

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

LEONCIO ELIZARRI, by his Special)
Administrator LETICIA PEREZ,)
GREGORY L. JORDAN, and)
TED VELLEFF, individually and for)
Others similarly situated,)
Plaintiffs,)
V.) Case No.
17 CV 8120
SHERIFF OF COOK COUNTY and)
COOK COUNTY, ILLINOIS,)
Defendants.)

DISCOVERY DEPOSITION OF TED VELLEFF
Taken on behalf of Defendant

The deposition of TED VELLEFF, a witness
called at the instance of the Defendant, for
purposes of DISCOVERY taken on June 17, 2021, at
2:00 p.m., via Zoom, before Erihia Schuster,
Illinois Certified Shorthand Reporter
No. 084-004660, pursuant to notice.

**CERTIFIED
TRANSCRIPT**

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<p style="text-align: right;">Page 2</p> <p>1 INDEX OF EXAMINATION</p> <p>2</p> <p>3 Page</p> <p>4 Questions by Attorney Dombrowski,5</p> <p>5 Questions by Attorney Flaxman.....83</p> <p>6</p> <p>7 INDEX OF EXHIBITS</p> <p>8 Letter Description Page</p> <p>9 A Answer to Interrogatories 14</p> <p>10 B Personal Belongings Form 54</p> <p>11 C Personal Belongings Form 60</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 4</p> <p>1 COURT REPORTER: This is Erika</p> <p>2 Schuster, and I am a Certified Shorthand</p> <p>3 Reporter. This deposition is being taken</p> <p>4 remotely, and those participating in this</p> <p>5 examination today are attending via Zoom, with</p> <p>6 the witness appearing from Chicago, Illinois.</p> <p>7 Counsel acknowledges their</p> <p>8 understanding that I am not physically present</p> <p>9 with the witness and that I will be reporting</p> <p>10 this proceeding remotely. Counsel further</p> <p>11 acknowledges that I will not be administering the</p> <p>12 oath in person, but am doing so remotely. The</p> <p>13 party and counsel consent to this arrangement and</p> <p>14 waive any objections to this manner of</p> <p>15 proceeding.</p> <p>16 Counsel, please indicate your</p> <p>17 agreement verbally on the record by stating your</p> <p>18 name and that you stipulate to these terms, after</p> <p>19 which I will swear in the witness and we may</p> <p>20 begin.</p> <p>21 ATTORNEY FLAXMAN: I'm Kenneth</p> <p>22 Flaxman, F-l-a-x-m-a-n, for the plaintiff, and I</p> <p>23 agree. I also agree to the recording with the</p> <p>24 expectation that I get a copy of whatever is</p> <p>25 recorded.</p>
<p style="text-align: right;">Page 3</p> <p>1 APPEARANCES</p> <p>2</p> <p>3 KENNETH N. FLAXMAN</p> <p>4 200 South Michigan Avenue</p> <p>5 Chicago, IL 60604</p> <p>6 Knf@kenlaw.com</p> <p>7</p> <p>8 On Behalf of the Plaintiffs,</p> <p>9</p> <p>10 DANIELLE MIKHAIL</p> <p>11 Cook County State's Attorney's Office</p> <p>12 500 Richard J. Daley Center</p> <p>13 Chicago, IL 60602</p> <p>14 Danielle.mikhail@cookcountyil.gov</p> <p>15 On Behalf of the Defendant</p> <p>16 Cook County,</p> <p>17</p> <p>18 GERALD M. DOMBROWSKI</p> <p>19 Sanchez Daniels & Hoffman, LLP</p> <p>20 333 West Wacker Drive, Suite 500</p> <p>21 Chicago, IL 60606</p> <p>22 GDombrowski@SanchezDH.com</p> <p>23 On Behalf of the Defendant</p> <p>24 Sheriff of Cook County.</p> <p>25</p>	<p style="text-align: right;">Page 5</p> <p>1 ATTORNEY DOMBROWSKI: Okay. Gerrie</p> <p>2 Dombrowski for the sheriff's office, I agree.</p> <p>3 And Ken, when you speak, there is a lot of</p> <p>4 reverb, just so you know.</p> <p>5 ATTORNEY FLAXMAN: I'm going to turn</p> <p>6 off of my microphone.</p> <p>7 ATTORNEY MIKHAIL: Danielle Mikhail</p> <p>8 for Cook County, and I agree to the stipulation.</p> <p>9 I think, Ken, there might be echo if you guys are</p> <p>10 in the same room with the mic on at the same</p> <p>11 time.</p> <p>12 IT IS HEREBY STIPULATED AND AGREED,</p> <p>13 that the deposition of TED VELLEFF may be taken</p> <p>14 in shorthand by Erika Schuster, a Certified</p> <p>15 Shorthand Reporter, and afterwards transcribed</p> <p>16 into typewriting.</p> <p>17</p> <p>18 * * * * *</p> <p>19 TED VELLEFF,</p> <p>20 of lawful age, being produced, sworn and examined on</p> <p>21 behalf of the Defendant deposes and says:</p> <p>22 DIRECT EXAMINATION</p> <p>23 BY ATTORNEY DOMBROWSKI:</p> <p>24 Q. Thank you. Mr. Velleff, can you</p> <p>25 state your full name for us and spell your first</p>

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<p style="text-align: right;">Page 6</p> <p>1 and last name?</p> <p>2 A. Ted Velleff, T-e-d V-e-l-l-e-f-f.</p> <p>3 Q. Please let the record reflect that</p> <p>4 this is the deposition of Mr. Velleff taken</p> <p>5 pursuant to notice and pursuant to agreement of</p> <p>6 the parties, also pursuant to all applicable</p> <p>7 federal court rules and the court rules in the</p> <p>8 Northern District of Illinois.</p> <p>9 Mr. Velleff, is your full -- do you</p> <p>10 go by -- is your given name Theodore Velleff?</p> <p>11 A. Yes, sir, it is, but I don't go by</p> <p>12 that.</p> <p>13 Q. All right. Your given name -- but</p> <p>14 Theodore is spelled T-h-e-o-d-o-r-e?</p> <p>15 A. Yes, sir.</p> <p>16 Q. Okay. Do you have a middle name?</p> <p>17 A. No, sir, just an initial K, as</p> <p>18 strange as it is.</p> <p>19 Q. Okay. Just an initial. All right.</p> <p>20 And sir, what is your date of birth?</p> <p>21 A. 9/4/1959, September the 4th.</p> <p>22 Q. And sir, I'm going to go off of the</p> <p>23 record and state your social security number just</p> <p>24 so we don't have it on the record and you tell me</p> <p>25 if that's accurate, okay? So we'll go off of the</p>	<p style="text-align: right;">Page 8</p> <p>1 I'm junior. The third. And Michelle, both</p> <p>2 Velleff, last names. They're 32 and 31 years</p> <p>3 old.</p> <p>4 Q. Okay. And are you working today?</p> <p>5 A. I am self-employed.</p> <p>6 Q. And what is --</p> <p>7 A. Roofing. I'm sorry.</p> <p>8 Q. I'm sorry? What are --</p> <p>9 A. Roofing, self-employed roofer.</p> <p>10 Q. Okay. And do you have your own</p> <p>11 company or are you just individually do roofing?</p> <p>12 A. Individually.</p> <p>13 Q. And how do you get those jobs?</p> <p>14 A. Well, all the years, all the people I</p> <p>15 know, you know. That's basically, you know.</p> <p>16 Q. And do they just bring you on the job</p> <p>17 sites to do whatever roofing is available?</p> <p>18 A. Like I'm working for a private</p> <p>19 contractor right now.</p> <p>20 Q. Okay.</p> <p>21 A. He's got plenty of work.</p> <p>22 Q. And how long have you been a</p> <p>23 self-employed roofer?</p> <p>24 A. On and off for 40 years.</p> <p>25 Q. And Mr. Velleff, do you have an</p>
<p style="text-align: right;">Page 7</p> <p>1 record right now.</p> <p>2 (Discussion held off of the record.)</p> <p>3 Q. We'll go back on. Back on the</p> <p>4 record, Mr. Velleff has confirmed his social</p> <p>5 security number. Mr. Velleff, where do you live</p> <p>6 right now?</p> <p>7 A. 7327 North Honore Street, Apartment</p> <p>8 2B, Chicago, Illinois 60626.</p> <p>9 Q. How long have you lived there?</p> <p>10 A. It'll be two years next month.</p> <p>11 Q. And do you live there with anyone?</p> <p>12 A. My brother.</p> <p>13 Q. And what is your brother's name?</p> <p>14 A. The same name as me, Randy,</p> <p>15 R-a-n-d-y, the same last name.</p> <p>16 Q. And what is your marital status</p> <p>17 today?</p> <p>18 A. Single.</p> <p>19 Q. And do you have any children?</p> <p>20 A. I do.</p> <p>21 Q. And how many children do you have?</p> <p>22 A. Two.</p> <p>23 Q. Can you just give me their names and</p> <p>24 ages?</p> <p>25 A. Okay. Teddy the third. I'm junior.</p>	<p style="text-align: right;">Page 9</p> <p>1 Illinois driver's license today?</p> <p>2 A. Yes, sir, I do.</p> <p>3 Q. And do you have that with you?</p> <p>4 A. Yes, sir, I do.</p> <p>5 Q. Could you put that up to the camera</p> <p>6 there so we can take a look at it?</p> <p>7 A. Sure. I'm digging it out now.</p> <p>8 Q. Okay.</p> <p>9 A. Is it legible? Can it be seen?</p> <p>10 Q. Yeah. Can you raise it a bit and</p> <p>11 then come a little closer? Okay. Thank you,</p> <p>12 sir. And is that driver's license valid today?</p> <p>13 A. It is.</p> <p>14 Q. Okay. And can you tell us when it</p> <p>15 was issued?</p> <p>16 A. You know, I'm so sorry to say I</p> <p>17 didn't bring my reading glasses. I'm going to</p> <p>18 ask Mr. Flaxman.</p> <p>19 Q. Okay.</p> <p>20 A. Oh, I know when it was issued. I am</p> <p>21 wondering when it expired. It was issued in 2019</p> <p>22 I'd say June or July.</p> <p>23 MR. FLAXMAN: The driver's license</p> <p>24 7/13/2019, issued; expires 9/4/2023.</p> <p>25 Q. Okay. Thank you. And Mr. Velleff,</p>

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<p style="text-align: right;">Page 10</p> <p>1 have you ever testified in a deposition before?</p> <p>2 A. Not that I recall, not that I can</p> <p>3 remember.</p> <p>4 Q. Okay. Have you ever been a plaintiff</p> <p>5 in a lawsuit other than this one?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. Do you recall what those cases</p> <p>8 were, the names and where they were filed?</p> <p>9 A. Not the names. I'm not sure where</p> <p>10 they were filed, but I know what they were about.</p> <p>11 Q. And in how many cases were you a</p> <p>12 plaintiff?</p> <p>13 A. Probably a good three or four.</p> <p>14 Q. And what were those cases about?</p> <p>15 A. Okay. I distinctly recall where they</p> <p>16 used to -- how did they put that? They used to</p> <p>17 search us entering the Cook County Jail by</p> <p>18 getting naked and bending over, and they don't do</p> <p>19 that anymore.</p> <p>20 Q. So you were a plaintiff in a search</p> <p>21 case?</p> <p>22 A. Yes, sir.</p> <p>23 Q. And --</p> <p>24 A. It is over. I was a plaintiff.</p> <p>25 Q. Okay. And how about other cases?</p>	<p style="text-align: right;">Page 12</p> <p>1 about Zoom and sometimes in person, we'll try to</p> <p>2 avoid talking over each other so the court</p> <p>3 reporter can take down everything we say and then</p> <p>4 you cannot look to Mr. Flaxman for answers. He's</p> <p>5 your counsel, and I know he wants to give answers</p> <p>6 sometimes, but he's not allowed. And if you</p> <p>7 don't know the answer to a question, "I don't</p> <p>8 know" is a fine answer as long as it's the truth.</p> <p>9 So other than that search case, do</p> <p>10 you recall ever being a class member in any other</p> <p>11 cases?</p> <p>12 A. I do.</p> <p>13 Q. Can you tell us know what they were?</p> <p>14 A. Sure. This next one I'll speak about</p> <p>15 is how the -- specifically for Chicago police</p> <p>16 departments, that they held me too long before --</p> <p>17 you know, before they either transferred me or</p> <p>18 letting me go because it has happened both ways;</p> <p>19 transferring me, meaning to the county jail from</p> <p>20 the police station; and letting me go, meaning</p> <p>21 back home, you know. And so that entailed that</p> <p>22 bit of explanation of it, and I think I even</p> <p>23 remember the name of that one was Dunn or</p> <p>24 something, Dunn.</p> <p>25 Q. D-u-n-n?</p>
<p style="text-align: right;">Page 11</p> <p>1 ATTORNEY FLAXMAN: Let me just help</p> <p>2 you. He's answering whether he's been a class</p> <p>3 member in cases, and I think we talked in</p> <p>4 interrogatories about the one case where he</p> <p>5 appears to have been a named plaintiff.</p> <p>6 Q. Okay. So Mr. Velleff, when I say a</p> <p>7 plaintiff in a case, I do also --</p> <p>8 A. I'm sorry. I get what you -- I</p> <p>9 understand.</p> <p>10 Q. Actually, I'm going to veer from</p> <p>11 Mr. Flaxman said, whether you were a named</p> <p>12 plaintiff or a class member, that's what we want</p> <p>13 to learn about as well. So you were -- were you</p> <p>14 a class member --</p> <p>15 A. That's what I was. I've never been a</p> <p>16 plaintiff. I've never been a -- right? I mean,</p> <p>17 I'm understanding right now. No. No. No. What</p> <p>18 I meant was am I stating the legal terms right?</p> <p>19 I'll tell you what I know. Here is what I know.</p> <p>20 I've been a plaintiff -- I've been a class member</p> <p>21 three or four times in the past years, and I</p> <p>22 don't ever recall being a main plaintiff.</p> <p>23 Q. Okay.</p> <p>24 A. Does that make sense?</p> <p>25 Q. Yeah. That's fine. And one thing</p>	<p style="text-align: right;">Page 13</p> <p>1 A. D-u-n-n, exactly, but the names -- I</p> <p>2 don't know why I can't remember names on that one</p> <p>3 except for Dunn. And should I go onto another</p> <p>4 class action?</p> <p>5 Q. Yes.</p> <p>6 A. Okay. The strip search I already</p> <p>7 said the strip search, didn't I? Did I mention</p> <p>8 the strip search yet?</p> <p>9 Q. Yes. You did mention the strip</p> <p>10 search.</p> <p>11 A. Yes, I did. There's another one that</p> <p>12 is in my head that I'm trying to dig out. The</p> <p>13 police department, strip search, another one.</p> <p>14 Oh, while I was in the county jail, they refused</p> <p>15 me medical and dental help, you know, being in</p> <p>16 pain and not even seeing me for days.</p> <p>17 Q. Okay. And that sounds like that's</p> <p>18 number three where you were a class member?</p> <p>19 A. Yes, sir.</p> <p>20 Q. Any other that you can recall as far</p> <p>21 as lawsuits where you were either a class member</p> <p>22 or possibly a named plaintiff?</p> <p>23 A. Not that I recall. I don't want to</p> <p>24 sound like funny or nothing, but here is the meat</p> <p>25 of it. I'm sure -- I'm like pretty sure there</p>

