

Roberto Ornelas 07/16/2021

1	IN THE UNITED STATES DISTRICT COURT	1	COOK COUNTY STATE'S ATTORNEY'S OFFICE
2	NORTHERN DISTRICT OF ILLINOIS	2	BY: DANIELLE A. MIKHAIL
3	EASTERN DIVISION	3	500 Daley Center
4	LEONCIO ELIZARRI, etc., )	4	Chicago, Illinois 60602
5	et al., )	5	312.603.3368
6	Plaintiffs, )	6	danielle.mikhail@cookcountyil.gov
7	vs. ) No. 17 CV 8120	7	Representing the Defendant,
8	SHERIFF OF COOK COUNTY )	8	Cook County, Illinois,
9	and COOK COUNTY, )	9	
10	ILLINOIS, )	10	
11	Defendants. )	11	
12		12	
13	The videoconference deposition of	13	
14	ROBERTO ORNELAS, called for examination pursuant	14	
15	to the Rules of Civil Procedure for the United	15	
16	States District Courts pertaining to the taking	16	
17	of depositions, taken before Michelle L.	17	
18	Flesher, Certified Shorthand Reporter of the	18	
19	State of Illinois, on July 16, 2021, at the hour	19	
20	of 10:30 a.m.	20	
21		21	
22		22	
23	Reported by: Michelle L. Flesher, CSR	23	
24	License No.: 084-002565	24	
	1		3
1	APPEARANCES:	1	I N D E X
2	KENNETH FLAXMAN LAW OFFICES	2	WITNESS EXAMINATION
3	BY: KENNETH N. FLAXMAN	3	ROBERTO ORNELAS
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8	Representing the Plaintiffs;	8	
9	SANCHEZ DANIELS & HOFFMAN, LLP	9	
10	BY: GERALD M. DOMBROWSKI	10	E X H I B I T S
11	333 West Wacker Drive, Suite 500	11	NUMBER MARKED FOR ID
12	Chicago, Illinois 60606	12	Ornelas Deposition
13	312.641.1555	13	Exhibit No. 2 24
14	gdombrowski@sanchezdh.com	14	Exhibit No. 3 19
15	And	15	Exhibit No. 4 14
16	COOK COUNTY SHERIFF'S DEPARTMENT	16	Exhibit No. 5 17
17	KHARA A. COLEMAN	17	Exhibit No. 6 7
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23	Sheriff of Cook County;	23	
24		24	
	2		4



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<p>1 THE REPORTER: My name is Michelle Flesher, 2 Certified Shorthand Reporter with McCorkle 3 Litigation. The parties are present via 4 videoconference to take the discovery deposition 5 of Roberto Ornelas in the matter of Leoncio 6 Elizarrri, et cetera, et al., vs. Sheriff of Cook 7 County and Cook County, Illinois, case number 8 17 CV 8120, in the United States District Court 9 for the Northern District of Illinois, Eastern 10 Division. 11 Today's date is July 16, 2021, and the 12 time is 10:30 a.m. This deposition is being 13 taken at the instance of the plaintiff. This 14 deposition is being taken by means of 15 videoconferencing, and the oath will be 16 administered remotely by the court reporter 17 pursuant to Governor Pritzker's Executive Order 18 2020-14. 19 (Witness sworn.) 20 THE REPORTER: Will all parties present 21 please state your name and agreement with this 22 procedure, starting with plaintiff's counsel. 23 MR. FLAXMAN: Hi, I'm Kenneth Flaxman. I 24 agree.</p> <p style="text-align: right;">5</p>	<p>1 A. 26 years and 9 months. 2 Q. Are you planning on retiring in the 3 next year or two? 4 A. No. 5 Q. Okay. Did you look at any documents to 6 prepare for this deposition today? 7 A. I looked at some, yes. 8 Q. Was one of the documents the current 9 form for -- that's given to prisoners when 10 they're leaving the jail to go to IDOC? 11 A. Yes. 12 Q. And we'll refer to that as Exhibit 6. 13 At the bottom left it says FCN-61, and 14 next to it, June of 19. Does the June of 19 15 mean that the form was published in June of 16 2019? 17 A. I believe so. 18 Q. And is this the form that is currently 19 used at the jail? 20 A. Yes. 21 Q. Do you use this form in your work at 22 the jail? 23 A. I use this form, yes. I am not there 24 when they fill it out, but I use it.</p> <p style="text-align: right;">7</p>
<p>1 MR. DOMBROWSKI: Gerry Dombrowski, for the 2 Sheriff. I agree. 3 MS. MIKHAIL: Danielle Mikhail, for Cook 4 County. I agree. 5 MS. COLEMAN: Khara Coleman, for the Sheriff. 6 I agree. 7 THE REPORTER: Thank you. You may proceed. 8 MR. FLAXMAN: Thank you. 9 ROBERTO ORNELAS, 10 called as a witness herein, having been first 11 duly sworn, was examined and testified as 12 follows: 13 EXAMINATION 14 BY MR. FLAXMAN: 15 Q. Mr. Ornelas, could you state and spell 16 your last name for us, please. 17 A. Sure. Last name, Ornelas, 18 o-r-n-e-l-a-s. 19 Q. Thank you. What's your business or 20 occupation? 21 A. Cook County Sheriff's Deputy, assigned 22 to corrections. 23 Q. And how long have you worked for the 24 sheriff in corrections?</p> <p style="text-align: right;">6</p>	<p>1 Q. And who is responsible -- who hands you 2 the form? 3 A. The officer assigned to the shipments 4 for that day. They collect these forms from the 5 detainees upon their release from the county 6 jail. 7 Q. And what do you do when you get those 8 forms? 9 A. I separate the ones that are designated 10 for pickups, that's where the detainee 11 designates -- someone picks up the property, and 12 the donated ones, where they sign off as 13 donated. 14 Q. And are there ever forms that you come 15 across where the prisoner or detainee has not 16 signed either donate or designated someone to 17 pick up? 18 A. Yes. 19 Q. What do you do with those? 20 A. I -- I hang onto them for -- well, it 21 says 45 days, but I hang onto it well past 22 45 days. 23 Q. And then what do you do with the 24 detainee's property?</p> <p style="text-align: right;">8</p>



