

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

LEONCIO ELIZARRI and GREGORY L.)
JORDAN, individually and for)
others similarly situated,)
)
Plaintiffs,) No. 17 cv 8120
)
vs.)
)
SHERIFF OF COOK COUNTY and COOK)
COUNTY, ILLINOIS,)
)
Defendants.)

The deposition of GREGORY JORDAN, called by
the Defendant for examination taken pursuant to the
Federal Rules of Civil Procedure of the United
States District Courts pertaining to the taking of
depositions, taken before Hailey M. Treasure CSR,
RPR, taken at 333 West Wacker Drive, Suite 500,
Chicago, Illinois, on July 11, 2019, at 2:12 p.m.

1 APPEARANCES:

2 KENNETH N. FLAXMAN, P.C.

3 BY: MR. KENNETH N. FLAXMAN

200 South Michigan Avenue, Suite 201

Chicago, Illinois 60604

312.427.3200

knf@kenlaw.com

5 appeared on behalf of the Plaintiffs;

6 SANCHEZ, DANIELS & HOFFMAN

7 BY: MR. GERALD M. DOMBROWSKI

333 West Wacker Drive

Chicago, Illinois 60606

312.641.1555

9 appeared on behalf of the Defendant

10 The Sheriff of Cook County.

11 COOK COUNTY STATE'S ATTORNEY'S OFFICE

12 BY: MS. DANIELLE MIKHAIL

50 West Washington, Suite 500

Chicago, Illinois 60602

312.603.3368

danielle.mikhail@cookcountyl.gov

14 appeared on behalf of the Defendant

15 Cook County;

17 * * * * *

23 Reported By: Hailey M. Treasure CSR, RPR

24 License No.: 084-004897

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DEPOSITION EXHIBITS

NUMBER/DESCRIPTION

REFERRED TO

Ex. A

59

Ex. B

60

Ex. C

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Ex. D

69

1 (Witness duly sworn.)

2 GREGORY JORDAN,

3 called as a witness herein, having been first duly
4 sworn, was examined and testified as follows:

5 EXAMINATION

6 BY MR. DOMBROWSKI:

7 Q. Sir, could you state your full name for
8 us including your middle name?

9 A. Gregory Lee Jordan.

10 Q. And Jordan, common spelling?
11 J-o-r-d-a-n?

12 A. Correct.

13 Q. And Lee is L-e-e?

14 A. Yes.

15 Q. Okay.

16 Please let the record reflect that
17 this is the deposition of plaintiff, Gregory
18 Jordan, taken pursuant to notice and by agreement
19 of the parties and pursuant to all applicable local
20 federal rules and the federal rules of civil
21 procedure.

22 Mr. Jordan, my name is Jerry
23 Dombrowski. I represent the Sheriff of Cook County
24 in this case. So I'm going to ask you some

1 questions about your background and about your
2 claim, essentially about your history. Okay?

3 A. Okay.

4 Q. Have you ever given a deposition before?

5 A. No.

6 Q. Okay. I'm sure your attorney has sat
7 down with you and explained the rules, but I'll
8 explain them again briefly. I have a court
9 reporter to my left. She'll be taking down
10 everything you say and everything all of the
11 attorneys say. So what we say needs to be clear
12 and out loud so she can take it down. All right?

13 A. Okay.

14 Q. If you don't understand a question, just
15 let me know and I'll repeat it so that you
16 hopefully will understand it. Okay?

17 A. Yes.

18 Q. If you answer a question today I'll
19 assume that you understood what was asked. Is that
20 fair?

21 A. Yes.

22 Q. Okay. Have you ever testified in any
23 matter before?

24 A. No.

1 Q. Okay. What is your date of birth?

2 A. June 25, 1966.

3 Q. Okay. So you are 53-years-old today?

4 A. Yes.

5 Q. All right. Sir, I'm going to ask your
6 Social Security number, but we're going to go off
7 the record so it's not on the record. Okay?

8 A. Okay.

9 (Discussion had off the record.)

10 MR. DOMBROWSKI: Mr. Jordan has given us his
11 full Social Security number off the record. So
12 we're back on the record.

13 BY MR. DOMBROWSKI:

14 Q. Sir, where do you live?

15 A. Chicago, Illinois.

16 Q. And what's your address?

17 A. 4248 West Le Moyne.

18 Q. And what's the zip there?

19 A. 60651.

20 Q. Is that a house or an apartment?

21 A. Apartment.

22 Q. And do you have a number? Apartment
23 number?

24 A. Apartment 1.

1 Q. How long have you lived there?

2 A. About 10 years.

3 Q. Do you live there with anyone else?

4 A. Yes. My mom.

5 Q. What is your mom's name?

6 A. Rose B. Jordan.

7 Q. And what is her date of birth?

8 A. I don't know.

9 Q. What year was she born?

10 A. In --

11 MR. FLAXMAN: Maybe how old is she?

12 THE WITNESS: She's 81.

13 BY MR. DOMBROWSKI:

14 Q. Okay. How long has she lived there?

15 A. She has lived there for about 10 years.

16 Q. And are you working today?

17 A. No, I'm not.

18 Q. And how do you support yourself?

19 A. I'm on disability.

20 Q. And how long have you been on

21 disability?

22 A. Since 2018.

23 Q. What is the nature of that disability?

24 A. The nature is schizophrenic and

1 depression.

2 Q. And when were you diagnosed with
3 schizophrenia?

4 A. Back in 19 -- I mean, 2001.

5 Q. Okay. And when were you diagnosed with
6 depression?

7 A. The same. Same year.

8 Q. Okay. When is the last time that you
9 have held a job?

10 A. That was in 2019. This year.

11 Q. And what did you do?

12 A. I worked for REM -- what kind of
13 place -- that was like -- it was like ADC where you
14 go look for work and they place you at different
15 areas that they have openings.

16 Q. And you think the name of the agency is
17 REM?

18 A. Yes. It's REM.

19 Q. R-e-m?

20 A. Yes. R-e-m.

21 Q. And where does that --

22 A. It's a day labor.

23 Q. Day labor.

24 A. Yes.

1 Q. And so they place you at different
2 places?

3 A. Yes.

4 Q. Who would you get a paycheck from?

5 A. REM.

6 Q. Now, is that still ongoing?

7 A. No.

8 Q. Okay. And why did that end?

9 A. Because I got laid off.

10 Q. Okay. And for 2019, about how many days
11 did you work?

12 A. I worked there for like four months at a
13 candy factory.

14 Q. And where was that?

15 A. That was in Bellwood.

16 Q. What was the name of that?

17 A. Ferrara.

18 Q. Ferrara?

19 A. Yeah, Ferrara.

20 Q. Is that off of the Eisenhower?

21 A. Yes.

22 Q. Okay. And how long did you work there?

23 A. Four months.

24 Q. And what happened to that position?

1 A. Got laid off.

2 Q. Okay. How about prior to that? Any
3 employment?

4 A. Yes. I worked at Malcolm X College.

5 Q. And from when to when?

6 A. That was from like -- in the 90's.

7 Q. And how many years or months did you
8 work there?

9 A. I worked there like two years there.

10 Q. And what did you do for them?

11 A. I was a janitor.

12 Q. Okay. And what happened to that job?

13 A. I went back to school.

14 Q. Okay. And one more. Prior to
15 Malcolm X, where did you work?

16 A. I was a tutor at Calhoun North
17 Elementary School.

18 Q. And where is -- does that still exist
19 today?

20 A. No. They closed the school down. It
21 was a grammar school.

22 Q. From when to when did you work as a
23 tutor?

24 A. That was in '95.

1 Q. Are you on any medications today?

2 A. Yes.

3 Q. And what medications are you taking?

4 A. Genvoya.

5 Q. Can you state that again?

6 A. Genvoya.

7 Q. Can you spell that for us?

8 A. J -- I mean, G-e-n-v-o-y-a.

9 Q. And what is that for?

10 A. That's for my HIV.

11 Q. Okay. Any other medications today?

12 A. No.

13 Q. Okay. Do you take any medications for
14 the schizophrenia or the depression?

15 A. I didn't take them this morning.

16 Q. Okay. Normally what would you take?

17 A. I have a list in my wallet. I don't
18 know the name by heart.

19 Q. Okay.

20 A. Carvedilol.

21 Q. Could you spell that for us?

22 A. C-a-r-v-e-d-i-l-o-l.

23 Q. And what is that for?

24 A. That's for high blood pressure.

1 Q. Okay. Anything else?

2 A. Olanzapine.

3 Q. Can you spell that for us?

4 A. O-l-a-n-z-a-p-i-n-e.

5 Q. And that is for?

6 A. Schizophrenia.

7 Q. Okay. Anything else?

8 A. And Sertraline, S-e-r-t-r-a-l-i-n-e.

9 Q. And what is that for?

10 A. Antidepressant.

11 Q. Okay. And of those, have you just taken
12 the Genvoya today?

13 A. Genvoya.

14 Q. Genvoya.

15 A. Yes.

16 Q. And do you normally take the medications
17 that you listed on a daily basis?

18 A. Yes.

19 Q. And why didn't you take them today?

20 A. I forgot.

21 Q. Okay. Is there anything about the
22 medications or anything in your system today that
23 would prevent you from being able to answer my
24 questions?

