

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 Erikia Schuster,
Illinois Certified Shorthand Reporter
No. 084-004660, pursuant to notice.

**CERTIFIED
TRANSCRIPT**

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Counsel acknowledges their understanding that I am not physically present with the witness and that I will be reporting this proceeding remotely. Counsel further acknowledges that I will not be administering the oath in person, but am doing so remotely. The party and counsel consent to this arrangement and waive any objections to this manner of proceeding.			
Counsel, please indicate your agreement verbally on the record by stating your name and that you stipulate to these terms, after which I will swear in the witness and we may begin.			
ATTORNEY FLAXMAN: I'm Kenneth Flaxman, F-l-a-x-m-a-n, for the plaintiff, and I agree. I also agree to the recording with the expectation that I get a copy of whatever is recorded.			
APPEARANCES			Page 3
KENNETH N. FLAXMAN 200 South Michigan Avenue Chicago, IL 60604 Knf@kenlaw.com			
On Behalf of the Plaintiffs,			
DANIELLE MIKHAIL Cook County State's Attorney's Office 500 Richard J. Daley Center Chicago, IL 60602 Danielle.mikhail@cookcountylil.gov			
On Behalf of the Defendant Cook County,			
GERALD M. DOMBROWSKI Sanchez Daniels & Hoffman, LLP 333 West Wacker Drive, Suite 500 Chicago, IL 60606 GDombrowski@SanchezDH.com			
On Behalf of the Defendant Sheriff of Cook County.			
ATTORNEY DOMBROWSKI: Okay. Gerrie Dombrowski for the sheriff's office, I agree. And Ken, when you speak, there is a lot of reverb, just so you know.			
ATTORNEY FLAXMAN: I'm going to turn off of my microphone.			
ATTORNEY MIKHAIL: Danielle Mikhail for Cook County, and I agree to the stipulation. I think, Ken, there might be echo if you guys are in the same room with the mic on at the same time.			
IT IS HEREBY STIPULATED AND AGREED, that the deposition of TED VELLEFF may be taken in shorthand by Erikia Schuster, a Certified Shorthand Reporter, and afterwards transcribed into typewriting.			
* * * * *			
TED VELLEFF, of lawful age, being produced, sworn and examined on behalf of the Defendant deposes and says:			
DIRECT EXAMINATION			
BY ATTORNEY DOMBROWSKI:			
Q. Thank you. Mr. Velleff, can you state your full name for us and spell your first			

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

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

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

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

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

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1 Q. -- stint -- was that your last 2 sentence to IDOC?	1 Q. When you were out of jail or out of 2 IDOC, would you work as a roofer during this 3 timeframe?
3 A. Yes, sir.	4 A. Yes, sir. Yes, sir. I would.
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?	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. Yes, it is.	9 A. He has been in the past, yes, sir.
10 Q. So you never went to IDOC for that 11 one?	10 Q. And how many times has he been your 11 attorney?
12 A. No, no.	12 A. Approximately, three or four.
13 Q. And it says retail theft, would that 14 be felony retail theft or misdemeanor?	13 Q. Has the Morrissey firm ever been your 14 attorneys?
15 A. Misdemeanor.	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.
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?	20 Q. That makes sense.
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.	21 A. And I only remember that one time. 22 Otherwise, it was only Mr. Kenneth Flaxman.
24 Q. Okay. Fair enough. And Mr. -- and 25 am I -- your last name is pronounced Velleff?	23 Q. Okay. Sir, as far as this lawsuit is 24 concerned, is it your claim that the Cook County Sheriff's Department in running the jail has some
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1 A. Velleff. Both the Es are the short E 2 sound.	1 of your property and that you are owed this 2 property?
3 Q. Okay.	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.
4 A. Velleff.	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?
5 Q. As far as your educational 6 background, where did you go to high school?	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.
7 A. Sullivan High School in Chicago, 8 Rogers Park.	21 Q. Okay. So as you sit here now, do you 22 have any specific items that you believe the sheriff's office owes you or possesses that you 23 think is yours?
9 Q. And did you graduate?	24 A. Well, I don't know if they have them
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 jail?	
23 Q. Yes.	
24 A. Or in jail? Which way --	

