

**EXHIBIT 3**



**Transcript of the Deposition of  
Allison D. Redlich, Ph.D.**

**Case:** Ben Baker, et al. v. City of Chicago, et al.  
**Taken On:** April 25, 2024

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

BEN BAKER and CLARISSA                    )  
GLENN,                                                )  
                                                        Plaintiffs,    )  
                                                        - vs-                        )   No. 16 CV-8940  
CITY OF CHICAGO, et al.,                        )  
                                                        Defendants.        )

The videotaped deposition of ALLISON  
D. REDLICH, PH.D., called for examination, taken  
via videoconference, taken pursuant to the Federal  
Rules of Civil Procedure of the United States  
District Courts pertaining to the taking of  
depositions, taken before KAREN A. FAZIO,  
CSR No. 84-1834, a Notary Public within and for the  
County of Cook, State of Illinois, and a Certified  
Shorthand Reporter of said state, on the 25th day  
of April, 2024, commencing at 9:00 a.m.

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1 REMOTE APPEARANCE:

2 LOEVY & LOEVY,  
3 311 North Aberdeen Street, 3rd Floor  
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5 (312) 243-5900  
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7 appeared on behalf of the Coordinated  
8 Plaintiffs;

9 LAW OFFICES OF KENNETH N. FLAXMAN, P.C.  
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14 MR. KENNETH N. FLAXMAN

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16 Plaintiffs;

17 HALE & MONICO, LLC  
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19 Chicago, Illinois 60604  
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21 MR. WILLIAM E. BAZAREK

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23 Defendants;

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appeared on behalf of the Coordinated  
Defendants;

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1     PRESENT:   (Continued)  
              JOHNSON & BELL, LTD.  
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6                     Watts;

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10                    appeared on behalf of the Defendant  
11                    Calvin Ridgell.

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REPORTED BY:   KAREN A. FAZIO, CSR

23

CSR No. 84-1834

24

VIDEOGRAPHER:  CHRISTOPHER ZYVERT

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1 I N D E X

2 ALLISON D. REDLICH, PH.D. EXAMINATION

3 BY MR. BAZAREK 6, 229

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5 BY MS. EKL 212

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8 E X H I B I T S

9 EXHIBIT MARKED FOR ID

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11 No. 2 171

12 No. 3 173

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| Page 5 | <p>1 THE VIDEOGRAPHER: For the record, my name is</p> <p>2 Christopher Zyvert from Video Instanter, the video</p> <p>3 recording device operator for this deposition. The</p> <p>4 business address is 134 North LaSalle Street,</p> <p>5 Suite 1400, Chicago, Illinois 60602.</p> <p>6 This deposition is being video-recorded</p> <p>7 pursuant to the Federal Rules of Civil Procedure</p> <p>8 and other applicable state and local rules.</p> <p>9 This is the video-recorded deposition of</p> <p>10 Dr. Allison Redlich in the matter of Baker, et al.</p> <p>11 versus City of Chicago, et al., Case No. 16-CV-8940</p> <p>12 in the United States District Court for the</p> <p>13 Northern District of Illinois, Eastern Division.</p> <p>14 Today's date is April 25th, 2024, and</p> <p>15 the time is 9:07 a.m.</p> <p>16 This deposition is being taken on behalf</p> <p>17 of the defendant, and being recorded at the</p> <p>18 instance of the defendant.</p> <p>19 Will the attorneys present please</p> <p>20 introduce themselves for the record?</p> <p>21 MS. KLEINHAUS: Good morning. Theresa</p> <p>22 Kleinhaus, appearing on behalf of the Loevy</p> <p>23 plaintiffs.</p> <p>24 MR. JOEL FLAXMAN: Joel Flaxman for the</p> | Page 7 | <p>1 police officers that Ben Baker and Clarissa Glenn</p> <p>2 are suing.</p> <p>3 And how are you today?</p> <p>4 A. I'm good. But it's Dr. Redlich, not Ms.</p> <p>5 Q. Are you a medical doctor?</p> <p>6 A. No.</p> <p>7 Q. Dr. Redlich, what kind of doctor are</p> <p>8 you?</p> <p>9 A. I have my Ph.D. in psychology.</p> <p>10 Q. Are you a clinician?</p> <p>11 A. No.</p> <p>12 Q. Can you prescribe medicine?</p> <p>13 A. No.</p> <p>14 Q. Can you make assessments over someone's</p> <p>15 cognitive ability?</p> <p>16 A. I was not trained to do that, no. I do,</p> <p>17 though, make assessments in a research capacity,</p> <p>18 but not in a clinical capacity.</p> <p>19 Q. Now I know you've given a deposition</p> <p>20 before at least in the Alvin Waddy case, right?</p> <p>21 A. Yes.</p> <p>22 Q. And Alvin Waddy is a drug dealer, right?</p> <p>23 MS. KLEINHAUS: Objection to form, foundation.</p> <p>24 It's argumentative.</p>                                                                                                                                           |
| Page 6 | <p>1 Flaxman plaintiffs.</p> <p>2 MR. BORKAN: Steve Borkan for Ridgell.</p> <p>3 MR. BAZAREK: William Bazarek for the</p> <p>4 individual defendants represented by Hale &amp; Monico.</p> <p>5 MS. MIAN: Good morning. Aleeza Mian for</p> <p>6 Watts.</p> <p>7 MS. EKL: Good morning. Elizabeth Ekl for the</p> <p>8 City of Chicago.</p> <p>9 MR. SULLIVAN: Sean Sullivan for Kallatt</p> <p>10 Mohammed.</p> <p>11 THE VIDEOGRAPHER: Will the court reporter</p> <p>12 please introduce yourself and swear in the witness?</p> <p>13 THE COURT REPORTER: My name is Karen Fazio.</p> <p>14 I'm with Royal Reporting.</p> <p>15 Will you please raise your right hand?</p> <p>16 (WHEREUPON, the witness was duly</p> <p>17 sworn.)</p> <p>18 ALLISON D. REDLICH, PH.D.,</p> <p>19 called as a witness herein, having been first duly</p> <p>20 sworn, was examined and testified remotely as follows:</p> <p>21 EXAMINATION</p> <p>22 BY MR. BAZAREK:</p> <p>23 Q. Good morning, Ms. Redlich. My name is</p> <p>24 William Bazarek. I represent a number of the</p>                                                                                                                                                                               | Page 8 | <p>1 THE WITNESS: Am I supposed -- should I answer</p> <p>2 that question?</p> <p>3 MS. KLEINHAUS: You can answer that question</p> <p>4 to the extent that you know.</p> <p>5 BY THE WITNESS:</p> <p>6 A. I have no idea if he's a drug dealer or</p> <p>7 not.</p> <p>8 BY MR. BAZAREK:</p> <p>9 Q. Did you ever review his arrest history?</p> <p>10 A. I can't recall. If it was on my report</p> <p>11 in Appendix A, then I did, but I don't recall. I</p> <p>12 didn't realize we were going to be talking about</p> <p>13 Alvin Waddy today.</p> <p>14 Q. Tell me, other than the Waddy case,</p> <p>15 where else have you been deposed, Doctor?</p> <p>16 A. For guilty plea cases?</p> <p>17 Q. Any time you've been deposed.</p> <p>18 A. It's -- there haven't been that many</p> <p>19 times, but I don't know off the top of my head.</p> <p>20 I've been serving as an expert witness in contested</p> <p>21 confession and guilty plea cases, largely</p> <p>22 confession cases, since 2004, but I don't do it</p> <p>23 very often.</p> <p>24 Q. Okay. And I know you've been deposed in</p> |

