

# Exhibit 5



Transcript of the Deposition of  
**Bryan Glenn**

**Case:** In Re: Watts Coordinated Pretrial Proceedings  
**Taken On:** February 23, 2024

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

)  
)  
In Re: WATTS COORDINATED )  
PRETRIAL PROCEEDINGS ) Case No. 19 CV 1717  
)  
)  
)

The deposition of BRYAN GLENN taken via  
videoconference, called by the Defendants for  
examination, pursuant to notice and pursuant to  
the Federal Rules of Civil Procedure for the  
United States District Courts pertaining to the  
taking of depositions, taken before Kari  
Wiedenhaupt, Certified Shorthand Reporter within  
and for the County of Cook and State of  
Illinois, commencing at the hour of  
11:32 a.m. on the 23rd day of February, 2024.

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On behalf of the Defendant Ronald Watts;

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16 Matthew Cadman and Michael Spaargaren.  
17  
18  
19  
20  
21  
22  
23  
24

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I N D E X

WITNESS	PAGE
BRYAN GLENN	
Examination by Ms. Olivier	6

E X H I B I T S

NUMBER	MARKED FOR ID
(None marked.)	

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1 (Whereupon, the witness was duly  
2 sworn.)

3 MS. OLIVIER: Let the record reflect that  
4 this is the deposition of Bryan Glenn being  
5 taken pursuant to notice and agreement of the  
6 parties in accordance with the Federal Rules of  
7 Evidence and Civil Procedure and all applicable  
8 local rules.

9 This matter is being taken in the Watts  
10 Coordinated Pre-trial Proceedings under  
11 Case No. 19 CV 1717 with all discovery pending  
12 before Magistrate Judge Finnegan in the United  
13 States District Court for the Northern District  
14 of Illinois. This matter's individual case  
15 number is 16 CV 8940. This deposition is being  
16 taken remotely via Zoom.

17 Can all attorneys present please  
18 identify themselves by stating their names on  
19 the record and the parties they represent?

20 I'll go first. My name is Kelly  
21 Olivier. I represent the individual defendant  
22 officers that are represented by Hale & Monico.

23 MR. TEPFER: Hi. Good morning. I'm Josh  
24 Tepfer. I represent the Loevy plaintiffs and in

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1 particular, Ben Baker and Clarissa Glenn.

2 MR. SCHALKA: Michael Schalka. I represent  
3 Defendants Spaargaren and Cadman in the  
4 coordinated proceedings.

5 MR. FLAXMAN: Joel Flaxman for the Flaxman  
6 plaintiffs.

7 MS. McELROY: Good morning. Lisa McElroy on  
8 behalf of Sergeant Watts.

9 MR. SCAHILL: Tim Scahill, Calvin Ridgell.

10 MS. MORRISON: Katherine Morrison, City of  
11 Chicago.

12 MS. OLIVIER: All right. I think that's  
13 everyone.

14 BRYAN GLENN,  
15 having been first duly sworn, was examined via  
16 videoconference and testified as follows:

17 EXAMINATION

18 BY MS. OLIVIER:

19 Q. Mr. Glenn, have you been deposed  
20 before?

21 A. No, I have not.

22 Q. Okay. Are you represented today by  
23 Josh Tepfer for the purposes of this deposition?

24 A. I don't know.



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1 THE WITNESS: Josh, are you representing me?  
2 I don't know the technicality of that.

3 MS. OLIVIER: Sorry, Josh. You're muted.

4 MR. TEPFER: Okay. I'm sorry. If you would  
5 like me to answer, we are not representing  
6 Mr. Glenn for this deposition.

7 BY MS. OLIVIER:

8 Q. Okay. All right. So I am just going  
9 to go over some kind of logistics before we get  
10 started.

11 So as you can see, we have a court  
12 reporter here. She is taking down every word  
13 that is said. Because of that, we need to do  
14 our best to try not to talk over one another.  
15 Because we're via Zoom, that can be a little bit  
16 difficult just with delays and things like that.  
17 So that being said, I will do my very best to  
18 allow you to fully answer any question before I  
19 start asking you another, but I just ask that  
20 you extend that same courtesy to me. Please  
21 allow me to fully ask the question even if you  
22 know where I'm going with it before you begin  
23 your answer. Okay?

24 A. (Witness speaking on mute.)

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1           Q.    All right. I see you're muted right  
2 now. If you could just make sure that you're  
3 off mute the whole time, because unfortunately,  
4 the court reporter can't take down nods of the  
5 head or shakes of the head. To the extent that  
6 a question calls for a yes or no answer, please  
7 answer out loud verbally yes or no. Okay?

8           A.    Okay. Thank you.

9           Q.    No problem. Also, things like uh-huh  
10 and uh-uh look the same on the record when it's  
11 written down. So, again, to the extent that you  
12 can answer with a yes or no, say yes or no.  
13 Okay?

14          A.    Yes.

15          Q.    All right. Lastly, you know, I don't  
16 expect this to be a super long day for you here.  
17 However, to the extent you need to take a break  
18 at any time, that's absolutely fine. I just ask  
19 that if a question is pending, meaning you've  
20 been asked a question, that you answer the  
21 question before we take that break. Okay?

22          A.    Yes.

23          Q.    And if at any point you need to take a  
24 break, just let me know and we can go ahead and

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1     **take it. Okay?**

2         A.     Yes.

3         **Q.     All right. And the very last thing is**  
4     **if you answer a question that I ask, I'm going**  
5     **to assume that you understood it. If you don't**  
6     **understand a question that I ask you, please let**  
7     **me know, and I will go ahead and try to rephrase**  
8     **it. Fair?**

9         A.     Yes.

10        **Q.     All right. Mr. Glenn, where are you**  
11    **located today?**

12        A.     I'm in Ruskin, Florida.

13        **Q.     Do you reside in Ruskin, Florida?**

14        A.     Yes.

15        **Q.     All right. How long have you lived**  
16    **there for?**

17        A.     Approximately 18 months.

18        **Q.     Prior to living in Ruskin, Florida,**  
19    **where were you residing?**

20        A.     Chicago.

21        **Q.     What neighborhood?**

22        A.     Hyde Park.

23        **Q.     Is there anyone present in the room**  
24    **with you?**

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1 A. No.

2 Q. All right. Is there anything on your  
3 screen right now besides this Zoom screen?

4 A. No.

5 Q. All right. Did you bring any materials  
6 with you today to assist with your testimony or  
7 with the deposition?

8 A. No.

9 Q. Okay. Please don't be offended by the  
10 next question I ask. It's something that we do  
11 ask of everyone we're deposing.

12 Are you currently on any medications  
13 that would affect your ability to testify  
14 truthfully?

15 A. No.

16 Q. Okay. Did you meet with any attorney  
17 from the Loevy law firm prior to appearing here  
18 today?

19 A. Yes.

20 Q. Or speak with them? Yes. Okay.  
21 How many times?

22 A. Once.

23 Q. Okay. And when was that conversation?

24 A. Monday, I believe.

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1           **Q.    Was that over the phone, via Zoom, in**  
2 **person?**

3           A.    Zoom.

4           **Q.    How long was that conversation for?**

5           A.    Approximately 40 minutes.

6           **Q.    What was discussed in that**  
7 **conversation?**

8           A.    Prepping me or telling me what to  
9 expect in this deposition.

10          **Q.    Okay. Did you discuss any of the**  
11 **substance of the testimony you would be**  
12 **providing today?**

13          A.    No.

14          **Q.    All right. I'm going to -- just so you**  
15 **kind of know where I'm going, I'm going to start**  
16 **by asking you a series of background questions,**  
17 **and then I will kind of get into the meat and**  
18 **potatoes, so to speak, of why you're here today.**  
19 **Okay?**

20          A.    Yes.

21          **Q.    All right. Mr. Glenn, what is your**  
22 **date of birth?**

23          A.    September the 4th, 1987.

24          **Q.    Who do you currently live with in**

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1 **Florida? Or do you live with anyone in Florida?**

2 A. My wife and children.

3 **Q. What's your wife's name?**

4 A. Miriam Glenn.

5 **Q. How long have you been married to**

6 **Miriam?**

7 A. It will be nine months in July.

8 **Q. Congratulations.**

9 A. Nine years. I said nine months.

10 **Q. Nine years. I was going to say, that's**  
11 **short. Okay.**

12 A. Nine years, yeah.

13 **Q. Hopefully she doesn't hear that answer.**

14 **And how many children do you have?**

15 A. We have two.

16 **Q. And when were they born?**

17 A. One August 1st, 2009. The other was  
18 born May 9th, 2021.

19 **Q. All right. Growing up where did you**  
20 **live? And when I say growing up, I mean from,**  
21 **you know, when you were born up until the age of**  
22 **18.**

23 A. Sure. I lived at 3831 South Lake Park  
24 from birth until eighth grade, freshman year,

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1 somewhere around there. So I would assume  
2 that's 13, 14 years old. My mother and father  
3 had two separate homes at that point, and I  
4 would go between homes. So we had a house also  
5 in Olympia Fields at 20616 South Corinth Avenue,  
6 and that's Olympia Fields 60461.

7 **Q. Were you going back and forth between**  
8 **the South Lake Park home and the Olympia Fields**  
9 **home?**

10 A. Yes, for a period of time.

11 **Q. Okay. Did you attend high school?**

12 A. I did.

13 **Q. Okay. Where did you attend high**  
14 **school?**

15 A. Ridge Central High School.

16 **Q. Is that located in the city of Chicago?**

17 A. That's in Olympia Fields.

18 **Q. Okay. Who -- which of your parents**  
19 **resided in Olympia Fields?**

20 A. My father.

21 **Q. And did you attend Ridge Central High**  
22 **School for all four years of high school?**

23 A. I initially enrolled at Mount Carmel,  
24 and I left within the first month of school and

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1 stayed at Ridge Central.

2 Q. Did you graduate high school?

3 A. I did.

4 Q. All right. What year did you graduate  
5 in -- graduate?

6 A. 2005.

7 Q. And, Mr. Glenn, you have three  
8 siblings, correct?

9 A. Yes.

10 Q. All right. Where do you fall in line?

11 A. I am the youngest.

12 Q. You are the youngest?

13 A. Yes.

14 Q. Okay. And then what's the next sibling  
15 above you?

16 A. My brother.

17 Q. Clarence?

18 A. Yes.

19 Q. All right. And do you know what year  
20 he was born?

21 A. '86.

22 Q. All right. And who is next after that?

23 A. Yvonne.

24 Q. All right. And when was Yvonne born?



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1           A.    '73 probably.

2           Q.    Don't worry. I won't hold you to it  
3 exactly. All right.

4                   And then is Clarissa the oldest?

5           A.    Yes.

6           Q.    So approximately how many years are  
7 between you and Clarissa?

8           A.    I guess that would put us in the  
9 15 years' range.

10          Q.    When you were growing up in -- at the  
11 South Lake Park address, were all of your  
12 siblings living there at that time?

