you a**  
11 **little bit -- and I'm going to take this down.**  
12 A. Okay.  
13 **Q. I want to talk to you a little bit about**  
14 **the incident where your testimony is that Watts used**  
15 **a key to get into your apartment. Do you remember**  
16 **that testimony?**  
17 A. Yes.  
18 **Q. And his -- my understanding is he said to**  
19 **you that someone left their keys in the door. Is**  
20 **that right?**  
21 A. Yes.  
22 **Q. Did you see the key that he used to get**  
23 **into your apartment?**  
24 A. No.

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1 **Q. Did he give you keys back after getting**  
2 **into your apartment?**  
3 A. No.  
4 **Q. How do you know he used a key to get in?**  
5 A. Because my door was locked.  
6 **Q. Did you see him with a key?**  
7 A. No.  
8 **Q. I'm a little bit unclear about your**  
9 **testimony about the electricity going off. Which**  
10 **was -- which resident told you that it was the**  
11 **police who turned off your electricity?**  
12 A. I was not -- I'm not for sure if it was a  
13 resident or someone living in the building. I think  
14 it was someone living in the building down the hall.  
15 I'm not for sure. I don't recall.  
16 **Q. All right. My understanding is that the**  
17 **residents never told you who it was that turned off**  
18 **your electricity; is that right?**  
19 A. Correct.  
20 **Q. Okay. Give me one second.**  
21 A. Uh-huh.  
22 **Q. Talking about the mailbox case and**  
23 **Mr. Baker's arrest in the mailbox case, my**  
24 **understanding of your testimony is that after**

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1 **that -- you saw him arrested, you followed him to**  
2 **the police station; is that right?**  
3 A. Yes.  
4 **Q. And you went into the -- I think you**  
5 **testified that you went into the lobby and you made**  
6 **a little bit of a scene, telling people that it --**  
7 **that the arrest was bogus; is that correct?**  
8 A. Yes. Yes.  
9 **Q. Why did you do that? Why did you feel as**  
10 **though that arrest was bogus?**  
11 A. Because Ben is not a psychic. So for him  
12 to tell his probation officer and call the lawyer  
13 and call the police station and have the lawyer to  
14 call to let them know or to see if he had a warrant  
15 or anything issued for his arrest because of  
16 narcotics that was -- supposedly had been taken out  
17 of a mailbox -- yeah.  
18 **Q. Well, you and Ben both knew that Watts was**  
19 **looking for him for those drugs because you were**  
20 **staying at different hotels on the South Side,**  
21 **right?**  
22 A. Yes.  
23 **Q. Okay. So that was knowledge -- it was out**  
24 **there that Watts looking for Ben for drugs from a**

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1 **mailbox; wasn't it?**  
2 A. Yes.  
3 **Q. Okay. The March 23rd, 2005, arrest --**  
4 **when I say that, do you know what I'm talking about,**  
5 **March 23rd, 2005?**  
6 A. You can refresh my memory fully.  
7 **Q. It's an arrest you said you were not**  
8 **present for, and you went down the stairs into the**  
9 **parking lot and saw him -- saw him being put into a**  
10 **car. Do you remember that?**  
11 A. That's the one where it was stated that  
12 Ben had narcotics in his hand or in his pocket or  
13 something. Okay. Yes.  
14 **Q. So do you know what he -- what Ben was**  
15 **doing before he was arrested?**  
16 A. No.  
17 **Q. And you didn't see him, Ben, until he was**  
18 **being placed into a police car, right?**  
19 A. Correct.  
20 **Q. You testified -- you testified that when**  
21 **you saw him being placed into a police car,**  
22 **initially Watts was not there; is that correct?**  
23 A. Correct.  
24 **Q. And you provided some testimony about a**



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1 phone call that you heard, and then Watts arrived  
2 after you heard the phone call; is that right?  
3 A. Yes.  
4 **Q. Who was making that phone call?**  
5 A. I don't recall.  
6 **Q. Was it a civilian or a police officer?**  
7 A. An officer.  
8 **Q. Can you describe that officer?**  
9 MR. TEPFER: I think this has all been asked  
10 already.  
11 BY THE WITNESS:  
12 A. No, I can't --  
13 MR. TEPFER: But go ahead.  
14 BY THE WITNESS:  
15 A. I can't recall right now.  
16 **Q. Do you know that person's name?**  
17 A. No.  
18 **Q. And what did you hear that person say on**  
19 **the phone?**  
20 A. That they got him.  
21 **Q. And could you hear anything being said on**  
22 **the other end of the phone?**  
23 A. Where are you at?  
24 **Q. You heard the person who was on the other**

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1 end of the phone say that?  
2 A. Yes.  
3 **Q. And how close were you to this officer**  
4 **when you heard that?**  
5 A. Maybe like a foot away. Not even that  
6 far --  
7 **Q. Was it --**  
8 A. -- from the police car.  
9 **Q. Was it a cell phone that the officer was**  
10 **talking on?**  
11 A. Yeah. I don't think they have  
12 walkie-talkies, yes.  
13 **Q. Okay. And could -- did you recognize the**  
14 **voice on the other end of the phone?**  
15 A. Honestly, no.  
16 **Q. All right. And then you saw -- your**  
17 **testimony before was you saw Watts pull up in his**  
18 **car?**  
19 A. Yes.  
20 **Q. And up until the point you saw Watts pull**  
21 **up in his car, Watts was not in the area, correct?**  
22 A. Watts was not in front of 527.  
23 **Q. That's a good point. Let me rephrase**  
24 **that. Up until you saw Watts pull up in his car,**

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1 you did not see Watts involved with Ben Baker and  
2 what you were seeing with Ben Baker being put into a  
3 car, correct?  
4 A. Correct.  
5 **Q. You testified about the -- I'm getting**  
6 **close to being finished here.**  
7 A. You're fine.  
8 **Q. You testified about the U UW arrest with**  
9 **your father's ammunition, and you said that someone**  
10 **sent those officers to your apartment. Do you**  
11 **remember that testimony?**  
12 A. Yes.  
13 **Q. Why do you think that, or how do you know**  
14 **that?**  
15 A. Because the officer made a comment. There  
16 was multiple officers in the apartment. And one of  
17 the officers made a comment and said he -- he said  
18 something about that it was bogus. It wasn't -- it  
19 didn't pan out. Whatever was said, he said that he  
20 was lying. It didn't pan out. There was nothing  
21 there.  
22 **Q. And did that officer or any officer who**  
23 **was in the apartment say who sent them there?**  
24 A. No, no names were mentioned.