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<p>1           So -- as for the detainee who has not 2 signed the form?</p> <p>3           A.   We -- we hang onto it, and we wait and 4 see if friends or family decide to pick it up.</p> <p>5           Q.   And how long do you wait?</p> <p>6           A.   Well, it could be months.</p> <p>7           Q.   Okay. What do you do with the 8 detainee's clothing for the detainee who has not 9 signed the form?</p> <p>10          A.   That's -- that's part of what we keep. 11 we just hang onto it.</p> <p>12          Q.   And what happens after that four or 13 five-month period has elapsed and no one has 14 come to pick up the detainee's property?</p> <p>15          A.   I still hang onto it. There's -- we -- 16 we hang onto it, basically.</p> <p>17          Q.   Is there ever a time when that property 18 starts getting -- is destroyed?</p> <p>19          A.   After some time, yes.</p> <p>20          Q.   Are you involved with keeping -- with 21 any record-keeping of what property is 22 destroyed?</p> <p>23          A.   If by -- paperwork given to the 24 warehouse, yes.</p> <p style="text-align: right;">9</p>	<p>1           Q.   Do you know who prepared it?</p> <p>2           A.   This, no. No, sir. I know it -- it's 3 prepared, I guess, by people at the County. Who 4 exactly, I don't know.</p> <p>5           Q.   Okay. Does the -- when you get the 6 forms after the detainee is shipped, do you also 7 get the property?</p> <p>8           A.   No, not at that time, no.</p> <p>9           Q.   Okay. Where is the property when the 10 detainee is shipped?</p> <p>11          A.   It's on our inventory belts.</p> <p>12          Q.   Could you -- what is the inventory 13 belt?</p> <p>14          A.   Well, just imagine a very large dry 15 cleaners. You hang the garments on a hook.</p> <p>16          Q.   Is there any property that is -- that 17 is not prisoner property but it's stored that is 18 not on the inventory hook?</p> <p>19          A.   No, if the property came down to us, 20 it's placed on a hook.</p> <p>21          Q.   Is there enough room on the inventory 22 hook to hold all the prisoner property?</p> <p>23          A.   Okay. Can you rephrase the question?</p> <p>24          Q.   All right. Is there enough room on the</p> <p style="text-align: right;">11</p>
<p>1           Q.   And where's the warehouse located?</p> <p>2           A.   That's off of Rockwell Street. I don't 3 know the exact address, but it's not far from 4 the compound.</p> <p>5           Q.   Is there any inventory of the prisoner 6 property that's held at the warehouse?</p> <p>7           A.   That, I would not know.</p> <p>8           Q.   Okay. Do you know who would know?</p> <p>9           A.   The warehouse director.</p> <p>10          Q.   Do you know who he or she is?</p> <p>11          A.   Ms. Pat Horne.</p> <p>12          Q.   Do you communicate with Ms. Horne about 13 the property that's being shipped to the 14 warehouse?</p> <p>15          A.   Yes.</p> <p>16          Q.   And do you -- does she communicate with 17 you to advise you when property is being -- has 18 been destroyed or otherwise disposed of?</p> <p>19          A.   No.</p> <p>20          Q.   Looking at Exhibit 6, do you know who 21 was involved in preparing this form?</p> <p>22          Exhibit 6 is the current shipment 23 donation, slash, designator form.</p> <p>24          A.   Okay. Can you repeat the question?</p> <p style="text-align: right;">10</p>	<p>1           inventory hooks as to hold the property of each 2 detainee?</p> <p>3           A.   No.</p> <p>4           Q.   What happens when there's an overflow?</p> <p>5           A.   We have shelves and another room where 6 we store that property.</p> <p>7           Q.   And after the detainee leaves the jail 8 to go to IDOC, how long is that property held in 9 the inventory hooks room?</p> <p>10          A.   45 days.</p> <p>11          Q.   Okay. Have you ever been involved with 12 working with prisoners who are being shipped and 13 having them sign the form?</p> <p>14          A.   Yes.</p> <p>15          Q.   And are the prisoners asked to sign the 16 form the morning that they're being shipped?</p> <p>17          A.   Yes.</p> <p>18          Q.   If you look at the form, the shipment 19 donation/designator form, it says, 20                You cannot take any of the items above 21 with you.</p> <p>22                That's the second paragraph. Do you 23 see that?</p> <p>24          A.   Yes.</p> <p style="text-align: right;">12</p>