13          A.    They were.

14          Q.    Okay. And at some point do you  
15 remember how old you were when Clarissa moved  
16 out?

17          A.    I do not.

18          Q.    Okay. When you were going back and  
19 forth between the Olympia Fields address and the  
20 Chicago address, were any of your other siblings  
21 going back and forth with you?

22          A.    My brother.

23          Q.    Okay. Would you kind of mirror each  
24 other -- each other's schedules with that going

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1     **back and forth?**

2           A.     Yes. He was one year ahead of me. He  
3     had -- was at Mount Carmel. I was in eighth  
4     grade still going to school at Holy Angels.

5           **Q.     Okay.**

6           A.     And so, yes, which was why I wound up  
7     going to -- we both ended up enrolling in Ridge  
8     Central High School.

9           **Q.     When you first started going back and**  
10    **forth between the Olympia Fields home and the**  
11    **Chicago home, was Clarissa still living with you**  
12    **guys in Chicago?**

13          A.     No.

14          **Q.     Okay. Do you know how long --**

15          A.     '95 -- '98 -- oh, I thought you  
16    finished.

17          **Q.     No. It's okay, Mr. Glenn. Go ahead.**

18          A.     Please restate the question.

19          **Q.     I'm just wondering, knowing that she**  
20    **was out of the home when you were at least in**  
21    **eighth grade, approximately when -- does that**  
22    **help you kind of think about how old you were**  
23    **when she moved out?**

24          A.     Sure. If I was using a proxy, I would

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1 say that it was before seventh or sixth grade  
2 for sure.

3 **Q. Okay. Growing up with Clarissa in your**  
4 **family home, how would you describe your**  
5 **relationship with her?**

6 A. She is my oldest sister. I don't know  
7 how to characterize that. She is much older  
8 than me. She was good. I mean, you know, she  
9 was my sister. I don't know what -- what more  
10 context you're looking for.

11 **Q. Would -- did she -- did you guys play**  
12 **together? Was she kind of like a second mom to**  
13 **you, or did you have your mom, and she was just**  
14 **the older sister hanging around? I guess I'm**  
15 **just trying to get some more context of that**  
16 **relationship.**

17 A. Well, there is -- there is only one  
18 mom.

19 **Q. Yes.**

20 A. So, yeah. My sister -- both of my  
21 sisters were playful. Just big sister  
22 activities. Watching us or taking us with them  
23 from time to time to the grocery store, grab  
24 something to eat, those types of things. I

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1 don't know about playing in the house. They  
2 had -- you know, it's not as if we were in the  
3 same age range, but we interacted. I mean, I  
4 don't know how else to say that, yeah.

5 **Q. Sure. Understood.**

6 **What is your highest level of**  
7 **education?**

8 A. I have a bachelor's degree.

9 **Q. Okay. Where did you attend college?**

10 A. Well, multiple places, but where did I  
11 get my bachelor's degree? The University of  
12 Louisiana at Monroe. I have also taken some  
13 continuing education courses through the  
14 University of Chicago. I have also attended  
15 junior college and community college prior to  
16 that as well.

17 **Q. Where did you attend junior college and**  
18 **community college?**

19 A. Joliet Junior College and Prairie State  
20 Community College.

21 **Q. When did you achieve your bachelor's?**

22 A. 2010.

23 **Q. And what sorts -- strike that.**

24 **What was your bachelor's degree in?**

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1           A.     Criminal justice.

2           **Q.     And then what sorts of continuing**  
3 **education courses have you taken through the**  
4 **University of Chicago?**

5           A.     Finance and private equity.

6           **Q.     Are you currently employed?**

7           A.     Yes.

8           **Q.     Where are you currently employed?**

9           A.     Service, my company.

10          **Q.     Your own company?**

11          A.     Yes.

12          **Q.     How long have you owned your own**  
13 **company for?**

14          A.     Approximately five years.

15          **Q.     And what type of company is Service?**

16          A.     We help local governments determine  
17 financial models for things like parking  
18 tickets, water bills, fines, and fees.

19          **Q.     So essentially you kind of help them**  
20 **organize to the extent, like, how much revenue**  
21 **they are going to be taking in from things like**  
22 **fines and fees and parking tickets and then how**  
23 **they will implement them in running the**  
24 **government?**

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1           A.     That's a way to say it to simplify it.  
2     I guess you could just say that we tell or  
3     advise them on what they should or shouldn't be  
4     charging folks for fines and fees.

5           **Q.     Got you.**

6                   **Prior to that job, were you employed?**

7           A.     Yes.

8           **Q.     Okay.   And where were you employed**  
9     **prior to starting your own company?**

10          A.     I was working for my aunt doing  
11     marketing.   So the name of the company was  
12     Comprehensive Quality Care, and I did marketing  
13     for them.

14          **Q.     Did you -- what years did you work for**  
15     **Comprehensive Quality Care?**

16          A.     Multiple stints.   Multiple stints.   I  
17     can't pull it up in the back of my head right  
18     now, yeah.

19          **Q.     Understood.**

20                   **Do you recall ever working there at the**  
21     **same time as your sister Clarissa?**

22          A.     I do.

23          MS. OLIVIER:   We lost someone.   Mr. Scahill.  
24     Let's pause for a second.   Sorry, Mr. Glenn.

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1 One moment.

2 (Short pause off the record.)

3 MS. OLIVIER: Oh, he's back. All right. We  
4 can go back on the record.

5 BY THE WITNESS:

6 A. Do you want to reask the question?

7 BY MS. OLIVIER:

8 Q. Yes. And I actually forgot what your  
9 answer was.

10 So did you ever work at Comprehensive  
11 Quality Care with your sister Clarissa?

12 A. Yes.

13 Q. Okay. We know from her deposition that  
14 she worked there from approximately 2004 through  
15 2014.

16 Knowing that, do you know approximately  
17 what years you would have overlapped with her?

18 A. Probably somewhere around the -- 2012,  
19 2013. Somewhere in there.

20 Q. And did you always work in marketing  
21 when you worked for Comprehensive Quality Care,  
22 or did you work in other areas as well?

23 A. Just marketing.

24 Q. What is the name of your aunt that you

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1     **worked for there?**

2         A.     What -- pardon me?

3         **Q.     What's the name of your aunt who you**  
4     **worked for there?**

5         A.     Joanne Glenn.

6         **Q.     Did you know a Debra Lee when you**  
7     **worked there?**

8         A.     I do recall Debra Lee.

9         **Q.     Okay. Did you ever work with her?**

10        A.     Could you define "work with"?

11        **Q.     I guess what do you -- what do you take**  
12     **that to me mean? Like, she worked for the same**  
13     **company as you, but you didn't interact with**  
14     **her? Or I don't know.**

15        A.     Yes. We worked there at the same time.  
16     She was in HR. So I'd interact with her when  
17     necessary.

18        **Q.     Got you.**

19                **Did you ever -- obviously, it's your**  
20     **sister. I'm sure you interacted with her when**  
21     **you worked with her at Comprehensive Quality**  
22     **Care, but did you ever -- were you ever**  
23     **performing the same jobs together?**

24        A.     I don't believe so.



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1           **Q.    Okay.  Do you recall what position your**  
2           **sister was when you were working there in**  
3           **2012/2013?**

4           A.    She did outbound calls.  That's all I  
5           know.

6           **Q.    Okay.  And then what was your**  
7           **understanding or what -- you did have an**  
8           **understanding.  You worked in marketing.**

9                   **What was Comprehensive Quality Care?**  
10           **What type of business was that?**

11           A.    A home health agency.

12           **Q.    Was it a home health agency for any**  
13           **specific population of individuals?**

14           A.    That, I won't speculate.  I would  
15           assume that it was for the area surrounding  
16           Chicago where we were positioned.

17           **Q.    When was the last time that you spoke**  
18           **with your sister Clarissa?**

19           A.    Within the past three weeks.  Not as --  
20           not as recent as a week, but in the past three  
21           weeks for sure.

22           **Q.    Would you describe your relationship as**  
23           **close today?**

24           A.    Yes.

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1           **Q.    And how often do you typically speak**  
2 **with her?**

3           A.    Typically, once a month.  Once or twice  
4 a month.

5           **Q.    And about how often would you say you**  
6 **see her or visit with her?**

7           A.    As often as we are in the same state  
8 probably.

9           **Q.    Understood.**  
10                **So, I guess, before you moved to**  
11 **Florida, how often were you seeing Clarissa?**

12           A.    Probably every month, every other  
13 month.

14           **Q.    Since you've moved to Florida, how**  
15 **often have you seen each other, would you say?**

16           A.    I have seen her since I moved maybe  
17 twice.

18           **Q.    Have you spoken with her about being**  
19 **deposed in this case?**

20           A.    Yes.

21           **Q.    All right.  And what have you discussed**  
22 **in -- or how many times have you spoken with her**  
23 **about it?**

24           A.    Once.

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1           **Q. All right. And when was that**  
2           **conversation?**

3           A. Whenever I got a phone call from Josh  
4           Tepfer the first time notifying me about the  
5           deposition.

6           **Q. All right. And what did you discuss**  
7           **with Clarissa at that time?**

8           A. I just asked what -- why did I get  
9           picked for the task?

10          **Q. What was her response?**

11          A. She said, "You weren't my first  
12          choice."

13          **Q. Oh, that's nice.**

14          A. Yes. It wasn't substantive, if that's  
15          your question. She just told me that, you know,  
16          she believes that I could speak well and that  
17          she did -- she just trusts me, that I would be  
18          able to speak on her behalf, so...

19          **Q. Are you pretty close with all your**  
20          **siblings, or are you closest with some more than**  
21          **others?**

22          A. I'm pretty close with every one of  
23          them.

24          **Q. Okay. Growing up, would you say you**

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1 and Clarence were closer just by virtue of the  
2 age gap?

3 A. Yes.

4 Q. But today, to the extent you are all  
5 adults, you are, like, about equally close with  
6 everybody? Or maybe not. You correct me.

7 A. I am probably -- I speak more to my  
8 sister Yvonne. I am equally close to everyone.

9 Q. Understood.

10 Where does Yvonne live?

11 A. 63rd and Rhodes.

12 Q. In Chicago?

13 A. Yes.

14 Q. And is Clarence still in Chicago?

15 A. No.

16 Q. Where does he reside now?

17 A. Matteson, Illinois.

18 Q. Ben Baker, do you recall the first time  
19 that you met him?

20 A. I do not.

21 Q. Do you recall your first memory of when  
22 he became involved with your sister and your  
23 family's life?

24 A. I do not have a specific time frame or

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1 snapshot of when I remember him first appearing.

2 Just kind of always been there, I guess.

3 **Q. Okay. Of your earliest memories Ben**  
4 **was around?**

5 A. To put that in perspective, how old is  
6 his oldest child, and then back out from there.

7 **Q. So Ben Baker, Jr. was born in July of**  
8 **1991.**

9 A. That would put me at four years old.  
10 So that gives you context.

11 **Q. All right. Do you recall Ben living**  
12 **with your family at that time?**

13 A. I do not remember that.

14 **Q. Okay. Do you recall Ben ever living**  
15 **with your family in your family home?**

16 A. He may have. I do not remember that.

17 **Q. Okay. But was he around a decent**  
18 **amount?**

19 A. I saw him. I don't know -- I don't  
20 know a decent amount. I don't know.

21 **Q. Okay. Do you know how often you would**  
22 **see him in the course of a week or a month as**  
23 **you were growing up?**

24 A. Often.

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1           Q.    Okay.  Sorry.  The reason I have to  
2   keep asking is just to the extent we can get an  
3   idea, because often can mean different things to  
4   different people.