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1 **Q. Okay. And then later, after that**  
2 **happened, you saw two officers, one of whom you**  
3 **believe was Watts, get into a scuffle?**  
4 A. One that I know that was Ronald Watts got  
5 into a scuffle.  
6 **Q. All right. And you saw a third officer**  
7 **identify Watts as a police officer to the officer**  
8 **with whom he was scuffling, right?**  
9 A. Correct.  
10 **Q. And you said earlier that they were**  
11 **fussing about Ben. Do you remember that?**  
12 A. Yes.  
13 **Q. What does that mean?**  
14 A. Watts wanted to take Ben. Me assuming.  
15 But Watts did make the comment, "I'll take him."  
16 And the other officer that I never seen before said  
17 no. And then it was like the shove match. So I  
18 assume that Watts wanted take Ben into custody or  
19 take him to the side or whatever he does and let the  
20 other officer go on about his life or everyday  
21 duties or whatever he do.  
22 **Q. Did you hear Watts say anything else?**  
23 A. No. Not that I recall, no.  
24 **Q. Did you see Watts do anything else?**

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1 A. No, not that I recall.

2 **Q. Just a couple questions about the**

3 **December 11th -- your December 11th, 2005, arrest.**

4 **When you testified that you saw Watts pull drugs**

5 **from his sleeve, can you describe a little better or**

6 **a little more clearly what you mean by that, like**

7 **what exactly he did?**

8 A. I didn't actually say pull. That's not

9 the words I used at all. I said he came out of his

10 sleeve with a bundle of drugs that looked like

11 narcotics. So it came from right under his sleeve

12 right into the palm of his hand, his left hand, on

13 the driver's side of the vehicle with the door open.

14 **Q. And was he -- what was he wearing? What**

15 **sleeve did it come out of?**

16 A. The left.

17 **Q. Right. But of what? What sort of**

18 **garment?**

19 A. I don't recall right now.

20 **Q. How long had he been looking through your**

21 **car before he did that?**

22 A. Oh, my goodness. For --

23 MR. TEPFER: Objection. Asked and answered.

24 Go ahead.

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1 BY THE WITNESS:

2 A. For a while. For a while. It was cold

3 out there. For a while. It might have been

4 shorter, but it seemed like it was a long time.

5 **Q. Did you ever report that specific**

6 **action -- right? -- the left sleeve action to the**

7 **FBI?**

8 A. To whoever would listen.

9 MR. GAINER: Okay. That's all the questions I

10 have for you. Thank you.

11 THE WITNESS: Thank you.

12 MR. TEPFER: Thank you. I assume we're going

13 to be going a little bit longer, whoever is next?

14 Should we take a few-minute break?

15 MR. PALLES: Yeah, thought I might go next, if

16 that's okay, but I'm all for a break. Do you want

17 to make it -- what? -- 4:20, ten minutes? Less?

18 MR. TEPFER: Yeah, that sounds -- 4:20 would be

19 great. I need a few-minute breather. Thank you.

20 MR. DAFFADA: I won't have any questions, just

21 so you know. So Eric, you can go the rest of the

22 distance, if you want.

23 MR. PALLES: Well --

24 MR. TEPFER: I assume --

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1 MR. PALLES: -- then there's Mr. Burns.

2 Mr. Burns has priority too.

3 MR. DAFFADA: Yeah, he always has questions.

4 MR. PALLES: But of course. I was like -- but

5 I won't be that long.

6 MR. TEPFER: Okay. Thank you.

7 MR. PALLES: About ten minutes.

8 MR. TEPFER: Okay.

9 MR. PALLES: 4:20 or whatever.

10 (Recess taken.)

11 THE VIDEOGRAPHER: The time is 4:20 p.m. We

12 are now back on the record.

13 EXAMINATION

14 BY MR. PALLES:

15 **Q. All right. Sorry. The new-fangled**

16 **technology gets me. All right. The -- just a quick**

17 **question about Mr. Baker. Are you currently living**

18 **with him?**

19 A. Yes.

20 **Q. Okay. And have you been living with him**

21 **since his most recent release from federal custody?**

22 A. Maybe like, give or take, a month or so

23 after he was released.

24 **Q. Okay. He might have had some halfway**

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1 **house or --**

2 A. No. He was -- he was with family.

3 **Q. Okay. Okay. In any event, your -- when**

4 **did you get divorced legally?**

5 A. Maybe a year or two before he got

6 released.

7 **Q. So we're talking about maybe 2016 or so?**

8 **Would that be about right? I'm sorry. 2014, '15?**

9 A. Yeah, around that. I would say more

10 closer to, yeah, '14.

11 **Q. All right. But you're still life partners**

12 **today, correct?**

13 A. Yes. Yes.

14 **Q. Okay. Okay. I don't know. In any event,**

15 **I want to take you to your arrest on December 11th**

16 **of 2005, and it was a Sunday afternoon, correct?**

17 **Remember? Yes?**

18 A. Yes.

19 **Q. Okay. Do you recall how you were dressed?**

20 A. I believe I had on some boots, a jacket,

21 and I had on two pair of pants.

22 **Q. Okay. The boots, were they red?**

23 A. Were they red?

24 **Q. Red. Yeah.**

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1 A. No, sir. No, sir. I don't recall owning  
2 a pair of red boots, reds shoes period, no, sir.  
3 **Q. Okay. How about the coat? What color was**  
4 **that?**  
5 A. I don't recall. Probably a black, but I  
6 don't recall.  
7 **Q. Did you own a beige coat at that time?**  
8 A. I apologize. I don't recall the color.  
9 **Q. Okay. Did you -- did you own a pair of**  
10 **black pants with a red stripe?**  
11 A. No, I -- no. My dad had -- I was moving  
12 furniture, moving things out of a house. So it  
13 would just be on -- just something to throw on to  
14 move items and keepsake items that -- that I lost,  
15 but...  
16 **Q. Okay.**  
17 A. But, no, it wouldn't be a bright color, I  
18 don't think.  
19 **Q. Okay. So you were moving what? You were**  
20 **moving what from inside a house?**  
21 A. Some furniture that was inside of the  
22 house.  
23 **Q. And where was that house located?**  
24 A. In Olympia Fields.

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1 **Q. Okay. And when you returned to Browning**  
2 **that day, was that furniture still in the car?**  
3 A. I apologize. Can you repeat the --  
4 **Q. Yes. The -- well, let me ask you this:**  
5 **You were out in Olympia Fields. Was that to pick up**  
6 **or drop off furniture or both?**  
7 A. I'm picking up. We sold my dad's house.  
8 **Q. Okay. So then where did you take the**  
9 **furniture?**  
10 A. It was going to my -- my apartment.  
11 **Q. Okay. Okay. So -- and am I correct that**  
12 **when you were bringing it back to your apartment,**  
13 **was Ben in the car with you?**  
14 A. Okay. Yeah. Wait. Hold on. I  
15 apologize. I need to backtrack. I'm thinking. And  
16 my dates or the time frame is wrong. I never --  
17 Ben -- it was a Sunday. Ben had picked me up. I  
18 was dressed in darker colors because I was moving  
19 things out of the house or getting rid of the last  
20 of the things in the house.  
21 I went to -- I got dropped off to my  
22 aunt's house on Prairie somewhere by my sibling.  
23 And then I called Ben and asked him to come and pick  
24 me up after I stayed for an hour or a couple of