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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.	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.
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?	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?
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.	14 A. I don't recall.
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?	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?
24 A. Yes, I have.	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 --
25 Q. And when have you done that?	
Page 35	Page 37
1 A. Like every time I come home, you 2 know, from IDOC.	1 I couldn't believe.
3 Q. And how would you do that?	2 Q. How did things change as far as you 3 were concerned?
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.	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.
11 Q. So you requested certain property 12 back and you just never got it back?	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?
13 A. That's right, sir.	23 A. I remember that. I remember that.
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?	24 Q. And did you understand that rule, 25 that if you didn't designate someone to retrieve
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	

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<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?</p> <p>5 A. I don't know about a time period. I 6 don't remember that.</p> <p>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.</p> <p>10 Mr. Velleff, can you see what is 11 marked as Exhibit A in the lower right-hand 12 corner?</p> <p>13 A. Lower right-hand corner?</p> <p>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?</p> <p>17 A. No. That's lower left-hand corner. 18 I don't mean to be wise or nothing.</p> <p>19 Q. Okay. For me, it is right. You see 20 Exhibit A in the lower left?</p> <p>21 A. Yeah.</p> <p>22 MR. FLAXMAN: I had it larger on my 23 computer and maybe Mr. Velleff could look at it 24 there.</p> <p>25 Q. We can go back on, if we weren't</p>	<p>Page 38</p> <p>1 answers to interrogatories truthful and accurate?</p> <p>2 A. Yes, sir.</p> <p>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?</p> <p>6 A. I did, sir.</p> <p>7 Q. Okay. I just want to ask you about a 8 few of these.</p> <p>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?</p> <p>13 A. Of course. Yes, I do.</p> <p>14 Q. Okay. And would these be individuals 15 that went from Cook County Jail to IDOC?</p> <p>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?</p> <p>25 Q. Yeah. So there were times since the</p>
<p>1 already.</p> <p>2 A. I can read it. I can read it on the 3 computer here.</p> <p>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?</p> <p>7 A. I do.</p> <p>8 Q. And that document is marked as 9 Exhibit A, correct?</p> <p>10 A. Correct.</p> <p>11 Q. And then I'm going to page through it 12 and there's six pages of --</p> <p>13 A. I'm seeing it.</p> <p>14 Q. -- question and answer, and then your 15 signature is there, correct?</p> <p>16 A. That's me, yeah.</p> <p>17 Q. All right. And that's -- the 18 document is dated June 6th, 2021, correct?</p> <p>19 A. Correct.</p> <p>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?</p> <p>24 A. Correct.</p> <p>25 Q. Now, as you sit here, are these</p>	<p>Page 39</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?</p> <p>5 A. There were a couple of those times, 6 yes, sir. Excuse me.</p> <p>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 property once you left the jail?</p> <p>10 A. Not all of the time, no. A couple of times, I -- no.</p> <p>11 Q. And what happened in cases where you 12 didn't leave with your property?</p> <p>13 A. They said it was at this location, 14 the streets of Homan and Fillmore, the second police station, Homan and Fillmore.</p> <p>15 Q. The Chicago police station?</p> <p>16 A. Yes, sir.</p> <p>17 Q. So sometimes you would be 18 incarcerated at Cook County Jail and then be 19 released from Cook County Jail, sometimes you 20 would be given your property that you came in 21 with and sometimes Cook County Jail personnel 22 would tell you that your property was with a</p>

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

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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.	1 stated you wanted to give up or donate your 2 property just before you were shipped out to 3 IDOC?
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?	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.
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.	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?
19 Q. And what did the sheriff tell you 20 about your property?	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.
21 A. That it was going to follow us to 22 IDOC.	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?
23 Q. And sometimes would the property 24 follow you to IDOC?	24 A. Not that I recall. I mean, not that 25 I recall.
25 A. It stopped. It stopped. Yeah. That	
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1 sometimes being '01, '02, '03, '04 and then it 2 gets leery after that.	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?
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?	23 A. Yes, sir.
8 A. No, I don't recall that.	24 Q. Okay. What is HIRT, H-I-R-T?
9 Q. Did you ever do that?	25 A. I'm not sure what that acronym -- I
10 A. Say it again. No. I'm sorry. Say 11 it again.	
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?	
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?	
20 Q. We'll just talk about Cook County for 21 now, so Cook County Jail personnel.	
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.	
25 Q. Did you ever sign anything that	