5                    Would that be once a week, multiple  
6   times a week?

7           A.    Let's say once a week for sure.

8           Q.    Okay.  And would it be him coming over  
9   to your family's home?

10          A.    I would have to say yes, because I know  
11   my mom would not have allowed me to go out  
12   during the week.  So it would probably be yes.

13          Q.    Okay.

14          A.    Especially at that age.

15          Q.    Right.  Clarissa, though, was still  
16   living in your family home at this time,  
17   correct?

18          A.    Yes.

19          Q.    Okay.  And do you have a memory of your  
20   nephew -- well, your nephew to the extent --  
21   your nephew, was he kind of like a brother  
22   growing up?

23          A.    All of my nieces and nephews still have  
24   a deferential relationship with us and still

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1 call us uncle.

2 Q. Oh, that's nice.

3 A. Yeah.

4 Q. Do you have a memory of Ben  
5 Baker, Jr. being born?

6 A. No.

7 Q. Okay. What about your nephew Gerard?

8 A. No.

9 Q. Okay. Your nephew Deon?

10 A. No.

11 Q. Okay. Did the -- did your nephews grow  
12 up in your family home with you or reside with  
13 you in the family home for a period of time?

14 A. Yes. I don't know if all three were  
15 there at the same time, but, yes, the kids were  
16 there when we were there.

17 Q. How would you describe your  
18 relationship with the kids?

19 A. Great.

20 Q. Do you still maintain a relationship  
21 with your nephews?

22 A. Yes.

23 Q. How would you describe your sister's  
24 personality growing up?

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1 A. Growing up -- me growing up?

2 **Q. You growing up, yes.**

3 A. I guess, what, older teenagerish  
4 behavior. That's kind of hard. I hadn't  
5 anticipated that.

6 So let me think. I just remember me  
7 and us being in the front room quite a bit. We  
8 would be in the front room, and my sister  
9 Clarissa and Yvonne with their kids. I don't  
10 know anything that they did outside of the  
11 house. That's my only view of them.

12 **Q. Got you.**

13 **From what you would see in the house,**  
14 **how would you describe her personality?**

15 A. Joking, kind, yeah.

16 **Q. Did you ever -- to the extent that you**  
17 **have memories of Ben kind of always being**  
18 **around, did you ever spend time -- like,**  
19 **one-on-one time with just your sister and Ben,**  
20 **or would it be with your nephews as well? Like,**  
21 **what's your memory of that growing up?**

22 A. Growing up or at any time in life?

23 **Q. Let's start with growing up, and then**  
24 **we can go forward.**



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1           A.    As a child, I do not remember -- well,  
2   that's -- I remember one time Clarissa getting  
3   her first home, first apartment, and I remember  
4   her cooking steaks, and I remember me and my  
5   brother going over there with just us and  
6   Clarissa and her family.

7           **Q.    Was this to her apartment in The Wells?**

8           A.    No. This was not in Ida B. Wells. In  
9   her first apartment, wherever that was. It  
10   was -- yeah. You would have to look that up.

11          **Q.    Was Ben there when you went over?**

12          A.    Yes.

13          **Q.    Okay. Do you recall times when Ben was**  
14   **not around because he was incarcerated either in**  
15   **Cook County Jail or in prison growing up, or**  
16   **would you have any awareness of that?**

17          A.    As a child, I -- I know there were  
18   stints where he wasn't around. I was not aware  
19   of why he wasn't around.

20          **Q.    Did you know or do you know Bernard**  
21   **Harvey or Bird, Gerard's dad?**

22          A.    Yes.

23          **Q.    All right. And how do you know him?**

24          A.    He has always been around as well.

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1           **Q.    Okay. Did he have a relationship with**  
2 **your family similar to Ben's or different?**

3           A.    I would say different.

4           **Q.    Okay. In what way?**

5           A.    I knew Bird's entire family, whereas I  
6 did not know Ben's entire family.

7           **Q.    Did you know any of Ben's family**  
8 **members?**

9           A.    Now, yes.

10          **Q.    Okay. And who do you know now of Ben's**  
11 **family that you didn't know before?**

12          A.    Yeah. His mom Cookie, Carol --

13          THE COURT REPORTER: What was the second  
14 name? I'm sorry.

15          THE WITNESS: Carol. They say Curl.

16          BY MS. OLIVIER:

17          **Q.    Okay. Got you.**

18          A.    You have -- oh, my gosh -- Thomas, who  
19 is a cousin of his. You have -- oh, my gosh.  
20 Now you're -- now you're making me think. I  
21 know a lot of his family members. One of them  
22 works at Neiman's. What is her name? She lived  
23 out in Matteson. Oh, my gosh. This is so  
24 wrong. I know --

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1           **Q.     That's okay.**

2           A.     Okay. Yeah. I know -- I know his  
3 family members. Let's just put it that way.  
4 They would know my name. How about that? Yeah.

5           **Q.     What changed, I guess, to where you**  
6 **didn't necessarily know them growing up, but you**  
7 **know them now?**

8           A.     Oh, exposure, time.

9           **Q.     And then did -- Bird, did his family**  
10 **live near your family, or how was it that you**  
11 **knew his entire family?**

12          A.     Because other people in our family  
13 interacted with Bird as well.

14          **Q.     Got you.**

15          A.     Whereas Clarissa was only interacting  
16 with Ben.

17          **Q.     Okay. How would you characterize your**  
18 **relationship with Ben growing up?**

19          A.     Good.

20          **Q.     Did you have any awareness that he had**  
21 **this involvement or interactions with police in**  
22 **terms of getting arrested and things like that?**

23          A.     I did not have any awareness until I  
24 got to high school probably.

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1           Q.    Okay.  And then knowing that you were  
2   born in 1987, you started high school in, like,  
3   2001, 2002, would you say?

4           A.    2001, yes.

5           Q.    2001.  Okay.

6                   Were you aware of Ben being in a gang?

7           A.    No.

8           Q.    When you got to high school and started  
9   to have this awareness of Ben's interactions  
10  with the criminal justice system, what was your  
11  understanding of it at that time?

12          A.    That he had been to jail before.

13          Q.    Okay.  Did you know what he had been to  
14  jail for?

15          A.    I'm trying not to superimpose my  
16  thoughts now on then.  I do not recall if I  
17  knew.  I just know that he had been to jail.

18          Q.    Okay.  Now what's your understanding of  
19  his criminal history in the late 19- -- or the  
20  90s and 2000s?

21          A.    Could you reask that?

22          Q.    Sure.

23                   Now as an adult do you have any  
24  understanding of what his criminal history was

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1 **before the year 2000?**

2 A. I have some understanding.

3 **Q. Okay. And what is that understanding?**

4 A. That when he was growing up at some  
5 point he was involved in gang activity as well  
6 as drugs.

7 **Q. Do you now as an adult looking back**  
8 **make any connections of seeing, like, "Oh, that**  
9 **I now know as an adult was evidence of him being**  
10 **involved in a gang or drug activity" or no?**

11 MR. TEPFER: Objection, vague and the form of  
12 the question.

13 But go ahead. You can still answer if  
14 you can.

15 BY THE WITNESS:

16 A. Could you restate the question?

17 BY MS. OLIVIER:

18 **Q. Sure.**

19 **Understanding -- or having this**  
20 **understanding that he was involved in gang and**  
21 **drug activity when you were growing up, now as**  
22 **an adult reflecting back can you think of any**  
23 **instances where you're now connecting -- making**  
24 **that connection of "Oh, that would have**

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1     **indicated to me that he was in a gang or he was**  
2     **selling drugs"?**

3             MR. TEPFER: Same objection.

4             But go ahead.

5     BY THE WITNESS:

6             A. No. I can't -- I can't say that I can  
7     draw a direct line to any memory.

8     BY MS. OLIVIER:

9             **Q. Maybe not even being able to draw a**  
10     **direct line, but do you have now reflecting back**  
11     **any instances or memories that you can think of**  
12     **that now have dawned on you of "Oh, he must have**  
13     **been dealing drugs that day" or something like**  
14     **that?**

15             MR. TEPFER: Same --

16     BY MS. OLIVIER:

17             **Q. Or been involved in gang activity or**  
18     **drug activity?**

19             MR. TEPFER: Same objection, form.

20     BY THE WITNESS:

21             A. No.

22     BY MS. OLIVIER:

23             **Q. How did you feel about Ben growing up?**  
24     **Did you view him as kind of like an older**

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1 **brother? Were you close with him? Was he just**  
2 **a guy that was around?**

3 A. I know that him and Clarissa were  
4 happy. I don't -- it's difficult for me to say  
5 anybody was a brother other than my brother and  
6 my sisters. Our family was our family. We  
7 didn't have the outsiders. We didn't do the  
8 play cousin thing. We didn't do that sort of  
9 stuff. So he was, you know, dating my sister,  
10 and it was all good with them, so it was all  
11 good with me.

12 **Q. How did your parents seem to feel about**  
13 **Ben?**

14 A. My dad was fine from what I could see.  
15 My mom has a problem with everyone, so...

16 **Q. I hope not your wife.**

17 A. No. I won't testify to that either,  
18 so...

19 **Q. When Ben would be at your home growing**  
20 **up -- you mentioned before you had memories of**  
21 **your sisters and their kids being in the front**  
22 **room.**

23 **Do you have any memories like that with**  
24 **Ben and Clarissa, you know, all hanging out as a**

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1     **family watching TV together or anything like**  
2     **that, eating meals?**

3         A.     No.

4         **Q.     Okay.**

5         A.     At our home, no.

6         **Q.     Did you ever know Ben to have a job?**

7         A.     In life?

8         **Q.     Yes.**

9         A.     Oh, yeah, didn't he -- he drove trucks  
10        or something recently.

11        **Q.     Okay. Besides that, any other times**  
12        **you can recall him having a job?**

13        A.     No.

14        **Q.     Okay. You're aware that Ben was**  
15        **arrested for dealing drugs in 2018, correct?**

16        A.     I saw a newspaper article that said  
17        that he was arrested for selling drugs.

18        **Q.     And did you -- have you -- when was the**  
19        **last time you had spoken with Ben prior to that**  
20        **happening or seeing that newspaper article?**

21        A.     You're asking me when was the last time  
22        I spoke to Ben before seeing a newspaper article  
23        about him being arrested?

24        **Q.     Yeah.**



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1           A.    It could have been within 48 hours of  
2    seeing that news article for all I know.  Yeah.

