

# Exhibit 29

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

)  
No. 19-cv-1717  
In re: Watts Coordinated Pretrial )  
Proceedings ) (*Judge Wood*)  
)  
(*Magistrate Judge Finnegan*)

**PLAINTIFF WILLIAM CARTER'S  
ANSWERS TO INTERROGATORIES**

The undersigned, under penalties of perjury, certifies that the following interrogatory answers are true:

1. State your full name and all other names, nicknames, or street names that you have ever used from January 1, 2004 through the present.

ANSWER: My full name is William Franklin Carter. Some people call me "Stormy."

2. Identify all schools you have attended with the dates of attendance.

ANSWER: Objective relevance and proportionality. Without waiving this objection, plaintiff answers: I got my GED when I was in Cook County Jail Boot Camp.

3. State the full name, current address, and the relationship to you of each person who you claim witnessed or has knowledge of the facts and circumstances of the arrests underlying this lawsuit.

ANSWER: My lawyer has disclosed this information.

4. Identify any and all employment you have held from January 1, 2004 to the present.

ANSWER: To the best of my recollection:

Malone Staffing, Equipment Operator, 3/20-current

Synergy, Journeyman General Laborer Local 6, 11/19-current;

Select Remedy/Magenta, Material Handler in about 2010

Staff Right/Kohl's, Material Handler, in about 2014

University of Chicago Press in 2010  
Express/Pepsi in 2015  
Self-employed as contractor since about 2010  
Cowboys, Chef, in about 2015  
Popeyes, in about 2017  
**Motion Industry, Material Handler, in about 2017**

5. Are you claiming any psychiatric, psychological, and/or emotional injuries as a result of this occurrence? If so, please state:

- a. The name of any psychiatric, psychological, and/or emotional injury claimed, and the name and address of each psychiatrist, physician, psychologist, therapist or other health care professional rendering you treatment for each injury;
- b. Whether you had suffered any psychiatric, psychological, and/or any emotional injury prior to the date of the occurrence; and
- c. If the answer to (b) is yes, please state:
  - i. The dates of any psychiatric, psychological, and/or emotional injury and if the injury persists today;
  - ii. Describe the nature of the psychiatric, psychological, and/or emotional injury; and
  - iii. The name and address of each psychiatrist, physician, psychologist, therapist or other health care professional rendering you treatment for each injury.

**ANSWER:** See my answers to the April 14, 2020 interrogatories.

6. Has anyone from the Civilian Office of Police Accountability contacted or attempted to contact you regarding the arrests complained of in your complaint?

**ANSWER:** No.

7. If your answer to interrogatory number 6 is yes, have you given a statement to the Civilian Office of Police Accountability?

**ANSWER:** Not applicable.

8. If you have not given a statement to the Civilian Office of Police Accountability, describe why you have not done so.

**ANSWER:** I gave accurate statements to OPS about my first two false arrests, and I sent an accurate letter to OPS about my third false arrest. Nothing happened.

9. Have you provided a statement to any federal law enforcement agencies regarding the arrests complained of in your complaint? If yes, please identify who you gave the statement to, who was present for the statement, when the statement was made, where the statement was made, and describe the substance of the statement.

**ANSWER:** No.

10. Have you provided a statement to the Cook County State's Attorney's Office regarding the arrests complained of in your complaint? If yes, please identify who you gave the statement to, who was present for the statement, when the statement was made, where the statement was made, and describe the substance of the statement.

**ANSWER:** No.

11. Describe with specificity what the following officers' role and/or actions were during your March 3, 2004 arrest.

- a. Kenneth Young
- b. Darryl Edwards
- c. Kallatt Mohammed

**ANSWER:** I accurately described the events around my March 3, 2004 arrest in my statement to OPS. The statement refers to a "male/white officer." That is Manuel Leano. PL JOINT F 00297-00299.

12. Identify which of the "Arresting Officers" (as you used the term in your complaint) "communicated the false story to prosecutors" regarding your March 3, 2004 arrest as you alleged in paragraph 22(d) of your complaint.