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<p style="text-align: right;">Page 14</p> <p>1 was one more at least, maybe two, but I just 2 don't remember what they are, you know. 3 Q. Okay. 4 A. It's just hard to remember. 5 Q. Now, I need to show you your answers 6 to interrogatories. We've marked it as Exhibit 7 A, but I'll refer to them shortly and then we'll 8 talk about them in detail a little bit later. 9 But in your answer to interrogatory No. 4, it is 10 listed Velleff versus Cook County, and the case 11 number is 12 CV 652, and that says complaining 12 about participation in the Dunn settlement. Do 13 you know what that was about? 14 A. Well, first of all, I got to 15 explain -- respond to say I'm a little lost. I 16 just spoke on the Dunn settlement, but you're 17 speaking about a specific thing that happened in 18 it? 19 Q. Right. Apparently, there was a case 20 called Velleff versus Cook County, 12 CV 652, 21 which seems like it was an offshoot of the Dunn 22 case. 23 Do you recall the facts and 24 circumstances surrounding that? 25 A. No. And also, again, not to be</p>	<p style="text-align: right;">Page 16</p> <p>1 even admitted it because they were slow getting 2 my paperwork around. I mean, that's the best way 3 I can answer what happened. 4 Q. Okay. Other than this case, do you 5 have any pending lawsuits or any claims that 6 you're aware of? 7 A. I have one pending lawsuit. 8 Q. And what is that one? 9 A. Okay. The attorney is out of 10 Mattoon, Illinois and it's called Heller and 11 Holmes and Associates. Heller Holmes and 12 Associates, and it's about IDOC, the prison 13 system in Illinois, them denying me treatment for 14 Hepatitis C. 15 Q. And is that case still pending? 16 A. It is. It's coming shortly to a 17 close, finally after years, but it's still 18 pending. 19 Q. Is it going to trial, or do you 20 believe that's going to settle? 21 A. It's going to settle. I mean, I 22 can't guarantee it, but it's like probably 23 definitely probably going to settle. 24 Q. Do you know -- 25 A. They're talking monetary now after</p>
<p style="text-align: right;">Page 15</p> <p>1 disrespectful at all, but you said "Vella." How 2 are you pronouncing that name? 3 Q. Velleff. 4 A. Okay. What is the spelling you have 5 for it? It sounds like you're saying "Vella." 6 Q. No. Velleff. 7 A. There you go. 8 Q. Okay. 9 A. Yeah, I don't recall. I just -- let 10 me see Dunn. I'm trying to remember because I 11 think I remember my counsel's name on that. It 12 was Loevy & Loevy. 13 Q. Okay. So Loevy & Loevy, and you 14 think in that 12 CV 652 case, they were your 15 counsel? 16 A. Yes, sir. 17 Q. Do you know what happened with that 18 case, how did that conclude? 19 A. This was the Chicago Police 20 Department staying in the lockup, right? That's 21 what I said, right? 22 Q. Yes. 23 A. That concluded -- they didn't have 24 much money left in the settlement fund, and I got 25 paid, but not what I was supposed to and they</p>	<p style="text-align: right;">Page 17</p> <p>1 they got rid of the particulars about how they 2 have to treat people if their fibrosis level is 3 so high and baa, baa, baa and how much time they 4 have to do and baa, baa, baa. 5 Q. Was that filed in state court or 6 federal report? 7 A. I'd have to call and ask Mr. 8 Kent Heller. I'm not positive of an answer. 9 Q. Okay. And was that regarding one of 10 your stays at the Illinois Department of 11 Corrections? 12 A. I'm not sure how to take that 13 question. It's regarding -- it's regarding that 14 they knew I had it since I've been in and out of 15 the system and the joint unfortunately too 16 many -- since '01, so instead of saying until 17 present, it'll be three years ago in September I 18 came home from Menard, and that's the last time 19 ever, you hear me tell it. And I'll tell you, 20 even though you didn't ask all this, but I'm 21 going to share it. Even though I got treated, I 22 tell people, like however you take it, because 23 I'm still going to get paid. I'm still a party 24 because I got treated and I don't have Hep C no 25 longer, but they knew I had it all those years,</p>

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<p style="text-align: right;">Page 18</p> <p>1 and they refused me treatment. And just like I</p> <p>2 asked my attorney, why do you manage they finally</p> <p>3 treated it? And he said because your level was</p> <p>4 so bad. That's the only reason, you see what I</p> <p>5 mean? I'm sorry.</p> <p>6 Q. Are you the only plaintiff in this</p> <p>7 case?</p> <p>8 A. Oh, there's approximately 2,000, a</p> <p>9 little bit over.</p> <p>10 Q. That's a class, also, correct?</p> <p>11 A. That's -- I'm no lawyer, but I</p> <p>12 learned over the years common sense when you run</p> <p>13 across things, and he has been telling me --</p> <p>14 Mr. Heller, out of Mattoon, Illinois, the guy</p> <p>15 over this, counsel on this, he's been telling me</p> <p>16 it's not a class yet, and that is like weird to</p> <p>17 me. He's got to individually do all of these</p> <p>18 2000. If it's not, it is him, so what do I know.</p> <p>19 Q. Now, in all of the cases that we've</p> <p>20 talked about separate from this one, do you</p> <p>21 recall ever giving any testimony or formal</p> <p>22 statement regarding those cases?</p> <p>23 A. Not in a court.</p> <p>24 Q. Okay. How about in an office where</p> <p>25 there's a court reporter, something like this?</p>	<p style="text-align: right;">Page 20</p> <p>1 A. Burglary.</p> <p>2 Q. And did you go to the -- just to</p> <p>3 shorten it, I'm going to say IDOC. Can we agree</p> <p>4 that --</p> <p>5 A. That's prison. That's prison. That</p> <p>6 means the same thing --</p> <p>7 Q. Right. So we can --</p> <p>8 A. Yeah, in my mind. Okay. Go ahead.</p> <p>9 Q. So we can agree when I say IDOC, that</p> <p>10 means Illinois Department of Corrections?</p> <p>11 A. And prison, yeah. They're the same</p> <p>12 thing, equivalent, yes, sir.</p> <p>13 Q. Did you go to IDOC after the '82</p> <p>14 burglary conviction?</p> <p>15 A. That was my first time, yes, sir.</p> <p>16 Q. And what was your sentence?</p> <p>17 A. Three years.</p> <p>18 Q. And after '82, when was your next</p> <p>19 felony conviction?</p> <p>20 A. '85.</p> <p>21 Q. And what was that for?</p> <p>22 A. Burglary three years.</p> <p>23 Q. You were sent to three years in IDOC?</p> <p>24 A. Yes, both times.</p> <p>25 Q. And after '85, when was your next</p>
<p style="text-align: right;">Page 19</p> <p>1 A. No. Only answering on paperwork, no,</p> <p>2 sir, otherwise.</p> <p>3 Q. All right. So my next category is</p> <p>4 onto your criminal history. It's my</p> <p>5 understanding that you have been to the Illinois</p> <p>6 Department of Corrections approximately ten</p> <p>7 times; is that accurate?</p> <p>8 A. Yes, sir.</p> <p>9 Q. Okay. First off, as far as your</p> <p>10 felony convictions are concerned, when was your</p> <p>11 first felony conviction?</p> <p>12 A. That would be 1978.</p> <p>13 Q. And what was that for?</p> <p>14 A. It was a burglary reduced to theft.</p> <p>15 The conviction was reduced to theft, the</p> <p>16 burglary.</p> <p>17 Q. Did you serve any time in the</p> <p>18 Illinois Department of Corrections for that one?</p> <p>19 A. Prison, no. Just the county.</p> <p>20 Q. All right. And that was Cook County?</p> <p>21 A. Yes.</p> <p>22 Q. And after 1978, when was your next</p> <p>23 felony conviction?</p> <p>24 A. '82.</p> <p>25 Q. And what was that for?</p>	<p style="text-align: right;">Page 21</p> <p>1 one?</p> <p>2 A. '93.</p> <p>3 Q. And what was that for?</p> <p>4 A. Aggravated battery, but it got</p> <p>5 reversed on appeal and remanded for a new trial</p> <p>6 right before I came home.</p> <p>7 Q. So you were sentenced to IDOC?</p> <p>8 A. Yeah, I did all of the time in</p> <p>9 prison, I mean, besides county, but it was -- I'm</p> <p>10 sorry.</p> <p>11 Q. That's okay. What was the sentence</p> <p>12 in the '93 conviction that was reversed?</p> <p>13 A. Even though it was an even number,</p> <p>14 but I call it an odd ball sentence, six years and</p> <p>15 2 months, Judge Jordan, nothing like the one we</p> <p>16 know and love, Michael Jordan.</p> <p>17 Q. So after it was reversed, were you</p> <p>18 retried?</p> <p>19 A. No. No, and I'll tell you why. I</p> <p>20 just told them forgot it because I wanted to get</p> <p>21 out of the city, which I'll explain. So like I</p> <p>22 was in a win/win situation. If I lose in the new</p> <p>23 trial, I've done all the time already. If I win</p> <p>24 a new trial, my kids can go to college for free.</p> <p>25 It wasn't 20 years, but it was three and a half</p>

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<p style="text-align: right;">Page 22</p> <p>1 years, but anyway, so fast forward, like I said, 2 I got out and I didn't like what I was doing in 3 life, so I wanted to get out of the city, and I 4 didn't tell the courts everything they needed to 5 know, that I didn't feel they needed to know, so 6 I just gave them a conviction, they called it 7 time served. I wasn't on parole because the 8 conviction is out there because of the reversal 9 and everything was -- I gave them a conviction 10 and they called it time considered served, you 11 know, on a new trial. The first court, they got 12 a new trial didn't come up until three months 13 after I came home from Pontiac, from doing the 14 six years and two months and then that's what 15 happened and so yeah. 16 Q. Do you know with that 1993 17 conviction, did that stay a conviction or was the 18 conviction vacated? 19 A. I believe it actually stayed. I 20 mean, I didn't do any outgoing work to have it 21 vacated, so I would have to think it was -- I 22 mean, if they just did it, that would be lovely 23 so I would have to think no, you know, even 24 though, you know. 25 Q. So after 1993, when was your next</p>	<p style="text-align: right;">Page 24</p> <p>1 A. In '01. 2 Q. And that was in Illinois? 3 A. Yeah. 4 Q. And what was -- 5 A. One year. One year. I did 60 days, 6 theft. 7 Q. You were sentenced -- you were 8 sentenced to one year DOC, but you were not sent 9 down to IDOC? 10 A. Yeah. Just to do 60 days. They 11 started that somewhere while I was gone in 12 California where you do only 60 days out of a 13 year, you know, in prison. The county time you 14 had didn't count towards that 60 days. 15 Q. So you think you -- 16 A. After you left the county, you'd go 17 home 60 days later after you get to IDOC. 18 Q. Fair enough. And when you say left 19 the county, you mean you went from the Cook 20 County Jail to the Illinois Department of 21 Corrections? 22 A. Yes, sir. 23 Q. So after the 2001 conviction, when 24 was your next conviction? 25 A. '02.</p>
<p style="text-align: right;">Page 23</p> <p>1 felony conviction? 2 A. You know, I had one and I guess it 3 counts, right, even if it's in another state? 4 Q. Yeah. 5 A. I had one in California for receiving 6 stolen property in '97. And then you pick up -- 7 I'm not trying to go too fast -- and when I came 8 home in '01, I started up again here in Chicago. 9 Q. And the 1997 conviction, that was for 10 receiving stolen goods? 11 A. Yes. 12 Q. And did you get any type of prison 13 sentence in California? 14 A. Yeah, yeah. Excuse me for saying 15 '97. The conviction was '96. 16 Q. Okay. And what was the sentence for 17 the '96 conviction? 18 A. It seems like two years. 19 Q. And then after serving that, you came 20 back to Illinois? 21 A. Well, not abruptly, but, you know, I 22 was out there five -- yeah. Yeah. I didn't come 23 back until '01. 24 Q. And when was your next felony 25 conviction?</p>	<p style="text-align: right;">Page 25</p> <p>1 Q. And what was that for? 2 A. The same thing, theft. 3 Q. And what was that sentence? 4 A. Three, three, three years. 5 Q. Now, are you looking at something, or 6 are you going by memory right now? 7 A. I am going by memory. I can name 55 8 Super Bowls. 9 Q. Wow. That's good. 10 A. And never make a mistake. 11 Q. All right. How about after the 2002 12 conviction, when was the next one? 13 A. '03. 14 Q. And what was that for? 15 A. Theft. 16 Q. And what was the sentence? 17 A. Two years. 18 Q. And that was IDOC? 19 A. Yes. 20 Q. All right. How about after '03? 21 A. '04. 22 Q. What was that for? 23 A. Theft, two more years. 24 Q. And how about after that 2004 25 conviction?</p>