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| Page 9                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Page 11                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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| <p>1 the past, but I'll just go over a few ground rules</p> <p>2 with you.</p> <p>3 If there's any question that I ask you</p> <p>4 today that you don't understand, can you let me</p> <p>5 know right away and I'll rephrase it? Okay?</p> <p>6 A. Okay.</p> <p>7 Q. I'm also going to assume, Doctor, that</p> <p>8 if you answer any questions today that you</p> <p>9 understood the questions. Is that fair?</p> <p>10 A. Yes. I will ask for clarification if I</p> <p>11 don't understand or if it later becomes apparent</p> <p>12 that I didn't understand. I may believe that I</p> <p>13 understood you at first, but then it may become</p> <p>14 apparent that I didn't.</p> <p>15 Q. Right. Any time today, if you think you</p> <p>16 misspoke, you can clarify your answer. Okay?</p> <p>17 A. Okay.</p> <p>18 Q. Okay. And, Doctor, can you remember to</p> <p>19 do that before this deposition concludes?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. And I just -- I want to make sure</p> <p>22 that any answers that you give, it's to questions</p> <p>23 that you understood. Is that fair?</p> <p>24 A. I will do my best.</p> | <p>1 A. Yes.</p> <p>2 Q. And are there other cases that you've</p> <p>3 been retained by the Loevy &amp; Loevy firm?</p> <p>4 MS. KLEINHAUS: I'm just going to object and</p> <p>5 direct her not to answer for any cases in which you</p> <p>6 haven't already been disclosed with the report</p> <p>7 that's been produced. That's work product that you</p> <p>8 shouldn't talk about in your answer.</p> <p>9 But to the extent you can answer without</p> <p>10 that, go ahead.</p> <p>11 BY THE WITNESS:</p> <p>12 A. Can you repeat the question, please?</p> <p>13 MR. BAZAREK: Can you read it back, please,</p> <p>14 Ms. Court Reporter?</p> <p>15 (WHEREUPON, the record was read by</p> <p>16 the reporter.)</p> <p>17 BY THE WITNESS:</p> <p>18 A. Not in the recent past.</p> <p>19 BY MR. BAZAREK:</p> <p>20 Q. Well, I'm not just talking about the</p> <p>21 recent past. You said you've been consulting on</p> <p>22 contested confession cases since 2004.</p> <p>23 Do I have that right, Doctor?</p> <p>24 A. Yes.</p>     |
| Page 10                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Page 12                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <p>1 Q. Okay. Are you being compensated today</p> <p>2 for this deposition?</p> <p>3 A. I believe so. I haven't submitted a</p> <p>4 bill.</p> <p>5 Q. Okay. To date, what have -- how much</p> <p>6 have you made in your review of the Ben Baker and</p> <p>7 Clarissa Glenn case?</p> <p>8 MS. KLEINHAUS: Objection to form.</p> <p>9 You can answer.</p> <p>10 BY THE WITNESS:</p> <p>11 A. I have not received any money to date.</p> <p>12 I submitted a bill last week or the week before,</p> <p>13 but I have not received it yet.</p> <p>14 BY MR. BAZAREK:</p> <p>15 Q. Okay. And what was the invoice for --</p> <p>16 strike that.</p> <p>17 Doctor, what's the amount of the unpaid</p> <p>18 bill that you submitted?</p> <p>19 A. I think it was about \$4,687.50, is my</p> <p>20 recollection.</p> <p>21 Q. Okay. And you've been hired by the</p> <p>22 Loevy &amp; Loevy firm on other cases, right?</p> <p>23 A. Yes.</p> <p>24 Q. And there's the Waddy case, right?</p>                                                                                                                                                    | <p>1 Q. Okay. So since 2004 --</p> <p>2 A. There's one case that I can think of,</p> <p>3 and that's it.</p> <p>4 MS. KLEINHAUS: And I would just direct you,</p> <p>5 again, to the extent you were a consulting expert</p> <p>6 versus an expert who is disclosed and offered a</p> <p>7 report, you shouldn't offer information about that.</p> <p>8 BY MR. BAZAREK:</p> <p>9 Q. Can you answer the question?</p> <p>10 A. I'm not sure what the question is, and</p> <p>11 you've asked me very clearly to indicate when I'm</p> <p>12 confused. I'm confused.</p> <p>13 Q. Okay. So I was asking you about cases</p> <p>14 where you've been retained by the Loevy &amp; Loevy</p> <p>15 firm.</p> <p>16 Do you understand that, Doctor?</p> <p>17 A. Yes.</p> <p>18 Q. And we've already talked about the Waddy</p> <p>19 case. You were retained in that case, correct?</p> <p>20 A. Yes.</p> <p>21 Q. You gave opinions, correct?</p> <p>22 A. Yes.</p> <p>23 Q. And you were paid for the opinions that</p> <p>24 you gave, correct?</p> |

6 (Pages 9 to 12)

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1 A. Yes.

2 Q. Okay. So -- and then I asked you about

3 other cases. You said something along the lines of

4 not in the recent past.

5 Do you remember you said that just about

6 three minutes ago?

7 A. Yes, I do.

8 Q. Okay. So you just were talking about

9 there was another case. When -- what is the time

10 frame of this other case when you were retained by

11 Loevy & Loevy?

12 A. My estimated guess is the early 2010s.

13 Q. Okay. And what was the name of that

14 case?

15 MS. KLEINHAUS: I would just direct you,

16 again, if that's a case that you were only

17 consulting on versus being a retained expert, you

18 shouldn't discuss any of your consulting.

19 BY THE WITNESS:

20 A. I was paid, but I did not provide any

21 deposition or testimony in court.

22 BY MR. BAZAREK:

23 Q. Okay. How much were you paid?

24 A. I would have to go back and check my

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1 records. I have no idea.

2 Q. Do you have records somewhere that would

3 reflect how much you were paid?

4 A. I believe so, yes.

5 Q. Okay. So other than that one case that

6 you've now testified that you didn't do a report,

7 you didn't testify in, and then Waddy --

8 A. To clarify, I did do a report. I did

9 not give a deposition or testify in court, but I

10 did produce a report.

11 Q. Was the report disclosed by the

12 plaintiff in that particular case?

13 A. I'm not a lawyer, and I don't know what

14 that means, and I have no idea.

15 Q. Okay. Well, you know you did a report

16 in this case, right?

17 A. Yes.

18 Q. And are you aware that your report was

19 actually disclosed to the other parties in this

20 case, or you don't know that?

21 A. I do know that because we are having a

22 deposition, and I believe that you're going to be

23 asking me questions about my report.

24 Q. Okay. And so -- but going back to the

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1 case from the 2010s, you don't know as to whether

2 or not that report was disclosed to the parties?

3 Is that your testimony?

4 A. I don't know with any certainty, no.

5 Q. Okay. Was it a final report or a draft

6 report?

7 A. I believe it was a final report.

8 THE COURT REPORTER: I'm sorry. I didn't get

9 the objection.

10 MS. KLEINHAUS: Objection, form and

11 foundation.

12 BY MR. BAZAREK:

13 Q. Do you understand the question?

14 A. I'm sorry. I believe I answered it.

15 I believe it was a final report.

16 Q. Okay. And it was a report that you

17 signed off on, correct?

18 A. Yes.

19 MS. KLEINHAUS: Objection to form.

20 BY MR. BAZAREK:

21 Q. And then that report was provided to the

22 attorneys at the Loevy & Loevy firm, is that

23 correct?

24 A. Yes.

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1 Q. Okay. Well, one of the things --

2 Doctor, at any time, I know you're a busy doctor,

3 if you need to take a break or anything like that,

4 you can do so. Just let us know, okay?

5 A. Okay.

6 Q. And, by the way, where are you today?

7 A. I am in Fairfax, Virginia.

8 Q. And that's a northern suburb of DC, is

9 that correct?

10 A. Yes.

11 Q. Okay. Is it near Falls Church,

12 Virginia?

13 A. Yes, I believe so.

14 Q. Okay. And are you -- you're a

15 scientist?

16 A. Yes.

17 MS. KLEINHAUS: Objection to form.

18 BY MR. BAZAREK:

19 Q. When did you become a scientist?

20 MS. KLEINHAUS: Objection to form.

21 BY THE WITNESS:

22 A. I guess I would say when I received my

23 Ph.D. in 1999, but I was doing science as a

24 doctoral student and as a research assistant before

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1 that.

2 BY MR. BAZAREK:

3 **Q. And what is your Ph.D. in?**

4 A. Psychology.

5 **Q. Any particular specialty in psychology,**

6 **or just psychology in general?**

7 A. Yes, it's developmental psychology.

8 **Q. And to get a Ph.D., do you have to**

9 **prepare papers?**

10 A. I don't know what you mean by "prepare

11 papers." Please, clarify.

12 **Q. How do you become a Ph.D.? What did you**

13 **have to do?**

14 A. Well, there are many things, but the

15 primary thing is to write a dissertation -- to

16 conduct research and -- your dissertation research,

17 and write up your dissertation, and defend it

18 before a committee.

19 **Q. And what was the topic of your**

20 **dissertation that led you to becoming a Ph.D.?**

21 A. It was comparing juveniles ages 12 and

22 13, and 16 and 17, to young adults using the lab

23 experiment and looking at their likelihood of

24 providing a false confession to a -- what we called

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1 a mock crime.

2 **Q. And can you just describe how you went**

3 **about doing that?**

4 A. Sure. This was about 25 years ago now,

5 but I'll do my best.

6 So we brought young adults, college

7 students, and adolescents, the ages that I just

8 mentioned, into the laboratory, and they were

9 seated at a computer. And they were told that they

10 were participating in a study looking at reaction

11 time, and I think it was memory, and the -- at some

12 point -- they're told not to hit the ALT key on the

13 computer while they're doing this test because the

14 computer might crash. And then the computer

15 crashes, and they're accused of hitting the ALT

16 key. And half of the participants are shown a

17 document with their key strokes, one of them

18 indicating that they hit the ALT key, and the other

19 half are not shown this document. And then they're

20 asked to sign a statement taking responsibility for

21 crashing the computer.

22 And we looked at the rates of 12- and

23 13-year-olds, and 15 and 16 -- 15- to 17-year-olds,

24 and 15- and 16-year-olds, and then college students

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1 and their likelihood of signing that confession,

2 that statement.

3 **Q. And what were the results of this --**

4 A. Experiment.

5 **Q. -- study that you did with the**

6 **adolescents and the college kids?**

7 A. We found that the adolescents were more

8 likely to take responsibility for crashing the

9 computer than the young adults, especially when we

10 presented them with the printout demonstrating that

11 they had indeed hit the ALT key.

12 **Q. How long did the study take where you**

13 **were literally with the adolescents and the college**

14 **kids?**

15 A. Do you mean the individual sessions, or

16 how long it took me to collect all of the data?

17 **Q. Yeah, that's -- yeah, that's a good --**

18 **let me clarify.**

19 **Was the study done on just one day with**

20 **all the participants, the adolescents and the**

21 **college kids?**

22 A. No. It was -- we brought in each

23 participant one by one, and it would have taken

24 over a year, I would estimate. It's been so long,

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1 I don't remember the details.

2 **Q. Okay. And then how many -- excuse me.**

3 **How many -- is it participant? Is that**

4 **the right word for the adolescents and the college**

5 **kids?**

6 A. Yes.

7 **Q. How many participants were there in this**

8 **study?**

9 A. I'm going to estimate over 100. I would

10 need to go back and look at the article that I

11 published the study in. I don't recall.