1 A. No.

2 Q. Have you consumed alcohol in the last
3 12 hours?

4 A. No.

5 Q. Okay. Have you ever been in the
6 military?

7 A. No.

8 Q. Can you detail for us, starting with
9 high school, what your educational background is?

10 A. I finished 11th grade.

11 Q. And where did you go to high school?

12 A. Marshall High.

13 Q. And is that on the west side of Chicago?

14 A. Yes.

15 Q. Any type of education after Marshall
16 High School?

17 A. I went to try to get my GED.

18 Q. And where did you go?

19 A. Malcolm X College.

20 Q. And were you successful?

21 A. No.

22 Q. Any other education that you're aware of
23 since Marshall High School other than the GED?

24 A. I just took up a trade.

1 Q. Okay. And what was your trade?

2 A. Building and maintenance.

3 Q. And did you have training for that?

4 A. Yes.

5 Q. And where did you go for training?

6 A. I went to Kilpatrick and Van Buren

7 Rehabilitative System Incorporation.

8 Q. And when did that happen?

9 A. That happened like in the '80s.

10 Q. Okay. Did you get any type of
11 certificate or anything like that?

12 A. Yes.

13 Q. And that was a certificate for -- what
14 did that certificate say?

15 A. It said congratulations in honor of
16 Gregory Jordan completing the six week course
17 class.

18 Q. And that class was involving building
19 and trade?

20 A. Yes.

21 Q. Any other certificates or classes that
22 we have not discussed?

23 A. No.

24 Q. And as far as your criminal history is

1 concerned, as we sit here today, do you have any
2 pending criminal matters against you?

3 A. Yes.

4 Q. And would that be in Cook County?

5 A. Yes.

6 Q. Have you ever lived outside of Cook
7 County?

8 A. No.

9 Q. Have you ever lived outside the city of
10 Chicago?

11 A. No.

12 Q. Okay. What are the pending criminal
13 charges that you have today?

14 A. Delivery.

15 Q. Is that delivery of a controlled
16 substance?

17 A. Yes.

18 Q. And what is the substance and amount
19 that you're charged with?

20 A. Two bags.

21 Q. And that would be of what?

22 A. Heroin.

23 Q. And what would be the weight that they
24 charged you with?

1 A. It was like under a gram.

2 Q. And what is the status of that matter?
3 Is that set for trial, or status, or something
4 else?

5 A. Set for trial.

6 Q. And when is that trial supposed to go
7 forward?

8 A. Well, they haven't set a date yet.

9 Q. Okay. So the next date you think is
10 going to be a trial date?

11 A. Yes.

12 Q. Okay. And are you represented by a
13 public defender?

14 A. Yes.

15 Q. Okay. Any other pending criminal
16 matters?

17 A. No.

18 Q. When were you arrested for that offense?

19 A. Back in 2018 of July, if I'm not
20 mistaken.

21 Q. And did you have a stay in Cook County
22 Jail as a result of this charge?

23 A. Yes.

24 Q. How long did you say in Cook County

1 Jail?

2 A. Eight days.

3 Q. And how were you able to get out?

4 A. I-bond.

5 Q. So as far as we know right now, as far
6 as you are aware, the only pending charge you have
7 against you is delivery of a controlled substance
8 stemming from a July 2018 arrest?

9 A. Yes.

10 Q. How many stays, including the July 2018
11 stay, have you had in Cook County Jail?

12 A. About five or six.

13 Q. And so of the five or six stays in Cook
14 County Jail, we know one was in July 2018, correct?

15 A. Mm-hmm.

16 Q. Yes?

17 A. Yes.

18 Q. Okay. And how about the other five?

19 MR. FLAXMAN: Actually two were in July of
20 2014.

21 MR. DOMBROWSKI: You said -- we're talking
22 2018 first.

23 MR. FLAXMAN: Oh, 2018. I'm sorry for that.

24

1 BY MR. DOMBROWSKI:

2 Q. Okay. So I'm going to go back
3 chronologically, okay, as far as your stays in Cook
4 County Jail, then we'll go to your criminal
5 history. All right?

6 A. Okay.

7 Q. So prior to the July 2018 stay, when was
8 your stay before that?

9 A. I don't recall the exact dates. I have
10 to look on my piece of paper for that.

11 Q. What would you refer to to refresh your
12 memory?

13 A. What do you mean?

14 Q. What piece of paper would you look at to
15 figure out when your stays were?

16 A. My criminal background.

17 Q. Okay. And would that be from the city
18 of Chicago?

19 A. Yes.

20 Q. Do you have anything like that with you
21 today?

22 A. No.

23 Q. Okay. Did you review anything in
24 preparation for your deposition today such as

1 documentation or anything like that?

2 A. No.

3 Q. Are you able to --

4 MR. FLAXMAN: Hold on. We have to clarify
5 that.

6 Remember this?

7 THE WITNESS: Oh, okay.

8 BY MR. DOMBROWSKI:

9 Q. All right. So your attorney is showing
10 you a document. What is that document in front of
11 you?

12 A. Answers to the interrogative.

13 Q. Answers to interrogatories?

14 A. Interrogatories. Right. Right.

15 Q. Okay. I'm going to ask you about those
16 later, but you reviewed those today before your
17 deposition?

18 A. Yes.

19 Q. Now, as far as your stays at Cook County
20 Jail prior to July 2018, it's my understanding that
21 that would be four or five stays prior to
22 July 2018, correct?

23 A. Yes.

24 Q. Do you know when your first stay was at

1 Cook County Jail?

2 A. In 1983.

3 Q. And what was that for?

4 A. That was for a burglary.

5 Q. How long did you stay there in that
6 stay?

7 A. I think six months.

8 Q. And what was the result of that charge?
9 Were you convicted?

10 A. Yes.

11 Q. And what was the sentence?

12 A. It was like two years.

13 Q. And did you end up going to the Illinois
14 Department of Corrections?

15 A. Yes.

16 Q. Okay. And after that 1983 burglary
17 conviction, when was your next stay at Cook County
18 Jail?

19 A. I think that was in 1980 -- I mean,
20 1989.

21 Q. And what was that charge?

22 A. That was theft.

23 Q. Felony or misdemeanor?

24 A. Felony.

1 Q. And how long did you stay in Cook County
2 Jail related to that charge?

3 A. About seven months.

4 Q. And were you convicted on that charge?

5 A. Yes.

6 Q. And what was your sentence?

7 A. Three years.

8 Q. And that would be three years in the
9 Illinois Department of Corrections?

10 A. Yes.

11 Q. Okay. After that 1989 theft conviction,
12 when was your next stay at Cook County Jail?

13 A. 1999.

14 Q. And what was that charge?

15 A. Burglary.

16 Q. And how long did you stay at Cook County
17 Jail?

18 A. About nine months.

19 Q. And were you convicted on that charge?

20 A. Yes.

21 Q. What was your sentence then?

22 A. Six years.

23 Q. And that would be six years in the
24 Illinois Department of Corrections?

1 A. Yes.

2 Q. After that stay, when was your next stay
3 at Cook County Jail?

4 A. I think that was like 2001.

5 Q. What was that charge?

6 A. Auto theft.

7 Q. How long did you stay in Cook County
8 Jail then?

9 A. About 11 months.

10 Q. And were you convicted?

11 A. Yes.

12 Q. And what was your sentence?

13 A. Three years.

14 Q. And that would be three years in the
15 Illinois Department of Corrections?

16 A. Yes.

17 Q. Okay. After that 2001 stay, when was
18 your next stay in Cook County Jail?

19 A. 2003.

20 Q. And are you looking at something right
21 now?

22 A. Yes.

23 Q. Okay. What are you looking at?

24 A. I'm looking at the response to be held

1 in the jail from 2003 to 2013.

2 Q. Okay. So you're looking at your answers
3 to interrogatories?

4 A. Yes.

5 Q. Okay. So if you could put those down
6 for a second, and I will ask you about those
7 specific answers, but I'm just trying to get a
8 detailed history of what you remember --

9 A. Okay.

10 Q. -- okay?

11 A. Okay.

12 Q. So you're saying your next stay is 2003
13 in Cook County Jail?

14 A. Yes.

15 Q. And what was that charge?

16 A. I don't recall.

17 Q. How long did you stay in Cook County
18 Jail then?

19 A. About 13/14 days.

20 Q. And were you convicted on that charge?

21 A. No.

22 Q. What was the conclusion of that offense?

23 A. Dismissed.

24 Q. When was your next stay after the 2003

1 stay?