3           **Q.    And I guess a better question is, did**  
4   **you -- well, did you have a relationship with**  
5   **him still at that time?**

6           A.    Yes.

7           **Q.    Do you have a relationship with Ben**  
8   **today?**

9           A.    Yes.

10          **Q.    All right.  Now, how would you describe**  
11   **that relationship today?**

12          A.    Good.  I don't have bad relationships.

13          **Q.    Fair enough.**

14                **When -- besides the newspaper**  
15   **article -- when you saw the newspaper article,**  
16   **were you surprised?**

17          A.    I was.

18          **Q.    What was your immediate reaction?**

19          A.    This is not good.

20          **Q.    Are you aware of your nephew Gerard's**  
21   **criminal history?**

22          A.    It was in the same newspaper article.

23          **Q.    Okay.**

24          A.    Prior to that, I had no understanding

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1 of anything that he had done.

2 **Q. Have you spoken with either Ben or your**  
3 **nephew Gerard about their charges or anything**  
4 **that happened after that?**

5 A. Let me bifurcate that. I know for a  
6 fact that I have not spoken with Gerard about  
7 anything other than him needing to get his  
8 record expunged and helping him to get a job.  
9 So in the context of that, I would have had to  
10 have talked to him in just saying, "Keep your  
11 head up. Don't get in any more trouble," things  
12 of that nature. We did not discuss details of  
13 how he got into the situation he was in.

14 **Q. Understood.**

15 A. Ben -- I try not to be patronizing with  
16 things that seem to be -- that would be  
17 sensitive for someone with so much spotlight. I  
18 do not recall discussing anything with Ben at  
19 all around the arrest or the news article.

20 **Q. Did you have contact with Ben when he**  
21 **was incarcerated following his arrest on those**  
22 **charges?**

23 A. In 2018?

24 **Q. And after that when he was ultimately**

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1 convicted and served time, did you have  
2 interactions with him either via phone, or did  
3 you visit him?

4 A. No.

5 Q. Do you recall any conversations you had  
6 with Clarissa around that time when that  
7 happened?

8 A. No, no.

9 Q. At any point since 2018, have you had  
10 any discussions with Clarissa about the fact  
11 that Ben and Gerard were arrested and convicted?

12 A. Yes.

13 Q. And what -- what have you discussed  
14 with her?

15 A. I told her that she needs to make sure  
16 that she does everything she can to keep her  
17 house together.

18 Q. What did you mean by that?

19 A. Making sure that everybody is doing  
20 what they are supposed to be doing and not  
21 getting themselves into trouble.

22 Q. Like selling drugs?

23 A. Like anything that could get them into  
24 trouble.

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1           **Q.    Yeah.  What was her response?**

2           A.    Quiet, somber.  "I understand."

3           **Q.    Did she seem surprised to you?**

4           A.    I would not be able to tell if she was  
5 surprised or not.

6           **Q.    Why do you -- why do you say that?**

7           A.    Why would you assume that I would be  
8 able to tell if she was surprised?

9           **Q.    She is your sister.**

10          A.    Right.

11          **Q.    You grew up with her.  You can**  
12 **understand, I'm sure -- you seem like an**  
13 **emotionally intelligent person.  You could**  
14 **probably understand people's reactions.  So I'm**  
15 **just curious.**

16          A.    Yeah.  Clarissa from 2005 forward has  
17 been a different individual.  So she has been  
18 much quieter, wears her embarrassment, has --  
19 tries to keep from -- tries to keep everything  
20 in, tries to hold everything in, keep a stronger  
21 front, things of that nature, as best as she  
22 can.  But, yeah, those types of things  
23 generally -- any conversations like that  
24 generally end in tears with her.

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1           **Q.    Besides the outward show of emotion in**  
2           **the form of tears, does she vocalize what she is**  
3           **feeling?**

4           MR. TEPFER:   Objection to form, I think.

5                     But go ahead.

6           BY THE WITNESS:

7           A.    It's difficult for me to remember her  
8           giving voice to her exact feelings.   Just really  
9           repeating, "I'm so sorry."   That's something  
10          that she said a lot.   "I'm so sorry.   I'm  
11          sorry."   She apologizes a lot for things and  
12          just -- you know, even when it has nothing to do  
13          with her.

14          BY MS. OLIVIER:

15          **Q.    Was she apologizing to you directly?**

16          A.    Yeah.

17          **Q.    When do you recall this happening?**

18          A.    During that phone call that you just  
19          asked about, me talking with her.

20          **Q.    This was in -- with respect to that**  
21          **2018 arrest?**

22          A.    Yes.

23          **Q.    Did she say why she was so sorry?**

24          A.    No.

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1           **Q. Did you have any understanding of why**  
2           **she was saying sorry? Like why do you --**  
3           **knowing your sister, why do you think she was**  
4           **apologizing?**

5           MR. TEPFER: Objection, calls for  
6           speculation.

7                     But go ahead and answer if you can.

8           BY THE WITNESS:

9           A. Yeah. The only thing I can tell you is  
10          that she always apologized as her way of trying  
11          to get out of the conversation and just put an  
12          end to it. Like -- you know, your earlier  
13          question was when we had a discussion around the  
14          arrest in 2018, how did she -- was she  
15          surprised? She was not.

16                    Preceding that question you asked me  
17          about had I ever had a talk with her about that  
18          and what did I mean by keeping your house in  
19          order, and I told you by keeping everybody out  
20          of trouble. So all I can tell you is, is  
21          that -- drawing a line from me telling her to  
22          keep her house in line, her apologizing, that's  
23          all I can tell you is her just saying she was  
24          sorry and crying.

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1 BY MS. OLIVIER:

2 Q. You noted that 2005 forward she has  
3 been a different individual. You have noted  
4 that she was much quieter. She wears her  
5 embarrassment and is kind of holding everything  
6 in.

7 How was that a change from how she was  
8 prior to 2005?

9 A. She was just a happier person; happier,  
10 more involved. After that she stopped answering  
11 phone calls all the -- sometimes. She had  
12 periods of not having interaction at all for --  
13 sometimes she would go dark for a couple months  
14 at a time. And, yeah, I mean --

15 Q. Do you remember how old you were when  
16 Clarissa moved out with your nephews from your  
17 family home? I think I asked that before. So  
18 strike that.

19 That was -- you said right around,  
20 like, middle school. Like sixth or seventh  
21 grade, you think?

22 A. That's right.

23 Q. Okay. Sorry about that.

24 Do you recall Clarissa having a job at

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1     **this time, or was she kind of just completely**  
2     **busy with the kids?**

3           A.     Probably just busy with the kids. I  
4     may also say that my dad was still alive, and  
5     hardly anybody worked because he took care of  
6     everybody.

7           Q.     And am I -- do I have the year right?  
8     **And I'm sorry for your loss.**

9                     Did your dad pass in 2004?

10          A.     Yes, April 22nd.

11          Q.     I'm sorry for your loss.

12                    Going to the Ida B. Wells complex  
13     **housing development, do you remember how old you**  
14     **were when Clarissa moved there?**

15          A.     My earliest memory of them being there  
16     would have to be between eighth grade and  
17     freshman year. So that is my earliest  
18     recollection.

19          Q.     Would you visit them in The Wells?

20          A.     Yes.

21          Q.     When I say "them," I'm referring to --  
22     **was Ben living there at the time as well?**

23          A.     Yes.

24          Q.     How often would you say that you would



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1 **visit Ben and Clarissa at The Wells?**

2 A. Once a month, once a -- once every  
3 other month maybe.

4 **Q. And were they living within the 527**  
5 **building in Apartment 206 at that time?**

6 A. That's the only place I remember them  
7 living.

8 **Q. Okay. When you would visit Clarissa,**  
9 **Ben, and your nephews, would you be going alone,**  
10 **or would you be going with other family members?**

11 A. No. I mean, I was not going alone to  
12 the projects. My -- my mom would not allow  
13 that. So if we went, it would usually be us  
14 being dropped off, me and my brother, or being  
15 walked by my mom or dad driving us over for  
16 something. It would -- it would have to be them  
17 cooking, Clarissa cooking, or something like  
18 that. We didn't just pop up for no reason.

19 **Q. Do you remember the time period**  
20 **where -- how the -- what the family's reaction**  
21 **was to Clarissa moving into the projects with**  
22 **the kids?**

23 A. I do not.

24 **Q. Do you remember yourself having any**

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1     **thoughts on it getting dropped off there?**

2     **Obviously, you didn't grow up in the projects.**

3     **So kind of what was your reaction?**

4           A.     I was -- my other sister moved out  
5     around the same time. So I -- it's difficult to  
6     draw a parallel. I don't know that -- in my  
7     head at the time, I don't know. I don't -- I  
8     don't know what I was thinking.

9           **Q.     Was your sister moving to The Wells**  
10    **your first "interaction," for lack of a better**  
11    **term, with the projects?**

12          A.     I don't know if Clarissa or Yvonne  
13    moved out first. Whichever one moved out first  
14    would have been my first interaction with the  
15    projects.

16          **Q.     Where did Yvonne move to?**

17          A.     She moved into the -- I don't know the  
18    official name of them. They were called New  
19    Town, and it was between 38th and 39th Street on  
20    Ellis. And she moved into a -- one of those  
21    tall buildings and stayed up on the eighth floor  
22    is all I remember, which was a block away from  
23    us.

24          **Q.     How would you describe the quality of**

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1     **New Town in comparison to The Wells where**  
2     **Clarissa was living?**

3           A.     How was the quality of what exactly?

4           **Q.     Let me ask you this:   How would you**  
5     **describe the quality of The Wells when you would**  
6     **go visit your sister?**

7           A.     Right.   And I'm asking the quality of  
8     what exactly?

9           **Q.     The living conditions, the buildings,**  
10    **the environment.**

11          A.     Yeah.   It was not -- it was not a gated  
12    community.   It was people all over the place,  
13    trash all over the place, yeah.   Just dirty and  
14    a lot of people.

15          **Q.     Did it strike you or did you have an**  
16    **awareness that -- you know, you mentioned that**  
17    **your mom was not having -- letting you go there**  
18    **by yourself.**

19                 **Did you have an awareness that there**  
20    **were safety concerns at The Wells?**

21          A.     I guess I would have to have been aware  
22    of that, and I don't know what safety concerns I  
23    would have exactly been thinking about, but  
24    just, you know, things -- in my mind safety

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1 concerns are like loose dogs running around at  
2 that time. I wasn't thinking about being shot,  
3 if that's what you were asking.

4 Q. Not necessarily that. But -- all  
5 right.

6 Did you ever hear gunshots, though,  
7 while you were there, or have a -- like, did you  
8 think that --

9 A. You could hear gunshots from where we  
10 lived as well. We were only a few blocks away,  
11 so...

12 Q. Yeah. But did it feel different in The  
13 Wells, though, versus where you grow up?

14 A. Yes. We lived --

15 Q. Okay. And what -- sorry. Go ahead. I  
16 interrupted you, Mr. Glenn. Go ahead. Sorry.

17 A. No. That's fine.

18 I said, yes, we lived in a house.  
19 That's all I was saying. So it was obviously  
20 different than that, yeah.

21 Q. Whether you've come to this realization  
22 now as an adult or if you realized it back then  
23 when you were, you know, a young teen or  
24 teenager, did you recognize that it was a high

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1     **drug dealing area, like there was a lot of**  
2     **narcotics activity happening in The Wells?**

3         A.     I was aware that people sold drugs in  
4     all of the projects. Not specifically The  
5     Wells.

6         **Q.     Yes. Can you recall -- or when you**  
7     **would go visit your sister seeing people**  
8     **standing in line to purchase drugs or drug**  
9     **dealers calling anything out?**

10        A.     I don't remember drug lines, but there  
11     were also people saying things along the street.  
12     We were -- we would observe that pretty much in  
13     every project you would see. So I lived at 30th  
14     and Lake Park, and even though you keep saying  
15     the Ida B. Wells, it's actually the Ida B. Wells  
16     extensions.