12 **Q. Okay. But in terms of the participants,**

13 **it was over a year period? Do I have that right?**

14 A. I believe so, yes.

15 **Q. Okay. And then how long after you**

16 **completed the study did you finish your**

17 **dissertation?**

18 A. I defended my dissertation and received

19 my Ph.D. in August of 1999.

20 **Q. Okay.**

21 A. And so it would have been soon

22 thereafter. I published the study in 2003,

23 although there's -- yeah.

24 **Q. And then the participants, did they --**

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| Page 21 | <p>1 <b>did the participants -- did that begin in 1998</b></p> <p>2 <b>going into '99, or was it even earlier than that?</b></p> <p>3 A. I believe it was earlier than that. I</p> <p>4 would say 1997.</p> <p>5 <b>Q. Okay. Have you ever done a study like</b></p> <p>6 <b>that with people in their thirties?</b></p> <p>7 A. Like that specifically?</p> <p>8 <b>Q. Yes.</b></p> <p>9 A. No.</p> <p>10 <b>Q. Okay. Have you ever done any studies</b></p> <p>11 <b>with individuals that are in their thirties?</b></p> <p>12 A. Yes.</p> <p>13 MS. KLEINHAUS: Objection to form.</p> <p>14 BY MR. BAZAREK:</p> <p>15 <b>Q. What studies have you done with people</b></p> <p>16 <b>in their thirties?</b></p> <p>17 A. Well, we've done studies where -- I</p> <p>18 published one recently where we observed guilty</p> <p>19 plea hearings in criminal court and juvenile court,</p> <p>20 and many of the defendants in that study were in</p> <p>21 their thirties, and we observed over 800 plea</p> <p>22 hearings, almost 600 in the criminal court, and</p> <p>23 then we interviewed 96 of those adult defendants,</p> <p>24 and many of them were in their thirties.</p> | Page 23 | <p>1 information. Is this going to be confidential? I</p> <p>2 mean, we have human subjects review boards, and,</p> <p>3 you know, that's something that I -- we don't</p> <p>4 disclose and that we promised the sites</p> <p>5 confidentiality.</p> <p>6 <b>Q. Well, when you attended these court</b></p> <p>7 <b>hearings, it was open to the public, right?</b></p> <p>8 A. Yes, but we've now published those data.</p> <p>9 <b>Q. Okay. I'm not asking for people's names</b></p> <p>10 <b>of who you studied.</b></p> <p>11 A. I understand.</p> <p>12 <b>Q. Okay. So, you know, first off, I don't</b></p> <p>13 <b>think this is private information of any sort. So</b></p> <p>14 <b>I don't know --</b></p> <p>15 <b>Do you have any thoughts on this, Tess?</b></p> <p>16 MS. KLEINHAUS: So my understanding is that in</p> <p>17 order to be able to conduct the study, it's likely</p> <p>18 that these locations -- these courthouse locations</p> <p>19 were promised confidentiality about where</p> <p>20 specifically it happened. I wonder if she could</p> <p>21 perhaps tell you, like, generally the geographic</p> <p>22 area of where they conducted it, if that would</p> <p>23 satisfy the confidentiality for the study and</p> <p>24 answer your question.</p> |
| Page 22 | <p>1 <b>Q. And then what was the time frame for</b></p> <p>2 <b>that study?</b></p> <p>3 A. Are you asking me when we collected the</p> <p>4 data?</p> <p>5 <b>Q. Well, you talked about -- yeah. Okay.</b></p> <p>6 <b>I'll clarify.</b></p> <p>7 <b>You actually attended criminal court</b></p> <p>8 <b>proceedings? Do I have that right?</b></p> <p>9 A. I -- we systematically observed plea</p> <p>10 hearings in criminal court, circuit court, and in</p> <p>11 two juvenile courts. And I attended many of the</p> <p>12 plea hearings, and I did some of the coding, but I</p> <p>13 did not attend all 800-plus of these plea hearings.</p> <p>14 <b>Q. How many plea hearings did you actually</b></p> <p>15 <b>attend, Doctor?</b></p> <p>16 A. I'm going to estimate -- do you want an</p> <p>17 estimate? Because I have no idea what the actual</p> <p>18 number is.</p> <p>19 <b>Q. Yes, sure.</b></p> <p>20 A. Okay. I'm going to estimate that I</p> <p>21 attended 200.</p> <p>22 <b>Q. And what courthouse or courthouses did</b></p> <p>23 <b>you attend these approximately 200 hearings?</b></p> <p>24 A. I don't usually disclose that</p>                    | Page 24 | <p>1 MR. BAZAREK: Yeah, well, let's try that.</p> <p>2 BY MR. BAZAREK:</p> <p>3 <b>Q. Can you say, like, what -- what county</b></p> <p>4 <b>this --</b></p> <p>5 A. That's exactly what I don't want to say.</p> <p>6 It's in the article is -- we call it Virginia.</p> <p>7 <b>Q. Okay.</b></p> <p>8 A. So the criminal court and one of the</p> <p>9 juvenile courts were in Virginia, and the other</p> <p>10 juvenile court was in California.</p> <p>11 <b>Q. Okay. So two locations, Virginia and</b></p> <p>12 <b>California?</b></p> <p>13 A. The criminal court was only Virginia,</p> <p>14 with the 30-year-olds.</p> <p>15 <b>Q. Gotcha. Okay.</b></p> <p>16 A. And -- can I add something?</p> <p>17 <b>Q. Go ahead.</b></p> <p>18 A. So I would have to go and look at my --</p> <p>19 there are studies that I've done because I've done</p> <p>20 a lot of studies on guilty pleas and false</p> <p>21 confessions, a lot of research over time, but I'm</p> <p>22 sure that I've done many studies with 30-year-olds.</p> <p>23 I just gave you one example.</p> <p>24 <b>Q. Okay. And what was the time frame for</b></p>                                                                                                                                                |

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| <p style="text-align: right;">Page 25</p> <p>1 <b>this study that we're talking about involving</b><br/> 2 <b>Virginia courts and California courts?</b><br/> 3 A. Again, so to clarify, do you mean the<br/> 4 period of -- over the time we collected the data?<br/> 5 <b>Q. Let's focus in on this. You have</b><br/> 6 <b>testified that you attended approximately 200 court</b><br/> 7 <b>proceedings where people pled to crimes, is that</b><br/> 8 <b>correct?</b><br/> 9 A. Yes.<br/> 10 <b>Q. Okay. So let's focus on that.</b><br/> 11 <b>What's the time frame for the 200 court</b><br/> 12 <b>proceedings that you attended in person?</b><br/> 13 A. Would you like me to check the article<br/> 14 that I published?<br/> 15 <b>Q. Sure, sure.</b><br/> 16 A. Okay. So --<br/> 17 <b>Q. And can you just tell us what article it</b><br/> 18 <b>is you're reading from?</b><br/> 19 A. Sure. It's -- well, one is the -- I<br/> 20 don't have that with me. The Dezember, et al.<br/> 21 article from -- we published that in 2022, I<br/> 22 believe. It might have been 2021. And the other<br/> 23 one was Redlich, et al., and that was published in<br/> 24 late 2022.</p>                                                                                                                                                                   | <p style="text-align: right;">Page 27</p> <p>1 different courtrooms. Obviously, only one person<br/> 2 could be in one courtroom at a time. The juvenile<br/> 3 pleas were a little bit different.<br/> 4 <b>Q. Right. And I want to focus now just on</b><br/> 5 <b>the 30-somethings that you were talking about.</b><br/> 6 A. Okay.<br/> 7 <b>Q. So -- and you would have a colleague</b><br/> 8 <b>attend court with you, and they would cover a</b><br/> 9 <b>different courtroom?</b><br/> 10 A. We had a whole research team. So I<br/> 11 believe there were six courtrooms. You know, we<br/> 12 might have four to six people, like me and three to<br/> 13 five other people.<br/> 14 <b>Q. Okay. But would you have multiple</b><br/> 15 <b>people as part of your team in the same courtroom,</b><br/> 16 <b>or you'd go to different courtrooms?</b><br/> 17 A. Both. So there is something called<br/> 18 interrater reliability to make sure that we're<br/> 19 coding the same thing. So on at least about -- I'm<br/> 20 sorry. Again, it's in the article. You want me to<br/> 21 look in the article about what percentage?<br/> 22 <b>Q. Sure.</b><br/> 23 A. 34 percent of the criminal court<br/> 24 hearings that we observed were observed by two</p>                                           |
| <p style="text-align: right;">Page 26</p> <p>1 I'm sorry. Let me be more specific. So<br/> 2 the Redlich, et al. is called Guilty Plea Hearings<br/> 3 in Juvenile and Criminal Court, and that was<br/> 4 published in Law and Human Behavior. Let me see if<br/> 5 I can find when -- okay. So all observations took<br/> 6 place between January 2017 and August 2018.<br/> 7 THE COURT REPORTER: Excuse me. Can you spell<br/> 8 that first name for me? December, did you say?<br/> 9 THE WITNESS: Yes, it's like December with a<br/> 10 Z. So it's D-E-Z-E-M-B-E-R.<br/> 11 BY MR. BAZAREK:<br/> 12 <b>Q. So going back to these -- you know, let</b><br/> 13 <b>me ask this question. Strike that question.</b><br/> 14 <b>Where you talked about the 200 court</b><br/> 15 <b>proceedings, would that be 200 separate proceedings</b><br/> 16 <b>on different days, or you could go to court on one</b><br/> 17 <b>day, for instance, and watch, you know, 20 pleas</b><br/> 18 <b>take place, 30 pleas take place, something like</b><br/> 19 <b>that?</b><br/> 20 A. For the criminal court, they had a plea<br/> 21 day, and it was morning to afternoon. And so we<br/> 22 did watch multiple pleas on that -- on Thursdays, I<br/> 23 believe. And so we could have seen, I don't know,<br/> 24 ten to 20 -- ten pleas maybe. We were sitting in</p> | <p style="text-align: right;">Page 28</p> <p>1 people -- at least two people.<br/> 2 <b>Q. Okay. So the individuals that -- and,</b><br/> 3 <b>again, I'm keeping with the 30-somethings. I'm not</b><br/> 4 <b>asking about juveniles, but the 30-somethings that</b><br/> 5 <b>you observed in a Virginia courthouse somewhere,</b><br/> 6 <b>what did you know about those individual cases</b><br/> 7 <b>where someone was taking a plea?</b><br/> 8 A. Only what we observed in court.<br/> 9 However, we interviewed close to 100 of those adult<br/> 10 defendants. And I don't want to give the<br/> 11 impression that all of them were in their thirties.<br/> 12 They ranged from 18 to -- let me try and see.<br/> 13 Yeah, I don't remember. Their mean age<br/> 14 was 32 years. And so I know that many of them were<br/> 15 in their thirties.<br/> 16 <b>Q. Okay. And so would you -- you said it</b><br/> 17 <b>was approximately 100 that you were able to talk</b><br/> 18 <b>to?</b><br/> 19 A. Yes.<br/> 20 <b>Q. And when you say 100, is that your whole</b><br/> 21 <b>group? Because I know you had a team. Or is it</b><br/> 22 <b>just you, Dr. Redlich, is talking to 100 people</b><br/> 23 <b>that have pled guilty to some crime?</b><br/> 24 A. I did not conduct all the interviews</p> |