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<p style="text-align: right;">Page 26</p> <p>1 A. '05.</p> <p>2 Q. What was that for?</p> <p>3 A. Theft.</p> <p>4 Q. And what was the sentence?</p> <p>5 A. One and a half.</p> <p>6 Q. One and a half years IDOC?</p> <p>7 A. Yes, sir.</p> <p>8 Q. And when was your next felony conviction?</p> <p>9</p> <p>10 A. Theft, two and a half years, the</p> <p>11 following year. Where we at? '06 now or '05?</p> <p>12 Q. Yeah. 2006.</p> <p>13 A. Yeah.</p> <p>14 Q. Two and a half years.</p> <p>15 A. One, three, two, two, one and a half,</p> <p>16 two and a half, three. Okay. And then the next</p> <p>17 one was three years and wait, we're on, what, '07</p> <p>18 now?</p> <p>19 Q. After the 2006 theft conviction?</p> <p>20 A. Yeah, you know what, in '7, I got</p> <p>21 five years. Oh, my God. I just pressed this</p> <p>22 accidentally, this middle thing. Is everything --</p> <p>23 I'm sorry. Can you hear me?</p> <p>24 Q. Yeah. I can hear you.</p> <p>25 A. You can't see me?</p>	<p style="text-align: right;">Page 28</p> <p>1 conviction?</p> <p>2 A. Then -- then I got convicted in 2012</p> <p>3 and got six years for a burglary.</p> <p>4 Q. Okay. And that was also IDOC?</p> <p>5 A. Yes. All of them.</p> <p>6 Q. Right. So all of the ones that we're</p> <p>7 going to talk about up to the present day would</p> <p>8 be IDOC?</p> <p>9 A. All of them, yes, sir.</p> <p>10 Q. All right. After 2012, when was your</p> <p>11 next conviction?</p> <p>12 A. '13. Wait a minute. Yeah. '13. I</p> <p>13 think it was like in December of '13.</p> <p>14 Q. And what was that for?</p> <p>15 A. That was for -- that was for</p> <p>16 burglary, too.</p> <p>17 Q. And what was that sentence?</p> <p>18 A. Six again. And then there's only one</p> <p>19 more.</p> <p>20 Q. Okay.</p> <p>21 A. The last one.</p> <p>22 Q. And when was the last one?</p> <p>23 A. In '17 -- in '17, I got convicted of</p> <p>24 theft and got four years. Never again.</p> <p>25 Q. Okay. I'm actually looking at</p>
<p style="text-align: right;">Page 27</p> <p>1 Q. I can see you.</p> <p>2 A. Okay. Everything is good then. I</p> <p>3 touched something on the -- anyway, he came over,</p> <p>4 and he says everything is fine. I'm holding it.</p> <p>5 I'm holding it in my hands instead of --</p> <p>6 Q. Not that Ken would know, but, you</p> <p>7 know.</p> <p>8 A. You know what, I'll set it on the</p> <p>9 table so I don't do it again.</p> <p>10 Q. That's good. Thank you. After the</p> <p>11 2006 conviction, what was the next felony</p> <p>12 conviction?</p> <p>13 A. 2007, I got five years, had to do</p> <p>14 half of that.</p> <p>15 Q. And what was that for?</p> <p>16 A. That was for -- that was for theft,</p> <p>17 also.</p> <p>18 Q. Okay. And how about after that 2007</p> <p>19 conviction, when was is the next one?</p> <p>20 A. '09.</p> <p>21 Q. And what was that for?</p> <p>22 A. Theft.</p> <p>23 Q. And what was that sentence?</p> <p>24 A. I got to think. Three. Three years.</p> <p>25 Q. Okay. How about after the 2009</p>	<p style="text-align: right;">Page 29</p> <p>1 answers to interrogatories, No. 6, and again,</p> <p>2 we'll go through all of the interrogatories, but</p> <p>3 the 2013 burglary, your answers to interrogatory</p> <p>4 indicate that after 2012, there was a</p> <p>5 January 23rd, 2014 conviction for identity theft</p> <p>6 where you were sentenced to five years IDOC. Is</p> <p>7 that --</p> <p>8 A. I put the date wrong on that. Yeah,</p> <p>9 I'm subject -- I'm human. I make -- yeah. I was</p> <p>10 wondering if -- yeah. I said December of '13 and</p> <p>11 you said January, so I was a month off, yeah.</p> <p>12 Q. Okay.</p> <p>13 A. Yeah.</p> <p>14 Q. And so then I also do have in your</p> <p>15 interrogatory No. 6 a July 31, 2017 conviction</p> <p>16 for theft where you were sentenced to four years</p> <p>17 IDOC.</p> <p>18 A. Give that date again.</p> <p>19 Q. July 31, 2017.</p> <p>20 A. Yeah. That's my last time ever and I</p> <p>21 came home in September of '18. That's my last</p> <p>22 time ever in or -- in.</p> <p>23 Q. So the July 31, 2017, four-year</p> <p>24 sentence to IDOC, that was your last --</p> <p>25 A. Yes, sir.</p>

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<p style="text-align: right;">Page 30</p> <p>1 Q. -- stint -- was that your last 2 sentence to IDOC? 3 A. Yes, sir. 4 Q. Okay. And then the last thing in 5 your interrogatory No. 6, you state on the top to 6 the best of my recollection and then the first 7 one you list is a March 30, 2021, time considered 8 served 189 days, retail theft; is that accurate? 9 A. Yes, it is. 10 Q. So you never went to IDOC for that 11 one? 12 A. No, no. 13 Q. And it says retail theft, would that 14 be felony retail theft or misdemeanor? 15 A. Misdemeanor. 16 Q. Okay. Thank you for that. Other 17 than the misdemeanor retail theft we talked about 18 for March of 2021, during this timeframe as far 19 as your criminal history is concerned, do you 20 recall any misdemeanor convictions? 21 A. No. It's too hard to -- I don't 22 recall. I mean, there might have been. I don't 23 even know. 24 Q. Okay. Fair enough. And Mr. -- and 25 am I -- your last name is pronounced Velleff?</p>	<p style="text-align: right;">Page 32</p> <p>1 Q. When you were out of jail or out of 2 IDOC, would you work as a roofer during this 3 timeframe? 4 A. Yes, sir. Yes, sir. I would. 5 Q. And for the cases that we talked 6 about, the class actions and where you were 7 either a member of a class or possibly a 8 plaintiff, was Mr. Flaxman ever your attorney? 9 A. He has been in the past, yes, sir. 10 Q. And how many times has he been your 11 attorney? 12 A. Approximately, three or four. 13 Q. Has the Morrissey firm ever been your 14 attorneys? 15 A. You know what, I believe he has, but 16 only -- only when he was -- I don't know if this 17 is the proper term -- but where he was working 18 with Mr. Flaxman, like they were both on the 19 case. 20 Q. That makes sense. 21 A. And I only remember that one time. 22 Otherwise, it was only Mr. Kenneth Flaxman. 23 Q. Okay. Sir, as far as this lawsuit is 24 concerned, is it your claim that the Cook County 25 Sheriff's Department in running the jail has some</p>
<p style="text-align: right;">Page 31</p> <p>1 A. Velleff. Both the Es are the short E 2 sound. 3 Q. Okay. 4 A. Velleff. 5 Q. As far as your educational 6 background, where did you go to high school? 7 A. Sullivan High School in Chicago, 8 Rogers Park. 9 Q. And did you graduate? 10 A. No. I quit my senior year, but I got 11 my GED in January of '83. 12 Q. Any other education or certifications 13 of any type after you got your GED in January of 14 '83? 15 A. I've taken like two college courses 16 during all of those times in prison and got, you 17 know, paperwork on it. 18 Q. And during your stays in IDOC and 19 Cook County Jail throughout this period that we 20 discussed, intermittently would you work as a 21 roofer? 22 A. Oh, you mean whenever I wasn't in 23 jail? 24 Q. Yes. 25 A. Or in jail? Which way --</p>	<p style="text-align: right;">Page 33</p> <p>1 of your property and that you are owed this 2 property? 3 A. What I always thought, yes. That's 4 what I always thought, and I can fully know the 5 answer even back behind saying, yes, that's what 6 I always thought, I'm coming to -- I've come over 7 the years to learn that like I'm just, like, I 8 don't think that I'm ever going to get it, you 9 know. 10 Q. Now, as you sit here today, do you 11 think that you are -- do you think the county -- 12 the sheriff's office has property of yours that 13 they should return? 14 A. I feel that way, but I have no clue 15 on what the answer is, you know. I can't like 16 even guess the answer because it's been so long, 17 and you know, all I can do is -- and the phone is 18 like superfluous, but I've went down there a 19 couple of times and asked about it, and they had 20 no positive answers for me. 21 Q. Okay. So as you sit here now, do you 22 have any specific items that you believe the 23 sheriff's office owes you or possesses that you 24 think is yours? 25 A. Well, I don't know if they have them</p>

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<p style="text-align: right;">Page 34</p> <p>1 or not, but I mean, what -- at the top of the 2 list what hurts me -- what I won't forget out of 3 all of these years and all this time, you know, 4 the most is a couple times in the winter I had 5 brand new Carhartt jackets, you know, and I 6 never -- I filled out whatever paperwork they 7 gave me and tried to do the right things and did 8 whatever they told me to do to get it back and I 9 just never got it back when I come home.</p> <p>10 Q. Let's say in the last ten years in 11 your stays at Cook County Jail where you did end 12 up at IDOC, is there property that you can state 13 for us specifically that you think is missing 14 during that timeframe?</p> <p>15 A. Yeah. Like I said -- like I just 16 said, the first thing I will mention twice, 17 Carhartt coats; every single time, my phone; 18 every single time, all of my ID, which I keep if 19 not a driver's license, a state of Illinois card 20 and a social security card.</p> <p>21 Q. And have you specifically requested 22 from the sheriff's office either by phone or in 23 writing or in person for your items back?</p> <p>24 A. Yes, I have.</p> <p>25 Q. And when have you done that?</p>	<p style="text-align: right;">Page 36</p> <p>1 to the IDOC, Stateville or receiving in Joliet 2 and it wasn't there. So that's what we were -- 3 speak of the I, me and everybody else on that bus 4 from IDOC, and then we wouldn't see it. It was 5 like, no, they didn't send it. You know, the 6 IDOC officials saying they, being the Cook County 7 Jail officials, no, they didn't send it and 8 that's when things started going haywire.</p> <p>9 Q. Is it your understanding that when 10 you did go from Cook County Jail to IDOC that 11 certain property of yours that the Cook County 12 Jail may have had could not be transferred to 13 IDOC?</p> <p>14 A. I don't recall.</p> <p>15 Q. Were you ever informed when you did 16 go from Cook County Jail to the Illinois 17 Department of Corrections that certain items just 18 could not be sent because of IDOC rules?</p> <p>19 A. You know, I might have. I might have 20 been informed that. I just -- like, I just don't 21 remember, but to piggyback on answering that is 22 what I answered right before, if I hope I'm not 23 mentioning it, that there was a change somewhere 24 like, I don't know, around '05 or '6ish, '04, 25 '05, that things just started going, you know --</p>
<p style="text-align: right;">Page 35</p> <p>1 A. Like every time I come home, you 2 know, from IDOC.</p> <p>3 Q. And how would you do that?</p> <p>4 A. The phone first, and like I said a 5 couple of minutes back, the phone was like a rat 6 race, not much happening. Going down there, the 7 same thing, you know, traveling, taking a bus or 8 the L or getting a ride and going down to 26 and 9 Cal, they couldn't find it. They couldn't. It 10 was a dead pin in the road.</p> <p>11 Q. So you requested certain property 12 back and you just never got it back?</p> <p>13 A. That's right, sir.</p> <p>14 Q. Now, as far as the procedure that you 15 know when you were you were incarcerated at Cook 16 County jail and then sentenced to a term at IDOC, 17 how would your property be handled by Cook County 18 Jail?</p> <p>19 A. The one thing I remember is they said 20 they would send it to IDOC with us, and then 21 early on in the millennium -- I'm not going to 22 say I truly believe it, but I'm going to tell you 23 that I know that they were doing that, like early 24 on in the millennium, '01, '02, but after that, 25 they would keep saying it and then when we'd get</p>	<p style="text-align: right;">Page 37</p> <p>1 I couldn't believe.</p> <p>2 Q. How did things change as far as you 3 were concerned?</p> <p>4 A. Like I said, we would see that it 5 came. We, meaning myself and, you know, all the 6 other prisoners, that it came from the county, 7 our clothes only, the clothing section of it 8 would come, and then they would explain to us how 9 to get it home if we wanted to, they being IDOC. 10 But then after that, Cook County Jail kept saying 11 they were going to keep doing it the same way, 12 but they were, like, I don't know, around '5, '6, 13 or '7, 2005, 2006, 2007. Then it wasn't -- we 14 wouldn't see it in prison no more, but yet they 15 would say it was going to follow. I'm talking 16 about the clothes, okay. And that's -- there it 17 is.</p> <p>18 Q. All right. During your stays at Cook 19 County Jail when you did get transferred to IDOC, 20 were you aware that you could designate an 21 individual to pick up your property that could 22 not go to IDOC within a certain timeframe?</p> <p>23 A. I remember that. I remember that.</p> <p>24 Q. And did you understand that rule, 25 that if you didn't designate someone to retrieve</p>

