



Transcript of the Deposition of  
**Milton Delaney**

**Case:** Milton Delaney, Jr. v. City of Chicago; et al.  
**Taken On:** July 26, 2021

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The figure consists of 12 horizontal bars, each preceded by a small black square. The bars are arranged in two columns of six. The first column has bars of lengths approximately 10, 15, 25, 30, 20, and 10. The second column has bars of lengths approximately 90, 95, 85, 70, 60, and 50. The bars are black on a white background.

13           Q.    Okay.  So, Mr. Delaney, I just want to  
14 make sure I understand.  You don't recall or you  
15 don't know if you hired a private attorney to  
16 represent you or if you had a public defender when  
17 you pled guilty?

18 A. I remember a woman named LaQuita Bonds.  
19 She -- I know she was present. If she hired an  
20 attorney -- if she hired an attorney, I don't  
21 remember. I just don't remember.

22 Q. Who is LaQuita Bonds to you?

23 A. She was a female friend to me at the time.

24 Q. Where was she at that you -- that you're

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1       **even referencing her?**

2           A.    I just remember I was in court.  I  
3    don't -- I don't know which was the court facility I  
4    was in.  I just don't remember that.

5           Q.    **So you remember LaQuita Bonds being at a**  
6   **courthouse that you were also in?**

7           A.    Yes.

8           Q.    **And was she in the gallery, like the**  
9   **seats?**

10          A.    I don't remember the setting.

11          Q.    **Okay.  Well, was she there -- she was**  
12   **there as a private citizen?  She wasn't there for a**  
13   **case, was she -- her own case; was she?  Do you**  
14   **know?**

15          A.    No.

16          Q.    **Did you have a conversation with Ms. Bonds**  
17   **while you were in court that day?**

18          A.    I don't remember.  I just -- I used to  
19   communicate with her on the phone, though.

20          Q.    **Okay.  Did you ever -- did she ever tell**  
21   **you that you -- that she hired a lawyer for you?**

22          A.    I don't remember.

23          Q.    **Do you remember, did she tell you anybody**  
24   **hired a law for you?**

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1 River. East Moline, yes.

2 Q. **Who came to visit you at East Moline?**

3 A. LaQuita Bonds.

4 Q. **Anybody else?**

5 A. I don't remember anyone else.

6 Q. **And if you answered this before, I'm not**  
7 **trying to ask you again unnecessarily, but what is**  
8 **your relationship with LaQuita Bonds?**

9 A. She was a girlfriend that turned into a  
10 relationship.

11 Q. **And there was -- you had no restrictions**  
12 **on your housing where you couldn't have visitors at**  
13 **East Moline or at Illinois River; is that correct?**

14 A. I don't remember having any restrictions  
15 that I couldn't receive visitors. I don't remember  
16 that. I don't even -- I don't even remember, like,  
17 having restrictions, like, getting in trouble while  
18 incarcerated. I just remember doing my time and  
19 coming home.

20 Q. **Okay. Did you have phone calls while you**  
21 **were in IDOC? And, again, I'm limiting my questions**  
22 **to the time you were serving your one-year in Cook**  
23 **County sentence and your eight-year Will County**  
24 **sentence. Okay?**

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1 A. Uh-huh.

2 Q. Did you have any phone calls? Did you  
3 talk to people on the phone when you were in prison?

4 A. Yes.

5 Q. Who did you talk to while you were in  
6 prison?

7 A. LaQuita Bonds, Roshanta Delaney -- she's  
8 my sister. I remember talking to Evelyn Watson.  
9 She was somewhat of a grandmother to me. She's  
10 deceased.

11 Q. How about to a Nicole Mohammed? Did you  
12 ever talk to a woman named Nicole Mohammed while you  
13 were in custody?

14 A. In custody where?

15 Q. At the Illinois Department of Corrections.

16 A. What, which, where, what? What year or  
17 whatever, because I don't recall that name. I  
18 don't -- I don't --

19 Q. How about the number --

20 A. Say that name again.

21 Q. Nicole Mohammed.

22 A. That name doesn't sound familiar to me.

23 Q. How about the phone number [REDACTED]-7639?  
24 Does that number sound familiar to you?

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1 A. Repeat that number again.

2 Q. Sure. [REDACTED] -7639.

3 A. No. I'm not good at remembering numbers.

4 So that -- that doesn't sound familiar to me.

The figure consists of a 15x15 grid of black bars on a white background. The bars are arranged in a pattern where they are longer in the center and shorter towards the edges. The grid is bounded by a thick black border.