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

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

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

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<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.</p> <p>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?</p> <p>17 A. Okay. Okay. Now what?</p> <p>18 Q. Okay. Do you think that's an 19 accurate statement of your second or third from 20 last conviction?</p> <p>21 A. Get the date again, just the date of 22 what you're --</p> <p>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>1 interrogatories answers jibe with the Exhibit C 2 as far as the date is concerned?</p> <p>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 --</p> <p>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?</p> <p>16 A. I see it.</p> <p>17 Q. Did you put that N slash A?</p> <p>18 A. I don't recall putting that.</p> <p>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?</p> <p>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>
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<p>1 A. Yeah, I see it.</p> <p>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?</p> <p>5 A. Which was given the next day 1/24. 6 Yeah. Yeah. Yeah.</p> <p>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?</p> <p>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.</p> <p>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?</p> <p>17 A. I'm not sure I know what you mean.</p> <p>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 --</p> <p>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.</p> <p>25 Q. It appears that at least your</p>	<p>1 ever putting an N/A. I mean, maybe I did, but I 2 don't recall it --</p> <p>3 Q. Okay.</p> <p>4 A. -- for these papers.</p> <p>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 to 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?</p> <p>12 A. I see it. I see it.</p> <p>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?</p> <p>23 A. I see it.</p> <p>24 Q. And then that signature that states 25 detainee's signature, that was yours, correct?</p>

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

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<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.</p> <p>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?</p> <p>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.</p> <p>19 Q. During all of these times --</p> <p>20 A. It was just bogus.</p> <p>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>1 That's a fact.</p> <p>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?</p> <p>6 A. I mean, there was nothing to work. 7 There was nothing there.</p> <p>8 Q. So you're saying you didn't have 9 anything on you? How did the clothes situation 10 work?</p> <p>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?</p> <p>14 Q. Okay. I'm talking about the clothes 15 on your body.</p> <p>16 A. Those were Cook County Jail uniforms, 17 sir.</p> <p>18 Q. Right. Did you have to change out of 19 the Cook County Jail uniform when you got to 20 IDOC?</p> <p>21 A. Absolutely.</p> <p>22 Q. What were you issued all these times 23 that you went to IDOC?</p> <p>24 A. I'm really scratching my head to 25 where this pertains, but I'll answer you, prison</p>
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<p>1 A. Yeah. In the early millennium, '01, 2 '02.</p> <p>3 Q. But then how about after that?</p> <p>4 A. No, I stopped seeing it, like I said 5 probably 30 minutes ago.</p> <p>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?</p> <p>10 A. Well, technically, state shit. State 11 meaning Cook County Jail clothes.</p> <p>12 Q. Okay. You would go down to IDOC with 13 the Cook County Jail clothes that you had to 14 wear?</p> <p>15 A. Yes. Yes. Yes. Yes, sir.</p> <p>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?</p> <p>20 A. Not that I recall.</p> <p>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?</p> <p>25 A. It was just not to my understanding.</p>	<p>1 issue because you're in prison now.</p> <p>2 Q. Did it say IDOC on the back?</p> <p>3 A. It might have, man. Yeah. Help me 4 out here, man.</p> <p>5 Q. All right. I'm trying to get 6 details.</p> <p>7 A. I mean, no. No. I can only hold so 8 much, man.</p> <p>9 ATTORNEY FLAXMAN: This might be a 10 good time to take a break.</p> <p>11 ATTORNEY MIKHAIL: Should we take 12 ten?</p> <p>13 ATTORNEY FLAXMAN: Yeah. (Recess taken.)</p> <p>14 Q. We'll go back on. Mr. Velleff, are 15 you ready to go? Mr. Velleff, are you ready?</p> <p>16 A. I am. (Discussion held off of the record 17 with Mr. Flaxman.)</p> <p>18 Q. So Mr. Velleff, when we were looking 19 at Exhibit C, which was the 2014 form, are you 20 now with me that the date was 1/24/14?</p> <p>21 A. I am.</p> <p>22 Q. Okay. You are, all right. And that 23 would match up with the January 23rd, 2014,</p>

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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	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.
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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	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