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| Page 29 | <p>1 myself. I conducted a portion of them.</p> <p>2 <b>Q. Okay. So out of the 100, how many</b></p> <p>3 <b>interviews did you yourself conduct?</b></p> <p>4 A. This is an estimate. I'm going to say</p> <p>5 25.</p> <p>6 <b>Q. And how is it that one of these</b></p> <p>7 <b>individuals who pled guilty would agree to talk to</b></p> <p>8 <b>you, Doctor?</b></p> <p>9 MS. KLEINHAUS: Objection to form.</p> <p>10 You can answer.</p> <p>11 BY THE WITNESS:</p> <p>12 A. We asked them if they wanted to</p> <p>13 participate in the research, and those people that</p> <p>14 we interviewed said yes.</p> <p>15 BY MR. BAZAREK:</p> <p>16 <b>Q. Okay. And so do you make the ask before</b></p> <p>17 <b>they plead guilty or after they plead guilty? How</b></p> <p>18 <b>does that work?</b></p> <p>19 A. In this study, it was after they pled</p> <p>20 guilty.</p> <p>21 <b>Q. So do you -- I'm just trying to</b></p> <p>22 <b>understand how you get their agreement that they're</b></p> <p>23 <b>going to talk to you. Do you walk up to them, hey,</b></p> <p>24 <b>do you have a moment, sir? You just pled guilty.</b></p>                                                                                                                                                                                                                                | Page 31 | <p>1 to them and asked them if they were interested in</p> <p>2 participating in research. Those we mostly would</p> <p>3 just get contact information and contact them a few</p> <p>4 days later, after their plea. Some people wanted</p> <p>5 to get interviewed right after their plea, but I</p> <p>6 would say most in the community did not.</p> <p>7 <b>Q. Okay. Were they paid to participate in</b></p> <p>8 <b>this study?</b></p> <p>9 A. Let me check my records. I can't</p> <p>10 remember -- I'm sorry. I would have to do a little</p> <p>11 more digging, but my recollection is that the</p> <p>12 people in custody were not paid because the jail</p> <p>13 did not want us to pay them, and even just putting</p> <p>14 money in their canteen or something like that. I</p> <p>15 think the people in the community, which was about</p> <p>16 15 percent of the sample -- most of them were in</p> <p>17 custody -- I do believe we paid them. And I think</p> <p>18 it was about \$40 or \$50.</p> <p>19 <b>Q. Okay. And when you would do the</b></p> <p>20 <b>interviews, whether it was people that were in the</b></p> <p>21 <b>county jail or that were on the outside, so to</b></p> <p>22 <b>speak, would the interview be done in one session?</b></p> <p>23 A. Yes, it took about an hour.</p> <p>24 <b>Q. Okay. Tell me -- as a scientist, a</b></p> |
| Page 30 | <p>1 <b>Can I talk to you? Do you talk to their attorney</b></p> <p>2 <b>to see if the attorney wants to talk to the person?</b></p> <p>3 <b>How does it work?</b></p> <p>4 A. So the people who were not sentenced</p> <p>5 to -- I'm sorry. A portion of our interviewees</p> <p>6 were in jail pre- and post their plea. And so some</p> <p>7 people were sentenced the same day, but most, I</p> <p>8 would say, were sentenced about a month later,</p> <p>9 after their plea.</p> <p>10 And so for those people who were in the</p> <p>11 county jail, we received permission. We worked</p> <p>12 with the jail, they allowed us to come in, and we</p> <p>13 had their name and information because we just</p> <p>14 observed their plea. And so we sat down with them,</p> <p>15 and in the rooms where they typically meet with</p> <p>16 their attorneys, so it was a private setting, and</p> <p>17 we asked them if they were willing to talk to us.</p> <p>18 And we described what we were trying to accomplish</p> <p>19 with the research, and we provided an informed</p> <p>20 consent, which is standard process in research.</p> <p>21 And for the people that were not</p> <p>22 incarcerated in the county jail, we did exactly</p> <p>23 what you said, and we -- after they pled guilty,</p> <p>24 they would go into the hallway, and then we went up</p> | Page 32 | <p>1 <b>doctor, do you feel that you learned things from</b></p> <p>2 <b>talking to these individuals that participated in</b></p> <p>3 <b>that study?</b></p> <p>4 A. That's the goal, yes.</p> <p>5 <b>Q. Okay. And when you're interviewing the</b></p> <p>6 <b>persons that are in custody or not in custody, do</b></p> <p>7 <b>they fill out any types of forms or surveys?</b></p> <p>8 <b>Anything like that?</b></p> <p>9 A. So these were interviews. So we were</p> <p>10 asking them questions, and they were, for the most</p> <p>11 part, standardized questions, parts of scales. But</p> <p>12 it wasn't the person -- it's not like we gave the</p> <p>13 person a piece of paper and said, fill this out.</p> <p>14 We asked the questions of them, and then recorded</p> <p>15 their answers.</p> <p>16 <b>Q. And, ultimately -- I know you said you</b></p> <p>17 <b>published -- is it paper or papers on this study</b></p> <p>18 <b>that we're talking about?</b></p> <p>19 A. So, so far we've published two</p> <p>20 studies -- two papers from the observational study,</p> <p>21 the one where we systematically observed more than</p> <p>22 800 plea hearings. We are now working on the</p> <p>23 publication for the interview data, but we have not</p> <p>24 published that yet. This is just one example of a</p>                                    |