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<p style="text-align: right;">Page 38</p> <p>1 the property, that it could not be sent to IDOC, 2 that it would you say -- your property would be 3 destroyed or done away with after a certain time 4 period? 5 A. I don't know about a time period. I 6 don't remember that. 7 Q. Okay. So Mr. Velleff, I'm going to 8 share a screen with you. First and foremost -- 9 we'll go off of the record for a sec here. 10 Mr. Velleff, can you see what is 11 marked as Exhibit A in the lower right-hand 12 corner? 13 A. Lower right-hand corner? 14 Q. Right. The title of the document 15 that I'm hoping you can see is Answer to 16 Interrogatories of Plaintiff Ted Velleff? 17 A. No. That's lower left-hand corner. 18 I don't mean to be wise or nothing. 19 Q. Okay. For me, it is right. You see 20 Exhibit A in the lower left? 21 A. Yeah. 22 MR. FLAXMAN: I had it larger on my 23 computer and maybe Mr. Velleff could look at it 24 there. 25 Q. We can go back on, if we weren't</p>	<p style="text-align: right;">Page 40</p> <p>1 answers to interrogatories truthful and accurate? 2 A. Yes, sir. 3 Q. And you signed off on them on page 4 six and what you are stating for us today is they 5 are true and accurate? 6 A. I did, sir. 7 Q. Okay. I just want to ask you about a 8 few of these. 9 As far as your experience with your 10 property as you initially detailed, do you know 11 of other individuals that experienced the same 12 thing you did? 13 A. Of course. Yes, I do. 14 Q. Okay. And would these be individuals 15 that went from Cook County Jail to IDOC? 16 A. Yeah, or otherwise. You know, I 17 mean, when you're in jail, you're talking to 18 people. You hear them complaining about stuff 19 and they might have -- when I left, they might 20 have still been sitting there. You understand 21 what I'm saying, right? And it goes either way. 22 Either way. Yes is the answer and sometimes no, 23 they were still sitting there when I left, but 24 you understand what I mean? 25 Q. Yeah. So there were times since the</p>
<p style="text-align: right;">Page 39</p> <p>1 already. 2 A. I can read it. I can read it on the 3 computer here. 4 Q. Mr. Velleff, what I'm showing you is 5 a document entitled Answer to Interrogatories of 6 Plaintiff Ted Velleff; do you see that? 7 A. I do. 8 Q. And that document is marked as 9 Exhibit A, correct? 10 A. Correct. 11 Q. And then I'm going to page through it 12 and there's six pages of -- 13 A. I'm seeing it. 14 Q. -- question and answer, and then your 15 signature is there, correct? 16 A. That's me, yeah. 17 Q. All right. And that's -- the 18 document is dated June 6th, 2021, correct? 19 A. Correct. 20 Q. And these were interrogatories we 21 sent you, as far as you understand, and for you 22 to answer the interrogatories related to this 23 case, correct? 24 A. Correct. 25 Q. Now, as you sit here, are these</p>	<p style="text-align: right;">Page 41</p> <p>1 criminal history we went over from 1978 to the 2 present where you would go to Cook County Jail 3 and then you would not be transported to IDOC, 4 right? 5 A. There were a couple of those times, 6 yes, sir. Excuse me. 7 Q. And as far as your property was 8 concerned that you believe came with you to Cook 9 County Jail, you would be able to leave with that 10 property once you left the jail? 11 A. Not all of the time, no. A couple of 12 times, I -- no. 13 Q. And what happened in cases where you 14 didn't leave with your property? 15 A. They said it was at this location, 16 the streets of Homan and Fillmore, the second 17 police station, Homan and Fillmore. 18 Q. The Chicago police station? 19 A. Yes, sir. 20 Q. So sometimes you would be 21 incarcerated at Cook County Jail and then be 22 released from Cook County Jail, sometimes you 23 would be given your property that you came in 24 with and sometimes Cook County Jail personnel 25 would tell you that your property was with a</p>

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<p style="text-align: right;">Page 42</p> <p>1 police department?</p> <p>2 A. Right. All of the time they tell us</p> <p>3 that. I don't know that to be true all of the</p> <p>4 time. All the time they tell us about that Homan</p> <p>5 and Fillmore thing, the police station located at</p> <p>6 Homan and Fillmore.</p> <p>7 Q. Okay. So sometimes you would go to</p> <p>8 Homan and Fillmore and your property would be</p> <p>9 there and sometimes your property would not be</p> <p>10 there?</p> <p>11 A. Put it this way, I can be more</p> <p>12 precise and exact. One time it was there. One</p> <p>13 time.</p> <p>14 Q. And then other times, how many other</p> <p>15 times was it not there?</p> <p>16 A. A couple. I'd say two, three.</p> <p>17 Q. Now, during your history of going in</p> <p>18 and out of Cook County Jail and also going to</p> <p>19 IDOC, these arrests and these convictions that we</p> <p>20 talked about since 1978, was it one particular</p> <p>21 police department that would arrest you or were</p> <p>22 you arrested by multiple police departments?</p> <p>23 A. It was multiple -- it wasn't one</p> <p>24 particular. It was multiple, but it wasn't a lot</p> <p>25 of different ones. I'm just saying, ironically,</p>	<p style="text-align: right;">Page 44</p> <p>1 and that one arrest with Evanston, the arresting</p> <p>2 officers would -- when they arrested you, would</p> <p>3 process you and in processing you they would take</p> <p>4 some of your property, right?</p> <p>5 A. Oh, yeah.</p> <p>6 Q. Okay. And then normally what would</p> <p>7 they do with that property?</p> <p>8 A. It was always, to my recollection,</p> <p>9 always, from way back in the day until present</p> <p>10 today, that they would, you know -- or actually,</p> <p>11 let me be careful how I answer this. I can't</p> <p>12 even remember back in the day. When I say back</p> <p>13 in the day, I'm talking about late '70s, '80s.</p> <p>14 But anyway, of recent, of the millennium, let's</p> <p>15 say, okay. In the millennium, they would -- the</p> <p>16 only thing they sent to the -- rather, the only</p> <p>17 thing they would keep and keep in the police</p> <p>18 station was stuff like cellphones. They stopped</p> <p>19 sending the cell phones to the county at some</p> <p>20 point. I can't -- even though I'm good with my</p> <p>21 dates, but I can't remember everything, you know.</p> <p>22 Q. Okay. But it --</p> <p>23 A. It stopped with the cellphones at</p> <p>24 some point, they did.</p> <p>25 Q. We'll say in the last 20 years when</p>
<p style="text-align: right;">Page 43</p> <p>1 it was -- it was one many of the times, but it's</p> <p>2 been two or three if you add all of them.</p> <p>3 Q. One of those police officers was the</p> <p>4 Chicago Police Department?</p> <p>5 A. It was always Chicago Police</p> <p>6 Department. I was just talking -- I thought you</p> <p>7 were getting down to districts. I'm sorry.</p> <p>8 Maybe I took that question wrong. It was always</p> <p>9 Chicago Police Department. It was never -- it</p> <p>10 was never, like, you know -- you know, it wasn't</p> <p>11 suburbs. It was still Cook County.</p> <p>12 Q. All of the convictions that we talked</p> <p>13 about since 1978, you believe all of those</p> <p>14 arrests were by the Chicago Police Department?</p> <p>15 A. Believe, I know -- you know what?</p> <p>16 Oh, you mean specifically ending up in IDOC? Is</p> <p>17 that the specific?</p> <p>18 Q. Well, let's just be specific, ending</p> <p>19 up at Cook County Jail.</p> <p>20 A. No, there was -- even still -- with</p> <p>21 the exception of there was an Evanston. There</p> <p>22 was an Evanston one. There was an Evanston one</p> <p>23 way back in '80.</p> <p>24 Q. Okay. And so when you did have the</p> <p>25 multiple arrests with Chicago Police Department</p>	<p style="text-align: right;">Page 45</p> <p>1 you were arrested and then sent to Cook County</p> <p>2 Jail, sometimes property would -- your property</p> <p>3 would follow you to the Cook County Jail,</p> <p>4 correct?</p> <p>5 A. Sometimes, yes, sir.</p> <p>6 Q. And sometimes some of that property</p> <p>7 would be kept by the arresting police department?</p> <p>8 A. Right.</p> <p>9 Q. Okay. And then as far as the</p> <p>10 property that did end up at Cook County Jail,</p> <p>11 what types of things would essentially follow you</p> <p>12 to Cook County Jail?</p> <p>13 A. Okay. Get ready for this; your keys,</p> <p>14 any keys, because I guess they figure, which I've</p> <p>15 got to give credit where credit is due, it makes</p> <p>16 sense, they figure if you get released, you've</p> <p>17 got to be able to get into your house, your</p> <p>18 apartment. So anyway, the answer is your keys</p> <p>19 and one ID, and there you have it.</p> <p>20 Q. And then during those times when you</p> <p>21 were sent to Cook County Jail, but then also</p> <p>22 sentenced to IDOC --</p> <p>23 A. But that answer -- I'm sorry. I'm</p> <p>24 sorry. I'm sorry. I'm sorry for cutting you</p> <p>25 off. That answer I just gave you, keys and one</p>

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<p style="text-align: right;">Page 46</p> <p>1 ID, that's what I know since I've been home for 2 these almost three years now. I don't know about 3 before.</p> <p>4 Q. So it was your understanding, though, 5 during we'll say the last 20 years when you were 6 sent from Cook County Jail to IDOC, some of your 7 property could not go with you to IDOC because of 8 IDOC rules?</p> <p>9 A. I just kind of figured that out. I 10 don't know exactly. We are talking like ten or 11 15 minutes back on how they -- I noticed the 12 change in the early millennium like around '05, 13 '06, '07, that, you know, we were getting told a 14 story. I don't want to say lied to. I'm not 15 scared to say that, you know. You know what I 16 mean? I mean, meaning specifically that it 17 wasn't being done what they said they were doing. 18 They being the sheriffs at the Cook County Jail.</p> <p>19 Q. And what did the sheriff tell you 20 about your property?</p> <p>21 A. That it was going to follow us to 22 IDOC.</p> <p>23 Q. And sometimes would the property 24 follow you to IDOC?</p> <p>25 A. It stopped. It stopped. Yeah. That</p>	<p style="text-align: right;">Page 48</p> <p>1 stated you wanted to give up or donate your 2 property just before you were shipped out to 3 IDOC?</p> <p>4 A. I don't recall that. If I did, in my 5 signature, I could tell you if I've got my 6 signature on there, but I don't recall.</p> <p>7 Q. All right. I'll show you some 8 documents. Is it true that sometimes you might 9 not want property to follow you from the Cook 10 County Jail to IDOC because you did not want to 11 deal with the property, you did not want to 12 handle your property?</p> <p>13 A. I can see -- I can see that -- I can 14 vaguely remember that happening once, because it 15 was summer and I didn't have -- I didn't have -- 16 I mean, I wasn't naked, but you know what I'm 17 saying? In other words, I had something like a 18 pair of shorts on that I didn't care about, but I 19 remember one time that happened.</p> <p>20 Q. All right. Were there any other 21 times where maybe clothing that you believed 22 followed you into Cook County Jail was clothing 23 that you did not want?</p> <p>24 A. Not that I recall. I mean, not that 25 I recall.</p>
<p style="text-align: right;">Page 47</p> <p>1 sometimes being '01, '02, '03, '04 and then it 2 gets leery after that.</p> <p>3 Q. On all these times where you were 4 sent from Cook County Jail to IDOC, were there 5 times just before you were sent from Cook County 6 Jail to IDOC that you stated to jail personnel 7 that you did not want any of your property?</p> <p>8 A. No, I don't recall that.</p> <p>9 Q. Did you ever do that?</p> <p>10 A. Say it again. No. I'm sorry. Say 11 it again.</p> <p>12 Q. In the times that you were sent from 13 Cook County Jail to IDOC, did you ever state to 14 any jail personnel that you did not want any 15 property to go follow you to IDOC?</p> <p>16 A. Okay. To answer that, I've got ask 17 this, because I -- when you say did I ever state 18 to any jail personnel, meaning either side or 19 just Cook County or even IDOC?</p> <p>20 Q. We'll just talk about Cook County for 21 now, so Cook County Jail personnel.</p> <p>22 A. No. The answer is no. I don't 23 recall saying I don't want my property to Cook 24 County Jail sheriffs.</p> <p>25 Q. Did you ever sign anything that</p>	<p style="text-align: right;">Page 49</p> <p>1 Q. Let's go back -- let's go back to 2 Exhibit A. And interrogatory No. 3 said describe 3 specifically the injury or damages that you claim 4 are the result of any actions by the defendants 5 or others referenced in your second amended 6 complaint. The answer is property that had been 7 seized from you was inventoried in 2011 as part 8 of the work performed by HIRT, H-I-R-T. This 9 property included cellphone, Illinois driver's 10 license, my social security card. The HIRT 11 inventory shows that my property had been 12 assigned numbers and there's listed a series of 13 numbers, and then you go onto state, my 14 understanding is that the sheriff held onto this 15 property until sometime in 2018 when the sheriff 16 ordered the property be destroyed. Part of the 17 damages I seek in this case is compensation for 18 loss of this stolen property. You also go onto 19 state I also had clothing, identification cards, 20 keys, belts, shoelaces each time that I entered 21 the jail. I seek compensation for the taking of 22 this property. Did I read that accurately?</p> <p>23 A. Yes, sir.</p> <p>24 Q. Okay. What is HIRT, H-I-R-T?</p> <p>25 A. I'm not sure what that acronym -- I</p>