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<p>1 Q. Does that mean that all of the property 2 that came in with the -- or let me rephrase 3 that. 4 Does that mean that none of the 5 property that came in with the detainee is 6 shipped with him or her to the Department of 7 Corrections? 8 A. Yes, none of that is shipped with the 9 detainee. 10 Q. And has that been -- was that the 11 practice before June of 2019? 12 A. Yes. 13 Q. Has that been the practice since at 14 least 2015? 15 A. Yes. 16 Q. When did you start working with 17 prisoner property? 18 A. I believe it -- well, when I started my 19 employment there, October 1994. 20 Q. Did you volunteer to work in property, 21 or were you -- 22 A. No, no, that happens at the tier level. 23 Q. Okay. When did you stop working with 24 prisoner property at the tier level?</p> <p style="text-align: right;">13</p>	<p>1 this form is? 2 A. This form here indicates a -- a gurney 3 is just a -- it's a big compartment with wheels, 4 and we store detainee property there. In this 5 case, that is the property that would be going 6 to the warehouse at 45 days or donated property. 7 What you see -- gurney 59, that's how 8 we labeled that particular gurney, and it had 96 9 bags in it. 10 Q. And before that black rectangle was 11 placed on the form, what information was on 12 page one of -- was on page -- on that page? 13 A. Well, it would have been gurney 14 number 60. By the size of that, maybe 61, 62. 15 Q. And did you prepare this form back in 16 January of 2018? 17 A. Yes. 18 Q. And let's look at page two, which is 19 marked Sheriff 0934. There's a signature. Is 20 that your signature? 21 A. No, that would be Officer Mayo. 22 Q. And what information was on the form 23 before the black rectangles were inserted there? 24 A. Other detainees' names and their IDs,</p> <p style="text-align: right;">15</p>
<p>1 A. I don't quite understand. You want to 2 know how -- how the process works? How I did 3 it? Is that what you're asking? 4 Q. No, I want to know how long you've -- 5 how long has it been since you've been on the 6 tier working with prisoner property? 7 A. Oh, I have not been on a tier since 8 I -- 2007. 9 Q. Okay. Let me ask you to look at what 10 has been -- it looks -- titled as Exhibit 4. 11 I think your counsel could hand that to 12 you. 13 MR. DOMBROWSKI: Ken, I don't have numbers on 14 it. Which -- 15 MR. FLAXMAN: Just the file number. You 16 don't have that either? 17 Exhibit 4 is the inmate shipment 18 property memorandum dated -- Sheriff 933. 19 MR. DOMBROWSKI: 933? Okay. 20 MR. FLAXMAN: Right. 21 THE WITNESS: Okay. I have that in front of 22 me. 23 BY MR. FLAXMAN: 24 Q. Could you tell us what this -- what</p> <p style="text-align: right;">14</p>	<p>1 ID numbers. Book and ID numbers. 2 Q. And did the unclaimed property that was 3 being -- that's referred to in this form, was 4 that -- does that include clothing, or was that 5 limited to -- well, did that include clothing? 6 A. Yes. 7 Q. Now, in the original form we had, the 8 Exhibit 6, the current form, it talks about 9 donating clothing? 10 A. The donation part? 11 Q. Right. What -- well, what happens with 12 donated clothing? 13 A. Donated property, that also gets sent 14 to the warehouse. 15 Q. What happens with donated clothing? Is 16 that made available to inmates who don't have 17 clothing? 18 A. Okay. In that case, if it's a donated 19 bag, we -- from that bag, we would use pants or 20 shirts for detainees who have none upon their 21 discharge, and jackets, for inclement weather. 22 Q. And is anything done with the compliant 23 property that had been placed in the sealed bag 24 by the arresting agency when the detainee says</p> <p style="text-align: right;">16</p>