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| <p style="text-align: right;">Page 33</p> <p>1 study that I've done with 30-year-olds.</p> <p>2 <b>Q. Okay. And just -- can you just briefly</b></p> <p>3 <b>describe the results of the study that two papers</b></p> <p>4 <b>have been published on?</b></p> <p>5 A. Sure. One paper focused just on the</p> <p>6 criminal court data where we were looking at</p> <p>7 differences in plea hearings for people who pled</p> <p>8 guilty to at least one felony versus people who</p> <p>9 pled guilty to misdemeanor only charges. And this</p> <p>10 was in circuit court. So all of their original</p> <p>11 charges were felony level. And we found that the</p> <p>12 plea colloquy was significantly shorter with people</p> <p>13 who pled only to misdemeanor offenses, and because</p> <p>14 it was shorter, it went over -- the judge asked</p> <p>15 significantly fewer questions related to</p> <p>16 voluntariness, knowingness, intelligence, and other</p> <p>17 things that we coded for.</p> <p>18 <b>Q. In that study, how many of the pleas of</b></p> <p>19 <b>guilty were for narcotics felony cases?</b></p> <p>20 A. There were many, but I don't know the</p> <p>21 exact number to tell you.</p> <p>22 <b>Q. In the study, how many of the crimes</b></p> <p>23 <b>were ultimately pled out to a misdemeanor and not a</b></p> <p>24 <b>felony?</b></p> | <p style="text-align: right;">Page 35</p> <p>1 yes. I'd say maybe 15 percent were women.</p> <p>2 MR. BAZAREK: Okay. Hey, can we take just</p> <p>3 a -- I want to take like a quick five-minute break,</p> <p>4 okay?</p> <p>5 THE WITNESS: Okay.</p> <p>6 MR. BAZAREK: Then we can come back.</p> <p>7 THE VIDEOGRAPHER: Going off the record at</p> <p>8 9:47 a.m.</p> <p>9 (WHEREUPON, a recess was had.)</p> <p>10 THE VIDEOGRAPHER: Back on the record at 9:55</p> <p>11 a.m.</p> <p>12 BY MR. BAZAREK:</p> <p>13 <b>Q. Dr. Redlich, when you're interviewing --</b></p> <p>14 <b>strike that.</b></p> <p>15 <b>When you're interviewing the subjects</b></p> <p>16 <b>that have pled guilty, you're receiving information</b></p> <p>17 <b>from them firsthand about why they pled guilty. Do</b></p> <p>18 <b>I have that right?</b></p> <p>19 A. That's one of the -- one set of</p> <p>20 questions that we'll ask them, about their reasons</p> <p>21 why. But we ask them lots of questions over the</p> <p>22 course of an hour.</p> <p>23 <b>Q. Do you do any type of cognitive</b></p> <p>24 <b>assessments when you're talking to these</b></p>                                                                                                                                                                               |
| <p style="text-align: right;">Page 34</p> <p>1 A. I think it was 12 percent misdemeanor</p> <p>2 only.</p> <p>3 <b>Q. Okay. So the vast -- well, the majority</b></p> <p>4 <b>was for felony cases -- felony cases that someone</b></p> <p>5 <b>pled to, is that correct?</b></p> <p>6 A. So they all began -- they all started as</p> <p>7 felonies, and then the 88 percent had at least one</p> <p>8 felony. They could have had -- they could have</p> <p>9 pled to misdemeanor, but they pled to at least one</p> <p>10 felony.</p> <p>11 <b>Q. And in terms of the study group of the</b></p> <p>12 <b>individuals who pled, did it include both men and</b></p> <p>13 <b>women?</b></p> <p>14 A. Yes.</p> <p>15 <b>Q. What was the breakdown in terms of the</b></p> <p>16 <b>males versus females? Do you know what that was?</b></p> <p>17 A. Not off the top of my head, but I could</p> <p>18 look if you want.</p> <p>19 <b>Q. That's -- well, yeah, if it doesn't take</b></p> <p>20 <b>too long, you can look. Or if you can ballpark it.</b></p> <p>21 <b>I mean, would you say the vast majority were men</b></p> <p>22 <b>who pled guilty to these felony crimes?</b></p> <p>23 A. Yeah, I would say the vast majority were</p> <p>24 men, as is common in the criminal legal system,</p>                                                                          | <p style="text-align: right;">Page 36</p> <p>1 <b>individuals?</b></p> <p>2 A. So in that specific study, we</p> <p>3 administered something called the digit span test.</p> <p>4 But, again, I do that for -- in a research capacity</p> <p>5 and not a clinical capacity.</p> <p>6 <b>Q. And describe what it is that you use.</b></p> <p>7 <b>What is this?</b></p> <p>8 A. So the digit span test is you ask the</p> <p>9 subject, the participant, to -- you give them a</p> <p>10 series of numbers, it increases, like, from two</p> <p>11 digits to, you know, maybe five digits, and you ask</p> <p>12 them to repeat it back to you. And so there's a</p> <p>13 forward portion, and then a backwards portion</p> <p>14 where, you know, you say, you know, two, seven,</p> <p>15 nine, six, three, and they have to repeat that</p> <p>16 backwards to you. So forwards and backwards.</p> <p>17 <b>Q. Okay. Any other tests that you perform</b></p> <p>18 <b>on these individuals that you interview?</b></p> <p>19 A. I mean, I developed a plea comprehension</p> <p>20 measure. In the past, I've administered measures</p> <p>21 of competent to stand trial, you know, using</p> <p>22 research instruments. But, no. Cognitive, I don't</p> <p>23 do intelligence tests, or, you know, things like</p> <p>24 that, no.</p> |

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| <p style="text-align: right;">Page 37</p> <p>1       <b>Q. But you do see the value in speaking</b><br/> 2       <b>directly with individuals who have pled guilty in</b><br/> 3       <b>order for you to gather information for your study,</b><br/> 4       <b>correct?</b><br/> 5       MS. KLEINHAUS: Objection to form, foundation,<br/> 6       incomplete hypothetical.<br/> 7       You can answer.<br/> 8       BY THE WITNESS:<br/> 9       A. For research purposes. And I don't look<br/> 10      at individuals. I look at an aggregate, patterns<br/> 11      and trends.<br/> 12      BY MR. BAZAREK:<br/> 13      <b>Q. But you still talk to individuals,</b><br/> 14      <b>right?</b><br/> 15      A. Yes.<br/> 16      <b>Q. Did you talk to Ben Baker or Clarissa</b><br/> 17      <b>Glenn about their arrests that were made on</b><br/> 18      <b>December 11, 2005?</b><br/> 19      A. No.<br/> 20      <b>Q. Why not?</b><br/> 21      A. Because I'm not that type of<br/> 22      psychologist, and I don't -- I've never done that<br/> 23      in any of the cases that I've worked on since 2004.<br/> 24      <b>Q. Is it because the lawyers won't let you</b></p>                                                                                                                                                                  | <p style="text-align: right;">Page 39</p> <p>1       <b>Clarissa Glenn about their December 11, 2005</b><br/> 2       <b>arrest, right?</b><br/> 3       A. I find very little to be impossible. I<br/> 4       said I don't feel qualified, and, therefore, I<br/> 5       don't think it's appropriate. I've reviewed the<br/> 6       materials related to their case.<br/> 7       <b>Q. But you would agree nothing prevents you</b><br/> 8       <b>from speaking with Ben Baker or Clarissa Glenn</b><br/> 9       <b>about the circumstances of their December 11, 2005</b><br/> 10      <b>arrests other than you feel that you're unqualified</b><br/> 11      <b>to do so, is that correct?</b><br/> 12      MS. KLEINHAUS: Objection to form. Asked and<br/> 13      answered.<br/> 14      You can answer it again.<br/> 15      BY THE WITNESS:<br/> 16      A. I've never pursued that, so I don't know<br/> 17      if it's impossible or not in the hypothetical<br/> 18      sense. I do not ask the attorneys to do that. I<br/> 19      don't know if Clarissa or Ben would be willing to<br/> 20      talk with me. It's just not something that I've<br/> 21      ever pursued.<br/> 22      BY MR. BAZAREK:<br/> 23      <b>Q. So, today, if Ben Baker and Clarissa</b><br/> 24      <b>Glenn said, hey, we'd really like to talk to</b></p> |
| <p style="text-align: right;">Page 38</p> <p>1       <b>talk to their clients?</b><br/> 2       MS. KLEINHAUS: Objection to form, foundation,<br/> 3       argumentative, and invades the Rule 26 protection.<br/> 4       So I would direct you not to answer as<br/> 5       to any specific case. With that, you can answer.<br/> 6       BY THE WITNESS:<br/> 7       A. It's for the reason that I just stated,<br/> 8       that I'm not that type of psychologist. It's not<br/> 9       because the -- I've asked and the attorney said no.<br/> 10      BY MR. BAZAREK:<br/> 11      <b>Q. Does anything prevent you from speaking</b><br/> 12      <b>with Ben Baker or Clarissa Glenn about the</b><br/> 13      <b>circumstances of their December 11, 2005 arrests?</b><br/> 14      MS. KLEINHAUS: Objection to form.<br/> 15      You can answer.<br/> 16      BY THE WITNESS:<br/> 17      A. I don't feel that I've been trained or<br/> 18      am qualified. So that would be preventing me to<br/> 19      speak to them directly. Rather, my -- I see my job<br/> 20      as educating the judge and the jury, if it comes to<br/> 21      that, about science of guilty pleas.<br/> 22      BY MR. BAZAREK:<br/> 23      <b>Q. But would you agree it's not impossible</b><br/> 24      <b>for you to request and speak with Ben Baker and</b></p> | <p style="text-align: right;">Page 40</p> <p>1       <b>Dr. Redlich. She's given opinions in our case. I</b><br/> 2       <b>think it would be a really good idea for her to --</b><br/> 3       <b>for us to talk to her. Would you take them up on</b><br/> 4       <b>that offer?</b><br/> 5       A. I don't know.<br/> 6       MS. KLEINHAUS: Objection, calls for<br/> 7       speculation.<br/> 8       Sorry. You can answer.<br/> 9       BY MR. BAZAREK:<br/> 10      <b>Q. Why? Why don't you know?</b><br/> 11      A. Because I don't know if it's<br/> 12      appropriate. I don't think it's appropriate, as<br/> 13      I've said.<br/> 14      Just so you know, my last name is<br/> 15      pronounced with a K sound, Redlich.<br/> 16      <b>Q. Redlich. Okay. Sorry. Thank you,</b><br/> 17      <b>Doctor.</b><br/> 18      A. It's okay.<br/> 19      <b>Q. Is that something you want to do,</b><br/> 20      <b>though? Do you think it would inform on the</b><br/> 21      <b>opinions you have in this case?</b><br/> 22      MS. KLEINHAUS: Objection to form, asked and<br/> 23      answered.<br/> 24      You can answer it again.</p>                                                                                                                                                                                          |

13 (Pages 37 to 40)