17        **Q.     Right.**

18        A.     So you have to go -- you have to go  
19     through New Town. There were also a little  
20     project complex just north of us on 37th Street,  
21     and then you had to actually go through the Ida  
22     B. Wells. So between us walking there you would  
23     go through multiple sets of projects, and there  
24     is inevitably people saying all sorts of things.

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1           **Q.     And thank you for the clarification.**

2                   **So you would actually -- when you would**  
3 **go visit your sister, you would walk through the**  
4 **actual Wells to get to the extensions where your**  
5 **sister lived?**

6           A.     Again, if my mom walked us --

7           **Q.     Okay.**

8           A.     -- we would walk through there.   If we  
9 were being driven, we would just drive down Lake  
10 Park and either go to 35th and come around or go  
11 through 37th and cut through by the park.

12           **Q.     Your sister has mentioned that your**  
13 **father actually offered to purchase a home for**  
14 **her instead of having her go to the projects.**

15                   **Do you -- have you ever spoken with her**  
16 **about that or had any discussions with her about**  
17 **the decision-making that she had in terms of**  
18 **moving into the extensions?**

19           A.     I don't know if it was her or my other  
20 sister, but one of them said that they just --  
21 our mom was so tough and heavy-handed that they  
22 were just ready to leave the house.   So I don't  
23 know if it was her or my other sister.   That's  
24 all I know.

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1           **Q. Did you find it odd or feel any sort of**  
2 **way about your sisters moving out of the house**  
3 **into these locations?**

4           A. Feel a certain way in what regard?

5           **Q. I guess, did you have any thoughts on**  
6 **where your sisters had decided to live?**

7           A. It was just odd that both of them left  
8 in roughly the same time period. They were both  
9 there, and then they both weren't there in a  
10 short period of time. I don't know if that was  
11 a matter of weeks or months, and -- no. It was  
12 just me and my brother and my mom at that time.  
13 My dad as well. So, yeah. That's all I  
14 remember. It was just -- went from all of us to  
15 just me and my brother at home the whole time.

16           **Q. Did your parents ever say anything to**  
17 **you about Clarissa moving in with Ben to that**  
18 **apartment?**

19           A. No.

20           **Q. Have you ever discussed it with either**  
21 **Clarissa or even your brother?**

22           A. Discuss what?

23           **Q. Clarissa and Ben moving to the 527**  
24 **building location.**

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1 A. No.

2 Q. Did you see -- or do you know when the  
3 last time was or how old you were the last time  
4 you visited your sister at the 527 building?

5 A. When was the last time, and the second  
6 part was how old?

7 Q. Yes. The last, whatever -- whatever is  
8 easiest for you to determine that.

9 A. I mean, it would have been in 2005. I  
10 would say it would be Q3/Q4 of 2005, somewhere  
11 in there.

12 Q. Your sister moved out in, like, the  
13 summer of 2006.

14 Do you know if you -- 2005 would have  
15 definitely been the last time, or would it have  
16 been just sometime -- like, once she moved out,  
17 you obviously wouldn't have gone back, I guess.

18 A. I don't -- I don't recall being there.  
19 And the reason why I'm saying this is because my  
20 mom had cancer at the same time, and I was  
21 taking her to chemo five days a week and  
22 radiation at an outpatient clinic in Olympia  
23 Fields. That continued all of 2005 until early  
24 2006 probably. If I did go to her place in



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1 2006, I don't recall.

2 Q. Did you notice the environment in The  
3 Wells extensions changing over time during that  
4 time period that you were visiting your sister  
5 there, or was it pretty much the same throughout  
6 that entire time period?

7 A. Changing how, exactly?

8 Q. For the better or for the worse?

9 A. I was getting older, so I don't know if  
10 my view would be the same. Because by the time  
11 I was -- 2005 came along I was driving myself,  
12 and we weren't living in the city any longer. I  
13 don't know if there was a noticeable change. I  
14 don't know that.

15 Q. To you, as you described it before, it  
16 was still dirty.

17 Were the buildings maintained well that  
18 you could see?

19 A. No.

20 Q. When you would visit your sister, do  
21 you recall -- I know you've obviously described  
22 people were yelling things all the time.

23 But did you ever -- when you would go  
24 actually into the 527 building, did you see any

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1     **individuals passing out drugs or saying anything**  
2     **that would indicate they were selling drugs?**

3         A.     All I can tell you is that when you go  
4     into a building, those project buildings, there  
5     are always people yelling things out. I could  
6     speculate that it's drug-related, but that's all  
7     I can tell you, because I wasn't there to  
8     purchase drugs, yeah.

9         **Q.     Did you ever see Ben selling drugs?**

10        A.     I did not.

11        **Q.     Do you ever recall anyone coming**  
12     **over -- anyone knocking on the door trying to**  
13     **purchase drugs or wanting Ben for any reason now**  
14     **looking back while you were there?**

15        A.     No. There was people knocking on the  
16     door. If they were, they usually came in, and I  
17     don't know of any nefarious activity happening,  
18     so...

19        **Q.     Were you ever fearful or concerned**  
20     **about your safety when you would visit Clarissa,**  
21     **Ben, and your nephews there?**

22        A.     No.

23        **Q.     All right. Why not?**

24        A.     I stated earlier I don't recall having

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1 the fear of anything other than dogs when I was  
2 younger. By the time I got older, I just -- I  
3 don't know. I didn't have fear of people or  
4 things in that regard.

5 **Q. Did you ever have an opportunity to**  
6 **observe Ben interacting with any other residents**  
7 **or individuals that were in the extensions that**  
8 **indicate to you, "Oh, he has some power here"?**

9 A. No. The extent of my interaction with  
10 Ben would usually be in their apartment, and  
11 then that would be it. I would leave. He would  
12 leave. We didn't -- we weren't talking in front  
13 of the building. We never talked in the  
14 stairwells, things of that nature, yeah.

15 **Q. And during this time period, did you**  
16 **know that Ben was dealing drugs out of the 527**  
17 **building or controlling that building?**

18 MR. TEPFER: Objection.

19 BY THE WITNESS:

20 A. No.

21 MR. TEPFER: Objection. What time period are  
22 we talking about?

23 MS. OLIVIER: Up until -- when he was  
24 visiting his sister there. So from when he was

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1 approximately seventh or eighth grade up to  
2 2005.

3 MR. TEPFER: Go ahead. Sorry.

4 BY THE WITNESS:

5 A. No, I don't. I do not recall being  
6 aware that he was controlling the building.

7 BY MS. OLIVIER:

8 Q. Have you ever discussed with Clarissa  
9 Ben's criminal history besides -- we obviously  
10 talked about the 2018 arrest.

11 But any of his other criminal history,  
12 have you discussed that with Clarissa?

13 A. No.

14 Q. Did you -- do you recall ever observing  
15 anything that might indicate that Ben was in the  
16 drug trade, like plastic baggies around or even  
17 drugs being out, cash being in certain places,  
18 anything like that?

19 MR. TEPFER: Objection, foundation.

20 BY THE WITNESS:

21 A. No.

22 BY MS. OLIVIER:

23 Q. Did your sister ever discuss with you  
24 while she was living -- that during this time

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1 period we're talking about, from seventh or  
2 eighth grade through 2005, being stressed about  
3 money or hard-pressed for cash or anything like  
4 that?

5 A. No.

6 Q. Do you recall what type of clothing  
7 that they would be -- your nephews or your  
8 sister or Ben would be wearing?

9 A. Do I remember the clothes she would be  
10 wearing?

11 Q. Yes or any other family member.

12 A. No.

13 Q. How did your sister seem during this  
14 time period when she was living in Apartment 206  
15 of the 527 building?

16 A. She was still the same. She was  
17 still -- it was all good. We would go over  
18 there and hang out from time to time.

19 Q. Did she seem to be happy living there?

20 A. Yeah.

21 Q. Ben was arrested multiple times during  
22 the year 2004, also 2005.

23 Do you recall seeing that have an  
24 impact on your sister at all at that time

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1 **period?**

2 A. I remember only the 2005 or 2006 when I  
3 became aware that she had went to prison as  
4 well. After that, I don't -- I don't remember.  
5 I remember one time before that hearing -- I  
6 wasn't there, but I just remember hearing from  
7 either a conversation between her and somebody  
8 in our house that Ben had been locked up in  
9 2004.

10 I don't -- they weren't -- they didn't  
11 say why, but just he had been locked up and that  
12 the police there were constantly after him. In  
13 2005 to 2006 whenever again she got locked up, I  
14 became aware that, you know, Ben was locked up,  
15 and she got out on bail or something to that  
16 regard and then ongoing cases and things of that  
17 nature after that.

18 **Q. When you overheard that conversation**  
19 **where it was discussed that the police were**  
20 **after Ben, was that your sister Clarissa saying**  
21 **that?**

22 A. Yes. I believe it was Clarissa just  
23 saying that some police officer kept bothering  
24 Ben.

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1           **Q.    What -- do you remember thinking**  
2 **anything at the time about that, or do you think**  
3 **anything of that now?**

4           A.    Well, I mean --

5           MR. TEPFER: I'm going to object to the form  
6 of that question, but --

7 BY MS. OLIVIER:

8           **Q.    Sure. And I will parse that out.**

9                   **At the time when you heard your sister**  
10 **say that the police were after Ben, what was**  
11 **going through your head?**

12           A.    Well, to make sure I have that correct,  
13 there -- she explicitly said that there was a  
14 police officer that kept asking Ben to pay him,  
15 and he wouldn't, and so he put him in jail.  
16 That was what she said the very first time in  
17 2004 whenever I heard that conversation.

18           **Q.    Okay. And what do you recall thinking**  
19 **at that time?**

20           A.    Wow.

21           **Q.    Did you -- was that the only**  
22 **conversation you overheard your sister having**  
23 **where that was brought up?**

24           A.    Yeah. I was actually pretty shocked.

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1 I don't -- again, I'm the youngest in the  
2 family. Those conversations don't -- have never  
3 happened with me.

4 So I just remember overhearing, and I  
5 don't remember who she was talking to, but I  
6 remember hearing that piece of information and  
7 just thinking, like, "Wow. It must be -- you  
8 know, like all the stuff you hear about the  
9 police and stuff or whatever, it must be true,  
10 in terms of a lot of dirty cops in Chicago and  
11 stuff like that."