2 A. 2017.

3 Q. So there were no stays at Cook County
4 Jail from 2003 to 2017?

5 A. As I can recall.

6 Q. Okay. What was the charge in 2017?

7 A. Burglary.

8 Q. And how long was your stay in Cook
9 County Jail in 2017?

10 A. About 11 months.

11 Q. And what was the conclusion of that
12 particular charge? Were you convicted?

13 A. Yes.

14 Q. And what was your sentence?

15 A. Seven years.

16 Q. And that would be seven years in the
17 Illinois Department of Corrections?

18 A. Yes.

19 Q. And so when were you released from that
20 2017 charge?

21 A. 2019 -- yeah -- 2018.

22 Q. Okay. So if you were sentenced to seven
23 years in the Illinois Department of Corrections in
24 2017, and you served 11 months in the Cook County

1 Jail, you first off would have gotten credit for
2 the 11 months, correct?

3 A. Right.

4 Q. And then by my calculation, even with
5 good time, it would seem if it's a 2017 charge,
6 that you would still be serving it. Is that
7 accurate or did something else happen?

8 A. I was in Sheridan Correctional Drug
9 Program.

10 Q. What program is that?

11 A. Sheridan. Sheridan, Illinois.

12 Q. Right, Sheridan, S-h-e-r-i-d-a-n?

13 A. Yes.

14 Q. What type of program was that?

15 A. That was like a drug program.

16 Q. Okay. So you had drug treatment related
17 to the seven year sentence?

18 A. Yes.

19 Q. And you got extra time credit off of the
20 seven year sentence because of the drug program?

21 A. Yes.

22 Q. And so we're now in July 2019. When
23 were you released from Sheridan? What month?

24 A. December of 2019.

1 Q. So we're not there yet. So we're in
2 July 2019. So we're not in December 2019 yet. So
3 do you have a month or a date when you were
4 released from Sheridan?

5 A. I know it was in December. Wait a
6 minute. December 2000 -- when I got released,
7 '18 -- '17.

8 Q. Okay. Now, your attorney can't help
9 you. And this deposition is -- really, the basis
10 of it is for me and my co-counsel here to find out
11 what you remember and what your claim is, but your
12 attorney can't help you answer.

13 A. Okay.

14 Q. So it's not really a test, but it's just
15 something I need to ask you questions about the
16 dates, which are important and the timeframes and
17 things like that. Okay?

18 A. Okay.

19 Q. So are we talking right now regarding
20 the burglary where you were sentenced to seven
21 years IDOC?

22 A. No. That was 2014. My mistake.

23 Q. Okay.

24 A. I remember it was 2014 when I got

1 arrested for the burglary.

2 Q. All right. So let's go back. So 2014
3 you got arrested for burglary and you believe you
4 spent 11 months in Cook County Jail?

5 A. Yes.

6 Q. And then as a result of that burglary,
7 you were convicted and you were sentenced to seven
8 years in the Illinois Department of Corrections?

9 A. Yes.

10 Q. So that seven year sentence would have
11 been handed down in 2015?

12 A. Right.

13 Q. And when did you complete that 7 year
14 sentence?

15 A. In 2018.

16 Q. Would that have been roughly December
17 of 2018?

18 A. December. Yes.

19 Q. Okay. All right. And the delivery of a
20 controlled substance charge, you previously
21 testified you were picked up on that in July 2018?

22 A. Yes.

23 Q. But that you still, according to what
24 you're telling me, you still would have been

1 incarcerated in the Illinois Department of
2 Corrections in July 2018?

3 A. No. I got out in December -- I mean, I
4 got out at the end of December 2017.

5 Q. Okay. So the 2014 burglary sentence,
6 that was seven years in the Illinois Department of
7 Corrections, you would have served from 2014 --
8 beginning at the Cook County Jail in 2014, you
9 would have been paroled in December 2017?

10 A. Yes.

11 Q. All right. And then you picked up the
12 delivery of a controlled substance charge in
13 July 2018?

14 A. Yes.

15 Q. From the gap of the 20 -- 2000 -- strike
16 that.

17 From the gap of 2003 to that burglary
18 offense which began in 2014, were there any other
19 stays that you can recall in Cook County Jail?

20 A. I don't recall.

21 Q. As far as all of the felony convictions
22 that you have and the stays in Cook County Jail,
23 have we covered everything?

24 A. I should say so.

1 Q. Okay. Do you have any misdemeanor
2 convictions that we have not discussed?

3 A. Just one for trespassing.

4 Q. And when was that?

5 A. It was like in early 2003/4.

6 Q. Was that criminal trespass to a
7 residence, or land, or something else?

8 A. Land.

9 Q. Okay. Did you have to serve any time at
10 all in Cook County Jail for that particular
11 offense?

12 A. Yes.

13 Q. Okay. And how long was that?

14 A. I think it was like 15/16 days.

15 Q. And then what happened with that charge?

16 A. That charge got thrown out.

17 Q. Any other misdemeanors that we have not
18 discussed?

19 A. No.

20 Q. Do you have an Illinois driver's license
21 today?

22 A. Yes.

23 Q. Could I see that?

24 MR. DOMBROWSKI: Okay. Mr. Jordan is handing

1 me his Illinois driver's license and it is class D.
2 His address is listed as 4248 West Le Moyne.
3 Apartment 1, Chicago, Illinois 60651. He's got a
4 date of birth listed as 6/25/66 with a license
5 number of J6352926610, issued 3/9/18.

6 Okay. Thank you, sir.

7 BY MR. DOMBROWSKI:

8 Q. Okay. The claim that we're here for
9 today, that Mr. Flaxman is representing you for,
10 what is that particular claim?

11 A. For the property case.

12 Q. Okay. And specifically what are you
13 claiming about your property?

14 A. I did not receive my wallet or my keys
15 in return with my state ID and my Social Security
16 card, voter registration card.

17 Q. And what is that in relation to? Was it
18 in relation to one of your stays at Cook County
19 Jail?

20 A. Yes.

21 Q. And which stay are we talking about?

22 A. 2014.

23 Q. Okay. And as you testified previously,
24 that would be related to your burglary offense?

1 A. Yes.

2 Q. And that would be the approximately
3 11 months that you served at Cook County Jail, and
4 then you were sent to the Illinois Department of
5 Corrections?

6 A. Yes.

7 Q. Okay. And is that the only thing -- or
8 strike that.

9 As far as having a property claim in
10 this matter, the property that you just detailed
11 for us, is that all of the property you are
12 claiming someone else possesses that is yours?

13 A. Yes.

14 Q. Okay. What police authority arrested
15 you for the burglary charge back in 2014?

16 A. Chicago PD.

17 Q. Okay. And as far as all the arrests and
18 the criminal history that we went down, were all of
19 those arrests of you made by the Chicago Police
20 Department?

21 A. Yes.

22 Q. Okay. And were you arrested with anyone
23 related to this burglary charge in 2014?

24 A. No.

1 Q. Do you know who the police officers were
2 who arrested you?

3 A. No.

4 Q. Where specifically were you arrested?

5 A. In Chicago, Illinois.

6 Q. Where about?

7 A. On the west side.

8 Q. On the west side. Do you remember the
9 streets?

10 A. Cicero and Gladys.

11 Q. And Gladys is G-l-a-d-y-s?

12 A. Yes.

13 Q. And was that your neighborhood at the
14 time?

15 A. Yes.

16 Q. What time of day were you arrested?

17 A. It was in the morning.

18 Q. Do you remember what day of the week?

19 A. No.

20 Q. What were you wearing that day?

21 A. I was wearing some shorts, a t-shirt,
22 some gym shoes and a baseball cap on.

23 Q. What did you have on your body that day
24 as far as any items?

1 A. My wallet and my keys.

2 Q. And what were the keys to?

3 A. The house and my mom's car.

4 Q. And what color was the wallet?

5 A. Black.

6 Q. Do you remember who the maker of the
7 wallet was?

8 A. No.

9 Q. What was in the wallet at the time of
10 your arrest?

11 A. My state ID, my Social Security card,
12 voter registration card, and a few phone numbers
13 that I had.

14 Q. Anything else?

15 A. Just business cards.

16 Q. Okay. Anything else in your pockets
17 that day other than the wallet that you described
18 and the keys that you described?

19 A. Not that I know of.

20 Q. Did you have anything else on your
21 person that we haven't talked about? In your
22 hands, a bag, or anything like that?

23 A. No.

24 Q. Okay. Do you know -- you were brought

1 to a Chicago precinct, correct?

2 A. Correct.

3 Q. And what precinct was that?

4 A. That was on Harrison and Kedzie.

5 Q. Prior to that arrest, had you been at
6 Harrison and Kedzie, at that particular precinct
7 before?

8 A. Yes.

9 Q. We'll say in the past -- in the 10 years
10 prior to that arrest in 2014, how many times were
11 you at that Harrison and Kedzie police precinct?