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<p style="text-align: right;">Page 50</p> <p>1 mean, that just -- to my recollection, they</p> <p>2 worked with the Cook County Jail people about</p> <p>3 inventory or something, yeah.</p> <p>4 Q. Did you ever get any type of</p> <p>5 notification from HIRT?</p> <p>6 A. That, I didn't, no, sir.</p> <p>7 Q. And as far as the numbers that are</p> <p>8 listed, the assigned numbers listed in answer No.</p> <p>9 3, where do those numbers come from?</p> <p>10 A. I'm not sure I understand.</p> <p>11 Q. Okay. So on the top of page two,</p> <p>12 which is an answer to interrogatory No. 3?</p> <p>13 A. Can I open this up, Mr. Flaxman?</p> <p>14 Q. Not during the deposition.</p> <p>15 A. I mean, on the phone. Can I make it</p> <p>16 wider? I'm asking you that. Can I make it wider</p> <p>17 where I can read it better? Can I make the</p> <p>18 screen wider?</p> <p>19 Q. Let me see if I can do that. Is that</p> <p>20 better?</p> <p>21 A. You did it. You did it. Okay. So</p> <p>22 what do I want to read?</p> <p>23 Q. Part of answer No. 3 states the HIRT</p> <p>24 inventory shows my property had been assigned</p> <p>25 numbers and --</p>	<p style="text-align: right;">Page 52</p> <p>1 answer?</p> <p>2 A. I've got to think for a minute. Give</p> <p>3 me a second. That's my answer, yes.</p> <p>4 Q. Okay. All right. And then we go</p> <p>5 onto No. 11, and we ask you please specifically</p> <p>6 describe the property you believe is owed to you</p> <p>7 regarding your second amended complaint and then</p> <p>8 you list miscellaneous clothing, cellphone</p> <p>9 identification cards, keys, belts, shoelaces. My</p> <p>10 recollection might be refreshed by the property</p> <p>11 inventory forms from the jail and from the</p> <p>12 arresting authorities; do you see that?</p> <p>13 A. I do.</p> <p>14 Q. And that is an accurate answer?</p> <p>15 A. Yes, sir.</p> <p>16 Q. Okay. Now, today, I can represent to</p> <p>17 you that we did tender some of your property to</p> <p>18 your attorney, Mr. Flaxman. Were you able to see</p> <p>19 any of the property that was returned to your</p> <p>20 attorney today?</p> <p>21 A. Yeah, it's right here. It's some</p> <p>22 shoelaces and a belt.</p> <p>23 Q. Okay. I can represent to you that</p> <p>24 there was a ship date of January 24th, 2014, on</p> <p>25 the bag. And can you confirm that this is your</p>
<p style="text-align: right;">Page 51</p> <p>1 A. Oh, okay. I see it.</p> <p>2 Q. Okay. Where did you get those</p> <p>3 numbers?</p> <p>4 A. I don't have a clue.</p> <p>5 Q. Okay. All right. We'll move on.</p> <p>6 And then we go to answer No. 6 that we've talked</p> <p>7 about, and it looks like a nice detail of your</p> <p>8 prior convictions, at least up to -- dating back</p> <p>9 to 2001. Is that accurate?</p> <p>10 A. Okay. Yeah.</p> <p>11 Q. So that's -- an answer to six is</p> <p>12 accurate to the best of your memory?</p> <p>13 A. Yeah.</p> <p>14 Q. All right. And if we go forward --</p> <p>15 A. I see it.</p> <p>16 Q. If we go forward to No. 10, it states</p> <p>17 did you designate any individual or entity at any</p> <p>18 time to pick up any of your personal items you</p> <p>19 claim were taken from you by any entity from 2010</p> <p>20 to the present related to your second amended</p> <p>21 complaint; if so, please state the full name,</p> <p>22 address and telephone number of any individual or</p> <p>23 entity who is designated to pick up any of your</p> <p>24 personal items and the date of the designation or</p> <p>25 request, and you say no. That is an accurate</p>	<p style="text-align: right;">Page 53</p> <p>1 property that was returned to you?</p> <p>2 A. Yeah, I'll confirm it. I need a</p> <p>3 Kleenex. I need Kleenex. I'm asking</p> <p>4 Mr. Flaxman.</p> <p>5 Q. Okay. We'll take a little break.</p> <p>6 A. No. No, I don't need a break. I</p> <p>7 just need a Kleenex.</p> <p>8 Q. All right.</p> <p>9 (Recess taken.)</p> <p>10 Q. We'll go back on. In that return of</p> <p>11 property that you see today, there's a black</p> <p>12 belt, an Illinois identification card with your</p> <p>13 face on it, correct?</p> <p>14 A. Yeah. Those three things, yeah.</p> <p>15 Q. And then there's also white</p> <p>16 shoelaces?</p> <p>17 A. Yeah, that being the third thing.</p> <p>18 Q. And there's various paperwork, some</p> <p>19 from Presence Help, some that's got the word</p> <p>20 caregiver on it, a Chicago Police Department</p> <p>21 personal property receipt, a Chicago Police</p> <p>22 Department property inventory with a number</p> <p>23 13009495, and also a notice to property owner or</p> <p>24 claimant from the Chicago Police Department. Do</p> <p>25 you see all that?</p>

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<p style="text-align: right;">Page 54</p> <p>1 A. Yes, sir.</p> <p>2 Q. Okay. And you can identify that as</p> <p>3 your property?</p> <p>4 A. I did. Uh-huh.</p> <p>5 Q. Okay. We're going to go onto what</p> <p>6 we've marked as Exhibit B. Do you see Exhibit B</p> <p>7 right there in front of you?</p> <p>8 A. I do.</p> <p>9 Q. All right. This document has a title</p> <p>10 on it Cook County Department of Corrections and</p> <p>11 then it has the address of 2700 South California</p> <p>12 in Chicago, Illinois, and then it's got a date of</p> <p>13 8/1/17 and detainee's name Theodore Velleff, and</p> <p>14 then a shipment date 8/1/17; do you see that?</p> <p>15 A. I do.</p> <p>16 Q. And then there's a G409 written</p> <p>17 across the top of that document, right?</p> <p>18 A. Right. Right. Right.</p> <p>19 Q. And then beneath that, it's got the</p> <p>20 word "keep," k-e-e-p. Do you see that?</p> <p>21 A. I'm sorry. Say it again.</p> <p>22 Q. Do you see the word k-e-e-p on the</p> <p>23 top?</p> <p>24 A. K-e-e-p, no.</p> <p>25 Q. So the top right-hand, it says --</p>	<p style="text-align: right;">Page 56</p> <p>1 you print that?</p> <p>2 A. That, I don't remember for sure.</p> <p>3 Q. Okay. And then it's got detainee ID</p> <p>4 20160927058; do you see that?</p> <p>5 A. I see it.</p> <p>6 Q. And whenever you did go to the Cook</p> <p>7 County Jail, were you assigned a specific</p> <p>8 detainee ID number?</p> <p>9 A. Everybody is.</p> <p>10 Q. Okay. And each time you went in, it</p> <p>11 was a different number?</p> <p>12 A. Oh, yeah.</p> <p>13 Q. Okay. Now, the bottom under the</p> <p>14 perforation that looks like a lot of dotted</p> <p>15 lines, it says, "I, Velleff, Theodore, detainee,</p> <p>16 ID number listed" and then it says, "Do hereby</p> <p>17 agree that for any reason this letter mailed by</p> <p>18 myself does not reach the designated person</p> <p>19 and/or the designated person does not respond</p> <p>20 within 45 days from the date of the shipment, see</p> <p>21 above, my property will be disposed of." Do you</p> <p>22 see that writing?</p> <p>23 A. I do.</p> <p>24 Q. And then beneath that, it's</p> <p>25 detainee's signature, there's an X and then it</p>
<p style="text-align: right;">Page 55</p> <p>1 you've kind of got to tilt your head a bit, it</p> <p>2 says k-e-e-p.</p> <p>3 A. Oh, okay. Yeah, now, I do, yeah.</p> <p>4 It's under the G409.</p> <p>5 Q. Right.</p> <p>6 A. It's under it. My fault. My fault.</p> <p>7 Q. Sure. No problem. If you look at</p> <p>8 the top right-hand corner, that black marker,</p> <p>9 that G409 and keep, did you write either of those</p> <p>10 things, G409 or keep?</p> <p>11 A. No.</p> <p>12 Q. Okay. And --</p> <p>13 A. Not that I recall.</p> <p>14 Q. You do recall being at the Illinois</p> <p>15 Department of Corrections -- strike that. You do</p> <p>16 recall on 8/1/17, you were still at the Cook</p> <p>17 County Jail?</p> <p>18 A. I recall that day.</p> <p>19 Q. Okay. So this -- this is the day --</p> <p>20 can you confirm that you are sent from Cook</p> <p>21 County Jail to IDOC?</p> <p>22 A. The last time in life, yeah.</p> <p>23 Q. And then when we go to the bottom of</p> <p>24 Exhibit B, it says, "I, Theodore Velleff." It's</p> <p>25 printed out your name, Velleff, Theodore. Did</p>	<p style="text-align: right;">Page 57</p> <p>1 says Ted Velleff; is that your signature?</p> <p>2 A. It is.</p> <p>3 Q. Okay. And then you wrote that</p> <p>4 signature and the date below it?</p> <p>5 A. Well, I know I wrote the signature.</p> <p>6 Q. Okay. And then there's an officer --</p> <p>7 it says officer's signature and star number,</p> <p>8 Buscimi, B-u-s-c-i-m-i, and then his number is</p> <p>9 16557. Do you see that?</p> <p>10 A. I do.</p> <p>11 Q. Do you remember that particular</p> <p>12 officer or deputy?</p> <p>13 A. I can't say that I do.</p> <p>14 Q. All right. So in signing this back</p> <p>15 on 8/1/17, you understood the policy of the Cook</p> <p>16 County Jail that if a designated person did not</p> <p>17 respond within 45 days that your property would</p> <p>18 be disposed of?</p> <p>19 A. I must have on that day remembered</p> <p>20 something -- I mean that, you know.</p> <p>21 Q. Okay. Were you acknowledging and do</p> <p>22 you acknowledge today that you knew that policy?</p> <p>23 A. I mean -- okay. The way you ask that</p> <p>24 question, you mean given for that day at that</p> <p>25 time going to prison and leaving Cook County</p>

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<p style="text-align: right;">Page 58</p> <p>1 Jail?</p> <p>2 Q. Right.</p> <p>3 A. Yeah. I realize it that day, yeah.</p> <p>4 By reading that. By reading that.</p> <p>5 Q. So you read that on that day, 8/1/17,</p> <p>6 you signed off and said, yes, I understand?</p> <p>7 A. Yeah, I did.</p> <p>8 Q. Okay. And also there's wording up</p> <p>9 above that states please be advised of the</p> <p>10 detainee named above has been transferred to the</p> <p>11 Illinois Department of Corrections and then it</p> <p>12 says if he/she were unable to take all of his or</p> <p>13 her personal belongings to the penitentiary with</p> <p>14 him/her and have a --</p> <p>15 A. I see it.</p> <p>16 Q. Okay. So you see that writing up</p> <p>17 above, correct?</p> <p>18 A. Yeah. Correct.</p> <p>19 Q. All right. On 8/1/17, did you</p> <p>20 designate anyone to come and get your property?</p> <p>21 A. I don't believe I did.</p> <p>22 Q. Okay. You understood that you could</p> <p>23 have, but you chose not to; is that accurate?</p> <p>24 A. I'm thinking that it is.</p> <p>25 Q. Okay. And back in August of 2017,</p>	<p style="text-align: right;">Page 60</p> <p>1 Q. Okay. And as far as this particular</p> <p>2 transaction is concerned, did you ever go back or</p> <p>3 contact the sheriff about this particular --</p> <p>4 A. This one I can honestly say that I</p> <p>5 felt the same way that day as I remembered that,</p> <p>6 no, I didn't care.</p> <p>7 Q. Okay. So as of August 2017, the</p> <p>8 property that may have been there with you, you</p> <p>9 were not concerned about?</p> <p>10 A. We're still talking about the same</p> <p>11 date on this paper, right?</p> <p>12 Q. Right.</p> <p>13 A. Yeah. August -- July 31st or</p> <p>14 August 1st?</p> <p>15 Q. August 1st.</p> <p>16 A. Yeah, yeah. It says 8/1. Correct.</p> <p>17 Correct.</p> <p>18 Q. All right. So let's move onto</p> <p>19 Exhibit C. Do you see Exhibit C there?</p> <p>20 A. I do.</p> <p>21 Q. All right. It's a somewhat similar</p> <p>22 form. It's got a different date on it. It says</p> <p>23 1/24/2014; do you see that?</p> <p>24 A. Yes, I do.</p> <p>25 Q. And then it has detainee name Ted</p>
<p style="text-align: right;">Page 59</p> <p>1 you did understand also that some property could</p> <p>2 not go with you to the Illinois Department of</p> <p>3 Corrections?</p> <p>4 A. You know what, again, I don't mean</p> <p>5 this like, you know, in this negative way, but at</p> <p>6 that point, I didn't -- things were changing.</p> <p>7 It's like I really didn't care, you know,</p> <p>8 specifically on this date and this last case</p> <p>9 because I knew something was going to change, and</p> <p>10 I'm not trying to mix you up and bore you with no</p> <p>11 long story or nothing, but I'm just saying I</p> <p>12 acknowledged all that and I didn't even care.</p> <p>13 Q. Okay. So on that date, did you</p> <p>14 decide to give up any property you may have had</p> <p>15 at the jail that could not follow you to IDOC?</p> <p>16 A. Well, I realized it in my own mind</p> <p>17 that that could happen because I read that and</p> <p>18 signed it.</p> <p>19 Q. Okay. So you knew that if you didn't</p> <p>20 designate someone to pick it up, it certainly</p> <p>21 could have been disposed of?</p> <p>22 A. That's what they're saying.</p> <p>23 Q. All right. And you were aware of the</p> <p>24 45-day date?</p> <p>25 A. Yes, sir.</p>	<p style="text-align: right;">Page 61</p> <p>1 Velleff and then shipment date 1/24/2014?</p> <p>2 A. Yeah.</p> <p>3 Q. All right. And so is that also a</p> <p>4 date that you were sent --</p> <p>5 A. You know what? I don't believe in</p> <p>6 that shipment date.</p> <p>7 Q. You think that's the wrong date?</p> <p>8 A. I think that's the wrong date.</p> <p>9 Q. Why do you think that?</p> <p>10 A. Because the only Super Bowl that I</p> <p>11 never saw is when Peyton Manning got clobbered by</p> <p>12 Russell Wilson, whether you remember or follow</p> <p>13 football or not, because, you know, there's no TV</p> <p>14 in receiving. There's TVs in the joint all over</p> <p>15 the place, but not receiving, and I missed that</p> <p>16 and I was sent in late December of '13 and you</p> <p>17 know. Yeah. Somebody got the date wrong.</p> <p>18 Somebody got the date wrong there. If they</p> <p>19 looked at my, whatever it's called, you know, my</p> <p>20 jacket and -- well, you know what? And whether</p> <p>21 this proves anything to anybody or not, if you</p> <p>22 look at the date of conviction, you're always,</p> <p>23 barring some like a COVID breakout, you know, and</p> <p>24 that only happened last year. You get the gist</p> <p>25 of what I'm saying? You only leave the Cook</p>