**ANSWER:** I do not at present know the names of these officers because I was not present for any communications between police and prosecutors. Investigation continues.

13. Identify the number of days you were confined at the Cook County Jail as a result of your March 3, 2004 arrest.

**ANSWER:** I was wrongly confined at the Cook County Jail for 226 days as the result of my wrongful arrests on March 3, 2004 and July 18, 2004.

14. Describe what occurred on May 12, 2005 that resulted in you being confined at the Cook County Jail as mentioned in paragraph 28 of your complaint.

**ANSWER:** My probation was violated.

15. Describe with specificity what the following officers' role and/or actions were during your June 18, 2004 arrest.

- a. Alvin Jones
- b. Darryl Edwards
- c. Kenneth Young
- d. John Rodriguez
- e. Gerome Summers
- f. Calvin Ridgell
- g. Kallatt Mohammed
- h. Ronald Watts

**ANSWER:** I accurately described the events around my June 18, 2004 arrest in my statement to OPS. PL JOINT F 00343-00346.

16. Identify which of the Arresting Officers (as you used that term in your complaint) used excessive and unreasonable force against you during the June 18, 2004 arrest, as alleged in paragraph 35 of your complaint.

**ANSWER:** Alvin Jones punched me in my jaw.

17. Identify all physical injuries you sustained as a result of the alleged force used against you during the June 18, 2004 arrest.

**ANSWER:** I felt a crack in my jaw.

18. Are you seeking damages based on the force you claim was used against you during the June 18, 2004 arrest?

**ANSWER:** No.

19. Did you obtain any medical treatment for any physical injuries you sustained as a result of the alleged force used against you during the June 18, 2004 arrest? If yes, please identify the physician and location of where you sought medical treatment.

**ANSWER:** Objection relevance; plaintiff does not seek damages for these injuries.

20. Identify which of the "Arresting Officers" (as you used that term in your complaint) "communicated the false story to prosecutors" regarding the June 18, 2004 arrest as you alleged in paragraph 38(d) of your complaint.

ANSWER: I do not at present know the names of these officers because I was not present for any communications between police and prosecutors. Investigation continues.

21. Have you ever purchased illegal narcotics? If your answer is yes, then identify the time period, geographic location, and person(s) from whom you purchased illegal narcotics.

ANSWER: Objection overly broad, irrelevant, not proportional.

22. Have you ever sold or distributed illegal narcotics? If your answer is yes, then identify the time period, geographic location, and person(s) that provided you the illegal narcotics that you sold or distributed.

ANSWER: Objection overly broad, irrelevant, not proportional.

23. Have you ever purchased or sold illegal narcotics jointly with another person or persons or on behalf of any group? If so, (a) identify each individual or group that you purchased or sold narcotics with and (b) identify each specific location for where these acts occurred

ANSWER: Objection overly broad, irrelevant, not proportional.

24. Have you ever belonged to or been associated with any street gang? If yes, identify the street gang, state your approximate age when you first joined or became associated with the street gang, state whether you still belong to the street gang, and identify the highest rank, if any, you attained.

ANSWER: The Chicago Police Department falsely associated me with the Gangster Disciples.

25. If your answer to interrogatory number 22 is yes, please identify the approximate amount of money or value of property that you received for engaging in the sale of illegal narcotics.

ANSWER: Objection overly broad, irrelevant, not proportional.

26. Identify with specificity all damages you are seeking in this lawsuit.

ANSWER: I was deprived of liberty for 1,601 days of confinement and I was also deprived of liberty while on bond pretrial and on parole after I finished my sentence. I seek compensation for those losses in an amount to be set by the jury. These damages cannot be calculated exactly. I also seek punitive damages against the individual defendants in amounts to be set by the jury.

27. Identify the last known address and/or telephone number of any witness not represented by counsel who has been identified by

any party in the coordinated cases captioned *In re: Watts Coordinated Pretrial Proceedings*, Case No. 19 C 1717.

ANSWER: My lawyer has disclosed this information.

Dated: 7-22-20

  
William Carter

  
Joel Flaxman  
*An attorney for plaintiff*  
For objections only