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1 hours or whatever. And Ben came to pick me up.  
2 And this is the day of the arrest for Ben  
3 and myself. And Ben came and picked me up. Okay.  
4 I believe I just still had -- I still had items from  
5 previous in my vehicle. Okay. Because I was trying  
6 to put it together. I apologize.  
7 **Q. Okay. So I'm trying to understand it.**  
8 **The -- was -- where was the furniture? Had the**  
9 **furniture been dropped off, or was the furniture in**  
10 **the car?**  
11 A. No, I still -- it was in the truck. I  
12 still had furniture left in the truck. It was a  
13 couple-day process of moving.  
14 **Q. Okay. And this was the time that the**  
15 **police stopped you; am I correct?**  
16 A. Stopped us, yes.  
17 **Q. Okay. At any time prior to that arrest,**  
18 **did you have occasion to run in and out of the**  
19 **building at 511 several times, 511 Browning?**  
20 A. No. Unless -- no.  
21 **Q. Okay. Do you know an Officer -- I'll get**  
22 **him.**  
23 A. I'm sorry. What was the question?  
24 MR. TEPFER: Yeah, I didn't hear it.

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1 BY MR. PALLES:  
2 **Q. Yeah, I'm sorry. I stopped in mid**  
3 **question. Do you know an officer named Henry**  
4 **Woodson from the Ida B. Wells neighborhoods?**  
5 A. Not that I can recall, no, sir.  
6 **Q. Okay. So, now, I believe you testified**  
7 **last time that the officers who arrested -- who**  
8 **found the drugs in your car -- or I'll say recovered**  
9 **drugs from your car were Sergeant Watts and AJ,**  
10 **correct?**  
11 A. Watts recovered drugs from out the sleeve  
12 of his belongings -- clothing.  
13 **Q. I'm not trying to trip you up. Okay? Let**  
14 **me -- if I didn't make it clear before, I represent**  
15 **Kallatt Mohammed. So I'm getting to this point.**  
16 **When was the first time you saw Kallatt Mohammed**  
17 **that day?**  
18 A. When I went to the police station in  
19 handcuffs, when I was arrested.  
20 **Q. Okay. And where was he --**  
21 A. At his --  
22 **Q. -- at that time?**  
23 A. At his desk.  
24 **Q. Okay.**

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<p style="text-align: right;">Page 249</p> <p>1 A. Or at a desk.</p> <p>2 <b>Q. Okay. So you were brought in to the</b></p> <p>3 <b>police station at 51st and Wentworth, correct?</b></p> <p>4 A. Yes. Yes.</p> <p>5 <b>Q. All right. And were there other people</b></p> <p>6 <b>who were apparent arrestees, who like you were --</b></p> <p>7 <b>well, were you handcuffed at the time -- at the</b></p> <p>8 <b>station?</b></p> <p>9 A. I was handcuffed at the station. And,</p> <p>10 yes, there was other people who appeared to be</p> <p>11 handcuffed also.</p> <p>12 <b>Q. Okay. Fine. And I seem to recall --</b></p> <p>13 <b>well, you recall in 2019 you sat down for a lengthy</b></p> <p>14 <b>interview with COPA, some of which was the subject</b></p> <p>15 <b>of the report we looked at, correct? Correct?</b></p> <p>16 A. Yes.</p> <p>17 <b>Q. Okay. All right. Now, at that point you</b></p> <p>18 <b>testified that you recognized some of the arrestees</b></p> <p>19 <b>who were in the station as residents of the 574</b></p> <p>20 <b>building. Did I get that --</b></p> <p>21 A. I did not, no.</p> <p>22 <b>Q. No. Did you recognize other arrestees</b></p> <p>23 <b>from the Ida B. Wells complex?</b></p> <p>24 A. Yes.</p>	<p style="text-align: right;">Page 251</p> <p>1 <b>detained?</b></p> <p>2 A. And myself, yes.</p> <p>3 <b>Q. Okay. Was this a -- was this a single</b></p> <p>4 <b>bench along the opposite wall?</b></p> <p>5 A. It appeared to be a single bench, yes.</p> <p>6 <b>Q. Okay. So -- and just so -- so we can</b></p> <p>7 <b>orient it, was Ben sitting on the same bench but</b></p> <p>8 <b>somewhere down to one of your sides?</b></p> <p>9 A. No. I would say that Ben was sitting</p> <p>10 right next to me.</p> <p>11 <b>Q. Okay. To your right or to your left?</b></p> <p>12 A. It would be to my left.</p> <p>13 <b>Q. Okay. I'm trying to get it in my head.</b></p> <p>14 <b>Okay. And the other arrestees, were they further</b></p> <p>15 <b>down to Ben's left, or were they on your side?</b></p> <p>16 A. I know there was a gentleman sitting next</p> <p>17 to Ben. So they weren't far apart at all.</p> <p>18 <b>Q. Did they seem to know each other?</b></p> <p>19 A. I cannot say what they kind of, you know,</p> <p>20 seemed to know, but I -- I will leave it at that. I</p> <p>21 can't say.</p> <p>22 <b>Q. Okay. I'm going to show you a picture.</b></p> <p>23 A. Okay.</p> <p>24 <b>Q. Or try to. Let me see if I can share my</b></p>
<p style="text-align: right;">Page 250</p> <p>1 <b>Q. Okay. Okay. And how many of them were</b></p> <p>2 <b>there at the same time you were arrested?</b></p> <p>3 A. How many people were -- appeared to be</p> <p>4 detained?</p> <p>5 <b>Q. Yes.</b></p> <p>6 A. Give or take, seven to ten.</p> <p>7 <b>Q. Okay. And also detained was Ben Baker,</b></p> <p>8 <b>correct?</b></p> <p>9 A. Yes.</p> <p>10 <b>Q. Okay. Can you describe for me, how big</b></p> <p>11 <b>was this room that you were in?</b></p> <p>12 A. I'm not a contractor, but it was a</p> <p>13 nice-sized room.</p> <p>14 <b>Q. A nice-sized room?</b></p> <p>15 A. Yes, sir.</p> <p>16 <b>Q. Let me ask you this: Where -- how many</b></p> <p>17 <b>desks? How many police desks did it have?</b></p> <p>18 A. So I can't give you a number, but they</p> <p>19 were more of a -- it puts me in the mind of long</p> <p>20 tables. And maybe it was two long tables connected</p> <p>21 and maybe three -- at least three rows.</p> <p>22 <b>Q. Okay. Good. That's certainly descriptive</b></p> <p>23 <b>enough. And across from there -- am I correct? --</b></p> <p>24 <b>was a bench where a lot of the individuals were</b></p>	<p style="text-align: right;">Page 252</p> <p>1 <b>screen. Hold on a minute. We're going to have to</b></p> <p>2 <b>go off again because I could have swore I had it.</b></p> <p>3 <b>Oh, here we go. Here we go. How's that? Did I do</b></p> <p>4 <b>it?</b></p> <p>5 A. Yes, you did.</p> <p>6 <b>Q. All right. One second. Well, we're</b></p> <p>7 <b>looking at a picture of -- well, I will start at the</b></p> <p>8 <b>top, if you don't mind. We are looking at a picture</b></p> <p>9 <b>of Willie Robinson. Is that --</b></p> <p>10 MR. TEPFER: Can we get the Bates here?</p> <p>11 MR. PALLES: I'm sorry.</p> <p>12 MR. TEPFER: Can we get the Bates?</p> <p>13 MR. PALLES: Yeah, yeah, yeah, yeah, yeah. I'm</p> <p>14 sorry. This is COPA-Watts 02305 through 2309.</p> <p>15 MR. TEPFER: Do you want to mark this as an</p> <p>16 exhibit, or did you already do that?</p> <p>17 MR. PALLES: I haven't. What's the next</p> <p>18 number, Ms. Reporter?</p> <p>19 THE REPORTER: 19.</p> <p>20 MR. PALLES: Do we know? 19?</p> <p>21 MS. OLIVIER: 19.</p> <p>22 MR. PALLES: We will mark this as 19, and I</p> <p>23 will send it to you afterwards.</p> <p>24 (Glenn Exhibit 19 marked.)</p>