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<p style="text-align: right;">Page 62</p> <p>1 County Jail and go to IDOC as long as you don't 2 got no cases pending barring a COVID breakout, 3 like I said, within a week or less. So the proof 4 would be when the conviction -- if you see a 5 conviction in December of '13, which I believe 6 you will because I got there right before 7 Christmas of '13 so that date is wrong. 8 Q. We'll go back to Exhibit C, but let's 9 right now go back to Exhibit A, to that point. 10 So if we look to answer to No. 6 here, and I'll 11 put my cursor here, it states in your answer as 12 far as the convictions and date of adjudication 13 and sentencing, it says January 23rd, 2014 IDOC, 14 five years identity theft, Circuit Court of Cook 15 County and then it's got 13 CR 008201. Do you 16 see that? 17 A. Okay. Okay. Now what? 18 Q. Okay. Do you think that's an 19 accurate statement of your second or third from 20 last conviction? 21 A. Get the date again, just the date of 22 what you're -- 23 Q. So the date -- and this is the third 24 line in answer to No. 6 for Exhibit A, the date 25 states January 23, 2014. Do you see that?</p>	<p style="text-align: right;">Page 64</p> <p>1 interrogatories answers jibe with the Exhibit C 2 as far as the date is concerned? 3 A. Yeah. I'm just thinking -- yeah. 4 It's just weird to me -- excuse me for being 5 honest and wanting to share, but neither one of 6 us I guess could go anywhere with it, but what I 7 am saying is I remember going down December of 8 '13 because I ate a Christmas meal. But other 9 than that, yeah, it jibes just like what you 10 said, when I would leave Cook County and go to -- 11 the next day, but you know it's like -- 12 Q. Okay. We'll move on. Let's talk 13 about Exhibit C again. And by detainee 14 designator or designator address, it's got an N 15 and a slash and an A. Do you see that? 16 A. I see it. 17 Q. Did you put that N slash A? 18 A. I don't recall putting that. 19 Q. Do you recall ever doing that on one 20 of these forms, saying not applicable, which I 21 believe is what N/A stands for? 22 A. Yeah. I mean -- I mean this has got 23 nothing to do with this case, okay. I mean, I 24 use N/A in life so I'm familiar with it. I'm 25 just saying that to say that, but I don't recall</p>
<p style="text-align: right;">Page 63</p> <p>1 A. Yeah, I see it. 2 Q. Okay. All right. So if we go to 3 Exhibit C, which is dated 1/24/2014, so that 4 would be a day after your conviction, correct? 5 A. Which was given the next day 1/24. 6 Yeah. Yeah. Yeah. 7 Q. Okay. So does the 1/24/14 date seem 8 accurate as far as when you went from Cook County 9 Jail to IDOC? 10 A. No. It doesn't because I said 11 December seems more accurate. I ate Christmas 12 meal in NRC. NRC is Stateville, in receiving. 13 Q. Okay. So you think the date is 14 incorrect, but as far as your answers to 15 interrogatories are concerned, the dates seem to 16 line up, don't that? 17 A. I'm not sure I know what you mean. 18 Q. Well, when you have a conviction on 19 January 23rd, 2014, and then you leave the Cook 20 County Jail for IDOC to serve that five-year 21 sentence the next day -- 22 A. That makes sense. Yes. That can 23 happen the way I explained it. Yes. All day 24 long it can happen that way. 25 Q. It appears that at least your</p>	<p style="text-align: right;">Page 65</p> <p>1 ever putting an N/A. I mean, maybe I did, but I 2 don't recall it -- 3 Q. Okay. 4 A. -- for these papers. 5 Q. It goes onto talk about please be 6 advised that the detainee named above has been 7 transferred to the Illinois Department of 8 Corrections. He was unable the take all of his 9 personal belongs, clothing, to the penitentiary 10 with him and has appointed you as his designator. 11 Do you see that wording? 12 A. I see it. I see it. 13 Q. And then it has instructions, talks 14 about division five and then it has a similar 15 wording to Exhibit B, and it states, "I, Ted 16 Velleff, detainee number 20130925133, do hereby 17 agree that for any reason this letter mailed by 18 myself does not reach the designated person 19 and/or the designated person does not respond 20 within 30 days from the shipment date, see above, 21 my property will be disposed of." Do you see 22 that? 23 A. I see it. 24 Q. And then that signature that states 25 detainee's signature, that was yours, correct?</p>

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<p style="text-align: right;">Page 66</p> <p>1 A. It looks like it.</p> <p>2 Q. Did you date it 1/24/2014?</p> <p>3 A. I see it dated. Yeah. I don't know</p> <p>4 if I dated it.</p> <p>5 Q. Okay. And then it's got an officer's</p> <p>6 signature and it looks like Davis, correct?</p> <p>7 A. It does.</p> <p>8 Q. Do you recall Officer or Deputy</p> <p>9 Davis?</p> <p>10 A. I don't.</p> <p>11 Q. I'm sorry?</p> <p>12 A. I said no, sir, I don't.</p> <p>13 Q. Okay. But again, back in -- either</p> <p>14 2013 or 2014, you were aware that you could</p> <p>15 designate someone to pick up your property that</p> <p>16 would not be traveling with you to IDOC, correct?</p> <p>17 A. If I read that, I had to, yeah.</p> <p>18 Q. Okay. And so you were aware during</p> <p>19 your stays at Cook County Jail that this was the</p> <p>20 policy of the jail when you were being</p> <p>21 transferred to IDOC?</p> <p>22 A. Yeah. In the latter -- like I said,</p> <p>23 in the latter part of -- it was different from</p> <p>24 the early millennium to the later. Yeah. They</p> <p>25 changed it.</p>	<p style="text-align: right;">Page 68</p> <p>1 property and not dispose of it?</p> <p>2 A. Yes. And I'm going to tell you</p> <p>3 something else -- and it's on record, but</p> <p>4 probably no records that you have, but believe</p> <p>5 me, it can be found, because I'm not lying to</p> <p>6 you, many times I worked -- I worked, because you</p> <p>7 saw how much I went to jail, so I don't like to</p> <p>8 sit around. One thing about me, at least --</p> <p>9 well, anyway, I worked in the clothing part of</p> <p>10 the -- I've worked in there a couple times over</p> <p>11 the years so --</p> <p>12 Q. Okay.</p> <p>13 A. I just thought I had to add that.</p> <p>14 Q. Now, during this particular stay at</p> <p>15 the Cook County Jail when you did go to IDOC</p> <p>16 either in December 2013 or January of 2014 as</p> <p>17 Exhibit C states, were you at all interested in</p> <p>18 getting any property back related to this</p> <p>19 particular Cook County stay in December of 2013</p> <p>20 and January of 2014?</p> <p>21 A. I'm trying -- as I think -- before I</p> <p>22 answer you, I'm thinking of when I got arrested</p> <p>23 on that case because if it was winter because I'm</p> <p>24 most interested in my -- a flashback -- my memory</p> <p>25 holds what I'm sorry for myself for getting</p>
<p style="text-align: right;">Page 67</p> <p>1 Q. As of at least 2010, you were aware</p> <p>2 that there was a policy as far as being able to</p> <p>3 designate someone to pick up your property and</p> <p>4 that if that designated individual was not or did</p> <p>5 not pick up the property your property could be</p> <p>6 disposed of?</p> <p>7 A. You know, I don't know how you take</p> <p>8 this, but I'm just going to be honest with you, I</p> <p>9 thought for a long time that they were -- as</p> <p>10 crazy as this sounds -- because I heard this from</p> <p>11 so many people, so I didn't know what to</p> <p>12 believe -- that they were still holding your</p> <p>13 stuff anyway even though they stated in these</p> <p>14 papers they're giving you, like you have in front</p> <p>15 of me, it'll be destroyed within, you know,</p> <p>16 sometimes it was 30 days -- am I nuts or sometimes</p> <p>17 it would say 30, sometimes it would say 45, but</p> <p>18 with the point being -- you get my point -- that</p> <p>19 they would keep it anyway, you know. And then I</p> <p>20 tell myself why am I hearing this, you would</p> <p>21 think they want to do it if they're saying if</p> <p>22 somebody doesn't pick it up. I don't know after</p> <p>23 that.</p> <p>24 Q. So it was your understanding that</p> <p>25 sometimes the sheriff would just keep the</p>	<p style="text-align: right;">Page 69</p> <p>1 caught and missing over the years is in the</p> <p>2 wintertime, like I said, you know, it's ironic a</p> <p>3 couple of times I got -- on this arrest, as I</p> <p>4 said, I'll have to get to the point -- this</p> <p>5 arrest was probably in the summer of '10 if I'm</p> <p>6 correct, so probably not as interested as I was</p> <p>7 in years before that, you know. So your question</p> <p>8 was, was I at all interested you said?</p> <p>9 Q. Right. In this particular</p> <p>10 transaction that we have as January of 2014, were</p> <p>11 you at all interested in getting any of your</p> <p>12 property back that you believe would not go with</p> <p>13 you to IDOC?</p> <p>14 A. I'm positive I was interested. All</p> <p>15 I'm saying is the thing I probably didn't have</p> <p>16 interest in, because, you know, there's always</p> <p>17 cellphones and ID, that's every time I got</p> <p>18 screwed on that. Every time. But as far as</p> <p>19 clothes, I wasn't. When it's summertime, I'm</p> <p>20 generally not interested in the clothes, but</p> <p>21 wintertime, I've got nice -- okay. You get the</p> <p>22 gist of that?</p> <p>23 Q. So sometimes you were interested --</p> <p>24 A. Clothes wise, no, but otherwise, yes,</p> <p>25 I was interested. ID and stuff -- see, this --</p>

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<p style="text-align: right;">Page 70</p> <p>1 what they would tell us out of their mouths, sir, 2 the sheriffs, that would be pertaining to clothes 3 only. They would give us this stuff, we'd read 4 it and sign it; whether we cared or not is a 5 horse of a different color, but they were just 6 talking about clothes. 7 Q. Was it your understanding, though, 8 during these transactions when you were going 9 from Cook County Jail to IDOC that sometimes it 10 was -- they referred to other items other than 11 clothes? 12 A. Maybe and probably. Maybe. But, 13 man. I've been so many times I got so sick of 14 it, never getting your stuff back. Like I said, 15 the only thing I didn't care about, which was 16 sometimes, was clothes and that's the only thing 17 I had no interest in and that's only sometimes 18 was clothes. 19 Q. During all of these times -- 20 A. It was just bogus. 21 Q. During all of these times when you 22 did go from Cook County Jail to IDOC, sometimes 23 it's my understanding that you would have some of 24 your belongings with you when you went down to 25 IDOC; is that accurate?</p>	<p style="text-align: right;">Page 72</p> <p>1 That's a fact. 2 Q. And when you did go to IDOC in the 3 last eleven years, how would that work once you 4 arrived at IDOC as far as your clothes or 5 belongings? 6 A. I mean, there was nothing to work. 7 There was nothing there. 8 Q. So you're saying you didn't have 9 anything on you? How did the clothes situation 10 work? 11 A. This was -- I didn't see any clothes 12 did not see any clothes there. I did not see any 13 clothes in IDOC. Capeesh? 14 Q. Okay. I'm talking about the clothes 15 on your body. 16 A. Those were Cook County Jail uniforms, 17 sir. 18 Q. Right. Did you have to change out of 19 the Cook County Jail uniform when you got to 20 IDOC? 21 A. Absolutely. 22 Q. What were you issued all these times 23 that you went to IDOC? 24 A. I'm really scratching my head to 25 where this pertains, but I'll answer you, prison</p>
<p style="text-align: right;">Page 71</p> <p>1 A. Yeah. In the early millennium, '01, 2 '02. 3 Q. But then how about after that? 4 A. No, I stopped seeing it, like I said 5 probably 30 minutes ago. 6 Q. From we'll say 2010 to the present 7 when you were transferred from Cook County Jail 8 to IDOC, first off, how were you dressed? What 9 did you have your body? 10 A. Well, technically, state shit. State 11 meaning Cook County Jail clothes. 12 Q. Okay. You would go down to IDOC with 13 the Cook County Jail clothes that you had to 14 wear? 15 A. Yes. Yes. Yes. Yes, sir. 16 Q. Were there times from 2010 to the 17 present where you had other property that you 18 owned with you when you went from the jail to 19 IDOC? 20 A. Not that I recall. 21 Q. So every time it's your understanding 22 that when you did go from Cook County Jail to 23 IDOC, you just had the Cook County clothes on 24 your body? 25 A. It was just not to my understanding.</p>	<p style="text-align: right;">Page 73</p> <p>1 issue because you're in prison now. 2 Q. Did it say IDOC on the back? 3 A. It might have, man. Yeah. Help me 4 out here, man. 5 Q. All right. I'm trying to get 6 details. 7 A. I mean, no. NO. I can only hold so 8 much, man. 9 ATTORNEY FLAXMAN: This might be a 10 good time to take a break. 11 ATTORNEY MIKHAIL: Should we take 12 ten? 13 ATTORNEY FLAXMAN: Yeah. 14 (Recess taken.) 15 Q. We'll go back on. Mr. Velleff, are 16 you ready to go? Mr. Velleff, are you ready? 17 A. I am. 18 (Discussion held off of the record 19 with Mr. Flaxman.) 20 Q. So Mr. Velleff, when we were looking 21 at Exhibit C, which was the 2014 form, are you 22 now with me that the date was 1/24/14? 23 A. I am. 24 Q. Okay. You are, all right. And that 25 would match up with the January 23rd, 2014,</p>