12 **Q. When did you first become aware that**  
13 **your sister was arrested?**

14 A. It had to be within -- I don't -- I  
15 didn't get a phone call as soon as she was  
16 arrested. But it was within a month. I don't  
17 know, because, again, I wasn't -- I wasn't  
18 involved in -- like, I didn't talk to her every  
19 day. Again, I was kind of wrapped up in taking  
20 care of my mom at the time. And that was new  
21 for me.

22 Yeah. So all I remember is becoming  
23 aware of it, that she had been locked up and  
24 that Ben was still locked up, and really,



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1     that's -- that's all I remember.

2           **Q.     And when you're -- and just so we are**  
3     **clear, when you're using the term "locked up,"**  
4     **you're saying that she was arrested. She was**  
5     **processed, like, through Cook County Jail but**  
6     **released. She never served any prison time or**  
7     **anything like that?**

8           A.     Sure. Well, I didn't -- I don't know  
9     what she did. I just know she was arrested.

10           So let me just clarify. I was -- I  
11    became aware she had been arrested and Ben had  
12    been arrested, and that's all I knew, yeah. And  
13    that she was not -- no longer being detained and  
14    that he was. That's all I knew.

15           **Q.     Yes. And so you know, your sister**  
16     **ultimately ended up pleading and receiving a**  
17     **sentence of probation.**

18           Do you remember having any  
19    conversations with her about that or any  
20    conversations in the family about that?

21           A.     No. Probably a few years with -- well,  
22    I don't know about a few years, but she asked me  
23    to help her write a letter to the governor  
24    around -- I don't know -- 2000 and -- I don't

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1 know. Somewhere in the -- I mean, within --  
2 within three years of her being arrested she  
3 asked me to help her write a letter to the  
4 governor.

5 Let me ask you this: Do you know when  
6 she moved into the place on 47th right off  
7 Cottage?

8 **Q. No. But I can find out.**

9 A. Don't worry about it. Okay. Well, we  
10 don't need to do all that.

11 But at any rate, she moved out. She --  
12 I remember her asking me to help her write a  
13 letter to the governor to ask to have her record  
14 expunged because of the things that had taken  
15 place, and she felt like she had no other option  
16 and things like that. And I remember I was  
17 writing a letter. And I think it was for her  
18 and Ben, if I'm not mistaken.

19 **Q. This was within --**

20 A. Actually, it was --

21 **Q. Sorry. Go ahead.**

22 A. My point was, that's the only  
23 conversation we had regarding her arrest and  
24 things like that. It's just -- it's like she

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1     couldn't get a job. She would -- you know, just  
2     saying how rough it was, how much the boys  
3     needed their dad, and things like that, so...

4           **Q.     So we know from Clarissa that she was**  
5     **working -- so she was arrested --**

6           A.     Uh-huh.

7           **Q.     -- December of 2005. But she was**  
8     **employed with Comprehensive from 2004 through**  
9     **2014.**

10           **So was she -- was it your understanding**  
11    **when you were speaking with her about writing**  
12    **this letter to the governor that she was trying**  
13    **to leave Comprehensive and that's -- and she**  
14    **needed help or something or --**

15           A.     So in that context, it must have been  
16    in 2014 or 2015.

17           **Q.     Okay.**

18           A.     This must have occurred then. I would  
19    have -- I thought it was earlier than that, but,  
20    yeah, I would actually -- I would ask her. I  
21    don't even remember when I wrote that letter.  
22    But at any rate, that's the only conversations  
23    we had around it. Whether it was right after  
24    she got arrested -- I think it was within a few

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1 years of her being arrested. I said three  
2 years, but maybe I'm wrong. So I apologize.

3 Q. Do you recall -- so you wrote this  
4 letter for her?

5 A. We wrote it together.

6 Q. She gave you the information, and you  
7 helped her put it together in letter form for  
8 the governor?

9 A. Sure.

10 Q. Were there discussions about the fact  
11 that two of the officers -- one of the officers  
12 that had arrested Ben and your sister had been  
13 federally indicted?

14 A. I would assume that that would be the  
15 reason why she thought it was so unjust, and I  
16 don't -- I don't even recall the particulars of  
17 the letter right now because I'm so removed from  
18 it.

19 Q. Sure. Okay.

20 A. But I would assume that that's why she  
21 asked me to help her is because she felt that  
22 that was so wrong.

23 Q. Did your sister ever talk with you  
24 about the fact that she was working with or

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1 **cooperating with the FBI?**

2 A. She did mention that at some point.  
3 She just said that there was somebody in the FBI  
4 that she was talking with to help her. I don't  
5 remember anything other than that.

6 **Q. And did you understand what that help**  
7 **was or meant?**

8 A. No.

9 **Q. Okay. What was your reaction when she**  
10 **said that she was talking to the FBI?**

11 A. Clarissa was pretty adamant that Ben  
12 was going to be released from jail early and  
13 that everybody would see that this was all a  
14 hoax and that she hadn't done anything wrong.  
15 So, I mean, as crazy as it sounds, she -- she  
16 was saying that from day one, like, you know, "I  
17 didn't do anything. Ben didn't do anything, and  
18 he is not going to stay in jail, because this  
19 was wrong," so...

20 **Q. What was your reaction to Clarissa**  
21 **saying this, that this was a hoax and all of**  
22 **that?**

23 A. Time well tell.

24 **Q. Now that -- or after their**

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1     **conviction -- both her and Ben's convictions**  
2     **were overturned, did -- what did you think?**

3         A.     I was happy and still am happy that she  
4     has some piece of vindication, that she knows  
5     that she was wronged and feels as if she has  
6     publically been acknowledged that it was wrong.

7         **Q.     Do you -- have you seen that public**  
8     **vindication impact her -- impact her?**

9         A.     No.   I can't say that I've seen a  
10    complete turnaround, no.   There has been moments  
11   of happiness, moments of joy.   She has also had  
12   some dark periods where she was just depressed  
13   and talked about suicide, things like that  
14   before.   And I had never heard her -- well, I  
15   guess I wouldn't have.   She wouldn't have come  
16   to me as a child about it, but I -- you know,  
17   things like that, that she talked with me and  
18   cried with me and talked about over the years,  
19   so...

20         **Q.     In terms of those dark periods of**  
21     **depression and her speaking of suicide, in**  
22     **what -- do you remember what time period she was**  
23     **referring to of what was going on that had**  
24     **brought her to such a dark place?**

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1           A.    I remember her telling me that she felt  
2   so low because she couldn't pay her bills and  
3   that she was asking her boys to pay some of the  
4   bills, and it's not right, because they  
5   shouldn't have to pay, things like that.  I  
6   mean, those types of conversations evolved into,  
7   you know, just crying, and, you know, me  
8   consoling and just talking with her, yeah.

9           **Q.    In the context of her employment,**  
10   **knowing that she worked at Comprehensive up to**  
11   **2014 and then she started working for another**  
12   **employer in, like, July of 2016, do you know if**  
13   **it would have been in that time period where she**  
14   **was unemployed, or was this even when she was**  
15   **employed she was feeling this pressure or**  
16   **stress?**

17          A.    That's a good question.  You would have  
18   to check, but I would -- I -- if I recall  
19   correctly, even going up to 2014 she wasn't  
20   working full-time in that entire time, but you  
21   would have to check.  But I remember her talking  
22   about -- yeah.  So maybe it wasn't that period.  
23   Maybe it was in the period.  I don't know.  I  
24   just remember having the conversations with her

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1 about it, so yeah.

2 **Q. Did she ever discuss any career**  
3 **aspirations that she had with you?**

4 A. She just always kept saying that she  
5 wanted to get out of the situation that she was  
6 in and wanted her and Ben to get this, you know,  
7 wrongful conviction behind them. That's what  
8 she kept talking about when she was -- before  
9 Ben was released. She just kept saying, "I'm  
10 just so ready for him to get out of jail and for  
11 everybody to see" and things of that nature.

12 Talks about her and career, I don't  
13 recall that.

14 **Q. Did she have any discussions with you**  
15 **prior to filing this lawsuit about the fact that**  
16 **she was going to be filing a lawsuit?**

17 A. No.

18 **Q. Has she had any discussions with you**  
19 **besides the conversation that you had with her**  
20 **about "Why am I going to have to show up in this**  
21 **case?" Have you had any other conversations**  
22 **with her about this lawsuit?**

23 A. I have asked her in the past two years  
24 or however long this ordeal has been going on --



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1 I have asked her, "How are you doing?" Because,  
2 you know, it was obvious that she needed money  
3 or just wasn't able to do things. She would  
4 make little comments like, "I don't have the  
5 funds to do this or that." And, you know, it  
6 would create an opportunity where I could just  
7 say, "How are things progressing over here?  
8 Have you guys -- are you at the conclusion of  
9 that?" Things like that, but that would be the  
10 only conversation that I had.

11 **Q. Has she discussed with you any of her**  
12 **expectations in terms of a settlement or a**  
13 **verdict or anything like that?**

14 A. Nothing substantive. Just saying that,  
15 "When we get done with this, we should be good.  
16 We should be taken care of, and we will be able  
17 to move."

18 **Q. Is she looking to move currently?**

19 A. I believe.

20 **Q. Do you know where she wants to go?**

21 A. No.

22 **Q. Does she want to join you in Florida?**

23 A. I don't know. I have asked her. I  
24 have been recruiting.

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1           **Q.     And what is her response?**

2           A.     "Maybe."

3           MR. TEPFER:   Objection.   Just kidding.

4           BY MS. OLIVIER:

5           **Q.     Do you know who -- or did you know --**  
6           **back during this time period of when you would**  
7           **visit your sister at the 527 building, did you**  
8           **know who Sergeant Watts was or have any**  
9           **awareness of, like, these police officers**  
10          **besides overhearing that conversation in 2004?**

11          A.     No.

12          **Q.     Okay.   Besides overhearing that**  
13          **conversation that your sister had, do you -- did**  
14          **Ben ever have any conversations about police**  
15          **around you?**

16          A.     No.

17          **Q.     Have you ever had any discussions ever**  
18          **with either Ben or your sister about Sergeant**  
19          **Watts or any of the police officers that were**  
20          **involved in their arrest in December of 2005?**

21          A.     Yes.

22          **Q.     All right.   And what was said?**

23          A.     I remember a conversation between me  
24          and Clarissa that she just described Watts and

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1 Mohammed and said that they were going after  
2 everybody in the Ida B. Wells that they think  
3 they could get money out of. And this had to be  
4 in the context of her talking about -- I won't  
5 even characterize what I think she was -- where  
6 I believe the conversation took place or how.

7 But I just remember having a  
8 conversation and just -- she just laid out some  
9 of the details saying that these are the types  
10 of people that they are, that these police  
11 officers were pestering them, that they were  
12 really bad people and -- yeah.

13 **Q. When you used the phrase "these are the**  
14 **types of people that they are," what did she**  
15 **mean by that, or what do you mean by that?**

16 A. What I mean by that is that these are  
17 the types of police officers that would steal  
18 and do whatever is necessary to get what they  
19 want out of people.