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1 MR. TEPFER: Thank you.  
2 BY MR. PALLES:  
3 Q. Okay. This is a picture of Willie  
4 Robinson. Do you remember this gentleman as the  
5 gentleman that Ben was talking to?  
6 A. I'll ask you to say it one more time.  
7 Q. Do you recognize this gentleman as the man  
8 that Ben Baker was talking to immediately to his  
9 left?  
10 A. No, I don't recall.  
11 Q. Do you recognize this gentleman?  
12 A. No.  
13 Q. Okay. And I assume, then, you do not  
14 recall seeing him in the station that day?  
15 A. No, I do not recall.  
16 Q. All right. Here's a picture of Michael  
17 Henderson. Have you ever seen this man before?  
18 A. Yes.  
19 Q. Okay. And how and under what  
20 circumstances had you seen him before?  
21 A. His mom -- where I grew up, his mom lived  
22 in a building next door, and he had a sister named  
23 Regina, and I was her friend.  
24 Q. Okay.

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1 A. And I used to see him coming in and out  
2 every you now and then.  
3 Q. Did you -- did he live in the Ida B. Wells  
4 Extensions at that time?  
5 A. I don't know.  
6 Q. Okay. Did you know him to be a drug user?  
7 A. No.  
8 Q. User. No. And I assume you didn't know  
9 him to be involved in the drug trade?  
10 A. No.  
11 Q. Do you recall seeing him at the station  
12 that day --  
13 A. No, I do not --  
14 Q. -- of your arrest?  
15 A. -- recall.  
16 Q. Here is Lewis Moore. Have you ever seen  
17 this gentleman before?  
18 A. Yeah, he looks very familiar.  
19 Q. I believe he might have gone by the name  
20 of Slick.  
21 A. Yes.  
22 Q. Okay. And how do you know him?  
23 A. I've seen his face around, around the  
24 building, 527, every now and then or on the side.

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1 Q. Okay. Did you -- do you know if he lived  
2 at 527?  
3 A. I don't think so. I don't know where he  
4 lived -- lived.  
5 Q. Do you know -- do you know if he lived in  
6 the Extensions?  
7 A. No, sir. I don't know.  
8 Q. Do you know him to be involved in the drug  
9 trade?  
10 A. No. No, I don't have knowledge of that  
11 either.  
12 Q. Do you recall seeing him at the station  
13 that day?  
14 A. Yes.  
15 Q. Okay. Was he sitting -- do you recall him  
16 in conversation with Ben?  
17 A. No, I do not recall him and Ben having a  
18 conversation.  
19 Q. Did you have a conversation with this  
20 gentleman?  
21 A. No, I did not.  
22 Q. Did you overhear any conversations that  
23 this gentleman had with anybody?  
24 A. I would say yes.

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1 Q. Okay. What do you recall?  
2 A. Watts walking up to him and asking him did  
3 he want to claim this bundle.  
4 Q. And his answer was?  
5 A. That's not mine.  
6 Q. Okay. And how about this gentleman, Larry  
7 Pulley? Do you recognize him?  
8 A. No.  
9 Q. No?  
10 A. No.  
11 Q. Do you have any recollection of seeing him  
12 in the police station on the day of your arrest?  
13 A. No.  
14 Q. Okay. And then lastly, this is  
15 Mr. Laurence Little. Do you recognize this man?  
16 A. I seen his face before.  
17 Q. Okay. Do you recall in what context?  
18 A. It had to be around the building, or  
19 there's a little shopping mall north of 527. So  
20 I've just seen him around sometimes.  
21 Q. Uh-huh. I'm going to stop the share. Did  
22 you have any occasion to learn why these other  
23 individuals were being detained at that time?  
24 MR. TEPFER: Objection to the form. Misstates