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| Page 41 | <p>1 BY THE WITNESS:</p> <p>2 A. I believe that I'm aware of how they</p> <p>3 feel by reading their depositions and all of the</p> <p>4 interrogatories and those things.</p> <p>5 BY MR. BAZAREK:</p> <p>6 <b>Q. Can you answer the question that I</b></p> <p>7 <b>asked?</b></p> <p>8 A. I believe that I did.</p> <p>9 MS. KLEINHAUS: Objection, argumentative.</p> <p>10 She's answered the question several times.</p> <p>11 MR. BAZAREK: Can you read back that question,</p> <p>12 please?</p> <p>13 (WHEREUPON, the record was read by</p> <p>14 the reporter.)</p> <p>15 BY MR. BAZAREK:</p> <p>16 <b>Q. It's your testimony you've answered that</b></p> <p>17 <b>question?</b></p> <p>18 MS. KLEINHAUS: Objection, argumentative.</p> <p>19 MR. BAZAREK: Read back the answer -- here,</p> <p>20 read the question, and then read the doctor's</p> <p>21 answer.</p> <p>22 (WHEREUPON, the record was read by</p> <p>23 the reporter.)</p> <p>24</p>                                                                                                                                                                              | Page 43 | <p>1 A. Thousands? No.</p> <p>2 <b>Q. Okay. Well, we know you spoke to at</b></p> <p>3 <b>least in the study we were talking about in</b></p> <p>4 <b>California -- in northern Virginia about 25</b></p> <p>5 <b>individuals, right, who pled guilty?</b></p> <p>6 A. In Virginia. I lived in northern</p> <p>7 Virginia, but I didn't say where the study was,</p> <p>8 yes.</p> <p>9 <b>Q. Okay. So tell me how many individuals</b></p> <p>10 <b>in your career, when you're interviewing</b></p> <p>11 <b>individuals that have pled guilty to a crime, have</b></p> <p>12 <b>you spoken with ballpark only, Dr. Redlich?</b></p> <p>13 A. So to clarify what you want me to do,</p> <p>14 are you talking about the number that I have spoken</p> <p>15 to directly or the number of participants in the</p> <p>16 many, many studies that I have published?</p> <p>17 <b>Q. No.</b></p> <p>18 A. Because I do not do all of the</p> <p>19 interviews myself.</p> <p>20 <b>Q. No, you directly, Dr. Redlich. You.</b></p> <p>21 A. I'm going to take a minute and look at</p> <p>22 some of the studies that I've published and remind</p> <p>23 myself.</p> <p>24 Are we talking about actual defendants</p>                |
| Page 42 | <p>1 BY MR. BAZAREK:</p> <p>2 <b>Q. So, if I understand your answer, you</b></p> <p>3 <b>think it's unnecessary to speak with Ben Baker and</b></p> <p>4 <b>Clarissa Glenn about the circumstances of their</b></p> <p>5 <b>arrest, is that correct?</b></p> <p>6 A. You asked me if it would inform my</p> <p>7 opinions.</p> <p>8 <b>Q. Do you think it's necessary or not</b></p> <p>9 <b>necessary to speak with Ben Baker and Clarissa</b></p> <p>10 <b>Glenn about their case?</b></p> <p>11 MS. KLEINHAUS: Objection to form, incomplete</p> <p>12 hypothetical.</p> <p>13 You can answer.</p> <p>14 BY THE WITNESS:</p> <p>15 A. It's not a question that I've asked</p> <p>16 myself, whether it's necessary or not because</p> <p>17 it's -- I don't feel that I'm qualified and have</p> <p>18 the training to speak with them.</p> <p>19 BY MR. BAZAREK:</p> <p>20 <b>Q. You speak to people all the time, right?</b></p> <p>21 A. In a research setting.</p> <p>22 <b>Q. You speak to people, what? Would you</b></p> <p>23 <b>say thousands of times about pleas of guilty that</b></p> <p>24 <b>they've given in court?</b></p> | Page 44 | <p>1 or any type of person that I've asked about pleas?</p> <p>2 <b>Q. No, I'll be -- it will be more narrow</b></p> <p>3 <b>than that.</b></p> <p>4 <b>How many people has Dr. Redlich</b></p> <p>5 <b>personally spoken with who have pled guilty to a</b></p> <p>6 <b>crime?</b></p> <p>7 A. So not not guilty pleas?</p> <p>8 <b>Q. Who have pled guilty to a crime.</b></p> <p>9 A. So an actual crime. So we're talking</p> <p>10 about actual defendants is what I was asking you.</p> <p>11 <b>Q. Correct. Exactly right.</b></p> <p>12 A. Okay. I'm going to take a minute.</p> <p>13 This is a ballpark, and I will also add</p> <p>14 that I do lots of different types of research</p> <p>15 methodologies. Interviewing defendants or</p> <p>16 interviewing people who just pled guilty is just</p> <p>17 one of my many methods that I use. But I'm going</p> <p>18 to say 500.</p> <p>19 <b>Q. So you certainly have experienced it in</b></p> <p>20 <b>talking to people that have pled guilty to crimes,</b></p> <p>21 <b>right?</b></p> <p>22 A. Using the standardized interview measure</p> <p>23 that has been approved by human subjects review</p> <p>24 boards, that is part of the research process.</p> |

14 (Pages 41 to 44)

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1 **Q. Right. And you could use those same**  
2 **questions, interview techniques, with Ben Baker and**  
3 **Clarissa Glenn, right?**  
4 A. In theory. I just don't see the need  
5 for that. So I do believe that it's not necessary.  
6 **Q. Did you even, like, think about that or**  
7 **consider wanting to talk to Ben Baker and Clarissa**  
8 **Glenn about the circumstances of their December 11,**  
9 **2005 arrests?**  
10 A. As I've said, I never considered that.  
11 I don't do that, and I've said that.  
12 **Q. So when I'm asking you questions at this**  
13 **deposition, is that the first time you've ever even**  
14 **thought about if that is something that should be**  
15 **done?**  
16 A. You're not the first person to ask me  
17 questions about it, no.  
18 **Q. Okay. Do you think it is necessary to**  
19 **talk to Ben Baker and Clarissa Glenn about their**  
20 **plea of guilty to drug crimes during September**  
21 **of 2006?**  
22 MS. KLEINHAUS: I'm just going to object to  
23 the form, and asked and answered.  
24 You can answer.

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1 BY THE WITNESS:  
2 A. I do not think it's necessary.  
3 BY MR. BAZAREK:  
4 **Q. Would you agree, other than you don't**  
5 **think it's necessary, that nothing prevents you**  
6 **from speaking with Ben Baker and Clarissa Glenn**  
7 **about their pleas of guilty to drug crimes during**  
8 **September of 2006?**  
9 MS. KLEINHAUS: Same objections to form, and  
10 also asked and answered.  
11 BY THE WITNESS:  
12 A. I don't know if there's anything  
13 preventing me because I never pursued it. I don't  
14 know if the attorneys would not let me. I don't  
15 know if Ben or Clarissa would refuse to talk to me.  
16 I don't know because it's never come up.  
17 BY MR. BAZAREK:  
18 **Q. And you've made no inquiry of any sort**  
19 **to see if they would even want to talk to you,**  
20 **right?**  
21 A. That's correct.  
22 **Q. Tell me, if -- strike that.**  
23 **What's your understanding of the**  
24 **circumstances of Ben Baker and Clarissa Glenn's**

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1 **arrests on December 11, 2005?**  
2 MS. KLEINHAUS: Objection to form.  
3 You can answer.  
4 BY THE WITNESS:  
5 A. Their version is -- Ben and Clarissa's  
6 version is that they were stopped by two police  
7 officers -- two police cars, and that drugs were  
8 planted on them; whereas, the police version of  
9 events is that they discovered drugs in the car. I  
10 believe it was 50 bags of heroin.  
11 BY MR. BAZAREK:  
12 **Q. And you understand that Ben Baker was a**  
13 **drug dealer, correct?**  
14 MS. KLEINHAUS: Objection to form, foundation,  
15 calls for speculation.  
16 You can answer.  
17 BY THE WITNESS:  
18 A. I'm not sure what you -- I don't know  
19 what characterizes somebody as a drug dealer. If  
20 it means that they have dealt drugs in the past, I  
21 believe that Ben admitted to that.  
22 BY MR. BAZAREK:  
23 **Q. Have you ever reviewed Ben Baker's**  
24 **arrest history? It's also known as a rap sheet.**

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1 A. Is it in my Appendix A? I don't believe  
2 I did.  
3 **Q. So I want to make sure. Is it your**  
4 **understanding that Ben Baker -- strike that.**  
5 **Is it your understanding that Ben Baker**  
6 **is a self-admitted drug dealer?**  
7 MS. KLEINHAUS: Objection to form,  
8 argumentative, foundation, calls for speculation.  
9 You can answer.  
10 BY THE WITNESS:  
11 A. I don't really recall the specifics.  
12 What I can say is that Ben's criminal history is  
13 not -- was not relevant to my analysis of the  
14 documents that were given to me and his -- the  
15 reasons why he and Clarissa took the plea.  
16 BY MR. BAZAREK:  
17 **Q. So is it your testimony that whether or**  
18 **not Ben Baker is a drug dealer, it has no relevance**  
19 **to your opinions in this case? Do I have that**  
20 **right?**  
21 A. Yes, you have it exactly right.  
22 **Q. Okay. Would you agree that Clarissa**  
23 **Glenn was aware that her husband, Ben Baker, was a**  
24 **drug dealer?**

15 (Pages 45 to 48)