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<p>1 donate it?</p> <p>2 A. That, too, gets sent to the warehouse.</p> <p>3 It's all in one bag. The little bag, the big</p> <p>4 bag.</p> <p>5 Q. Okay. Do you know if the sealed bag</p> <p>6 that arrives with the inmate or the detainee</p> <p>7 from the arresting agency is ever unsealed</p> <p>8 before the prisoner leaves the jail?</p> <p>9 A. Yes.</p> <p>10 Q. When is it unsealed?</p> <p>11 A. There's a compartment in that bag</p> <p>12 that's set aside for currency. Like currency,</p> <p>13 the bag has to be opened, and they then put the</p> <p>14 money in the detainee's account.</p> <p>15 Q. Is there any other occasion when that</p> <p>16 sealed property bag that arrives with the</p> <p>17 detainee from the arresting agency is opened?</p> <p>18 A. If there is a wedding band, and they</p> <p>19 request it, prescription eyeglasses, that is</p> <p>20 given to them.</p> <p>21 Q. Well, let me show you which is a</p> <p>22 document -- or let me ask your counsel to show</p> <p>23 you a document that's a screenshot which has</p> <p>24 been identified as Exhibit 5. It's a landscape.</p> <p style="text-align: right;">17</p>	<p>1 to -- there's a highlighted line sent to</p> <p>2 warehouse May 5 through 26. Do you see that?</p> <p>3 A. Yes.</p> <p>4 Q. When you looked at it, were you able to</p> <p>5 click on that line and bring up the document</p> <p>6 that's referred to by the file name?</p> <p>7 A. Yes.</p> <p>8 Q. And was that the document that we</p> <p>9 looked at with the -- with those black</p> <p>10 rectangles?</p> <p>11 A. No. No.</p> <p>12 Q. What was on the document when you --</p> <p>13 when you reviewed it, sent to warehouse May 5</p> <p>14 through 26?</p> <p>15 A. The shipment form that Mr. Elizarri</p> <p>16 filled out.</p> <p>17 Q. Let me ask you to look at Exhibit 3,</p> <p>18 which is Sheriff 855.</p> <p>19 A. I have that.</p> <p>20 Q. Is this the IDOC shipment designator</p> <p>21 form that was in effect from July of 2017 until</p> <p>22 the other form came in in 2019?</p> <p>23 A. Yes, I believe so.</p> <p>24 Q. Were you involved in changing the form?</p> <p style="text-align: right;">19</p>
<p>1 A. Yes, I have that in front of me.</p> <p>2 Q. Could you tell us what it is, if you</p> <p>3 know?</p> <p>4 A. That right there would be -- it's a</p> <p>5 screenshot of files that represent property that</p> <p>6 was sent to the warehouse.</p> <p>7 Q. So you would use this -- do you use the</p> <p>8 information on the screenshot in your work?</p> <p>9 A. At that time, yeah, that was one of the</p> <p>10 methods, yes.</p> <p>11 Q. Were you involved in finding or</p> <p>12 locating property that belonged to the named</p> <p>13 plaintiff -- any of the named plaintiffs in this</p> <p>14 case, Mr. Velleff, Mr. Jordan, or Mr. Elizarri?</p> <p>15 A. Yes.</p> <p>16 Q. How did you go about doing that?</p> <p>17 A. Well, communications with the</p> <p>18 warehouse, for one. Another, in our inventory</p> <p>19 of property based on the paperwork we filed</p> <p>20 away.</p> <p>21 Q. And were you -- did you look at this</p> <p>22 screenshot, the Exhibit 5?</p> <p>23 A. This particular one, for Elizarri.</p> <p>24 Q. When you looked at it, were you able</p> <p style="text-align: right;">18</p>	<p>1 A. No.</p> <p>2 Q. Do you know why it was changed?</p> <p>3 A. For clarification.</p> <p>4 Q. Were you involved in --</p> <p>5 A. Well --</p> <p>6 Q. Go ahead.</p> <p>7 A. I don't know what you mean by</p> <p>8 involvement. I just -- I wanted something a</p> <p>9 little more -- clearer, less cluttered. And</p> <p>10 they came up with this.</p> <p>11 Q. What did you feel was unclear about the</p> <p>12 2017 form?</p> <p>13 A. Their -- well, a disclaimer stating the</p> <p>14 detainee's -- maybe a little more information on</p> <p>15 what they're doing.</p> <p>16 Q. What were the topics about which more</p> <p>17 information was provided on the 2019 form?</p> <p>18 A. Bigger boxes. Bigger boxes. The size</p> <p>19 kind of adds -- on -- on my part, for the</p> <p>20 designation and the donation.</p> <p>21 Q. When the prisoner checked the donate</p> <p>22 box and the form came to you, what, if anything,</p> <p>23 did you do with the prisoner's property?</p> <p>24 A. If he donate -- signed off on it, we</p> <p style="text-align: right;">20</p>