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<p style="text-align: right;">Page 257</p> <p>1 the testimony.</p> <p>2 But go ahead.</p> <p>3 BY THE WITNESS:</p> <p>4 A. No.</p> <p>5 <b>Q. Okay. Now, the long bench that we're</b></p> <p>6 <b>talking about, were you and Ben in the middle of the</b></p> <p>7 <b>bench, towards the right end of the bench, the right</b></p> <p>8 <b>quarter of the bench? Where? Where were you?</b></p> <p>9 A. I felt that I was at the last part of the</p> <p>10 bench, the end of the bench.</p> <p>11 <b>Q. Okay. All right. And where was Mohammed?</b></p> <p>12 A. Directly in front of us, of Ben and</p> <p>13 myself.</p> <p>14 <b>Q. Now -- and I believe this is from an</b></p> <p>15 <b>affidavit that you did for -- to vacate your -- your</b></p> <p>16 <b>conviction in which you said, "When Officer Mohammed</b></p> <p>17 <b>saw us," meaning Ben and you, "he asked what we were</b></p> <p>18 <b>doing there."</b></p> <p>19 A. Yes.</p> <p>20 <b>Q. Okay. So what did you tell him?</b></p> <p>21 A. Ben said, Your boy, your boy Watts or</p> <p>22 ask -- your boy Watts or ask your boy Watts. But he</p> <p>23 said, "your boy." And then he said "Watts" at the</p> <p>24 end.</p>	<p style="text-align: right;">Page 259</p> <p>1 <b>did you hear Watts tell him to put in the report?</b></p> <p>2 A. Honestly, I don't recall.</p> <p>3 <b>Q. Okay. Where did you first meet Mohammed?</b></p> <p>4 A. Like an introduction?</p> <p>5 <b>Q. Yeah. Or how did you know him? How did</b></p> <p>6 <b>you know who he was?</b></p> <p>7 A. I always -- I always saw him with Watts,</p> <p>8 but as far as the name, I don't recall how I</p> <p>9 obtained his name the first time, yeah.</p> <p>10 <b>Q. Going back to this report, was -- was</b></p> <p>11 <b>Mohammed actually sitting at, like, a typewriter?</b></p> <p>12 <b>Or was it a computer terminal? Or was it a laptop?</b></p> <p>13 <b>I'm trying to put it in context.</b></p> <p>14 A. Something's saying a typewriter, but I'm</p> <p>15 not 100 percent sure, but I believe it was a</p> <p>16 typewriter.</p> <p>17 <b>Q. Okay. Well, then again, the police</b></p> <p>18 <b>equipment sometimes leaves something to be desired.</b></p> <p>19 <b>Anyway, I'm looking over my notes so we can -- you</b></p> <p>20 <b>know, so I can skip over stuff that's already been</b></p> <p>21 <b>discussed.</b></p> <p>22 A. Okay.</p> <p>23 <b>Q. How did you come to know Jamar Lewis?</b></p> <p>24 A. Through Ben.</p>
<p style="text-align: right;">Page 258</p> <p>1 <b>Q. Uh-huh.</b></p> <p>2 A. And Mohammed held head his head back down</p> <p>3 at his desk and started typing.</p> <p>4 <b>Q. Okay. Now, I believe that COPA said that</b></p> <p>5 <b>you assumed that he was typing up your report. Is</b></p> <p>6 <b>that a fair characterization of your testimony,</b></p> <p>7 <b>first of all?</b></p> <p>8 A. I would say that I really felt that he had</p> <p>9 a part in typing up my report.</p> <p>10 <b>Q. Okay. Did you -- and what is -- and that</b></p> <p>11 <b>is based on what?</b></p> <p>12 A. On Watts actually passing the report</p> <p>13 around the room for officers to do a part in typing</p> <p>14 on this paper document and then giving it to</p> <p>15 Mohammed and telling him things to put on there and</p> <p>16 also --</p> <p>17 <b>Q. And what -- I'm sorry. Go ahead.</b></p> <p>18 A. And scolding him -- I take it as scolding</p> <p>19 him -- in the reference of him taking too long to</p> <p>20 type up what needs to be typed up because the game</p> <p>21 was on.</p> <p>22 <b>Q. Well, I think I could share with you,</b></p> <p>23 <b>you're not the only witness to complain about his</b></p> <p>24 <b>typing ability. But that being said, the -- what</b></p>	<p style="text-align: right;">Page 260</p> <p>1 <b>Q. Okay. And would it be true that your</b></p> <p>2 <b>relationship -- or excuse me -- that the</b></p> <p>3 <b>relationship that you and Ben had with Jamar Lewis</b></p> <p>4 <b>predates Ben's arrest in the mailbox case in 2004?</b></p> <p>5 A. Yes. They had a relationship before 2004.</p> <p>6 I believe so.</p> <p>7 <b>Q. Okay. What about Arthur Kirksey? Did --</b></p> <p>8 <b>how long, if you know, were Ben and Arthur -- did</b></p> <p>9 <b>Ben and Arthur Kirksey have a relationship?</b></p> <p>10 A. Over 40 plus years.</p> <p>11 <b>Q. Wow. Okay. So you described Kirksey as</b></p> <p>12 <b>an associate. Am I correct?</b></p> <p>13 A. Yeah. Yes.</p> <p>14 <b>Q. Would Ben similarly describe him? Or do</b></p> <p>15 <b>you think he would describe him more as a friend?</b></p> <p>16 A. A friend.</p> <p>17 <b>Q. Okay. Now, did you -- well, how did you</b></p> <p>18 <b>and Ben first come to retain Matt Mahoney as an</b></p> <p>19 <b>attorney?</b></p> <p>20 A. I don't recall that. I don't recall.</p> <p>21 <b>Q. Okay. Let me ask you this: Were you</b></p> <p>22 <b>aware that Jamar Lewis also retained Matt as an</b></p> <p>23 <b>attorney?</b></p> <p>24 A. If I did, I forgot.</p>



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<p style="text-align: right;">Page 261</p> <p>1       <b>Q. Okay. What about Arthur Kirksey? Were</b>  2       <b>you aware that Arthur Kirksey retained Matt Mahoney</b>  3       <b>as an attorney?</b>  4       A. I'm not 100 percent sure, but I kind of  5       think so, but...  6       <b>Q. Okay.</b>  7       A. I think Arthur -- yeah.  8       <b>Q. How about Elgin Moore? Were you aware</b>  9       <b>that Elgin Moore was represented by Matt Mahoney?</b>  10      A. No.  11      <b>Q. Okay. And do you know a guy named Brian</b>  12      <b>Patrick?</b>  13      A. Yes.  14      <b>Q. And how do you know Brian Patrick?</b>  15      A. Living at the building of 527.  16      <b>Q. Okay. Was he a friend of yours?</b>  17      A. No.  18      <b>Q. Was he a friend of Ben's?</b>  19      A. I don't know.  20      <b>Q. Was he an associate of Ben's?</b>  21      A. I would say yes to that.  22      <b>Q. Okay. Well, at any time, did you ever</b>  23      <b>come to learn that Jamar Lewis, Arthur Kirksey,</b>  24      <b>Elgin Moore, and Brian Patrick had all had</b></p>	<p style="text-align: right;">Page 263</p> <p>1       her best ability.  2       <b>Q. Okay. Well, she referred to this New</b>  3       <b>Yorker article as an authoritative article. Do you</b>  4       <b>recall that?</b>  5       MR. TEPFER: I didn't hear you. You broke up.  6       MR. PALLES: She -- sorry.  7       BY MR. PALLES:  8       <b>Q. She referred to that article in argument</b>  9       <b>as an authoritative article. Do you recall that?</b>  10      A. No.  11      <b>Q. Do agree with it? Well, you can't agree</b>  12      <b>with it because you haven't read it, right?</b>  13      A. I didn't even know she was in it.  14      <b>Q. Fair. Well, that will cut down some of</b>  15      <b>these questions. But let me say this: Here's a</b>  16      <b>quote. Okay? And this has to do with the period of</b>  17      <b>time obviously after the events that we've been</b>  18      <b>talking about so far.</b>  19      "Clarissa told me, I was mad and angry and  20      had a lot of hate in me. And you're not supposed to  21      hate anyone, but these officers changed my entire  22      being." That's true, correct? Do you stand by that  23      today?  24      A. Not that -- I don't hate now.</p>
<p style="text-align: right;">Page 262</p> <p>1       backgrounds of criminal drug arrests?  2       A. No.  3       <b>Q. You know, I would like to talk with you a</b>  4       <b>moment about the New Yorker article. Now, I don't</b>  5       <b>believe everything I read in the media so -- and I'm</b>  6       <b>not going to -- I'm going to talk about it as a</b>  7       <b>jumping off point, and if you have any disagreements</b>  8       <b>with what was written, you let me know.</b>  9       A. I didn't read it.  10      <b>Q. Okay. Well, let me -- well, okay. Well,</b>  11      <b>let me ask you this: Do you recall -- well, let me</b>  12      <b>back up.</b>  13      When Ben was sentenced in his recent  14      federal case, he was represented by a woman named  15      Molly Armour; am I correct?  16      A. Yes.  17      <b>Q. Okay. And Molly Armour -- you were in</b>  18      <b>court when Molly Armour made various arguments going</b>  19      <b>to what would be an appropriate sentence for Ben; am</b>  20      <b>I correct?</b>  21      A. She went into argument of what she felt  22      was appropriate for Ben to be sentenced?  23      <b>Q. Yes. Yes.</b>  24      A. I felt that she did her job as well -- to</p>	<p style="text-align: right;">Page 264</p> <p>1       <b>Q. Okay. Okay. But at the time of the</b>  2       <b>article, did you have a certain amount of hatred?</b>  3       A. Yeah.  4       <b>Q. And in the immediate aftermath while these</b>  5       <b>circumstances were unfolding you certainly did,</b>  6       <b>correct?</b>  7       A. Yeah, a little. Yes.  8       <b>Q. Okay. Now, also in the article, it says</b>  9       <b>that when you first met with David Navarro and the</b>  10      <b>police agents, et cetera, about Watts's conduct,</b>  11      <b>they pulled out photos of the tactical team, and you</b>  12      <b>said in the article, "Clarissa recalled they were</b>  13      <b>already investigating."</b>  14      Was that -- is that an assumption on your  15      part, or did they actually tell you that they were  16      investigating?  17      A. I believe Dave Navarro actually made that  18      statement, that they've been watching them,  19      investigating them.  20      <b>Q. Okay. All right. Now, again from the</b>  21      <b>article, "By 2008, Clarissa had concluded that the</b>  22      <b>only way to bring Ben home was to help law</b>  23      <b>enforcement catch Watts taking a bribe. She</b>  24      <b>contacted the Office of Professional Standards, she</b></p>