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| Page 49 | <p>1 MS. KLEINHAUS: Objection to form, foundation,<br/>2 calls for speculation.<br/>3 You can answer.<br/>4 BY THE WITNESS:<br/>5 A. I'm not entirely sure what Clarissa knew<br/>6 about her husband.<br/>7 BY MR. BAZAREK:<br/>8 <b>Q. Is it your testimony that Clarissa<br/>9 Glenn -- strike that.<br/>10 Is it your understanding that Clarissa<br/>11 Glenn did not know that her husband was a drug<br/>12 dealer at Ida B. Wells?</b><br/>13 MS. KLEINHAUS: Objection to form, foundation,<br/>14 calls for speculation.<br/>15 You can answer.<br/>16 BY THE WITNESS:<br/>17 A. I vaguely remember her being asked that<br/>18 question, and I don't remember her response, in one<br/>19 of the documents that I reviewed.<br/>20 BY MR. BAZAREK:<br/>21 <b>Q. Well, you read Clarissa Glenn's<br/>22 deposition, and you read Ben Baker's deposition,<br/>23 right?</b><br/>24 A. Yeah. That's what I'm saying. I did</p>                                                                                                                                                                                                                            | Page 51 | <p>1 <b>if Ben Baker and Clarissa Glenn were in the car<br/>2 together and there was heroin in that car, would<br/>3 that change any of your opinions in this case?</b><br/>4 A. I don't know.<br/>5 MS. KLEINHAUS: Same objections.<br/>6 THE WITNESS: Sorry.<br/>7 MS. KLEINHAUS: Go ahead.<br/>8 BY THE WITNESS:<br/>9 A. I don't know if it would change my<br/>10 opinion or not because I don't have the full -- you<br/>11 know, is it their heroin? Is it somebody else's<br/>12 heroin? What are they saying about it? I mean, I<br/>13 would need to look at the information that I had,<br/>14 and you're not giving me enough information. I<br/>15 don't -- I don't like engaging in these<br/>16 hypotheticals. I was asked to review the evidence<br/>17 that I did -- that I listed in Appendix A, and<br/>18 that's what I've done.<br/>19 BY MR. BAZAREK:<br/>20 <b>Q. Well, I know you were asked to do things<br/>21 that Ben Baker and Clarissa Glenn's attorneys told<br/>22 you to do. But I have questions about this case,<br/>23 and so I'm going to ask again.<br/>24 And if Ben Baker and Clarissa Glenn were</b></p> |
| Page 50 | <p>1 not memorize either document. They were extremely<br/>2 lengthy. But I remember -- I think I remember her<br/>3 being asked that question, but I don't recall her<br/>4 answer because it's not really relevant to my<br/>5 analysis and the reason that I was asked to opine<br/>6 on this case.<br/>7 <b>Q. Well, let me ask you this: If, in fact,<br/>8 Ben Baker and Clarissa Glenn were driving in a car<br/>9 together on December 11, 2005, and they had heroin<br/>10 inside that automobile that they drove in, would<br/>11 that change any of your opinions in this case?</b><br/>12 MS. KLEINHAUS: Objection to form, incomplete<br/>13 hypothetical.<br/>14 You can answer.<br/>15 BY THE WITNESS:<br/>16 A. I use the totality of the circumstances<br/>17 approach, and I looked at all of the different<br/>18 factors. I don't -- I didn't make an analysis<br/>19 based on this hypothetical that they did have<br/>20 drugs. There's conflicting accounts of that --<br/>21 what was in the car and whether the two of them had<br/>22 drugs or not.<br/>23 BY MR. BAZAREK:<br/>24 <b>Q. Dr. Redlich, here's -- my question is,</b></p> | Page 52 | <p>1 <b>inside that car, and there was heroin in the car --<br/>2 consider that fact as I've just expressed it to<br/>3 you -- would that change any of your opinions in<br/>4 this case?</b><br/>5 MS. KLEINHAUS: Objection to form, asked and<br/>6 answered. She says she doesn't know.<br/>7 You can answer it again.<br/>8 MR. BAZAREK: Will you quit the speaking<br/>9 objections, Tess? Just make your objections.<br/>10 Thanks.<br/>11 Go ahead. Let's read the question back.<br/>12 (WHEREUPON, the record was read by<br/>13 the reporter.)<br/>14 BY THE WITNESS:<br/>15 A. And the answer to that question is I<br/>16 don't know.<br/>17 BY MR. BAZAREK:<br/>18 <b>Q. What more would you need to know? They<br/>19 were in the car, and they have heroin. What else<br/>20 do you need to know as to whether or not it would<br/>21 change one of your -- any of your opinions?</b><br/>22 A. The things that I just mentioned, that<br/>23 is it their heroin? What do they have to say about<br/>24 it? What are other circumstances that might be</p>                                                                         |

16 (Pages 49 to 52)

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| <p style="text-align: right;">Page 53</p> <p>1 involved in the case? I don't know. There's a lot</p> <p>2 of other hypothetical information that I don't know</p> <p>3 about, and I would need to have access and to make</p> <p>4 an informed opinion. Right now I have no opinion</p> <p>5 of that.</p> <p>6 <b>Q. Okay. Ben Baker is a self-admitted drug</b></p> <p>7 <b>dealer. Do you understand that?</b></p> <p>8 MS. KLEINHAUS: Objection to form.</p> <p>9 Argumentative.</p> <p>10 BY MR. BAZAREK:</p> <p>11 <b>Q. Do you know that?</b></p> <p>12 A. No.</p> <p>13 <b>Q. You don't know that? Okay. And then</b></p> <p>14 <b>he's also a Gangster Disciple.</b></p> <p>15 <b>Have you ever interviewed Gangster</b></p> <p>16 <b>Disciples in your cases?</b></p> <p>17 MS. KLEINHAUS: Objection to form, foundation,</p> <p>18 calls for speculation.</p> <p>19 You can answer, if you know.</p> <p>20 BY THE WITNESS:</p> <p>21 A. Is that a gang in the Chicago area?</p> <p>22 BY MR. BAZAREK:</p> <p>23 <b>Q. Yes.</b></p> <p>24 A. Then no.</p>                                                                                                                                                                         | <p style="text-align: right;">Page 55</p> <p>1 (WHEREUPON, the record was read by</p> <p>2 the reporter.)</p> <p>3 BY THE WITNESS:</p> <p>4 A. So I believe that I answered your</p> <p>5 question because we're talking about my opinions in</p> <p>6 this case which go to the voluntariness and the</p> <p>7 reliability of the guilty pleas. And I'm saying</p> <p>8 that there are other factors in this case that I</p> <p>9 spoke about very -- very in detail in my report</p> <p>10 that led to my opinion. So I believe that I did</p> <p>11 answer your question.</p> <p>12 BY MR. BAZAREK:</p> <p>13 <b>Q. You didn't answer the question at all.</b></p> <p>14 <b>You're avoiding the question.</b></p> <p>15 MS. KLEINHAUS: Please stop with the</p> <p>16 argumentative commentary. Please.</p> <p>17 MR. BAZAREK: Well, we have -- this is going</p> <p>18 to be a long deposition. I can tell you that.</p> <p>19 MS. KLEINHAUS: That's fine. Take your time,</p> <p>20 but there's no reason to scold the witness that she</p> <p>21 didn't answer your question.</p> <p>22 MR. BAZAREK: I'm not scolding the witness.</p> <p>23 I'm not going to scold the witness. I'm going to</p> <p>24 ask the court reporter to read the question again.</p> |
| <p style="text-align: right;">Page 54</p> <p>1 <b>Q. Okay. Do you know anything about</b></p> <p>2 <b>narcotics operations of the drug dealers at</b></p> <p>3 <b>Ida B. Wells during the 2000s?</b></p> <p>4 A. No.</p> <p>5 <b>Q. So you persist in saying you can't</b></p> <p>6 <b>answer this question where I'm giving you a basic</b></p> <p>7 <b>hypothetical. So let's -- maybe I'll try and be a</b></p> <p>8 <b>little more descriptive for you. Okay,</b></p> <p>9 <b>Dr. Redlich?</b></p> <p>10 <b>So let's say both Ben Baker and Clarissa</b></p> <p>11 <b>Glenn knew that they had heroin inside that car,</b></p> <p>12 <b>and, in fact, that they did have heroin inside that</b></p> <p>13 <b>car.</b></p> <p>14 <b>Would that change any of your opinions</b></p> <p>15 <b>in this case?</b></p> <p>16 A. So my analysis was looking at the</p> <p>17 voluntariness of the plea as well, and it would not</p> <p>18 change -- I mean, there were other factors that</p> <p>19 spoke to the voluntariness and the reliability of</p> <p>20 the guilty pleas that have nothing to do with the</p> <p>21 drugs.</p> <p>22 MR. BAZAREK: Can you read back the question</p> <p>23 because it wasn't answered?</p> <p>24</p> | <p style="text-align: right;">Page 56</p> <p>1 Go ahead. Let's try a third time. See</p> <p>2 if that works.</p> <p>3 THE WITNESS: Can I interrupt for a minute?</p> <p>4 MS. KLEINHAUS: Objection, this is harassing</p> <p>5 to read the same question over and over again.</p> <p>6 It's clear she believes she answered your question.</p> <p>7 So perhaps you need to rephrase it or ask your next</p> <p>8 question.</p> <p>9 BY MR. BAZAREK:</p> <p>10 <b>Q. Do you understand that question,</b></p> <p>11 <b>Dr. Redlich, or not?</b></p> <p>12 A. I was going to clarify what you mean by</p> <p>13 my opinions because I believe that I am talking</p> <p>14 about my opinions in this case. But I want to make</p> <p>15 sure that you and I are on the same page about what</p> <p>16 my opinions are.</p> <p>17 <b>Q. What are your opinions in this case?</b></p> <p>18 A. You're asking me about my opinions. I'm</p> <p>19 asking you. You're saying I'm not answering the</p> <p>20 question.</p> <p>21 <b>Q. What --</b></p> <p>22 A. I'm talking about my opinions. My</p> <p>23 opinions are about the voluntariness and the</p> <p>24 reliability of the guilty pleas from the two of</p>                                                      |

17 (Pages 53 to 56)

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1 them, from Baker and Glenn.