20 **Q. Do you remember where this conversation**  
21 **with Clarissa took place?**

22 A. No. I was trying, but I don't recall.

23 **Q. Do you remember if this was after she**  
24 **filed the lawsuit, and she was kind of**

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1 explaining what was -- logistically what was  
2 happening?

3 A. I don't know.

4 Q. Okay. When she said that they were  
5 going after everyone in the Ida B. Wells that  
6 they think they can get money out of, what did  
7 you -- what -- do you know what she meant by  
8 that, or what did you understand that to mean?

9 A. I understood it to mean that if they  
10 believed that they could extract money from you,  
11 that they would go after you.

12 Q. And do you know why she said that or  
13 why she was holding that -- or why she was  
14 holding that view?

15 A. No.

16 Q. Has she ever described for you what  
17 happened on December 11th, 2005 leading up to  
18 her arrest?

19 A. Did she ever describe what happened?

20 Q. Or recount it to you?

21 A. Yes. I believe, yes.

22 Q. What do you remember her saying to you?

23 A. That the -- so now -- now I'm thinking.  
24 He, as in Sergeant Watts -- so let me just say

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1 it this way: She said that he told Ben, "I told  
2 you I was going to get you. I told you I was  
3 going to get you," something to that effect, and  
4 said that the police were searching the vehicle  
5 and couldn't find anything. And then Sergeant  
6 Watts came up with something that he had and  
7 planted it on them.

8 **Q. Did she mention anyone else being**  
9 **present besides Sergeant Watts?**

10 A. I just remember her talking about "I  
11 told you I was going to get you." And these may  
12 be two separate incidents, but I remember her  
13 talking about that and saying that -- having an  
14 interaction with Ben. So it must have been that  
15 or the 2004. I don't know. I don't know which  
16 one it was. I'm assuming it was 2005.

17 **Q. Did Clarissa ever discuss with you any**  
18 **of Ben's arrests besides the December of 2011**  
19 **arrest that she felt were wrongful or false?**

20 A. You said 2011?

21 **Q. Sorry. December 11th, 2005. Besides**  
22 **that arrest. Thank you for the correction.**

23 A. We didn't talk about background or  
24 criminal history or anything of that nature.

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1           **Q.     Have you ever spoken with your sister**  
2 **about Ben's criminal history either before 2005**  
3 **or after -- what happened after 2005 once he was**  
4 **released from prison?**

5           A.     When you say spoke about his criminal  
6 history, what do you mean?   Saying anything to  
7 her?

8           **Q.     Right.   About his other convictions,**  
9 **other arrests?**

10          A.     No.   I have never asked her about  
11 anything that he has ever done.

12          **Q.     Well, why not?**

13          A.     I'm -- I have taken the stance that I  
14 don't think that it's appropriate for me to put  
15 her in a position where she is just going to be  
16 breaking down or embarrassed.   Because I have  
17 seen it too many times when I try to have a real  
18 conversation with her.   She usually just --  
19 again, she just -- she has been so fragile, and  
20 I have just avoided those types of  
21 conversations.

22                 Because I'm not her father, right, and  
23 so as a -- her younger brother, I just try not  
24 to put myself in a position of lecturing or

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1 asking anything that I think would fracture our  
2 relationship.

3 Q. Has your mother passed as well?

4 A. No.

5 Q. Okay. She is still living?

6 A. (Nodding.)

7 Q. Obviously, yes. Okay.

8 Is she in Chicago too?

9 A. Yes.

10 Q. Understanding that your dad passed away  
11 in 2004, and I'm sure that was obviously --  
12 obviously a loss for your family, was this  
13 2005 -- this December of 2005 arrest, did  
14 that -- did you see a difference in the impact,  
15 I guess, from the loss of your father passing  
16 versus the impact of this arrest, or was it kind  
17 of all conflated together because there was just  
18 a lot going on at the time?

19 A. No. I wouldn't conflate the two. They  
20 are two different distinct periods, yeah.

21 Q. Do you recall how you learned of the  
22 fact that Ben was going to be released from  
23 prison and that both his and your sister's  
24 convictions were being overturned?

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1           A.    It would had to have come directly from  
2 Clarissa. Yeah. I don't -- I don't have a --  
3 the moment is not popping out to me that, "Oh,  
4 she texted me because I was doing this." I  
5 don't have that, but I know it would have to  
6 have come from her.

7           **Q.    Do you remember how she was in terms of**  
8 **emotionally?**

9           A.    Happy.

10          **Q.    Today how would you describe how**  
11 **Clarissa is emotionally, mentally?**

12          A.    She is progressing. She has gotten  
13 better in terms of not avoiding phone calls and  
14 just being depressed and doesn't even want to  
15 talk about it, that sort of stuff. Yeah.  
16 Because, you know, for me, I'm -- I don't know.  
17 You know, men and women probably process things  
18 differently, and I tend to be more effervescent  
19 where I'm always looking for a way out. And I  
20 know that's not everybody's MO to be thinking  
21 and trying to turn lemons into lemonade. I know  
22 that's not how everybody thinks.

23               And so for her, I know that there has  
24 been times where she just literally has avoided



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1 my phone calls because she doesn't -- she just  
2 feels -- you know, she has told me that she just  
3 felt embarrassed for a period of time and just  
4 didn't want to talk and that, you know, there  
5 was not -- there was no end that she could see.

6 So -- but at any rate, she has gotten  
7 better. We talk, like I said, probably once a  
8 month. They are good conversations. We -- I  
9 saw her -- she came down to a funeral, what, a  
10 month ago into Tallahassee. And we hugged and  
11 embraced, and it was a really good moment,  
12 because I hadn't seen her for a few months.

13 Actually, I saw her in December. My  
14 mom moved, and I was upset with her, because I  
15 told her that she should go pick up some pillows  
16 so I didn't have to go do it, because I flew in  
17 on a 48-hour trip, and I thought it was wrong of  
18 them to ask me to do more after I had spent all  
19 this money on plane tickets coming to help my  
20 mom move. But at any rate, so she was -- me and  
21 her were upset with each other, and we squashed  
22 that within 60 days. So that was a good moment,  
23 so yeah.

24 **Q. It always is when you can squash it**

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1 with the siblings, right?

2 When would you say approximately  
3 when -- this progression, I guess, because you  
4 have noted that -- you know, even if it's baby  
5 steps or it's getting better slowly but surely,  
6 when would you start saying that you started to  
7 see that progression?

8 A. Probably right after Ben got released.

9 Q. Okay.

10 A. Yeah.

11 Q. So Ben was released in January of 2016.

12 Does that sound -- does that ring true  
13 to you in terms of, like, that being the start  
14 of a progression of, okay, things are looking up  
15 and aren't so -- aren't so dark?

16 A. Yeah, sure. I remember just -- again,  
17 I remember her and me having a conversation on  
18 January 16 and just hugging it out and she just  
19 crying and just so happy, you know.

20 Q. And would you say that that started the  
21 progression that things have been getting better  
22 and better over time?

23 A. I can't speak to better and better or  
24 if there has been setbacks again.

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1           **Q.     Okay.**

2           A.     So, yeah, I've kind of got a lot going  
3 on on this side as well. But, you know,  
4 generally speaking, she is in a much better  
5 place today than she was in 2016.

6           **Q.     And I have some questions for you about**  
7 **the New Yorker article, the piece that was done**  
8 **on your sister.**

9                   **First and foremost, do you recall being**  
10 **interviewed for that article?**

11          A.     I do remember, generally speaking. I  
12 literally don't -- I haven't read it since it  
13 came out. So I don't -- it's not as if it's  
14 hanging up on the wall over here. So I don't  
15 remember, yeah.

16          **Q.     So it came out in May of 2018.**

17                   **Do you remember when it came out?**

18          A.     You just said May 2018.

19          **Q.     Yes.**

20          A.     Yeah. That's when you said it came  
21 out. That's --

22          **Q.     Oh, sorry. When -- sorry.**

23                   **When I asked you if you remember when**  
24 **it came out, like, do you remember what the mood**

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1     **was around the article in your family or --**

2           A.     I don't know if anybody -- I don't know  
3     if we -- probably me and Clarissa and maybe me  
4     and Yvonne talked about me doing the interview,  
5     because it was the same thing as this where she  
6     just said, you know, "I would like for you to  
7     speak to them," and so -- and again, I have  
8     always tried to be there for my sister.

9           I just want to see her have the best  
10    quality of life she can going forward. I know  
11    she has had a rough go of it and been  
12    traumatized. And I'm just trying my best to do  
13    what I believe she believes that a good brother  
14    would do. Because I could easily just decline,  
15    and say "no thank you" to, you know, either of  
16    these things.

17           But, you know, I just -- to answer your  
18    question -- no. We talked, me and her, and she  
19    asked me would I do the interview. And I  
20    believe the girl's name was Jennifer who did it.  
21    Jen. She goes by Jen. And -- but I don't -- we  
22    didn't have conversations. It wasn't like, you  
23    know, the next holiday party we all sat around  
24    and talked about the New Yorker article. It was

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1 nothing like that, so yeah.

2 **Q. Do you remember the interview with Jen?**

3 A. I remember -- being very honest, I just  
4 remember her asking me who else she could talk  
5 with in the family and if I could connect her.  
6 In terms of what we talked about, it would have  
7 had to have been questions about the arrest and  
8 growing up, and that's all I can think of right  
9 now. That's all I can think of.

10 **Q. When she asked you if there was anyone**  
11 **else that she could speak with in the family,**  
12 **did you give her the names of anyone else?**

13 A. Well, she asked specifically for my  
14 mom, because she said that she wasn't answering  
15 her phone calls and asked if there was a  
16 different phone number she could have for her.  
17 And then she asked -- that's all I remember was  
18 her asking specifically for a different phone  
19 number for my mom. That's what I remember.

20 Yeah. She might have asked about my  
21 other siblings, but don't hold me to that. I  
22 know she asked me about my mom. She said she  
23 had a number, and she wasn't answering the  
24 phone, so...

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1           **Q. Did you tell her -- did you -- what was**  
2 **your response to that?**

3           A. I asked her what phone number she had,  
4 and she told me, and I said, "Well, you're  
5 actually calling another number," because she  
6 had -- she had just recently transitioned  
7 numbers. So I gave her the other number, and I  
8 told her hopefully she would answer for this  
9 call, yeah.

10          **Q. And do you know if your mom did?**

11          A. I do not know if she did.

12          **Q. Have you ever spoken with your mom**  
13 **about whether or not she spoke with the New**  
14 **Yorker?**

15          A. I asked her did she ever get a phone  
16 call from them, and she said she did not. I  
17 didn't follow up afterwards.

18          **Q. So it sounds like then Clarissa**  
19 **approached you about being interviewed for the**  
20 **article.**

21                **Do you remember -- was it just one time**  
22 **that you spoke with the journalist Jen?**

23          A. Yeah. I was trying to think of that  
24 while you were talking, and maybe twice at most.

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1           **Q.    Do you recall how long the**  
2 **conversations were?**

3           A.    Probably in the hour and a half range.

4           **Q.    Each one or total?**

5           A.    I'm -- I'm thinking that there was a  
6 one-and-a-half-hour conversation, and there  
7 might have been a follow-up call.