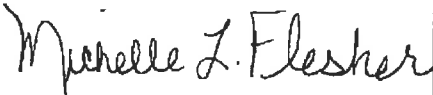
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<p>1 would set that to the side for -- if we needed</p> <p>2 pants, shirts, or jackets. We would remove that</p> <p>3 and log that in our CCOMS systems and send the</p> <p>4 rest to -- to the warehouse.</p> <p>5 Q. What is CCOMS an abbreviation for?</p> <p>6 A. Let's see. Cook County Office</p> <p>7 Management System. It's a management system</p> <p>8 where we manage the detainee's whereabouts,</p> <p>9 property, movement.</p> <p>10 Q. And how long have you been using that</p> <p>11 system at the jail?</p> <p>12 A. Since its inception a few years back.</p> <p>13 Q. Is any effort made to remove plain</p> <p>14 wedding bands from compliant property when the</p> <p>15 prisoner is being shipped to IDOC and the</p> <p>16 wedding band is still in the property bag?</p> <p>17 A. If we are made aware that there's a</p> <p>18 wedding band upon shipment, we -- we will remove</p> <p>19 that and give that to the detainee.</p> <p>20 Q. If there is a government issued</p> <p>21 identification in this property bag that the</p> <p>22 prisoner arrived with -- at the jail with, is</p> <p>23 any effort made to remove that government issued</p> <p>24 ID and send it to IDOC with the prisoner?</p> <p style="text-align: right;">21</p>	<p>1 shipment donation/designator form? Is that on</p> <p>2 the day of shipment?</p> <p>3 A. No. The best I can answer that is when</p> <p>4 I worked the tier. And upon our notification</p> <p>5 that the detainee is being shipped, we would be</p> <p>6 given these forms, and we would have the</p> <p>7 detainee fill out their part.</p> <p>8 Q. When you worked on the tier, were you</p> <p>9 notified in the early morning hours of the day</p> <p>10 of shipment that the particular detainee was</p> <p>11 being shipped?</p> <p>12 A. Yes.</p> <p>13 Q. And early morning hours is like 3:00,</p> <p>14 4:00 a.m.?</p> <p>15 A. Yes.</p> <p>16 Q. What shift did you work when you worked</p> <p>17 on the tier?</p> <p>18 A. The night shift, 11:00 to 7:00 a.m.</p> <p>19 Q. And what shift do you work now?</p> <p>20 A. 6:00 to 2:00.</p> <p>21 Q. That's ...</p> <p>22 I need to check one thing, and then</p> <p>23 we're just about done.</p> <p>24 Oh, let me ask you to look at compliant</p> <p style="text-align: right;">23</p>
<p>1 A. No, we do not give identifications to</p> <p>2 the detainees upon their shipment.</p> <p>3 Q. Is there anything else other than</p> <p>4 wedding bands that is -- can be removed from the</p> <p>5 sealed property bag and sent along with the</p> <p>6 prisoner to IDOC?</p> <p>7 A. If we're made aware of prescription</p> <p>8 eyeglasses.</p> <p>9 Q. Anything else?</p> <p>10 A. No.</p> <p>11 Q. And how would you be made aware of</p> <p>12 prescription eyeglasses?</p> <p>13 A. The detainee himself would let us know.</p> <p>14 Q. Is there a form for that?</p> <p>15 A. No, there's no form. We just indicate</p> <p>16 that in the jail management system, referred to</p> <p>17 as CCOMS, that a pair of eyeglass --</p> <p>18 prescription eyeglasses were removed.</p> <p>19 Q. Are prisoners notified in advance of</p> <p>20 when their shipment date will be to IDOC?</p> <p>21 A. I don't know that.</p> <p>22 Q. That's fine.</p> <p>23 When is the prisoner asked to sign that</p> <p>24 form? I don't think I've asked you this. The</p> <p style="text-align: right;">22</p>	<p>1 arrestee property, which I'll call Exhibit 2.</p> <p>2 It's been marked Elizarri 11 -- or 1012.</p> <p>3 A. I have that in front of me.</p> <p>4 Q. And is that -- that's dated 2008. Do</p> <p>5 you know, has the list of compliant property</p> <p>6 changed since 2008?</p> <p>7 A. Yes, there's a newer one.</p> <p>8 Q. And are there more compliant property</p> <p>9 items on the newer one or less? Or if you -- if</p> <p>10 you can tell me.</p> <p>11 A. I would have to -- I would have to see</p> <p>12 the other one.</p> <p>13 Q. Okay. Do you know the date of the</p> <p>14 newer one?</p> <p>15 A. No, sir.</p> <p>16 MR. FLAXMAN: I have nothing further.</p> <p>17 MR. DOMBROWSKI: Danielle, do you have any?</p> <p>18 Anything?</p> <p>19 MS. MIKHAIL: I do not.</p> <p>20 MR. DOMBROWSKI: Thank you. No questions</p> <p>21 here.</p> <p>22 MR. FLAXMAN: Signature?</p> <p>23 MR. DOMBROWSKI: We'll reserve.</p> <p>24 MR. FLAXMAN: Thank you.</p> <p style="text-align: right;">24</p>