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<p>1 County Jail, did you enter the jail with 2 property?</p> <p>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.</p> <p>6 Q. And did you get your ID and keys 7 back?</p> <p>8 A. Yes.</p> <p>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?</p> <p>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?</p> <p>20 Q. When you say there might have been 21 one or two other times in life, you mean --</p> <p>22 A. That I left the Cook County Jail back 23 into the world, the free world.</p> <p>24 Q. Let's say from 2000 to the present, 25 as far as arrests that led to convictions, how</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 --</p> <p>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?</p> <p>22 A. You mean the date, the morning 23 leaving 26 and Cal to go to Joliet?</p> <p>24 Q. Yes.</p> <p>25 A. Okay. We -- okay. Well, it would go</p>
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<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?</p> <p>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.</p> <p>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?</p> <p>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?</p> <p>15 Q. March 2021?</p> <p>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.</p> <p>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?</p> <p>24 A. Yeah, yeah. Once -- I have to 25 really -- I mean, I'd have to think for five or</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.</p> <p>8 Q. Did you see a deputy or officer or 9 some sheriff personnel regarding your property 10 before you got on the bus?</p> <p>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.</p> <p>15 Q. So you would see someone about the 16 money, and how was the money handled? What would 17 they do?</p> <p>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.</p> <p>25 Q. So you would sign a form regarding</p>

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

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1 of memory, yeah. We all make mistakes is all I 2 can say, I guess.	1 property bag if you remember? 2 A. (Inaudible.)
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?	3 COURT REPORTER: I'm not hearing 4 that. I'm sorry. 5 THE WITNESS: His question or just my 6 answer?
9 A. I don't recall that.	7 COURT REPORTER: Your answer. When 8 you are turning your head and talking to him, I'm 9 not hearing it.
10 Q. And were there times when you entered 11 the jail that you had an Illinois State driver's 12 license?	10 THE WITNESS: Oh, I'm sorry. I'm 11 sorry.
13 A. Wait. (Inaudible.)	12 A. Go ahead and ask that again.
14 COURT REPORTER: I don't know if he's 15 speaking on the record or not, but I can't hear 16 him.	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. I asked him to ask it again.	17 A. From my recollection, it was in the 18 property bag because I didn't have it with me.
18 Q. Well, was there ever a time when you 19 were at the jail when you had an Illinois 20 driver's license?	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?
21 A. No.	24 A. Yes.
22 Q. Was there a time at the jail when you 23 had a driver's license at the time you were arrested before going to the jail?	25 MR. FLAXMAN: I have nothing further.
25 A. I haven't had my Illinois license for	
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1 some years. I always had the other ID. 2 Q. Okay. How about a social security 3 card?	1 ATTORNEY DOMBROWSKI: I don't have 2 any further questions.
4 A. Every time. Every time.	3 MR. FLAXMAN: We'll -- oh, Danielle, 4 we need to ask you.
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?	5 ATTORNEY MIKHAIL: Nothing from 6 County. Thank you.
8 A. Yeah.	7 ATTORNEY FLAXMAN: We will reserve 8 signature.
9 Q. And did that social security card 10 follow you to the penitentiary ever?	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?
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 COURT REPORTER: I will do that. No 15 problem.
14 Q. Okay.	16 MR. FLAXMAN: I would like an E-Tran 17 copy.
15 A. I don't think it followed me.	18 COURT REPORTER: Okay. All right. 19 I've got your e-mail. That sounds good.
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?	20 (The deposition was concluded at 4:03 21 p.m.)
21 A. I remember that, I mean, it 22 happening, yeah. I remember that piece of paper.	22
23 Q. And was that -- did you have that 24 form with you when you were sent from the police department to the jail, or was it in your	23
25	24
25	25