12 A. One time.

13 Q. Okay. Did they bring you in handcuffed?

14 A. Yes.

15 Q. At the time of your arrest were you
16 searched?

17 A. Yes.

18 Q. How many officers were there?

19 A. Two.

20 Q. When you were brought to the station,
21 did the officers take anything off of you such as
22 your wallet, keys, or anything else?

23 A. Yes.

24 Q. What did they take?

1 A. My wallet, my keys and that's about it.

2 Q. How long did -- go ahead.

3 A. And the change that I had.

4 Q. How much change did you have?

5 A. About 60 some cents.

6 Q. Okay. It was all coins, obviously?

7 A. Yeah, it was coins.

8 Q. When did they take that off of you?

9 When they were arresting you?

10 A. Yes.

11 Q. And was that on the street?

12 A. Yes.

13 Q. Were you arrested at somebody's place of
14 business, at a home, or somewhere else?

15 A. A place of business.

16 Q. Okay. What was the name of the
17 business?

18 A. It was a store. It was a liquor store.
19 I forgot the name. I don't remember the name.

20 Q. Was it open at the time?

21 A. No.

22 Q. So were you there without permission?

23 A. Yes.

24 Q. Okay. So they bring you to the station,

1 they frisked you, they took the items off of you?

2 A. Right.

3 Q. How long did you stay at the precinct?

4 A. About two nights.

5 Q. What did you do when you were there
6 generally?

7 A. Just stay in the cell and stay asleep.

8 Q. Did anyone question you when you were
9 there?

10 A. No.

11 Q. During that two night approximately stay
12 at the precinct, what were you wearing?

13 A. My shorts, my t-shirt, my gym shoes, and
14 I had my baseball cap.

15 Q. So you still had your street clothes?

16 A. Yes.

17 Q. Where did you go after the two day stay
18 at the precinct?

19 A. They sent me to the County.

20 Q. Okay. And we're talking Cook County
21 Jail?

22 A. Yes.

23 Q. As far as the property that was taken
24 off of you by the Chicago police officers, did you

1 see those officers do anything with the property?

2 The wallet, the keys, et cetera?

3 A. No.

4 Q. Okay. Did you ever see them put it in a
5 bag or anything else?

6 A. They put it in a bag, that's about it.

7 Q. Okay. And you saw that occur?

8 A. Yes.

9 Q. Where did that happen?

10 A. When I was being searched. I mean, like
11 when I went in the back of the police station where
12 they get ready to put you in the cell, and I asked
13 them, can I make a phone call, before -- where they
14 fingerprint you at.

15 Q. Yes.

16 A. Yeah.

17 Q. And were you able to make a phone call?

18 A. Yes.

19 Q. Who did you call?

20 A. I tried to call my mom.

21 Q. Did you talk to her?

22 A. No.

23 Q. And the bag that your items were put in,
24 what did that look like?

1 A. Clear bag with red writing -- I mean,
2 red stripes on it.

3 Q. Okay. Any other identifying features
4 about the bag that you can recall?

5 A. What was written on it.

6 Q. And what was written on it?

7 A. My name.

8 Q. Anything else?

9 A. That's about it.

10 Q. Did you ever see that bag again for
11 those two days that you stayed?

12 A. No.

13 Q. Okay. So that particular precinct has a
14 lockup?

15 A. Okay.

16 Q. Is that correct?

17 A. Yes.

18 Q. Okay. And your photo was taken there?

19 A. Yes.

20 Q. How were you transported to the Cook
21 County Jail?

22 A. Through a bus.

23 Q. Where was your bag of items at that
24 point?

1 A. I don't know.

2 Q. Did you ever see it again after your
3 items were loaded into it?

4 A. No.

5 Q. When you went from the precinct to Cook
6 County Jail in that bus, were you handcuffed?

7 A. Yes.

8 Q. What were you wearing then?

9 A. They gave us a suit -- I mean, actually,
10 I went there with my clothes, with my clothes I had
11 got locked up in.

12 Q. Okay. So you still had your street
13 clothes on?

14 A. Uh-huh.

15 Q. Is that yes?

16 MR. FLAXMAN: You have to say yes or no.

17 BY MR. DOMBROWSKI:

18 Q. Is that yes?

19 A. Yes.

20 Q. Okay. At the precinct did they
21 fingerprint you and photograph you?

22 A. Yes.

23 Q. Okay. When you went to the Cook County
24 Jail you were processed there?

1 A. Yes.

2 Q. What did they do when you got to Cook
3 County Jail?

4 A. Actually they had us to change our
5 clothes into the jumpsuits and they processed us
6 downstairs.

7 Q. And what did they do for you or to you
8 when they processed you?

9 A. Actually we -- they took our picture,
10 fingerprinted us, and we seen different, you know,
11 psychiatrists and counselors and they put us in the
12 cage.

13 Q. Okay. And how many people did you
14 specifically meet with that time?

15 A. About three.

16 Q. Okay. And did they all work, as far as
17 you know, for Cook County Jail?

18 A. Yes.

19 Q. And was it a psychiatrist, a
20 psychologist or who?

21 A. Psychologist. They had us talk to a
22 drug counseling, what to do when we get out, who we
23 can contact, and the counselor for Cook County
24 Jail.

1 Q. Okay. And were you handed anything
2 during any of those sessions?

3 A. Yeah, just a gateway program that I can
4 attend when I got out.

5 Q. Okay. And do you remember what they
6 told you about anything else as far as programs,
7 your property, what would happen to you or anything
8 like that?

9 A. I don't recall.

10 Q. When did you realize you were charged
11 with a crime?

12 A. When they transferred me to the County.

13 Q. Were you informed as to what you were
14 charged with?

15 A. Yes.

16 Q. And who informed you?

17 A. The sergeant at the police station.

18 Q. What did he tell you?

19 A. I asked him what was I being charged
20 with and he told me.

21 Q. And what was the charge at that point?

22 A. Burglary.

23 Q. Okay. So after meeting with those
24 individuals at the Cook County Jail, where did you

1 go?

2 A. They put us in a cell and then they
3 basically divided us into different wings, housing
4 units.

5 Q. And what wing were you assigned to?

6 A. I was in division 6 2M.

7 Q. Would that division change at any point
8 during that approximately 11-month stay?

9 A. Would it change?

10 Q. Right.

11 A. What do you mean?

12 Q. Did you ever leave division 6 for
13 somewhere else?

14 A. No.

15 Q. Okay. And the 2M designation, what is
16 that?

17 A. That was like a drug -- a medication
18 unit.

19 Q. And were you on medications at that
20 time?

21 A. Yes.

22 Q. And what were your medications for?

23 A. For antidepressant, HIV, and
24 psychotropic medication.

1 Q. Did you receive your medications
2 regularly during that stay at Cook County Jail?

3 A. Yes.

4 Q. Okay. And did you receive counseling
5 during that stay?

6 A. No.

7 Q. Did you request counseling or?

8 A. They said that they was going to bring
9 counseling -- they was going to get us counseling,
10 but no one ever came.

11 Q. Did you have any other type of services
12 when you were there other than the ones you've
13 already talked about?

14 A. No.

15 Q. Okay. Did anyone talk to you during
16 your stay at Cook County Jail --

17 A. No.

18 Q. -- about your property?

19 A. No.

20 Q. Did you mention your property to anyone
21 when you first arrived at the Cook County Jail?

22 A. Yes.

23 Q. Who did you mention that to?

24 A. To the gentleman that was bagging them

1 up. That was -- we got to the County and we got
2 off the bus, I asked him where our property at and
3 he said that it's going to be in lockup, have
4 someone to come pick it up.

5 Q. He instructed you to ask someone to pick
6 it up?

7 A. Yes.

8 Q. Did you do that?

9 A. I tried.

10 Q. And how did you try?

11 A. By getting on the phone, my one free
12 phone call.

13 Q. And, now, are we talking about Cook
14 County Jail?

15 A. Yes.

16 Q. And did you make that phone call?

17 A. Yes.

18 Q. And who did you call?

19 A. I called my mom.

20 Q. And did you get ahold of her?

21 A. No.

22 Q. Did you ever try to call her again?

23 A. Yes.

24 Q. Okay. How many times during that

1 11-month stay did you talk to your mom?

2 A. Like twice.

3 Q. Okay. Was that always over the phone?

4 A. Yes.

5 Q. Did your mom ever come to visit you?

6 A. Yes. About twice.

7 Q. Okay. So you spoke to your mom twice
8 over the phone and she visited you twice during
9 that 11-month stay?

10 A. Yes.

11 Q. During those conversations and those
12 visits, did you ever talk to your mom about your
13 property?

14 A. Yes.

15 Q. How many times?

16 A. Twice.

17 Q. When were those times?

18 A. Like two months apart. I asked her, did
19 she come up here and pick up my property and she
20 said she would get around -- she'll get to it.