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<p>1 MR. DOMBROWSKI: Thank you. Ken, are you 2 ordering? 3 MR. FLAXMAN: Of course. 4 (Discussion off the record.) 5 THE REPORTER: Mr. Dombrowski, do you want a 6 copy? 7 MR. DOMBROWSKI: Yes, ma'am. 8 (Deposition concluded at 11:00 a.m.) 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> <p style="text-align: right;">25</p>	<p>1 STATE OF ILLINOIS ) 2 ) SS: 3 COUNTY OF MCHENRY ) 4 Michelle L. Flesher, an Officer of the 5 Court, do hereby certify that heretofore, 6 to-wit, on the 16th day of July, 2021, 7 personally appeared before me, ROBERTO ORNELAS, 8 in a cause now pending and undetermined in the 9 Northern District of Illinois, wherein LEONCIO 10 ELIZARRI, et al., are the Plaintiffs, and 11 SHERIFF OF COOK COUNTY, et al., are the 12 Defendants. 13 I further certify that the said witness 14 was first duly sworn to testify the truth, the 15 whole truth, and nothing but the truth in the 16 cause aforesaid; that the testimony then given 17 by said witness was reported stenographically by 18 me in the presence of the said witness, and 19 afterwards reduced to digital format by 20 Computer-Aided Transcription, and the foregoing 21 is a true and correct transcript of the 22 testimony so given by said witness as aforesaid. 23 I further certify that the signature to 24 the foregoing deposition was reserved by counsel</p> <p style="text-align: right;">27</p>
<p>1 STATE OF ILLINOIS ) 2 ) SS: 3 COUNTY OF C O O K ) 4 IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS 5 COUNTY DEPARTMENT - LAW DIVISION 6 LEONCIO ELIZARRI, et al, ) 7 Plaintiffs, ) 8 vs. ) No. 17 CV 8120 9 SHERIFF OF COOK, et al, ) 10 Defendants. ) 11 This is to certify that I have read the 12 transcript of my deposition taken in the 13 above-entitled cause by Michelle L. Flesher, 14 Certified Shorthand Reporter, on the 16th day of 15 July, 2021, and that the foregoing transcript 16 accurately states the questions asked and the 17 answers given by me as they now appear. 18 19 ROBERTO ORNELAS 20 SUBSCRIBED AND SWORN TO 21 before me this _____, day 22 of _____ 2021. 23 24 Notary Public</p> <p style="text-align: right;">26</p>	<p>1 for the respective parties. 2 I further certify that the taking of this 3 deposition was pursuant to notice, and that 4 there were present at the deposition the 5 attorneys hereinbefore mentioned. 6 I further certify that I am not counsel 7 for nor in any way related to the parties to 8 this suit, nor am I in any way interested in the 9 outcome thereof. 10 IN TESTIMONY WHEREOF: I have hereunto 11 set my verified digital signature this July 16, 12 2021. 13 14  15 16 17 Illinois Certified Shorthand Reporter 18 19 20 21 22 23 24</p> <p style="text-align: right;">28</p>



Roberto Ornelas 07/16/2021

1 McCORKLE LITIGATION SERVICES, INC.  
2 200 N. LaSalle Street Suite 2900  
3 Chicago, Illinois 60601

4 July 16, 2021

5 Gerald M. Dombrowski  
6 Sanchez, Daniels & Hoffman, LLP  
7 333 West Wacker Drive, Suite 500  
8 Chicago, Illinois 60606

9 IN RE: Leoncio Elizarri, et al., vs.  
10 Sheriff of Cook County, et al.

11 COURT NUMBER: 17 CV 8120

12 DATE TAKEN: July 16, 2021

13 DEPONENT: Roberto Ornelas

14 Dear Mr. Dombrowski:

15 Enclosed is the deposition transcript for the  
16 aforementioned deponent in the above-entitled  
17 cause. Also enclosed are additional signature  
18 pages, if applicable, and errata sheets.

19 Per your agreement to secure signature, please  
20 submit the transcript to the deponent for review  
21 and signature. All changes or corrections must  
22 be made on the errata sheets, not on the  
23 transcript itself. All errata sheets should be  
24 signed and all signature pages need to be signed  
and notarized.

After the deponent has completed the above,  
please return all signature pages and errata  
sheets to me at the above address, and I will  
handle distribution to the respective parties.  
If you have any questions, please call me at  
(312) 263-0052.