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<p style="text-align: right;">Page 265</p> <p>1     <b>said, and was referred to the FBI, where she offered</b>  2     <b>to help recruit informants." True?</b>  3         A. I wouldn't say "recruit." That's like  4     doing an interview or something. I wouldn't say  5     recruit.  6         <b>Q. You wouldn't say it was true?</b>  7         A. I wouldn't say "recruit."  8         <b>Q. Oh, recruit.</b>  9         A. That's like doing an interview with five  10     or six people to see who is a good fit for the job.  11     I wouldn't say recruit.  12         <b>Q. Okay. All right. Well, we'll talk about</b>  13     <b>that in a minute. Do you recall who you dealt with</b>  14     <b>at the -- at OPS at that time?</b>  15         A. No, sir.  16         <b>Q. Okay. Let me ask you this. Could it have</b>  17     <b>been a Joseph Barnes of IAD?</b>  18         A. I have no knowledge.  19         <b>Q. Do you know who Joe -- when I say "Joe</b>  20     <b>Barnes," that name doesn't mean anything to you?</b>  21         A. No, sir.  22         <b>Q. Okay. All right. So it says that you</b>  23     <b>were referred to the FBI, but you don't recall who</b>  24     <b>referred you to the FBI at this point in time?</b></p>	<p style="text-align: right;">Page 267</p> <p>1     BY MR. PALLES:  2         <b>Q. Yeah, yeah. I'm trying to. Okay.</b>  3     <b>Earlier on in your testimony, you talked about</b>  4     <b>having -- you said that your relationship with</b>  5     <b>Holliday ended at or about the time that you told</b>  6     <b>him you had some information that Watts was going to</b>  7     <b>be paid which you wanted to have recorded. Did I</b>  8     <b>understand that testimony correctly?</b>  9         A. So I didn't say anything about recording.  10     But I did inform him that a payment was going to be  11     paid to Watts -- I did say Watts' name -- that same  12     day, within matters of an hour or whatever. I  13     forgot what was told to me how long the frame was to  14     meet up with Watts or one of his crew members and --  15     yeah.  16         <b>Q. All right. Well, this is what I want to</b>  17     <b>know. Who was making payment?</b>  18         A. The person who was making a payment was --  19     I got the phone call from Arthur Kirksey.  20         <b>Q. Okay. And did he say that he was making</b>  21     <b>the payment?</b>  22         A. Well, yes. Yes.  23         <b>Q. Why did he call you to tell you that he</b>  24     <b>was making the payment?</b></p>
<p style="text-align: right;">Page 266</p> <p>1         A. I assumed that it was the OPS, Operation  2     [sic] of Professional Standards. They gave me the  3     number to call.  4         <b>Q. Okay. And once you did so, do you recall</b>  5     <b>who you were put in touch with?</b>  6         A. I was -- actually, I assume that I was  7     talking to a -- maybe a receptionist or an answering  8     person at an office, and they -- the person gathered  9     my information, name and number, and said that  10     someone will be in touch with me.  11         <b>Q. Okay. Now, I want to try to relate</b>  12     <b>this -- this portion of the story to something that</b>  13     <b>we talked about earlier in the deposition. And I'm</b>  14     <b>not trying to throw salt on the wound. It had to do</b>  15     <b>with something that you told Calvin Holliday. But</b>  16     <b>really what I want to know is, at that point in time</b>  17     <b>when you spoke with Mr. Holliday, you said that you</b>  18     <b>had information that Watts was going to be paid. Do</b>  19     <b>you recall that?</b>  20         MR. TEPFER: I'm sorry. Object to form. But  21     are you asking -- I didn't understand the question.  22         THE WITNESS: Can you repeat that question or  23     change your question?  24</p>	<p style="text-align: right;">Page 268</p> <p>1         A. Because I talked to Ben and told him that  2     I needed to make something happen. He needed to  3     come home. I needed to clear my background so  4     that -- I just needed my background cleared. And I  5     told him that I wanted to reach out to the FBI, and  6     he was saying no to -- to that situation; that's not  7     what you do.  8         And I told him that I really wanted to.  9     So he went for me to do that. And I told him that I  10     was going to talk to Art. And he was like, yeah, if  11     that's what you want to do, I'm behind you. And I  12     pulled Art to the side -- I talked to his girlfriend  13     at the time or female friend or whatever at the time  14     and --  15         <b>Q. Let me stop you there. Stacy. Let me</b>  16     <b>stop you there. Stacy Graham?</b>  17         A. Yes.  18         <b>Q. Okay. Continue.</b>  19         A. And I got Arthur's number or she passed  20     him the -- I got Arthur's number. And he came over  21     to my residence, and I spoke to him, got the nerve  22     and just asked him and told him that Ben can't do  23     all those years, and I needed his help and did he  24     know anyone. And he told me that he pays him. He</p>