21 Q. Okay. And so when was that first
22 conversation about your property?

23 A. Like the first three months I was in
24 there.

1 Q. Okay. And then you talked to her again
2 about your property?

3 A. Yes.

4 Q. And that second conversation, was that
5 over the phone or in person?

6 A. Over the phone.

7 Q. What did you tell her and what did she
8 tell you?

9 A. She told me, she said, when she gets
10 around, she'll get to it.

11 Q. Okay. So you believed that your mom
12 would go and pick up your property?

13 A. I would believe that.

14 Q. Okay. And the property that we're
15 talking about is a property that you believe was
16 bagged initially by the Chicago police officers?

17 A. Yes.

18 Q. At any point when you were in Cook
19 County Jail, did you see the bag of property that
20 we're talking about?

21 A. No.

22 Q. Okay. Other than your conversations
23 with your mom and the one conversation, I believe,
24 with a Cook County Jail person, any other

1 conversations you had with anyone during that
2 11-month stay regarding your property?

3 A. No.

4 Q. Okay. And as far as this particular
5 stay, we've talked about it initially, but you were
6 eventually sentenced to seven years in the Illinois
7 Department of Corrections?

8 A. Yes.

9 Q. And was that just on one burglary charge
10 or multiple charges?

11 A. One charge.

12 Q. Okay. Were there other charges that
13 came along with the burglary charge in 2014?

14 A. No.

15 Q. Okay. So the seven year sentence, was
16 that a result of a plea of guilty?

17 A. Yes.

18 Q. And you previously testified it was an
19 11-month stay and then at some point in 2015 you
20 went to the Illinois Department of Corrections?

21 A. Mm-hmm.

22 Q. Yes?

23 MR. FLAXMAN: You have to say yes or no.

24 THE WITNESS: Yes.

1 BY MR. DOMBROWSKI:

2 Q. Okay. Which one?

3 MR. FLAXMAN: Which department of corrections
4 or --

5 THE WITNESS: Which one?

6 BY MR. DOMBROWSKI:

7 Q. Which prison?

8 A. Oh, I was at Sheridan both times.

9 Q. Sheridan?

10 A. Yes.

11 Q. Just prior to being sent from Cook
12 County Jail to Sheridan, were you released in any
13 fashion from Cook County Jail?

14 A. No.

15 Q. Prior to leaving Cook County Jail to
16 serve your sentence at the Sheridan Correctional
17 Center, did you speak to anyone about your
18 property?

19 A. Yes.

20 Q. Who did you speak to?

21 A. The guy that drove us on the bus.

22 Q. Drove you on the bus to?

23 A. Sheridan.

24 Q. Okay. So that trip from Cook County

1 Jail to Sheridan, was that in an Illinois
2 Department of Corrections bus?

3 A. Yes.

4 Q. How many people were on that bus?

5 A. About 30 of us.

6 Q. And those 30, were they all from Cook
7 County Jail?

8 A. Most of them.

9 Q. Okay. Did that bus stop at any other
10 stops before getting to Sheridan?

11 A. Yes.

12 Q. Do you recall where?

13 A. No.

14 Q. And you asked the bus driver about the
15 property that we've been talking about?

16 A. Yes.

17 Q. What did you ask him?

18 A. I asked him where's my property at and
19 he said you got to wait until we get to the prison
20 to find that out.

21 Q. Was there any property transported on
22 that bus?

23 A. Not as I know of.

24 Q. Okay. Did you see anyone load anything

1 on to that bus?

2 A. No.

3 Q. Did you have anything on your person?

4 A. No.

5 Q. What were you wearing when you went from
6 Cook County to Sheridan?

7 A. A jumpsuit.

8 Q. Was that still a Cook County jumpsuit?

9 A. Yes.

10 Q. Stepping back a bit. When you went from
11 the Chicago police precinct to Cook County Jail in
12 the bus that you testified to, did you have
13 anything on your person?

14 A. No.

15 Q. When you got to Sheridan to start
16 serving your sentence, did you speak to anyone in
17 those first couple months about the property that
18 we've discussed?

19 A. No.

20 Q. At any point when you were at Sheridan
21 Correctional Center serving your sentence, did you
22 speak to anyone there about your property?

23 A. Yes.

24 Q. Who did you speak to?

1 A. I spoke with the sarge.

2 Q. And do you remember the sergeant's name?

3 A. Not to be exact.

4 Q. Can you describe him for me?

5 A. He's Caucasian, older guy, shaggy gray
6 hair, gray beard, mustache.

7 Q. Was he known by any names that you
8 recall?

9 A. I don't recall.

10 Q. So it's your understanding that he was
11 stationed at the Sheridan Correctional Center?

12 A. Yes.

13 Q. How many conversations did you have with
14 him about your property?

15 A. One time.

16 Q. And when was that roughly as far as from
17 the time that you got there?

18 A. About two days after I got there.

19 Q. What did you say to him and what did he
20 say to you?

21 A. I asked him about my property and he
22 said that he don't know nothing about it. He
23 didn't know nothing about it.

24 Q. Okay. Any other parts of that

1 conversation that you have not relayed to me?

2 A. No.

3 Q. Did you speak to anyone else when you
4 were incarcerated at Sheridan regarding your
5 property?

6 A. No.

7 Q. Did anyone come to visit you at
8 Sheridan?

9 A. No -- my mom.

10 Q. She physically came and saw you?

11 A. Yes.

12 Q. How many times?

13 A. Two times.

14 Q. During those two visits, did you ever
15 discuss with her -- have any discussions with her
16 regarding your property?

17 A. Yeah. One time I asked her did she go
18 pick up my property and she said he didn't get --
19 she had forgotten and she said that if she got a
20 chance, she'll go.

21 Q. Okay. Any other conversations with her
22 during your Sheridan stay about your property?

23 A. No.

24 Q. Any other conversations with anyone that

1 we have not talked about at Sheridan regarding your
2 property?

3 A. No.

4 Q. Okay. Before you were shipped to
5 Sheridan, did you ever tell anyone at Cook County
6 Jail that your mother was going to pick up your
7 property?

8 A. Yes.

9 Q. Who did you tell?

10 A. I told the guy -- one of the lieutenants
11 there.

12 Q. Do you remember that lieutenant's name?

13 A. No.

14 Q. Did you tell anyone else, that you
15 recall, that your mother was going to come and get
16 your property?

17 A. Nu-huh.

18 Q. No?

19 A. No. No.

20 Q. Did you ever tell anyone verbally at
21 Cook County Jail that you were going to donate your
22 property?

23 A. No.

24 Q. Did you ever sign anything that stated

1 that you were going to donate your property?

2 A. No.

3 Q. Did you know the rules about your
4 property when you came to the Cook County Jail in
5 2014?

6 A. What do you mean?

7 Q. Were you ever handed anything in writing
8 about the property procedures at Cook County Jail?

9 A. Yes.

10 Q. Okay. And were you handed -- what were
11 you handed specifically?

12 A. Actually, really, it was a receipt.

13 Q. And who gave you the receipt?

14 A. The gentleman and when we got processed
15 in through the -- doing intake.

16 Q. And we're talking intake at the Cook
17 County Jail?

18 A. Yes.

19 Q. And what did that receipt state?

20 A. It just had property and my signature.

21 Q. Okay.

22 A. And some numbers on there.

23 Q. And as far as this suit is concerned,
24 where you are a plaintiff, it is just the one time

1 that you were at Cook County Jail for those 11
2 months and was then sent to the Illinois Department
3 of Corrections that you are claiming property is
4 owed to you and that you have not received it?

5 A. Yes.

6 Q. Okay. Other than what we've talked
7 about, did you ever contact anyone from Cook County
8 Jail about your property?

9 A. Yes.

10 Q. And other than what we've talked about?

11 A. Yes.

12 Q. And when did you do that?

13 A. When I got out.

14 Q. Okay. And so when did you get out
15 exactly?

16 A. I got out in December of 2018.

17 MR. FLAXMAN: We went through this before.

18 BY MR. DOMBROWSKI:

19 Q. Okay. So there's some testimony that --
20 was it 2017?

21 A. '17.

22 Q. Okay. So you were paroled from the
23 seven year sentence?

24 A. Yes.

1 Q. Who did you contact at Cook County Jail
2 regarding your property?

3 A. Called Cook County and I spoke to --
4 they connected me to the property office and I told
5 them, I asked them about my property and they put
6 me on hold. And after that they told me they don't
7 have no property up in there with my name.

8 Q. Do you know the name of the person that
9 you talked to?

10 A. I don't recall.

11 Q. And where did you get the number --
12 phone number?

13 A. Through 411.

14 Q. And how long were you on the phone at
15 that point in total?

16 A. About 35 minutes.

17 Q. Okay. How long were you on hold?

18 A. About 10 to 12 minutes.

19 Q. Okay. And so did you speak to one
20 person?

21 A. Yes.

22 Q. And was that a man or a woman?

23 A. A man.

24 Q. And did he tell you that he was going to

1 check?