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<p>1 CERTIFICATE OF REPORTER</p> <p>2</p> <p>3 I, ERIKIA SCHUSTER, a Certified Shorthand</p> <p>4 Reporter (IL), Missouri Notary No. 09561566, do</p> <p>5 hereby certify that the witness whose testimony</p> <p>6 appears in the foregoing deposition was duly sworn by</p> <p>7 me, that the testimony of said witness was taken by</p> <p>8 me to the best of my ability and thereafter reduced</p> <p>9 to typewriting under my direction; that I am neither</p> <p>10 counsel for, related to, nor employed by any of the</p> <p>11 parties to the action in which this deposition was</p> <p>12 taken, and further that I am not a relative or</p> <p>13 employee of any attorney or counsel employed by the</p> <p>14 parties thereto, nor financially or otherwise</p> <p>15 interested in the outcome of the action.</p> <p>16</p> <p>17</p> <p>18 </p> <p>19</p> <p>20 _____</p> <p>21 Certified Court Reporter</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>Page 90</p> <p>1 WITNESS CERTIFICATION</p> <p>2</p> <p>3 I hereby certify that I have read the</p> <p>4 foregoing transcript of my deposition testimony,</p> <p>5 and that my answers to the questions propounded,</p> <p>6 with the attached corrections or changes, if</p> <p>7 any, are true and correct.</p> <p>8</p> <p>9</p> <p>10</p> <p>11</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>Page 91</p> <p>1 Errata Sheet</p> <p>2 NAME OF CASE: ELIZARRI VS SHERIFF OF COOK COUNTY, et al.</p> <p>3 DATE OF DEPOSITION: 06/17/2021</p> <p>4 NAME OF WITNESS: TED VELLEFF</p> <p>5 Reason Codes: 1. To clarify the record.</p> <p>6 2. To conform to the facts.</p> <p>7 3. To correct transcription errors.</p> <p>8 Page _____ Line _____ Reason _____</p> <p>9 From _____ to _____</p> <p>10 Page _____ Line _____ Reason _____</p> <p>11 From _____ to _____</p> <p>12 Page _____ Line _____ Reason _____</p> <p>13 From _____ to _____</p> <p>14 Page _____ Line _____ Reason _____</p> <p>15 From _____ to _____</p> <p>16 Page _____ Line _____ Reason _____</p> <p>17 From _____ to _____</p> <p>18 Page _____ Line _____ Reason _____</p> <p>19 From _____ to _____</p> <p>20 Page _____ Line _____ Reason _____</p> <p>21 From _____ to _____</p> <p>22 Page _____ Line _____ Reason _____</p> <p>23 From _____ to _____</p> <p>24</p> <p>25</p> <p style="text-align: center;">TED VELLEFF</p>
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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

ANSWER TO INTERROGATORIES OF PLAINTIFF TED VELLEFF

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

1. State your full name, current address, date of birth and Social Security number.

ANSWER: Theodore (Ted) Velleff, 7327 N Honore, Chicago, Illinois,

09/04/59, 322-58-7354.

2. State the full name, address, and telephone number of each person who you claim is a witness to the facts and circumstances detailed in your Second Amended Complaint.

Objection: Witnesses to the alleged policy have previously been disclosed in this case. Answer: No witnesses other than those previously disclosed. Investigation continues.

3. Describe specifically the injuries or damages you claim are a result of any actions by the Defendants or others referenced in your Second Amended Complaint.

ANSWER: Property that had been seized from me was inventoried in 2011 as part of the work performed by HIRT. This property included a cell

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

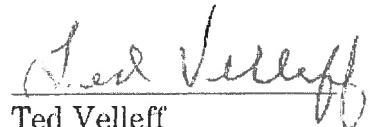
received, whether you signed that documentation, and what property the documentation referred to.

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.

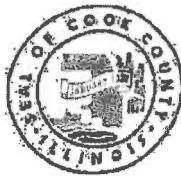
ANSWER: My understanding is that property would be held while I remained at the Jail and returned to me if I was released to the free world from the Jail. On those occasions when I left the Jail for IDOC, my understanding was the Jail would seize my clothing and give it to other detainees and send my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

11

Date: 8/1/17

Detainee's Name: VELLEFF, THEODORE

Shipment Date: 8/1/17

Detainee's Designator: _____

Designator's Address: _____

City, State & Zip Code: _____

*6/1/17
KBP
6/1/17*

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#: 20160927658

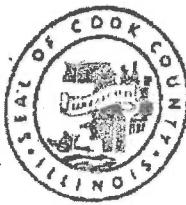
do hereby agree that for any reason this letter, mailed by myself, does not reach the designated person, and/or the designated person does not respond within forty-five (45) days from the date of shipment (see above) my property will be disposed of.

Detainee's Signature: X Theod Velleff

Date: 8/1/17

Officer's Signature & Star#: Buscemi #16557

EXHIBIT B



Cook County
Department
of
Corrections

3-B-7

CAN'T FIND
WRONG # OF BOOK
H-2
H-3

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 : H

Designator Address : H

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: Davis