Sincerely,  
Michelle L. Flesher

Court Reporter

cc: ALL COUNSEL OF RECORD

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## Compliant Arrestee Property (CAP)

Compliant Property Consists of:

- Currency (United States ONLY)
- Identification (one [1] United States Government issued identification card with photograph)
- Plain wedding band (no engraving or stones)
- Keys
- Prescription eyeglasses (limit 2)
- Prescription Medication (with a pharmacy label matching the subject's identification)
- Bible and/or Koran (soft cover books only)
- Legal documents (soft cover books only)
- One jacket, coat or sweater (inventoried by D.O.C. on arrival)

2008 Cook County Sheriff's Office of Planning



ELIZARRI1012

Elizarrri v. Sheriff, 17-cv-8120

EXHIBIT

3



**COOK COUNTY SHERIFF'S OFFICE**  
**DEPARTMENT OF CORRECTIONS**  
**IDOC SHIPMENT DESIGNATOR FORM**

H1627

AJ

GENERAL INFORMATION (To be completed by the Divisional Office)			
SUBJECT/DETAINEE NAME (PRINT): Brown, Geround	INMATE ID#: 2218 0305015	CURRENT DATE: 17 Jan 19	SHIPMENT DATE: 17 Jan 19
DONATION AUTHORIZATION (To be completed by the Subject/Detainee)			
BE ADVISED: ALL INVENTORIED PROPERTY WILL BE DONATED			
CHECK BOX <input checked="" type="checkbox"/> DONATION	SUBJECT/DETAINEE SIGNATURE: <i>[Signature]</i>		DATE: 
SWORN MEMBER NAME (PRINT):	SWORN MEMBER SIGNATURE:	STAR#:	DATE:
AUTHORIZED DESIGNATOR INFORMATION (To be completed by the Subject/Detainee)			
NAME:			
ADDRESS:			
CITY:		STATE:	ZIP:
PICKUP INSTRUCTION			
<p>Please be advised that the subject/detainee named above has been transferred to the Illinois Department of Corrections. The subject/detainee was unable to take all of his or her personal clothing/belongings to the penitentiary with them and have appointed you as his or her authorized designator. Upon receiving this letter you must call (773) 694-6310 or (773) 694-5410 to confirm a pickup date.</p> <p>On your pickup date bring this letter and two pieces of valid identification, one with a picture (i.e. driver's license, State ID, passport) to the Cook County Department of Corrections, Division 5 Lobby. You may pick up clothing/belongings only on the date given to you between the hours of 8:00 a.m. and 2:00 p.m.</p> <p>IF THE PROPERTY IS NOT PICKED UP WITHIN 45 DAYS FROM THE DATE SUBJECT/DETAINEE IS SHIPPED TO THE ILLINOIS DEPARTMENT OF CORRECTIONS, THE PROPERTY WILL BE REMOVED FROM STORAGE AND DISPOSED OF ACCORDINGLY.</p>			
ACKNOWLEDGEMENT (Subject/Detainee's name to be completed by the Divisional Officer)			
Brown, Geround		Inmate's ID# 208-0305015	
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.			
SUBJECT/DETAINEE SIGNATURE:			
SWORN MEMBER SIGNATURE:		STAR#:	DATE:

(FCN-54) (JUL 17)

PINK COPY-DETAINEE

WHITE COPY-DEPARTMENT

5

Sheriff 0855



## COOK COUNTY DEPARTMENT OF CORRECTIONS

### MEMORANDUM

TO: Office of Support Services

DATE: 25JAN18

FROM: RTC/Ofc. Ornelas #14679

SUBJECT: Inmate Shipment Property

Dir. Horne, the 6 gurneys the Warehouse is receiving today are in compliance with Sheriff's Office Procedure 109 and the unclaimed property contained in the gurneys is now eligible for destruction.

Gurney #59 96 bags



SIGNATURE:

*[Handwritten signature]* 14679

**Sheriff 0933**



59

20160927058

Signature: Mayo 16867

**Sheriff 0934**

« DOC (U:) » Clothing Room » SHIPMENTS » Sent to Warehouse »