2 A. Yes.

3 Q. What did he say he was going to check?

4 A. He said he was going to check and see if
5 my property there.

6 Q. Okay. Did he tell you how he was going
7 to do that?

8 A. No.

9 Q. And were you on hold again when he did
10 that?

11 A. Yes.

12 Q. Okay. And he -- the same person came
13 back on the line?

14 A. Yes. I recall.

15 Q. And what did he specifically tell you?

16 A. He told me that he couldn't find my
17 property.

18 Q. Okay. And what was your response?

19 A. I said -- well, I said, that's -- I
20 don't see how you can't find it. I said, it's
21 there. And he said well, I don't know what to tell
22 you, sir, Mr. Jordan. I said well, someone needs
23 to help me find my property because my wallet and
24 my keys is there. And I said, this my mom's car

1 keys and my house keys, and I said my ID and stuff
2 and he just told me, he said -- well, he didn't
3 know what to tell me.

4 Q. Okay. And then the conversation ended?

5 A. Yes.

6 Q. Did you have any other conversations
7 after that conversation with anyone from Cook
8 County or Cook County Jail regarding the property
9 that we're talking about today?

10 A. No.

11 Q. Did you write any letters?

12 A. No.

13 Q. Did you ever have any other discussions
14 that we haven't already talked about with your
15 mother regarding her picking up your property?

16 A. Yeah.

17 Q. When did that occur?

18 A. That occurred when I got out.

19 Q. And what did you say to your mother and
20 what did she say to you?

21 A. I said mom, where's my ID at, and she
22 said that she hit her head and she was like oh, I
23 forgot. I forgot to go get your stuff, and I said
24 well, why did you forget, you know?

1 Q. And what was her response?

2 A. She just said well maybe you can go back
3 up there and pick it up.

4 Q. Did you ever try to do that after that
5 phone call?

6 A. No. I assumed they lost it.

7 Q. And you assumed that because of the
8 conversation with that man?

9 A. Yes.

10 Q. Okay. Any other discussions with anyone
11 else about your property that we're here for today
12 that we have not talked about other than talking
13 with your attorney?

14 A. No.

15 Q. Okay. Mr. Jordan, I'm going to show you
16 some documents and I'll ask you some questions.
17 They've been marked as exhibits. So the Exhibit A
18 that we've marked, it is answers to
19 interrogatories.

20 Now, are these the answers to
21 interrogatories that you looked at today before the
22 deposition?

23 A. Yes.

24 Q. And you had previously looked at them

1 prior to today's date?

2 A. Yes.

3 Q. Okay. And if we page through these,
4 page 4, looks like that's your signature dated
5 4/9/19, correct?

6 A. Yes.

7 Q. Now, in looking at these answers to
8 interrogatories, are they accurate and truthful?

9 A. Yes.

10 Q. Do you, as you look at them today, want
11 to make any additions or subtractions to your
12 answers?

13 A. No.

14 Q. Okay. Moving forward. I'm going to
15 show you what we've marked as Exhibit B, plaintiff
16 Jordan's response to requests to admit. Do you
17 recall ever seeing that document?

18 A. Yes.

19 Q. Okay. So -- and if we look at page 2,
20 it's actually signed electronically by Joel
21 Flaxman, one of your attorneys, correct?

22 A. Yes.

23 Q. Can you take a look at the requests and
24 the responses and let me know if they are accurate

1 and truthful?

2 A. They are accurate.

3 Q. And are they truthful?

4 A. Yes.

5 Q. Okay. So if we look at some of the
6 questions and requests, technically, prior to the
7 burglary arrest in July 2014, you had a
8 July 2, 2014, arrest. Is that accurate?

9 A. Yes.

10 Q. Okay. And you were charged with
11 drinking on a public way?

12 A. Yes.

13 Q. Were you charged with anything else that
14 you recall on July 2, 2014?

15 A. No.

16 Q. Okay. Was there a stay at Cook County
17 Jail in July 2014 prior to the burglary, July 2014
18 stay, that you were ultimately sent to the Illinois
19 Department of Corrections?

20 A. No.

21 Q. Okay. So you don't recall a stay for a
22 week or so prior to the burglary stay at Cook
23 County Jail in July 2014?

24 A. I don't recall.

1 Q. Okay. All right. And if we look at --
2 still looking at Exhibit B, there's an attachment
3 to Exhibit B and it's entitled "Cook County
4 Sheriff's Office received clothing," and it
5 actually has a date of 7/3/2014 below. Do you see
6 that?

7 A. Mm-hmm.

8 Q. Yes?

9 MR. FLAXMAN: You have to say yes or no.

10 THE WITNESS: Yes.

11 BY MR. DOMBROWSKI:

12 Q. All right. And is that your signature
13 below?

14 A. Yes.

15 Q. Do you recall signing this document?

16 A. Yes.

17 Q. And do you remember what this document
18 was for? It says "received clothing receipt." Was
19 that you being handed back your clothing or was
20 that you submitting your clothing?

21 A. I guess when they took my clothes off.

22 Q. Okay. And then you signed and that was
23 an accurate list of what you had as far as clothing
24 at that point in July -- on July 3, 2014?

1 A. Yes.

2 Q. Okay. So there's a second attachment to
3 Exhibit B, and there is an identifier on the top
4 and it states "H1565." Do you see that?

5 A. Yes.

6 Q. And then it has "March 13, 2015,
7 detainee's name, Gregory Jordan," and then
8 "shipment date, 13 March, 2015." Do you see that?

9 A. Mm-hmm.

10 Q. Yes?

11 MR. FLAXMAN: You have to say yes or no.

12 THE WITNESS: Yes. Sorry.

13 BY MR. DOMBROWSKI:

14 Q. Were you sent to the Illinois Department
15 of Corrections from Cook County Jail on
16 March 13, 2015?

17 A. Yes.

18 Q. So that is an accurate date as far as
19 your shipment date?

20 A. Yes.

21 Q. Okay. And then do you recall seeing
22 this document when you were at Cook County Jail
23 before you left to go serve your sentence at
24 Sheridan?

1 A. I don't recall.

2 Q. Okay. It looks like there is -- on the
3 bottom its got your name, "I Gregory Jordan," and
4 then detainee ID. Do you see that?

5 A. Mm-hmm.

6 MR. FLAXMAN: You have to say --

7 THE WITNESS: Yes.

8 BY MR. DOMBROWSKI:

9 Q. Okay. And it goes on to state that "I
10 Gregory Jordan," and then it gives your detainee
11 number, "do hereby agree that for any reason this
12 letter mailed by myself does not reach the
13 designated person and/or the designated person does
14 not respond within 45 days from the date of
15 shipment, see above, my property will be disposed
16 of." Do you see that?

17 A. Mm-hmm. Yes.

18 Q. And is that your signature below there?

19 A. Yes.

20 Q. And then the date, is that -- did you
21 date it or did someone else date it?

22 A. Someone else dated this.

23 Q. And then it looks like there's an
24 officer signature there with a star number,

1 correct?

2 A. Yes.

3 Q. Do you know who that officer is?

4 A. No.

5 Q. Okay. If we look at the date on the top
6 of that, you'll see a 13, March '15. Did you mark
7 that down?

8 A. No.

9 Q. And its got detainee's name, your name
10 printed. Did you print that?

11 A. No.

12 Q. Okay. And its got a designation below
13 that and it says in print "donate." Do you see
14 that?

15 A. Yes.

16 Q. Did you authorize people at the Cook
17 County Jail to donate your property?

18 A. No.

19 Q. Do you know why your signature is on
20 this document that states donate?

21 A. Donate wasn't on there when I signed it.

22 Q. And how do you know that?

23 A. Because I remember. I wouldn't have
24 donated my wallet, my ID, and my keys.

1 Q. When you signed this document were you
2 requesting that someone else pick up your items?

3 A. Yes.

4 Q. And at that point on March 13, 2015, did
5 you want your mother, Rose Jordan, to pick up your
6 property?

7 A. Yes.

8 Q. And it's your understanding that she
9 never made an attempt?

10 A. Right. Yes.

11 Q. And we've discussed that throughout the
12 deposition, correct?

13 A. Correct.

14 Q. Was it your anticipation when you were
15 sent to Sheridan in March 2015 that at some point
16 within this 45-day period that your mother would
17 indeed pick your property up?

18 A. Yes.

19 Q. Okay. All right. I'm going to show you
20 what we've marked as Exhibit C and it's entitled
21 "Cook County Sheriff's Office received clothing
22 receipt," and it is three pages. Do you see that
23 in front of you?