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Page 269	<p>1 pays Watts.</p> <p>2 <b>Q. All right. So I understand it,</b></p> <p>3 <b>somewhere -- I mean, you want to get Ben out. You</b></p> <p>4 <b>want to prove that these officers are corrupt?</b></p> <p>5 A. No, no, no. I wanted to get Ben -- I</p> <p>6 wanted to clear my name first because that way I can</p> <p>7 take care of my family and I can take care of Ben.</p> <p>8 That's Number 1. Then my second agenda was to get</p> <p>9 Ben out for the false allegations.</p> <p>10 <b>Q. Okay. So you asked Art Kirksey, who you</b></p> <p>11 <b>knew at that time to be a drug dealer, to see if you</b></p> <p>12 <b>could -- if he could help you by making a payment to</b></p> <p>13 <b>Watts or his team?</b></p> <p>14 A. No.</p> <p>15 <b>Q. Okay. What's wrong about that?</b></p> <p>16 A. I went to Arthur. Arthur came to my</p> <p>17 apartment, my house. I was renting a house. So</p> <p>18 Arthur came over. I asked him to come over. I</p> <p>19 beat around the bush because you just don't come</p> <p>20 out and talk about that, FBI and things like that.</p> <p>21 And I said I need Ben out. And I also</p> <p>22 told him if he knows someone that can help me. He</p> <p>23 asked me what am I trying to do. And I said, "Well,</p> <p>24 do you know anybody that's paying him?"</p>	Page 271	<p>1 an agent and he really wasn't.</p> <p>2 <b>Q. Okay. All right. Let me --</b></p> <p>3 A. Okay.</p> <p>4 <b>Q. I'm looking for my -- to share a screen</b></p> <p>5 <b>with you here.</b></p> <p>6 A. Okay. Take your time, within that</p> <p>7 two-hour frame.</p> <p>8 <b>Q. Yeah, within the two-hour frame. Okay.</b></p> <p>9 A. And it might be less.</p> <p>10 MR. PALLES: Yeah, yeah. Here we go. All</p> <p>11 right. This is -- okay. We got to go -- we're</p> <p>12 going confidential here. This may or may not be</p> <p>13 that other document. I assume it is, actually.</p> <p>14 MR. TEPFER: Exhibit 18 already, right?</p> <p>15 MR. PALLES: Yeah.</p> <p>16 (Proceedings deemed confidential</p> <p>17 and transcribed under separate</p> <p>18 cover, pages 272 to 287</p> <p>19 inclusive.)</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>
Page 270	<p>1 And he was quiet for a minute. And he</p> <p>2 said he pays him. I think he even gave me an amount</p> <p>3 of what he pays him weekly or something like that.</p> <p>4 And I asked him will he be okay to talk to the FBI.</p> <p>5 And he said, yeah, for Popcorn, because he called</p> <p>6 him -- he called Ben Popcorn. He said, "Yeah, for</p> <p>7 Popcorn, yeah." That's how it came about. It</p> <p>8 wasn't nothing about a recording. That wasn't --</p> <p>9 you know, all that, no.</p> <p>10 <b>Q. I got it. But you were looking around to</b></p> <p>11 <b>find somebody who was in the drug trade who was</b></p> <p>12 <b>making payments to Watts or his team for protection;</b></p> <p>13 <b>is that correct?</b></p> <p>14 A. Watts, period. I wasn't thinking about --</p> <p>15 <b>Q. Watts, period.</b></p> <p>16 A. I wasn't thinking about the team or</p> <p>17 nothing about protection. I had no idea why.</p> <p>18 <b>Q. Okay. When the -- when you went to meet</b></p> <p>19 <b>the -- went to meet the FBI in September of 20 --</b></p> <p>20 <b>September of '07, do you recall what members of the</b></p> <p>21 <b>FBI were present?</b></p> <p>22 A. I'm confused on that question because I</p> <p>23 don't know the time that you're speaking of. And if</p> <p>24 you're speaking of me being told that an officer was</p>	Page 288	<p>1 MR. PALLES: All right. I'll mark this as the</p> <p>2 next exhibit. This page is COPA-Watts 1642.</p> <p>3 MR. TEPFER: Is that Exhibit 22?</p> <p>4 (Glenn Exhibit 22 marked.)</p> <p>5 MR. PALLES: I'm sorry?</p> <p>6 MR. TEPFER: Is that Exhibit 22?</p> <p>7 MR. PALLES: If you say so. Yeah, 22.</p> <p>8 BY MR. PALLES:</p> <p>9 <b>Q. Tell me when you have had a chance to look</b></p> <p>10 <b>at it.</b></p> <p>11 A. Oh.</p> <p>12 MR. TEPFER: The problem is the screen is</p> <p>13 blocking. Her Zoom screen is blocking when you</p> <p>14 share.</p> <p>15 You can look on mine. For whatever reason</p> <p>16 it's blocking.</p> <p>17 MR. PALLES: Let me -- can I rearrange it</p> <p>18 possibly?</p> <p>19 MR. TEPFER: I think we're okay now. She's</p> <p>20 looking on mine.</p> <p>21 Can you see it?</p> <p>22 THE WITNESS: Uh-huh.</p> <p>23 MR. PALLES: Does that help at all?</p> <p>24 MR. TEPFER: Yeah, that does.</p>