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<p style="text-align: right;">Page 74</p> <p>1 conviction for identity theft where you went down 2 to IDOC, sentenced to five years? 3 A. Correct. 4 Q. All right. So Mr. Velleff, during 5 all of these stays at Cook County Jail that did 6 end up with you being sent to IDOC on a sentence, 7 is it fair to say that sometimes you did not want 8 to retrieve the property of yours that was at 9 Cook County Jail and maybe there were other times 10 where you expected it to come down with you to I 11 IDOC? 12 A. That's a definite. You put that 13 correct. 14 Q. All right. Now, as far as Exhibit B 15 and C, the 2017, August 1, 2017, and then 16 January 24, 2014, is it fair to say with those 17 two shipments to IDOC from Cook County Jail that 18 you were agreeing that your property could be 19 disposed of by the Cook County Jail? 20 A. Yes, but only with clothes. 21 Q. Okay. So you're stating that you 22 were okay with them disposing of your clothes, 23 but not other things? 24 A. Precisely. 25 Q. Okay. And then as far as these two</p>	<p style="text-align: right;">Page 76</p> <p>1 Cook County Jail? 2 A. When I came home in '18? Yes. I 3 went and asked the phone and then went in person 4 because it was to no avail to ask about IDs and 5 phones and stuff like that. 6 Q. Okay. And what month in 2018 would 7 that have been? 8 A. October. 9 Q. Okay. Now, your last incarceration 10 in Cook County Jail when you got time considered 11 served for the retail theft, did you leave the 12 jail with your property? 13 A. I'm thinking. No. 14 Q. Are you missing any property from 15 that incarceration? 16 ATTORNEY FLAXMAN: Let me object 17 because that assumes that he left the jail when 18 he received time considered served and just to 19 make it clear, he was on electronic monitoring 20 and not in jail and got credit for that time. 21 Let him ask another question. 22 ATTORNEY DOMBROWSKI: Wait. Ken, you 23 can't testify, by the way. 24 MR. FLAXMAN: I'm not testifying. 25 I'm making a speaking objection.</p>
<p style="text-align: right;">Page 75</p> <p>1 incarcerations, first at Cook County Jail and 2 then at IDOC, just talking about the 2014 that is 3 Exhibit C and the 2017 that is Exhibit B, on 4 those two occasions did you ever go back to the 5 Cook County Jail or Cook County Jail personnel 6 either in writing, by phone or in person and ask 7 for your property? 8 A. Yes. 9 Q. And as far as the 2014 incarceration 10 when did you do that? 11 A. When I came home in '16. 12 Q. Okay. So when you -- do you remember 13 what month you came home in 2016 related to the 14 2014 incarceration? 15 A. I do, September. 16 Q. Okay. So September 2016, how did you 17 try to retrieve your property? 18 A. Both by, like I said, before phone 19 first and that's a runaround, I got basically 20 nothing, and the in-person thing, the same thing, 21 talk to this person, talk to -- we don't know 22 where it is, is the final answer from those 23 people at 26 and California. 24 Q. As far as the 2017 incarceration at 25 IDOC, did you try to retrieve any property from</p>	<p style="text-align: right;">Page 77</p> <p>1 A. I figured he said it meaning this -- 2 Q. Okay. Let me ask you about the 3 March 30, 2021, conviction for retail theft. So 4 you answer in No. 6 was March 30, 2021 time 5 considered served 189 days, was that time served 6 at Cook County Jail? 7 A. No, that's what I was getting ready 8 to explain. On the day of that conviction -- I 9 was only in for 18 days, from October 4th of last 10 year, 2020, until 18 days later, what was that? 11 23rd or something. I did 18 days in there, got 12 out on an ankle bracelet. Now you're catching 13 what I'm saying? 14 Q. Yes. 15 A. I stayed at home on an ankle 16 bracelet, but I was allowed to go to work and I 17 did until the conviction and then I got off of 18 the ankle bracelet. 19 Q. The time on the ankle bracelet. Was 20 that time considered served? Is that part of the 21 189 days? 22 A. It's most of it. I only did 18 days 23 that time, yes, sir. 24 Q. So during that 18-day period, which 25 was in 2020, that you actually were inside Cook</p>

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<p style="text-align: right;">Page 78</p> <p>1 County Jail, did you enter the jail with 2 property? 3 A. I've got to think. I'm thinking. 4 Some. I'm trying to think what. Yeah, just an 5 ID and my keys. 6 Q. And did you get your ID and keys 7 back? 8 A. Yes. 9 Q. So sometimes when you did serve time 10 at Cook County Jail but were allowed to leave 11 Cook County Jail into the free world, you would 12 on those occasions leave with your property that 13 you expected to leave with? 14 A. Well, obviously, there's nothing to 15 be proud of, but that hardly ever happened. I 16 almost went to the joint every time. Beside this 17 time in question, there might have been one or 18 two other times in life where I left to -- you 19 see what I mean? 20 Q. When you say there might have been 21 one or two other times in life, you mean -- 22 A. That I left the Cook County Jail back 23 into the world, the free world. 24 Q. Let's say from 2000 to the present, 25 as far as arrests that led to convictions, how</p>	<p style="text-align: right;">Page 80</p> <p>1 10 minutes because it's happened so rarely. It's 2 happened at least one other time and maybe two 3 other times in my whole life. I don't know if 4 it's one or two. I'd have to really do some, you 5 know, digging in my head, but obviously, I'm 6 ashamed to say so. It was always but once and 7 maybe twice. To figure out if it was two instead 8 of one, I'd need a lot of time or help or 9 something, but it was -- 10 Q. Okay. So I do want to go back 11 finally -- this is my final segment. The 12 procedure when -- we'll say in the last 21 years 13 since 2000, the procedure when you were sentenced 14 in court to IDOC time and then right before you 15 left IDOC -- strike that. Right before you left 16 Cook County Jail to be sent to IDOC, so I just 17 want to concentrate on that timeframe. When you 18 knew that you were going from Cook County Jail to 19 IDOC during that timeframe you just stated, how 20 would that work physically? Where would you go? 21 Who would you see and how would the procedure go? 22 A. You mean the date, the morning 23 leaving 26 and Cal to go to Joliet? 24 Q. Yes. 25 A. Okay. We -- okay. Well, it would go</p>
<p style="text-align: right;">Page 79</p> <p>1 many times did you serve time at Cook County Jail 2 and then get released from Cook County Jail into 3 the free world? 4 A. Okay. Look how I'm going to answer 5 this. I mean, I'm sorry. If I got convicted, I 6 didn't leave the -- the only way I left the Cook 7 County Jail was to go to IDOC, prison. 8 Q. But there was at least one time and 9 maybe more, right, so the time in March of 2021, 10 you did not go to IDOC. You got credit for time 11 served and then you went home? 12 A. You see you missed what I explained 13 to you a minute ago. In March of -- in March 14 just this past part, right? 15 Q. March 2021? 16 A. Right. That's the day I was 17 convicted, sir, only. I've been out of county 18 jail for five months on house arrest, remember, 19 we just explained it. 20 Q. Right. So my question is there were 21 other times besides the March of 2021 time that 22 you went into Cook County Jail but for some 23 reason didn't go to IDOC? 24 A. Yeah, yeah. Once -- I have to 25 really -- I mean, I'd have to think for five or</p>	<p style="text-align: right;">Page 81</p> <p>1 like this. We would wait in bull pens and we 2 would sign -- sign a piece of paper about money, 3 you know, about any funds you had on the books 4 there at Cook County Jail on your books, sign 5 that paper and then we'd get cuffed up and we'd 6 wait and get cuffed up and put on the bus. 7 Waiting in bull pens and stuff. 8 Q. Did you see a deputy or officer or 9 some sheriff personnel regarding your property 10 before you got on the bus? 11 A. Yeah. With the thing about the money 12 and anything that had to do with property would 13 probably be at the -- you know, within that 14 morning, a different sheriff. 15 Q. So you would see someone about the 16 money, and how was the money handled? What would 17 they do? 18 A. They would have -- they would have a 19 piece of paper, you know, with your name on it 20 when your time was to be called for my name and 21 it would state what I had on the books at the 22 time and then they asked me to sign it and then 23 it would follow me. And it usually took about 24 three weeks to hit on your books in prison. 25 Q. So you would sign a form regarding</p>

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<p style="text-align: right;">Page 82</p> <p>1 designating someone for your property or donating</p> <p>2 your property such as the forms that we talked</p> <p>3 about in Exhibit B and Exhibit C, correct?</p> <p>4 A. Right.</p> <p>5 Q. So you would be told the policy</p> <p>6 regarding the property, you would sign off on the</p> <p>7 form such as Exhibit C or Exhibit B and then you</p> <p>8 would get on the bus; is that right?</p> <p>9 A. Yeah. Between the money and the</p> <p>10 property, yeah.</p> <p>11 Q. And if you ever did have a question,</p> <p>12 did you ask a deputy or a personnel at the jail</p> <p>13 as far as your property was concerned?</p> <p>14 A. I mean, we've got a question, we ask,</p> <p>15 yes, sir.</p> <p>16 Q. Okay. And as far as this procedure</p> <p>17 that you described being brought down, filling</p> <p>18 out forms as far as cash and property, this was</p> <p>19 essentially the procedure from roughly 2000 to</p> <p>20 the present?</p> <p>21 A. Pretty much the way I remember it.</p> <p>22 Q. Okay. Okay. Sir, I don't have any</p> <p>23 further questions. I think maybe the other</p> <p>24 attorneys may have a few. Thank you.</p> <p>25 ATTORNEY MIKHAIL: Nothing from the</p>	<p style="text-align: right;">Page 84</p> <p>1 A. It was.</p> <p>2 Q. Did this -- when you got out of the</p> <p>3 penitentiary, did the penitentiary give you a</p> <p>4 state ID card?</p> <p>5 A. No.</p> <p>6 Q. When you went -- did you have to a</p> <p>7 get a new state ID card?</p> <p>8 A. Yes, I did.</p> <p>9 Q. What did you have to do to get a new</p> <p>10 state ID card when you get out of the</p> <p>11 penitentiary after entering in 2014?</p> <p>12 A. There's a release paper that they</p> <p>13 give everybody anyway the day you get released</p> <p>14 from prison and DMV started to accept that, along</p> <p>15 with the money they charge for an ID card, and</p> <p>16 get the new ID.</p> <p>17 Q. Do you have to pay a fee to get a new</p> <p>18 ID card?</p> <p>19 A. Yeah, they charge you.</p> <p>20 Q. The ID card that you have that you</p> <p>21 got back today expires on September 4th of 2018;</p> <p>22 is that correct?</p> <p>23 A. Yes, that's correct.</p> <p>24 Q. And am I correct that you got out of</p> <p>25 the penitentiary sometime before September 4th of</p>
<p style="text-align: right;">Page 83</p> <p>1 County.</p> <p>2 ATTORNEY FLAXMAN: I'm coming.</p> <p>3 All right. Can you guys hear me now?</p> <p>4 ATTORNEY DOMBROWSKI: Yes.</p> <p>5 ATTORNEY FLAXMAN: Okay. Thank you.</p> <p>6 CROSS-EXAMINATION BY MR. FLAXMAN:</p> <p>7 Q. I lost my notes. Let's go back to</p> <p>8 Exhibit B. Gerrie, could you move that?</p> <p>9 ATTORNEY DOMBROWSKI: Yeah.</p> <p>10 Q. And the form talks about telling --</p> <p>11 where you signed at the bottom, you were agreeing</p> <p>12 that if somebody doesn't reach the designated</p> <p>13 person, your property will be disposed of and it</p> <p>14 has your signature next to it.</p> <p>15 A. Yeah. Yeah.</p> <p>16 Q. And is it correct that there is no</p> <p>17 designated person on that form?</p> <p>18 A. That's right.</p> <p>19 Q. Now, when you -- when you got back</p> <p>20 property today, was one of the things that you</p> <p>21 received a state ID card, which I'll hold up to</p> <p>22 the screen?</p> <p>23 A. Yes, that's true.</p> <p>24 Q. And was that a card that you had with</p> <p>25 you when you were arrested back in 2014?</p>	<p style="text-align: right;">Page 85</p> <p>1 2018?</p> <p>2 A. Oh, yeah.</p> <p>3 Q. So this card would have been a valid</p> <p>4 state identification card when you get out of the</p> <p>5 penitentiary?</p> <p>6 A. It would have still been valid.</p> <p>7 Q. Okay. How much time did it take you</p> <p>8 to go get a new state ID card?</p> <p>9 A. I got one right away, within the</p> <p>10 first week.</p> <p>11 Q. Well, did you spend the day?</p> <p>12 A. Oh, oh, I'm sorry. Yeah. Like three</p> <p>13 hours.</p> <p>14 Q. Okay. Now, Mr. Dombrowski asked you</p> <p>15 about whether there was a confusion about the</p> <p>16 date being December of 2013 and January of 2014</p> <p>17 and you agree that you were mistaken about the</p> <p>18 2013 date?</p> <p>19 A. I do agree now.</p> <p>20 Q. Okay. And was that because you were</p> <p>21 told about what Circuit Court records showed</p> <p>22 about when that plea of guilty was?</p> <p>23 A. Right.</p> <p>24 Q. Okay.</p> <p>25 A. I just had something in my own mind</p>