24 A. Mm-hmm. Yes.

1 Q. Have you ever seen this document before?

2 A. No.

3 Q. Okay. So it looks like clothing
4 received date 7/27/2014, and it says clothing
5 received time 3:34 p.m. Do you see that?

6 A. Yes.

7 Q. Now, looking at the description of the
8 received clothing receipt, there appears to be four
9 items listed with a note saying "sandals," correct?

10 A. Mm-hmm.

11 Q. Yes?

12 MR. FLAXMAN: Yes or no.

13 THE WITNESS: Yes.

14 BY MR. DOMBROWSKI:

15 Q. And so listed is "t-shirt, beige.
16 Sealed property bag, clear. Pants, tan. Other
17 clothing, white." Do you see that?

18 A. Yes.

19 Q. Do you believe this is an accurate list
20 of what --

21 A. No.

22 Q. No. Wait, let me finish the question.
23 Do you believe this is an accurate list of the
24 property that you had on you when you were arrested

1 by the Chicago police in late July 2014?

2 A. No.

3 Q. And why not?

4 A. Because I didn't have on no sandals. I
5 had on white gym shoes.

6 Q. And how do you know that?

7 A. Because I remember.

8 Q. Okay. So you remember being arrested
9 with the white gym shoes?

10 A. Yes.

11 Q. Okay. And if we go to page 2, which is
12 actually Bates stamp Sheriff 028, it says "inmate
13 money." Do you see that?

14 A. Yes.

15 Q. And it has got the same time and date,
16 7/27/14 at 3:34 p.m. Do you see that?

17 A. Yes.

18 Q. Now, is it your belief that you had
19 coins on you at the time of your arrest?

20 A. About 60 cents.

21 Q. Okay. But that's not listed there?

22 A. No.

23 Q. Okay. And if we go to the next page,
24 which is Bates stamp Sheriff 029, it looks like a

1 similar page, but it has got zeros as far as money
2 is concerned, correct?

3 A. Correct.

4 Q. Okay. Have you ever seen the page 2 and
5 3 of Exhibit C before today?

6 A. No.

7 Q. Okay. All right. We just have a final
8 exhibit to show you, and this is marked Exhibit D,
9 and it has the title "Cook County Department of
10 Corrections Inmate Information Handbook." Have you
11 ever seen this handbook or any handbook like it
12 during any of your stays at Cook County Jail?

13 A. Yes.

14 Q. During your 2014 stay that ultimately
15 led you being taken from the Cook County Jail to
16 Sheridan Correctional Center, were you shown this
17 document?

18 A. Yes.

19 Q. Okay. And if we go to chapter 9, which
20 is on page 26 of the document, it's -- do you see
21 that it says "chapter 9 property"?

22 A. Mm-hmm.

23 Q. Yes?

24 A. Yes.

1 Q. Okay. And then it has a question, "what
2 happens to my money and property while I'm at
3 CCDOC?" Do you see you that?

4 A. Yes.

5 Q. And it says "your personal property,
6 cell phone, keys, ID, are kept at CCDOC property
7 office located at 2700 South California Avenue,
8 Chicago, Illinois. When you are discharged you
9 must show the property officer your photo ID to
10 have your property returned. Property will be kept
11 in the property office for 90 days after you leave
12 the CCDOC, then it will be disposed of in
13 accordance with the CCDOC general order. For more
14 information call the property office at
15 773-674-5780." Do you see that?

16 A. Yes.

17 Q. And it also states below clothing,
18 "unclaimed personal clothing items shall be placed
19 in the divisional unclaimed clothing." Do you see
20 that?

21 A. Yes.

22 Q. And then below that it says "releasing
23 personal property," and it states "you may
24 authorize an individual to retrieve your property,

1 upon the request of the inmate, CRW's will assist
2 in the release of personal property to another
3 individual or agency. The inmate will sign a
4 release form identifying the name and the address
5 of the person authorized to receive the property.
6 The receiving party must have valid picture
7 identification." Do you see that?

8 A. Yes.

9 Q. These three sections under chapter 9
10 property of Exhibit D, you understood those to be
11 the rules when you were taken into custody at Cook
12 County Jail in July 2014?

13 A. No.

14 Q. You did not understand that those were
15 the rules?

16 A. No.

17 Q. And why not?

18 A. I didn't understand it. I mean I don't
19 think I read this part.

20 Q. Okay. Did you read other parts of the
21 handbook?

22 A. Yeah. The first two pages.

23 Q. And what were those pages?

24 A. The inmate responsibility and the

1 introduction.

2 Q. Let me ask you just generally, in July
3 of 2014, when you were in Cook County Jail, was it
4 your understanding that if no one came to pick up
5 your items they could be disposed of?

6 A. Somewhat, yeah.

7 Q. Okay. And that's why you had those
8 conversations with your mom about your property?

9 A. Yes.

10 Q. So if your mom did what she said she was
11 going to do, your property would be with her and
12 you would have ultimately gotten ahold of it?

13 A. Yes.

14 Q. Okay. Do you believe anyone from the
15 Chicago Police Department is holding your property
16 that we've discussed today?

17 A. I'm not sure.

18 Q. Okay. All right. Just a few more
19 background questions. Have you been known by any
20 other names?

21 A. Yes. Gregory Smith.

22 Q. Any other names?

23 A. Gregory Martin and Greg Jones. That's
24 it.

1 Q. Have you gone by any nicknames
2 throughout your life?

3 A. No.

4 Q. As far as the names Greg Jones, Gregory
5 Smith, and Gregory Martin, have these names been
6 associated with your date of birth or different
7 dates of birth?

8 A. Different dates of birth.

9 Q. Okay. And why did you go by these
10 various names?

11 A. Because I was being stopped by the
12 police and I gave my brother's last name.

13 Q. And which last name is your brother's?

14 A. Smith.

15 Q. Okay. And what's your brother's first
16 name?

17 A. Daniel.

18 Q. Okay. So on occasion when you were
19 stopped by the police, you would say you were
20 Gregory Smith?

21 A. Yes.

22 Q. And -- but you would give your same
23 birth date?

24 A. Yes.

1 Q. And was that true also for Greg Jones
2 and Gregory Martin?

3 A. Yes.

4 Q. Have you been arrested under these names
5 in the past?

6 A. Yes.

7 Q. Have you been convicted of any crimes
8 under these names in the past?

9 A. No.

10 Q. Have you been charged with obstructing
11 justice or anything like that for using these
12 particular names?

13 A. No.

14 Q. If there was a scenario where you gave
15 one of these aliases and then you were arrested,
16 would you clarify who you were or would you
17 ultimately be found out as far as your real
18 identity?

19 A. Be found out.

20 Q. Okay. And how would the police do that?

21 A. By fingerprinting me.

22 Q. And normally they'd run the
23 fingerprints?

24 A. Right.

1 Q. But you never got charged with giving a
2 false name?

3 A. No.

4 Q. Do you know why that is?

5 A. I don't know.

6 Q. Fair enough. Have you ever been a
7 plaintiff, as you are today, in any matter?

8 A. No.

9 Q. Okay. Have you ever made a claim in any
10 matter for personal injury, property loss, or
11 anything like that?

12 A. Yes.

13 Q. And what was that related to?

14 A. That was the -- from the County -- the
15 County Jail.

16 Q. And what was that related to?

17 A. The dentist.

18 Q. So you had a dental claim?

19 A. Yes.

20 Q. Okay. And when did you have a dental
21 claim?

22 MR. FLAXMAN: I object to the question. It
23 assumes that there's only one.

24

1 BY MR. DOMBROWSKI:

2 Q. So what I'm trying to get to is are
3 there other cases with Gregory L. Jordan or Gregory
4 Jordan as a plaintiff suing Cook County, Cook
5 County Sheriff, or any other person or entity?

6 A. No.

7 Q. Okay. And when you say you had a dental
8 claim, is that something that you were complaining
9 about dental care at Cook County?

10 A. Yes.

11 Q. And was that claim resolved or is that
12 ongoing?

13 A. No. It was resolved.

14 Q. Okay. Was there a lawsuit filed?

15 A. Yes.

16 Q. Okay. But you were not specifically
17 named?

18 A. What do you mean was I named?

19 Q. Well, we're going to go off the record
20 for a second.

21 (Discussion had off the record.)

22 BY MR. DOMBROWSKI:

23 Q. We've had a discussion off the record
24 with plaintiff's counsel, Mr. Flaxman, and he has

1 detailed what he believes is Mr. Jordan's history
2 as far as dental claims, and one is the Smith case,
3 one is the Smenetek case, S-m-e-n-e-t-e-k, I
4 believe.

5 And Mr. Jordan, you've heard my
6 statement and then your attorney's statement off
7 the record. Is his memory accurate as far as the
8 claims that you may have filed regarding dental
9 matters?

10 A. Yes.

11 Q. Okay. And the dental matters related to
12 dental treatment or lack of dental treatment at the
13 Cook County Jail?