8           **Q.    And so this was all over the phone?**

9           A.    Yes.

10          **Q.    She quoted you -- or you were quoted in**  
11 **the New Yorker article as saying that when you**  
12 **visited Clarissa's building there were "drug**  
13 **addicts and drug dealers standing in the hall,**  
14 **screaming up to the next level that someone is**  
15 **coming."**

16                   **Is that a memory that you have?**

17          A.    You know, if you recall, you asked were  
18 people --

19          **Q.    Yeah.**

20          A.    -- saying things in the building. And  
21 I said yes. When you go in these buildings,  
22 people are saying all types of stuff.

23          **Q.    Yeah. Did that ever bring any concern**  
24 **to you for your sister and Ben and your nephews**

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1     **living there, or was it just kind of normal?**

2           A.     I probably compartmentalized their life  
3     from my life and said, "This is their life, and  
4     this is what they've got going on. And it is  
5     what it is." Clarissa kept a clean house at  
6     least. It wasn't like when you walked in her  
7     house it was filthy or dirty, or you could tell  
8     you were in the projects. She kept her house  
9     looking decent and kept it -- some decorations  
10    and stuff like that, you know.

11          **Q.     Another quote that you have in the**  
12    **article is "Every part of her was dying on the**  
13    **inside." This is in reference to following the**  
14    **arrest. "The person you love - that you wrapped**  
15    **yourself up in, that you made a huge bet on - is**  
16    **now in jail. You're being ridiculed - family is**  
17    **ostracizing you. Not necessarily us, but other**  
18    **extended family. Now all of your business is**  
19    **out in the open. For a person like her, that's**  
20    **huge."**

21                **And I have a few follow-up questions**  
22    **based off that quote. In terms of family**  
23    **ostracizing her, which family members were you**  
24    **referencing?**



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1           A.     Her and my other cousin Shondra did not  
2 particularly -- I would say that there was a --  
3 a splitting of the two there where they didn't  
4 talk as much. I could see -- I could see a  
5 clear line where it was -- it was -- we don't go  
6 to the same functions at the same time, things  
7 like that.

8                     And Clarissa said that people were --  
9 Shondra and people like that, people that she  
10 was around were talking about her and talking  
11 about Ben and saying, you know, all sorts of  
12 stuff about them. And so she said she didn't  
13 want them -- to be around them and things like  
14 that, so...

15           **Q.     Do you recall any other relatives**  
16 **besides Shondra?**

17           A.     Clarissa claims that it was Shondra and  
18 her mom, but I'm not privy to any of those  
19 things that took place. This is hearsay from  
20 what Clarissa told me she was hearing from other  
21 people.

22           **Q.     Shondra and Shondra's mother?**

23           A.     Yes.

24           **Q.     Okay. What is Shondra's last name, if**

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1     **you know?**

2           A.     Glenn.

3           **Q.     Glenn as well. Okay. And then you**  
4     **noted, you know, all of her business was out in**  
5     **the open and "for a person like her, that's**  
6     **huge."**

7                   **When you use the phrase "for a person**  
8     **like her," what do you mean by that?**

9           A.     Fragile. Somebody who is high, social,  
10    emotional, very -- one of those types of people  
11    that just draws all of their information from  
12    social cues. It's pretty tough for her. You  
13    know, she is the type of person that reads body  
14    language and reads into, you know -- over, I  
15    think, reads into situations in terms of, "Oh, I  
16    don't like this person. This person is --  
17    doesn't like me."

18                   How can you say that without talking to  
19    this person? You know, she is one of those  
20    types of people, you know. Yeah. And so you  
21    asked what did I mean? That's what I mean. I  
22    mean she is the type of person that if she  
23    believes people are talking about her, now she  
24    is like, "Oh, they hate me. They don't like

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1 me," you know, and that sort of thing and now  
2 withdrawing. And I just think that from what I  
3 could observe that there was a clear, again,  
4 change in her after the arrest. And she felt as  
5 if that -- I think that she thought that  
6 everybody was constantly talking about her and  
7 her business, you know, and that was mortifying  
8 for her.

9 **Q. What are your thoughts on Ben?**

10 A. I thought we covered that.

11 **Q. Well, I'm just wondering now today.**

12 **Like, I know that -- we have kind of touched**  
13 **around it.**

14 **But I just -- like, more directly, what**  
15 **are your thoughts on Ben?**

16 MR. TEPFER: Objection, asked and answered.  
17 Form, vague.

18 Go ahead.

19 BY THE WITNESS:

20 A. I think Ben is a good guy. I think Ben  
21 and Clarissa love each other. I believe Ben is  
22 an intelligent person. And I believe Ben, had  
23 he been born into a family with a stable home,  
24 he would probably have went to college and got a

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1 job working somewhere and been a very happy  
2 person working a 9:00-to-5:00 job if he grew up  
3 in that type of background.

4 BY MS. OLIVIER:

5 **Q. So we have gone through and discussed**  
6 **differences in your sister's personality in just**  
7 **doing her -- everything that you saw before her**  
8 **2005 arrest and after.**

9 **Is there anything else that you can**  
10 **think of in terms of changes you noticed in your**  
11 **sister after that 2005 arrest that we have not**  
12 **discussed?**

13 A. No. I think I have touched on pretty  
14 much everything. Clarissa is my oldest sister.  
15 Again, we talk probably once a month. She is in  
16 a good place right now in terms of at least  
17 being able to work on expressing herself as  
18 opposed to just not answering the phone or  
19 hiding herself out.

20 Again, I have tried to just love on her  
21 as much as possible, because I believe that she  
22 needs that. She needs to feel validation from  
23 her family. And I don't know that my brother is  
24 an overly emotional type of person. I mean, I

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1 know her and my sister talk a lot, but I just  
2 try to bring up the rear to keep our family  
3 tight, because -- since my dad died, things of  
4 that nature. She is a good girl. She wants to  
5 do good in life, wants to have a good life,  
6 wants everything that everybody else has in  
7 terms of just wanting the quality in life and to  
8 be able to move forward. And, yeah, I mean, I  
9 don't know if there is anything that I haven't  
10 touched on specifically.

11 **Q. And just to kind of wrap this up for my**  
12 **questioning, has Clarissa ever -- I know she has**  
13 **spoken with you a little bit -- or has spoken**  
14 **with you about her mental health about these**  
15 **periods of depression and dark thoughts and**  
16 **things like that.**

17 **You did mention suicide. Was it just**  
18 **one time or multiple times that she voiced that**  
19 **to you?**

20 **A.** I remember one specific time having  
21 this conversation with her about it, and I told  
22 her that that was not the answer, and I  
23 explained that, you know, "Your boys, everybody  
24 that is still here that loves you, you would be

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1 leaving them behind. You would be leaving  
2 behind all the future hope and opportunity that  
3 you have," things of that nature. So I can  
4 remember suicide one time, but the feeling of  
5 despair happened -- I don't know -- maybe five  
6 or six times over the course of the years, you  
7 know.

8 **Q. And this was during the time period**  
9 **that Ben was incarcerated, you think; before he**  
10 **was released?**

11 A. Sure, yeah.

12 **Q. Has she ever discussed with you whether**  
13 **she is seeing a therapist or has any intentions**  
14 **of seeing a therapist?**

15 A. Has she seen a therapist that I know?  
16 I don't know the -- I don't know the answer to  
17 that. She may have told me that she was. I  
18 don't recall.

19 **Q. And has she ever discussed with you**  
20 **besides these dark thoughts and being down and**  
21 **depressed and withdrawn, any other symptoms of**  
22 **depression or anxiety?**

23 A. No. She would just, again, say it's  
24 not supposed to be like this. She doesn't know

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1     why, you know, things have to be so bad for her,  
2     things like that, but not that I can, yeah,  
3     think of.

4           MS. OLIVIER: Those are all the questions I  
5     have for you, but some of the other attorneys on  
6     this Zoom might have some. So thank you very  
7     much for your time, and I should have nothing  
8     else. Thanks.

9           MR. TEPFER: Does anyone have any questions?

10           I do not.

11           MS. McELROY: Lisa McElroy. I do not have  
12     any questions. Thank you.

13           MR. SCHALKA: Michael Schalka. I don't have  
14     any questions either.

15           MR. SCAHILL: None for me. Tim Scahill.

16           MS. MORRISON: None for me. Thanks.

17           MS. OLIVIER: Signature?

18           MR. TEPFER: Yeah. So, Bryan, the way it  
19     works is you have the opportunity to review the  
20     deposition transcript to make any sort of  
21     corrections if there is any scrivener errors or  
22     anything along those lines. You can't really  
23     amend your answers at that point. You have two  
24     choices. You can either wait and do that, or

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1 you can waive signature and sort of trust that  
2 Kari there took everything down correctly.

3 I'm not your lawyer. I'm not giving  
4 you any advice on it, but you -- people do  
5 either or both -- either. So whatever you would  
6 like.

7 THE WITNESS: Yeah. I -- I'm not implicated  
8 in anything here, and I have no problem  
9 releasing this to move forward.

10 MS. OLIVIER: All right. Signature waived.

11 All right. Thank you very much,  
12 Mr. Glenn.

13 THE WITNESS: Thank you.

14 THE COURT REPORTER: Did you need to order  
15 the transcript, Ms. Olivier?

16 MS. OLIVIER: Yes. We will order.

17 THE COURT REPORTER: Did anyone need a copy?

18 (No response.)

19 (Deposition concluded at  
20 1:16 p.m.)

21

22

23

24



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1           IN THE UNITED STATES DISTRICT COURT  
2           NORTHERN DISTRICT OF ILLINOIS  
3           EASTERN DIVISION

4           I, Kari Wiedenhaupt, Certified Shorthand  
5     Reporter, do hereby certify that on  
6     February 23, 2024, the deposition of the  
7     witness, BRYAN GLENN, called by the Defendant,  
8     was taken before me via videoconference,  
9     reported stenographically, and was thereafter  
10    reduced to typewriting under my direction.

11          The said deposition was taken via  
12    videoconference, and there were present counsel  
13    as previously set forth.

14          The said witness, BRYAN GLENN, was first  
15    duly sworn to tell the truth, the whole truth,  
16    and nothing but the truth, and was then examined  
17    upon oral interrogatories.

18          I further certify that the foregoing is a  
19    true, accurate, and complete record of the  
20    questions asked of and answers made by the said  
21    witness, BRYAN GLENN, on the date and time  
22    hereinabove referred to.


23          The signature of the witness, BRYAN  
24    GLENN, was waived by agreement of counsel.

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1           The undersigned is not interested in the  
2       within case, nor of kin or counsel to any of the  
3       parties.

4           Witness my official signature as a  
5       Certified Shorthand Reporter in the State of  
6       Illinois on March 13, 2024.

7  
8  
9  
10  
11             
12       Kari Wiedenhaupt, CSR  
13       161 North Clark Street  
14       Suite 3050  
15       Chicago, Illinois 60601  
16       Phone: 312.361.8851



17  
18  
19  
20  
21  
22  
23  
24       CSR No. 084-003582

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