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<p style="text-align: right;">Page 86</p> <p>1 of memory, yeah. We all make mistakes is all I 2 can say, I guess. 3 Q. Okay. But does any form that the 4 county ever showed you or gave to you when you 5 were there at any time or at any time when you 6 went to the IDOC state that your driver's license 7 or state ID card or social security card would 8 not be sent to IDOC with you? 9 A. I don't recall that. 10 Q. And were there times when you entered 11 the jail that you had an Illinois State driver's 12 license? 13 A. Wait. (Inaudible.) 14 COURT REPORTER: I don't know if he's 15 speaking on the record or not, but I can't hear 16 him. 17 A. I asked him to ask it again. 18 Q. Well, was there ever a time when you 19 were at the jail when you had an Illinois 20 driver's license? 21 A. No. 22 Q. Was there a time at the jail when you 23 had a driver's license at the time you were 24 arrested before going to the jail? 25 A. I haven't had my Illinois license for</p>	<p style="text-align: right;">Page 88</p> <p>1 property bag if you remember? 2 A. (Inaudible.) 3 COURT REPORTER: I'm not hearing 4 that. I'm sorry. 5 THE WITNESS: His question or just my 6 answer? 7 COURT REPORTER: Your answer. When 8 you are turning your head and talking to him, I'm 9 not hearing it. 10 THE WITNESS: Oh, I'm sorry. I'm 11 sorry. 12 A. Go ahead and ask that again. 13 MR. FLAXMAN: Since you've got the 14 question, can you read it back? 15 (Requested portion of the transcript 16 was read by the court reporter.) 17 A. From my recollection, it was in the 18 property bag because I didn't have it with me. 19 Q. And did one of the things that you 20 want in this lawsuit compensation for clothing 21 that the sheriff took from you and gave to other 22 detainees who were leaving the jail and needed a 23 jacket or other clothing? 24 A. Yes. 25 MR. FLAXMAN: I have nothing further.</p>
<p style="text-align: right;">Page 87</p> <p>1 some years. I always had the other ID. 2 Q. Okay. How about a social security 3 card? 4 A. Every time. Every time. 5 Q. Was there a time when you were 6 arrested and you had a social security card and 7 you ended up at the county jail? 8 A. Yeah. 9 Q. And did that social security card 10 follow you to the penitentiary ever? 11 A. Actually, I'm not sure. I'm not sure 12 of it, I'll say, but I'm going to say what I 13 think. I don't think so. 14 Q. Okay. 15 A. I don't think it followed me. 16 Q. And inside or along with the property 17 bag that you were given today, which has 18 essential booking number 187515202 on it, were 19 you given a personal property receipt from the 20 Chicago Police Department? 21 A. I remember that, I mean, it 22 happening, yeah. I remember that piece of paper. 23 Q. And was that -- did you have that 24 form with you when you were sent from the police 25 department to the jail, or was it in your</p>	<p style="text-align: right;">Page 89</p> <p>1 ATTORNEY DOMBROWSKI: I don't have 2 any further questions. 3 MR. FLAXMAN: We'll -- oh, Danielle, 4 we need to ask you. 5 ATTORNEY MIKHAIL: Nothing from 6 County. Thank you. 7 ATTORNEY FLAXMAN: We will reserve 8 signature. 9 MR. DOMBROWSKI: Thank you, Madam 10 Court Reporter, I will order this, regular 11 delivery, and I should send you the exhibits. 12 Can you shoot me an e-mail and then I'll just 13 respond with the exhibits? 14 COURT REPORTER: I will do that. No 15 problem. 16 MR. FLAXMAN: I would like an E-Iran 17 copy. 18 COURT REPORTER: Okay. All right. 19 I've got your e-mail. That sounds good. 20 (The deposition was concluded at 4:03 21 p.m.) 22 23 24 25</p>

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1 CERTIFICATE OF REPORTER	1 WITNESS CERTIFICATION
2	2
3 I, ERIKIA SCHUSTER, a Certified Shorthand	3 I hereby certify that I have read the
4 Reporter (IL), Missouri Notary No. 09561566, do	4 foregoing transcript of my deposition testimony,
5 hereby certify that the witness whose testimony	5 and that my answers to the questions propounded,
6 appears in the foregoing deposition was duly sworn by	6 with the attached corrections or changes, if
7 me, that the testimony of said witness was taken by	7 any, are true and correct.
8 me to the best of my ability and thereafter reduced	8
9 to typewriting under by direction; that I am neither	9
10 counsel for, related to, nor employed by any of the	10
11 parties to the action in which this deposition was	11
12 taken, and further that I am not a relative or	12
13 employee of any attorney or counsel employed by the	13
14 parties thereto, nor financially or otherwise	14 DATE _____ TED VELLEFF
15 interested in the outcome of the action.	15
16	16
17	17
18 	18 PRINT NAME
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20	20 JOB 414004
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4 NAME OF WITNESS: TED VELLEFF
5 Reason Codes: 1. To clarify the record.
6 2. To conform to the facts.
7 3. To correct transcription errors.
8 Page _____ Line _____ Reason _____
9 From _____ to _____
10 Page _____ Line _____ Reason _____
11 From _____ to _____
12 Page _____ Line _____ Reason _____
13 From _____ to _____
14 Page _____ Line _____ Reason _____
15 From _____ to _____
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LEGAL

(866) 715-7770
advancedONE.com

6. Were you ever convicted of a felony or misdemeanor? If so, please detail the specific charge, the date of adjudication and the sentence received on those criminal convictions.

ANSWER: To the best of my current recollection:

March 30, 2021, time considered served (189 days) retail theft,
Circuit Court of Cook County, 20 CR 1110401

July 31, 2017, IDOC 4 years, theft, Circuit Court of Cook County,
16 CR 1571901

January 23, 2014, IDOC 5 years, identity theft, Circuit Court of
Cook County, 13 CR 008201

June 4, 2012, burglary, IDOC 6 years, Circuit Court of Cook
County, 10 CR 1302701

September 29, 2009, IDOC 3 years, theft, Circuit Court of Cook
County, 09 CR 1175901

December 18, 2007, IDOC 5 years, theft, Circuit Court of Cook
County, 07 CR 1309001

August 7, 2006, IDOC 3 years, retail theft, Circuit Court of Cook
County, 06 CR 1327601

March 10, 2004, IDOC 3 years, retail theft, Circuit Court of Cook
County, 04 CR 0005201

March 15, 2002, IDOC 3 years, retail theft, Circuit Court of Cook
County, 04 CR 0394701

September 24, 2001, IDOC 1 year, retail theft, Circuit Court of Cook County, 01 CR 2125201

I recall two convictions in the 1980's and two in the 1990's.

7. Please detail the date of your arrest, personal items on your person at the time of your arrest, and the personal items you allege that were taken from you by any law enforcement entity related to your allegations contained in your Second Amended Complaint.

ANSWER: I do not recall the dates of each arrest. As to the two most recent arrests that resulted in my incarceration in IDOC, jail records show that I entered the Jail on September 9, 2013 and assigned number 2013-0925133 and again on September 27, 2016, when I was assigned number 2016-0927058.

8. Please detail all dates of your incarcerations, including admissions and releases, in any jail or penitentiary from 2010 to the present.

ANSWER:

I entered the jail on 2010-07-09 and left for IDOC on 2010-07-19.

I entered the jail on 2010-12-23 and left for IDOC on 2012-06-05.

I entered the jail on 2013-09-25 and left for IDOC on 2014-01-24.

I entered the jail on 2016-09-27 and left for IDOC on 2017-08-01.

I entered the jail on 2019-11-13 and I was released on 2019-11-13.

I entered the jail on 2020-01-09 and I was released 2020-01-09.

I do not recall the dates on which I was released from IDOC.

9. Please detail any and all personal items you claim were taken from you and not returned to you by any entity from 2010 to the present related to your Second Amended Complaint,

specifically detailing the date, items alleged to have been taken and what entity or individual took those items, and whether those items were ever returned to you.

ANSWER: In addition to the property inventoried during the HIRT project in 2011, jail officers took my clothing and the property that had been taken from me on arrest, including identification cards, keys, belt, and shoelaces. No property was ever returned to me when I left the Jail for IDOC.

10. Did you designate any individual or entity at any time to pick up any of your personal items you claimed were taken from you by any entity from 2010 to the present related to your Second Amended Complaint? If so, please state the full name, address and telephone number of any individual or entity who you designated to pick up any of your personal items and the date of designation or request.

ANSWER: No.

11. Please specifically describe the property that you believe is owed to you by any entity or individual, including the Defendants here, that in any way related to the claims made by you in your Second Amended Complaint.

ANSWER: Miscellaneous clothing, cell phone, identification cards, keys, belt, and shoelaces. My recollection might be refreshed by the property inventory forms from the Jail and from the arresting authorities.

12. Have you requested any items you claim were taken from you related to your Second Amended Complaint be returned to you at any point from 2010 to the present? If so, please detail when those items were taken, what items were taken and when the requests were made to return those items.

ANSWER: No.

13. Did you receive any documentation at any point, from 2010 to the present, that referenced or referred to any personal items that may have been taken from you by any entity related to your Second Amended Complaint? If so, please state the documentation

received, whether you signed that documentation, and what property the documentation referred to.

ANSWER: I believe that I received property inventory forms from the arresting authorities and from the Jail. I no longer have those documents.

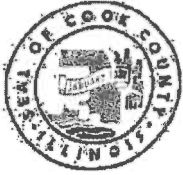
14. Were you aware of the policy of Cook County jail or the Cook County Department of Corrections regarding the inventory and return of your property from 2010 to the present? If so, please state your understanding of the policies and procedures of the Cook County jail or the Cook County Department of Corrections related to your specific property items that are related to your allegations contained in your Second Amended Complaint.

ANSWER: My understanding is that property would be held while I remained at the Jail and returned to me if I was released to the free world from the Jail. On those occasions when I left the Jail for IDOC, my understanding was the Jail would seize my clothing and give it to other detainees and send my other property with me to IDOC. I believed that my identification cards, keys, belt, and shoelaces would be sent from the Jail to IDOC.

Dated: June 6, 2021


Ted Velleff

/s/ Kenneth N. Flaxman
Kenneth N. Flaxman
(objections only)



COOK COUNTY DEPARTMENT OF CORRECTIONS
 2700 SOUTH CALIFORNIA AVENUE
 CHICAGO, ILLINOIS 60608
 (773) 674-6601

Date: 8/1/17
 Detainee's Name: VELLEFF, Theodore
 Shipment Date: 8/1/17
 Detainee's Designator: _____
 Designator's Address: _____
 City, State & Zip Code: _____

G 409

Please be advised that the detainee named above has been transferred to the Illinois Department of Corrections. He/She were unable to take all of his/her personal clothing/belongings to the penitentiary with him/her and have appointed you as his/her designator. Upon receiving this letter you must call (773) 674-0110 to confirm a pickup date.

On your pick-up date, bring this letter, two (2) pieces of valid identification, one with a picture (such as driver's license, State ID, passport, etc.) to the Cook County Department of Corrections, Division 8 (RTU). You may pickup clothing/belongings only on the date given to you between the hours of 8:00 a.m. and 2:00 p.m.

If the property is **NOT** picked up within forty-five (45) days of the date of this letter, it will be removed from storage and disposed of accordingly

I, VELLEFF, Theodore Detainee's ID#: 20160227058
 do hereby agree that for any reason this letter, mailed by myself, does not reach the designated person, and/or the designated person does not respond within forty-five (45) days from the date of shipment (see above) my property will be disposed of.

Detainee's Signature: X *Theodore Velleff*
 Date: 8/1/17

Officer's Signature & Star#: BUSCINE #16557

EXHIBIT B



**Cook County
Department
of
Corrections**

3-B-7
CAN'T FIND
WRONG # OF BOOK
H266

2700 South California Boulevard/Chicago, Illinois 60608 (773)869-7100

Date: 1/24/2014

Detainee Name: Velleff, Ted

Shipment Date: 1/24/2014

Detainee Designator: 2/A

Designator Address: _____

City & State: _____

Please be advised that the detainee named above has been transferred to Illinois Department of Corrections. He was unable to take all of his personal clothing/belongings to the penitentiary with him and has appointed you as his designator. Upon receiving this letter you must **Call 773/869-7152** to confirm a pickup date. On your pickup date, bring this letter, two (2) pieces of valid identification, one with a picture, such as a driver's license, State ID, to Cook County Department of Corrections, **Division Five (5)**.

You may pick up clothing/belongs only on the date given to you between the hours of 8:00 a.m. and 2:00 p.m.

If this clothing is not picked up within thirty (30) days of the date of this letter, it will be removed from storage and disposed of.

I, Ted Velleff Detainee ID No. 20130925133

do hereby agree that for any reason this letter, mailed by myself, does not reach the designated person, and/or the designated person does not respond within thirty (30) days from the shipment date (see above) my property will be disposed of.

DETAINEE SIGNATURE Ted Velleff

DATE: 1/24/2014

REFERENCE NO. _____

OFFICER'S SIGNATURE: Pani



EXHIBIT C