14 A. Yes.

15 Q. Okay.

16 MR. FLAXMAN: And then the other case was
17 Jackson vs. Sheriff which is 2007. I've got Swab
18 attest and intake, which was also \$200 for class
19 member and he was a class member.

20 BY MR. DOMBROWSKI:

21 Q. Okay. Does that sound accurate,
22 Mr. Jordan?

23 A. Yes.

24 Q. Okay. Any other matters that you may

1 have been a plaintiff or a claimant in that we have
2 not discussed?

3 A. No.

4 Q. Are you on social media at all?
5 Facebook, Instagram, anything like that?

6 A. No. I don't believe in that.

7 Q. Have you made any public comments or
8 public posts of any type regarding this particular
9 case?

10 A. No.

11 Q. Have you ever talked to anyone regarding
12 the facts and circumstances surrounding this case,
13 other than your attorneys, that may have been or
14 may be in a similar situation, such as, I don't
15 have my property, I believe it was lost or
16 misplaced?

17 A. No.

18 Q. Okay. When you were at Cook County
19 Jail, did you ever hear any other detainee or
20 inmate discuss their property and not being able to
21 get ahold of it?

22 A. Yes.

23 Q. Okay. Was that common, or was that
24 rare, or something else?

1 A. That was -- became common.

2 Q. Okay. How about when you went to
3 Sheridan? Was there a specific correctional
4 officer or correctional person that would deal with
5 inmate property as it came from other jails in
6 Illinois?

7 A. I'm not sure.

8 Q. Okay. Was any property transferred of
9 yours from Cook County Jail to the Sheridan
10 Correctional Center in 2015?

11 A. I'm not sure.

12 Q. Okay. Do you recall having any property
13 ever handed to you that may have been in the
14 custody of Cook County Jail?

15 A. No.

16 Q. Okay. During your last stay at Cook
17 County Jail, without going into any of the details
18 of the charges, first, were you arrested by the
19 Chicago police related to the most recent pending
20 charge?

21 A. Yes.

22 Q. And what station were you brought to?

23 A. Harrison and Kedzie.

24 Q. Did you have property on you that was

1 placed into a bag and transported to Cook County
2 Jail during that incident?

3 A. Yes.

4 Q. What was transported to Cook County Jail
5 of yours?

6 A. My wallet and some change, some money --
7 well, actually, really just about \$3.

8 Q. And was that first put in a bag by
9 someone from the Chicago Police Department?

10 A. Yes.

11 Q. And how long was that stay at Cook
12 County Jail related to the pending charges?

13 A. Related to the pending, that stay at the
14 County -- I stayed at the County for about, I'd
15 say, 90 days, but I got out. I got out early.

16 Q. Because you I-bonded out?

17 A. Yes.

18 Q. What happened to your property then?

19 A. I went and picked it up.

20 Q. Where did you go pick it up?

21 A. I went to the County.

22 Q. You went back to the property section of
23 the jail?

24 A. No. Actually, really, I went to the

1 police station and picked it up over there on Homan
2 and Fillmore.

3 Q. Why did you do that?

4 A. Because I didn't stay locked up long.

5 Q. Were you able to successfully pick up
6 your property?

7 A. Yes.

8 Q. How did you know it was there?

9 A. Because that's the information that they
10 gave us where it was going to be at.

11 Q. And who gave you that information?

12 A. The gentleman at the County Jail.

13 Q. Was it your understanding that Cook
14 County sent it back to the Chicago Police
15 Department?

16 A. Probably did, yes.

17 Q. And was the same property you say that
18 was taken off of you still in a bag?

19 A. Yes.

20 Q. And you were able to retrieve all the
21 property?

22 A. Yes.

23 Q. And was it a clear bag like similar to
24 the one that we discussed that was filled in July

1 2014?

2 A. Yes.

3 Q. Was anything missing?

4 A. No.

5 Q. Other than the personal inconvenience
6 that you -- when you do not have your
7 identification, and your Social Security card and
8 keys, do you have a value that you place on your
9 property that you say was not returned to you back
10 in 2014 or 2015?

11 A. Yes.

12 Q. What is the value?

13 A. Actually, really, I have a value, but
14 it's kind of priceless to me because I had to go
15 back and go through all the changes and challenges
16 to get all that replaced.

17 Q. And what did you specifically replace?

18 A. I replaced my state ID, my Social
19 Security card and my mom's keys to her car, and the
20 door keys to the house.

21 Q. I take it your mom had a second set of
22 those keys?

23 A. Yes.

24 Q. And did you ultimately replace them?

1 A. Yes.

2 Q. And did you do that when you came back
3 from Sheridan in 2017?

4 A. Yes.

5 Q. And when did the state ID card expire?

6 A. It was on my birthday. On the 18th of
7 this last year.

8 Q. Of 2018?

9 A. Yes.

10 Q. But in the interim you would have gotten
11 your Illinois driver's license?

12 A. Yes.

13 Q. Okay. Prior to receiving the Illinois
14 driver's license that you have on you today, when
15 was the last time you had an Illinois driver's
16 license?

17 A. That's my first time receiving it.

18 Q. Okay. So you went through the class and
19 did the driving test?

20 A. No. I studied the test when I was in
21 Sheridan. They gave us like a driver's book -- ed
22 book and I just studied and when I got out I went
23 and took the test.

24 Q. And was that a written and driving test

1 or just driving?

2 A. A written test. I took the written and
3 the driver's test when I got out, but when I was
4 incarcerated I studied the book.

5 Q. So you studied when you were
6 incarcerated, then took the written and driver's
7 exam and got the Illinois driver's license?

8 A. Yes.

9 Q. And that was your first?

10 A. My first time receiving my driver's
11 license.

12 Q. So other than the physical wallet
13 itself, everything that you're claiming was either
14 lost or misplaced or not returned to you has been
15 replaced?

16 A. Yes.

17 MR. DOMBROWSKI: Okay. Sir, I don't believe I
18 have any other questions.

19 MR. FLAXMAN: May I?

20 MR. DOMBROWSKI: Yes.

21 EXAMINATION

22 BY MR. FLAXMAN:

23 Q. Let me direct your attention back to
24 Exhibit B. The last page where it says the word

1 "donate" at the top or like 20 percent down, is
2 that your handwriting?

3 A. No.

4 MR. FLAXMAN: Thank you. Nothing further.

5 MR. DOMBROWSKI: Any questions?

6 MS. MIKHAIL: I don't have any questions.

7 MR. FLAXMAN: Signature will be reserved.

8 THE COURT REPORTER: Would you like to order?

9 MR. DOMBROWSKI: I think I will. Regular
10 delivery. I'll give you the exhibits. E-tran for
11 me. E-tran mini.

12 THE COURT REPORTER: Would you like to order?

13 MR. FLAXMAN: E-tran and then that's all.
14 Copy.

15 THE COURT REPORTER: Would you like to order?

16 MS. MIKHAIL: No.

17 FURTHER DEPONENT SAITH NAUGHT

18 (Proceedings concluded at

19 3:40 p.m.)
20
21
22
23
24

ERRATA SHEET

I, GREGORY JORDAN, have read the foregoing transcript of my deposition taken on July 11, 2019, and except for any corrections noted below, it is a true and correct transcript of my deposition given on the date aforesaid.

CORRECTIONS BASED ON ERRORS IN
REPORTING OR TRANSCRIPTION

PAGE LINE

GREGORY JORDAN

STATE OF ILLINOIS)
COUNTY OF)

Subscribed and sworn to before me
this day of , 2019.

[Seal]

Notary Public

1 STATE OF ILLINOIS)
) SS:
2 COUNTY OF COOK)

3 I, Hailey M. Treasure CSR, RPR, do hereby
4 certify that GREGORY JORDAN was duly sworn by me
5 to testify the whole truth, and that the foregoing
6 deposition was recorded stenographically by me and
7 was reduced to computerized transcript under my
8 direction, and that the said deposition constitutes
9 a true record of the testimony given by said
10 witness.

11 I further certify that the reading and
12 signing of the deposition was not waived, and that
13 the deposition was submitted to Mr. Kenneth
14 Flaxman, deponent's counsel, for signature.
15 Pursuant to Rule 30(e) of the Federal Rules of
16 Procedure, if deponent does not appear or read and
17 sign the deposition within 30 days, the deposition
18 may be used as fully as though signed, and this
19 certificate will then evidence such failure to
20 appear as the reason for signature not being
21 obtained.

22 I further certify that I am not a relative or
23 employee or attorney or counsel of any of the
24 parties, or a relative or employee of such attorney
or counsel, or financially interested directly or
indirectly in this action.

IN WITNESS WHEREOF, I have hereunto set my
hand this 19 day of July, A.D. 2019.

Hailey Treasure

Hailey M. Treasure CSR, RPR
Illinois CSR License 084-004897