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<p style="text-align: right;">Page 289</p> <p>1 Is there a question pending? You want her</p> <p>2 to look at this?</p> <p>3 MR. PALLES: Yeah, I want her to look at it.</p> <p>4 Sorry.</p> <p>5 BY MR. PALLES:</p> <p>6 <b>Q. Well, if you look -- well, let me just ask</b></p> <p>7 <b>you this.</b></p> <p>8 A. I -- okay. So what does it mean,</p> <p>9 "Finding: Default/failure to appear"?</p> <p>10 <b>Q. Yeah. That didn't means you didn't show</b></p> <p>11 <b>up.</b></p> <p>12 A. How? I just told you Mohammed was there.</p> <p>13 <b>Q. Yeah, I understand what you just told me.</b></p> <p>14 <b>I'm showing you this record. Do you still maintain</b></p> <p>15 <b>that Mohammed was there in January?</b></p> <p>16 A. This is the court. This is all -- okay.</p> <p>17 So I'm getting it right. Okay. You're showing me,</p> <p>18 and I just told you what happened in court. This is</p> <p>19 saying that I wasn't in court? I'm telling you that</p> <p>20 I was in court. It's your word against theirs.</p> <p>21 If they had cameras, let's roll the</p> <p>22 cameras back. The court was in the afternoon. So</p> <p>23 let's all look at the cameras. So I'll look at the</p> <p>24 cameras. I probably was like 20 pounds lighter than</p>	<p style="text-align: right;">Page 291</p> <p>1 A. No.</p> <p>2 <b>Q. Okay. All right. According to federal</b></p> <p>3 <b>documents, an individual came out of the house, your</b></p> <p>4 <b>house on Rhodes to deliver the documents -- I'm</b></p> <p>5 <b>sorry -- to deliver the drugs to Ms. -- to</b></p> <p>6 <b>Ms. Mayfield. Do you know who that individual was?</b></p> <p>7 A. No.</p> <p>8 <b>Q. At the same time your husband was</b></p> <p>9 <b>distributing fentanyl-laced heroine out of that</b></p> <p>10 <b>home, your son was also dealing drugs; was he not?</b></p> <p>11 MR. TEPFER: Objection to form, argumentative.</p> <p>12 Go ahead.</p> <p>13 BY THE WITNESS:</p> <p>14 A. I have -- and where is it? It was told to</p> <p>15 me that he was dealing drugs when -- the day he got</p> <p>16 arrested.</p> <p>17 <b>Q. And that was the same day that Ben got</b></p> <p>18 <b>arrested as well, correct?</b></p> <p>19 A. Yes.</p> <p>20 <b>Q. Okay. And the son we are talking about,</b></p> <p>21 <b>his name is Gerard; am I correct?</b></p> <p>22 A. Yes.</p> <p>23 <b>Q. Or Gerald?</b></p> <p>24 A. Gerard.</p>
<p style="text-align: right;">Page 290</p> <p>1 I am now, but I am on there.</p> <p>2 <b>Q. Okay. So now --</b></p> <p>3 A. Failure to appear. I apologize.</p> <p>4 MR. TEPFER: I'm not trying to run out the</p> <p>5 clock, but 14 hours is a long time. If Terry is</p> <p>6 going to have other questions, I think we're down to</p> <p>7 about 40 minutes left or so. So I'm just --</p> <p>8 MR. PALLES: I'm just about done. Hold on.</p> <p>9 THE WITNESS: Okay.</p> <p>10 BY MR. PALLES:</p> <p>11 <b>Q. Do you know a woman name LaToya Mayfield?</b></p> <p>12 THE REPORTER: I'm sorry. Say it again.</p> <p>13 MR. PALLES: LaToya Mayfield.</p> <p>14 BY THE WITNESS:</p> <p>15 A. The name sounds familiar.</p> <p>16 <b>Q. Okay. It would appear that in March of</b></p> <p>17 <b>2017, she appeared at your house to pick up certain</b></p> <p>18 <b>Fentanyl-laced heroin on behalf of Jamar Lewis.</b></p> <p>19 A. Okay.</p> <p>20 <b>Q. Were you present at the time that that</b></p> <p>21 <b>occurred?</b></p> <p>22 A. No.</p> <p>23 <b>Q. Was Jamar Lewis and LaToya Mayfield</b></p> <p>24 <b>frequent visitors to your home?</b></p>	<p style="text-align: right;">Page 292</p> <p>1 MR. PALLES: Okay. Those are all the questions</p> <p>2 I have. Thank, you Ms. Glenn.</p> <p>3 THE WITNESS: Thank you. Have a good night.</p> <p>4 MR. BURNS: If I'm last, I can share with all</p> <p>5 of you that I have no questions. Thank you,</p> <p>6 Ms. Glenn.</p> <p>7 THE WITNESS: Thank you very much, and you have</p> <p>8 a good night also.</p> <p>9 MR. BURNS: Take care. Get some sleep, Josh.</p> <p>10 MR. TEPFER: Do I look tired? Does anyone have</p> <p>11 follow up? I'll give you your chance. All right.</p> <p>12 MR. PALLES: I will send -- Who do I send my</p> <p>13 exhibits to here? You, Krista?</p> <p>14 THE REPORTER: Yes, you can send it to that</p> <p>15 address up on there on the top.</p> <p>16 MR. PALLES: Info@royal --</p> <p>17 THE REPORTER: Yes.</p> <p>18 MR. PALLES: -- Reporting? Well, thank you</p> <p>19 all.</p> <p>20 MR. TEPFER: Thank you.</p> <p>21 MS. OLIVIER: Signature, Josh?</p> <p>22 MR. TEPFER: I think we'll reserve. Thank you.</p> <p>23 MS. OLIVIER: All right. Krista, we will</p> <p>24 take -- we will be ordering. Just the -- but not</p>

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1 the video at this time, Matt.

2 MR. TEPFER: Thank you.

3 THE VIDEOGRAPHER: Okay. Thank you. This is  
4 the end of the deposition. The time is 5:44 p.m.

5 The total running length of this deposition is

6 6 hours, 26 minutes and 55 seconds. We're now off  
7 the record.

8 THE REPORTER: Will there be any copy?

9 MR. TEPFER: What?

10 THE REPORTER: Will there be a copy ordered?

11 MR. TEPFER: I'm not.

12 (Recording stopped.)

13 MR. TEPFER: Not at this time. But I probably  
14 will. Okay.

15 Okay, guys. Thank you very much. I  
16 respect your respectful questions. Have a good  
17 night.

18 MS. OLIVIER: Thank you. Have a good night.

19 (Proceedings concluded at  
20 5:45 p.m.)

21

22

23

24

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

4           IN RE WATTS COORDINATED PRETRIAL       )  
5           PROCEEDINGS,                                )  
6    ) No. 19 CV 1717  
7    )

8                   I hereby certify that I have read the  
9           foregoing transcript of my continued deposition  
10          given at the time and place aforesaid, consisting of  
11          pages 1 to 295, inclusive, and I do again subscribe  
12          and make oath that the same is a true, correct, and  
13          complete transcript of my deposition so given as  
14          aforesaid and includes changes, if any, so made by  
15          me.

16                   \_\_\_\_\_  
17                   CLARISSA GLENN

18          SUBSCRIBED AND SWORN TO  
19          before me this \_\_\_\_\_ day  
20          of \_\_\_\_\_, A.D. 2023.

21                   \_\_\_\_\_  
22                   Notary Public  
23  
24



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1 STATE OF ILLINOIS )  
 ) SS:  
2 COUNTY OF C O O K )

3 I, KRISTA R. DOLGNER, a Certified  
4 Shorthand Reporter within and for the State of  
Illinois, do hereby certify:

5 That previous to the commencement of the  
6 examination of the witness, the witness was duly  
sworn to testify the whole truth concerning the  
7 matters herein;

8 That the foregoing videoconference  
9 deposition was reported stenographically by me, was  
thereafter reduced to a computerized transcript by  
10 me, and constitutes a true record of the testimony  
given and the proceedings had;

11 That the said deposition was taken before  
me on the date and time specified;

12 That the reading and signing by the  
13 witness of the deposition transcript was agreed upon  
as stated herein;

14 That I am not a relative or employee or  
15 attorney or counsel, nor a relative or employee of  
such attorney or counsel for any of the parties  
16 hereto, nor interested directly or indirectly in the  
outcome of this action.

17 IN WITNESS WHEREOF, I do hereunto set my  
18 hand at Chicago, Illinois.

19

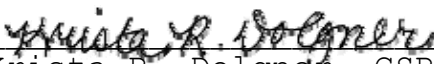
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