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Search Sent to Warehouse

Name	Date modified	Type	Size
July 05 2016 donated sent to warehouse	7/5/2016 2:39 PM	Adobe Acrobat D...	2,429 KB
JULY 7,9,10, 2016	7/29/2016 2:11 AM	Adobe Acrobat D...	11,515 KB
JULY 14, 21, 22, 25, 2016	7/28/2016 8:05 AM	Adobe Acrobat D...	10,149 KB
Mar 3, April 12	4/27/2016 2:52 PM	Adobe Acrobat D...	14,600 KB
Mar 7, 8, 10, 11, 14, 17	3/26/2016 10:24 AM	Adobe Acrobat D...	16,185 KB
Mar 7,10,11	4/30/2016 2:27 PM	Adobe Acrobat D...	16,013 KB
Mar 15, 17	3/30/2016 10:33 AM	Adobe Acrobat D...	8,411 KB
March 7,8,14,15 2016	4/30/2016 1:17 PM	Adobe Acrobat D...	16,077 KB
March 7,10,11	4/30/2016 1:21 PM	Adobe Acrobat D...	11,209 KB
MAY 31, JUNE 2,3,6, 2016	7/26/2016 8:16 AM	Adobe Acrobat D...	12,287 KB
past 45 days sent to Warehouse july 8,11,...	9/1/2016 10:47 AM	Adobe Acrobat D...	9,243 KB
past 45 days sent to Warehouse july 8,11,...	9/1/2016 10:47 AM	Adobe Acrobat D...	15,325 KB
Sent to the Warehouse on 23JUN16	6/21/2016 3:22 PM	Adobe Acrobat D...	15,037 KB
sent to warehouse August 22,23 donated,...	8/25/2016 5:26 AM	Adobe Acrobat D...	13,610 KB
sent to warehouse August 25,26,29,30 do...	9/1/2016 10:49 AM	Adobe Acrobat D...	11,526 KB
sent to warehouse june 13-16	8/2/2016 10:15 AM	Adobe Acrobat D...	10,064 KB
sent to warehouse may 5-26	6/8/2016 10:13 AM	Adobe Acrobat D...	5,404 KB
SENT TO WAREHOUSE OCT 3,4,6,7	11/3/2016 11:42 AM	Adobe Acrobat D...	18,428 KB
sent to warehouse various April 2016 dates	5/8/2016 10:17 AM	Adobe Acrobat D...	4,503 KB
ship for warehouse june 23-24	8/8/2016 10:08 AM	Adobe Acrobat D...	8,510 KB
shipment for warehouse june 7thru23	8/8/2016 10:02 AM	Adobe Acrobat D...	8,612 KB
SKMBT_42316060815520	6/9/2016 7:07 AM	Adobe Acrobat D...	12,323 KB

sent to warehouse may 5-26 Date modified: 8/8/2016 10:13 AM  
 Adobe Acrobat Document Size: 5.27 MB  
 Date created: 8/8/2016 10:14 AM  
 Offline availability: Not available

Sent to Warehouse on 8-8-16

**EXHIBIT**

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**COOK COUNTY SHERIFF'S OFFICE**  
**DEPARTMENT OF CORRECTIONS**  
**SHIPMENT DONATION/DESIGNATOR FORM**

**EXHIBIT**

6

When you were admitted to the Department of Corrections, you may have had clothing items and/or personal property that was inventoried during admission and held during your detention. Belongings known as compliant property were placed in a sealed bag by the arresting agency.

You are being shipped to the Illinois Department of Corrections or to another facility and cannot take any of the items above with you. You have two choices. **You can donate the items or designate someone to pick them up.** Below are two sections, Donation Authorization and Authorization for Property Pickup. **DO NOT FILL OUT BOTH SECTIONS.**

I have read the above and I understand.

Subject/Detainee Signature: \_\_\_\_\_ Date: \_\_\_\_\_

**GENERAL INFORMATION**

*(To be completed by the Divisional Officer)*

SUBJECT/DETAINEES NAME:	SUBJECT/DETAINEE ID #	CURRENT DATE:	SHIPMENT DATE:
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**OPTION #1: DONATION AUTHORIZATION**

*(To be completed by the Subject/Detainee)*

**I HEREBY AUTHORIZE THE DONATION OF MY COMPLIANT PROPERTY AND SURRENDER THE PROPERTY TO THE SHERIFF'S OFFICE.**

CHECK BOX: <input type="checkbox"/> <b>DONATION</b>	SUBJECT/DETAINEE SIGNATURE:	DATE:
SWORN MEMBER SIGNATURE:	SWORN MEMBER STAR #:	DATE:

**OPTION #2: AUTHORIZATION FOR PROPERTY PICKUP**

*(To be completed by the Subject/Detainee)*

**I HEREBY AUTHORIZE THE FOLLOWING PERSON TO PICK UP MY COMPLIANT PROPERTY AT THE COOK COUNTY JAIL:**

NAME:	ADDRESS:	CITY/STATE/ZIP:
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I, \_\_\_\_\_ Inmate's ID # \_\_\_\_\_  
do hereby understand 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.

INMATE'S SIGNATURE:		
SWORN MEMBER SIGNATURE:	SWORN MEMBER STAR #:	DATE:

**PICKUP INSTRUCTION**

Please be advised that the subject/detainee named above has been transferred to the *Illinois Department of Corrections* or to another facility. The subject/detainee was unable to take all his or her personal clothing/belongings to the penitentiary with them and have appointed you as his or her authorized designator. Upon receiving this letter, you must call (773) 674-0110 or (773) 674-5410 to confirm a pickup date.

On your pickup date, bring this letter and a valid photo ID (i.e., driver's license, State ID, passport) to the Cook County Department of Corrections, *Division 5 Lobby*. You may pick up 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 45 days of the date of this letter, it will be removed from storage and disposed of accordingly.