2 **Q. Right. But you're making opinions about**

3 **what they did in the court proceeding where they**

4 **pled guilty, correct?**

5 A. Yes. That's what speaks to the

6 voluntariness of why they took the pleas. Did they

7 feel that it was voluntary, or were they coerced

8 into taking it, and were they reliable pleas.

9 **Q. So let's try it this way: If Ben Baker**

10 **and Clarissa Glenn were, in fact, guilty of**

11 **possessing heroin on that day, would that change**

12 **any of your opinions in this case?**

13 MS. KLEINHAUS: Objection to form, incomplete

14 hypothetical, calls for speculation.

15 You can answer.

16 BY THE WITNESS:

17 A. I would like my answer to be I don't

18 know because I don't have all of the information.

19 That is what I am uncomfortable answering my --

20 your hypothetical.

21 BY MR. BAZAREK:

22 **Q. So if Ben -- let's go back to it. If**

23 **Ben Baker and Clarissa Glenn knowingly possessed**

24 **heroin inside the vehicle on December 11, 2005,**

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1 **that would not change any of your opinions in this**

2 **case, is that correct?**

3 MS. KLEINHAUS: Objection to form, asked and

4 answered, calls for speculation, incomplete

5 hypothetical.

6 Go ahead.

7 BY THE WITNESS:

8 A. There is a possibility that it would

9 change, but I don't know because I don't feel that

10 I have all of the information. But there is a

11 possibility.

12 BY MR. BAZAREK:

13 **Q. Okay. And why is there a possibility**

14 **that your opinions would change?**

15 A. Because that might speak to the

16 reliability of the guilty pleas. Not the

17 voluntariness, but the reliability. It could

18 influence it. It may not. I don't know because

19 this is all a hypothetical, and I don't have all of

20 the information that I feel that I need to answer

21 your question fully.

22 **Q. Well, if Alvin Jones's account of the**

23 **arrest of Ben Baker was truthful, and the arrest of**

24 **Clarissa Glenn, if that was truthful, and he**

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1 **recovered the narcotics from the car, would that**

2 **change any of your opinions in this case?**

3 MS. KLEINHAUS: Objection to form.

4 You can answer.

5 BY THE WITNESS:

6 A. I think that you just asked me the same

7 exact question. You were asking me to assume that

8 they're guilty. You're asking me to assume that

9 Detective Jones -- is it detective? I'm not sure.

10 Found the drugs.

11 BY MR. BAZAREK:

12 **Q. Right.**

13 A. So my answer is the same. It may change

14 my opinion. I'm not sure.

15 **Q. And so what would it -- what would it --**

16 **what other further information would you need to**

17 **know?**

18 MS. KLEINHAUS: Objection, asked and answered.

19 You can answer again.

20 BY THE WITNESS:

21 A. I don't know because this is all purely

22 speculation and hypotheticals. I would need to

23 have the totality of the circumstances and all of

24 the full picture. I would need to hear a version

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1 of events from the two defendants. I would need

2 other information.

3 BY MR. BAZAREK:

4 **Q. Well, you've read the deposition**

5 **transcripts of the police officers, right?**

6 **According to the appendix that I read, these are**

7 **all things you reviewed.**

8 A. Yes, but that doesn't, you know, affect

9 your hypothetical.

10 **Q. I mean, I don't think I'm asking a**

11 **complicated hypothetical. I'm just asking you to**

12 **answer whether or not -- if, in fact, Ben Baker and**

13 **Clarissa Glenn possessed heroin in the car, whether**

14 **it would change any of your opinions.**

15 A. And I conceded that it may change my

16 opinion. I'm not sure what you want me to say.

17 You just want me to say that it would change my

18 opinion, and I'm not comfortable saying that.

19 **Q. And tell me why you're not comfortable**

20 **in saying that. You need more information? Is**

21 **that what it is?**

22 A. Yes.

23 **Q. Do you think you had enough information**

24 **to render the opinions that you had in this case,**

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1 **or do you think you need some more information?**  
 2 A. I think the ultimate issue is a matter  
 3 for the jury, and I didn't offer an opinion that  
 4 they are factually guilty -- I'm sorry, factually  
 5 innocent. My opinion is that these -- the risk  
 6 factors that are present in this case are  
 7 consistent with other involuntary and false guilty  
 8 plea cases.  
 9 **Q. My question is, do you think you need**  
 10 **more information to give opinions in this case, or**  
 11 **you had just enough by what the plaintiffs'**  
 12 **attorneys gave you to review?**  
 13 A. I feel comfortable with --  
 14 MS. KLEINHAUS: Objection, argumentative.  
 15 You can answer.  
 16 BY THE WITNESS:  
 17 A. I feel comfortable with the opinions  
 18 that I've issued.  
 19 BY MR. BAZAREK:  
 20 **Q. No. I'm asking about the materials that**  
 21 **you reviewed. Do you have sufficient materials to**  
 22 **render opinions in this case?**  
 23 A. Yes. That was my way of saying that I  
 24 believe that I had sufficient information to make

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1 the opinions that I've made. I didn't offer any  
 2 firm opinions or the ultimate issue in this case.  
 3 That's the province of the jury.  
 4 **Q. Okay. And did you have -- just bear**  
 5 **with me.**  
 6 **Do you have your report handy that you**  
 7 **prepared in this case -- let me take a step back.**  
 8 **What did you do to prepare for this**  
 9 **deposition?**  
 10 THE WITNESS: I'd like to take a break.  
 11 MR. BAZAREK: Yeah. How long would you like,  
 12 Doctor?  
 13 THE WITNESS: Five minutes, please.  
 14 MR. BAZAREK: Okay.  
 15 THE VIDEOGRAPHER: Going off the record at  
 16 10:30 a.m.  
 17 (WHEREUPON, a short recess was  
 18 taken.)  
 19 BY MR. BAZAREK:  
 20 **Q. Dr. Redlich, when Ben Baker and Clarissa**  
 21 **Glenn pled guilty to the drug crimes during that**  
 22 **September of 2006 hearing, they were represented by**  
 23 **counsel, is that correct?**  
 24 A. I believe so.

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1 **Q. And his name was Matthew Mahoney?**  
 2 A. Yes. I mean, it says -- I'm looking at  
 3 it. It says appeared for the defendant without  
 4 plural, but I assume -- was he for both?  
 5 **Q. It was Matthew Mahoney, right?**  
 6 A. Was he the attorney for both defendants?  
 7 **Q. I know you read the -- did you read the**  
 8 **transcript of the court proceeding?**  
 9 A. Yes. I'm looking at it right now, and  
 10 I'm saying it says, "Mr. Matthew Mahoney appeared  
 11 for the defendant," without the "s," even though it  
 12 was two defendants.  
 13 **Q. Right.**  
 14 A. Yeah.  
 15 **Q. But you know from reading the transcript**  
 16 **he represented both Mr. Baker and Clarissa Glenn,**  
 17 **right?**  
 18 A. I guess so. I'm not an attorney. Yeah.  
 19 **Q. Okay. All right. Did you make any**  
 20 **efforts to speak with Mr. Mahoney?**  
 21 A. No.  
 22 **Q. Why not?**  
 23 A. I had no questions for him.  
 24 **Q. Well, if you're offering opinions as to,**

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1 **you know, why his clients pled guilty, why wouldn't**  
 2 **you want to speak to the man himself who was**  
 3 **standing right next to them when they were in front**  
 4 **of Judge Toomin?**  
 5 MS. KLEINHAUS: Objection to form,  
 6 argumentative.  
 7 You can answer.  
 8 BY THE WITNESS:  
 9 A. Because he would be answering  
 10 questions -- or giving an opinion about what he  
 11 thought his clients were thinking from -- based on  
 12 almost 20 years before, when I have the information  
 13 directly from Clarissa and Ben.  
 14 BY MR. BAZAREK:  
 15 **Q. Well, you didn't speak to Clarissa and**  
 16 **Ben.**  
 17 A. No. I have the information from their  
 18 depositions and other things that I reviewed.  
 19 **Q. So you didn't think it was necessary to**  
 20 **speak to Mr. Mahoney. Do I have that right?**  
 21 A. Yes.  
 22 **Q. And I know from looking at your appendix**  
 23 **you didn't review his deposition, but were you**  
 24 **aware that he gave a deposition in this case?**

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| Page 65 | <p>1 A. No, I was not aware of that.</p> <p>2 <b>Q. Do you think it would have been prudent</b></p> <p>3 <b>for you to review the deposition transcript of</b></p> <p>4 <b>Mr. Mahoney before you offered opinions in this</b></p> <p>5 <b>case?</b></p> <p>6 A. I don't know about prudent, but I would</p> <p>7 have read it if it had been provided to me, and to</p> <p>8 see if it was relevant or not. I don't know what</p> <p>9 was in it. I don't know what Mr. Mahoney said, so</p> <p>10 it's hard to answer that question without knowing</p> <p>11 what was in it.</p> <p>12 <b>Q. Well, you've already testified that the</b></p> <p>13 <b>materials that you've been provided by Mr. Baker</b></p> <p>14 <b>and Ms. Glenn are sufficient for you to formulate</b></p> <p>15 <b>your opinions, right?</b></p> <p>16 A. Yes. I'm saying that what I had was</p> <p>17 sufficient. I did not say that every single thing</p> <p>18 that I reviewed I found to be relevant. I don't</p> <p>19 know if it's relevant until I review it.</p> <p>20 <b>Q. So you don't know one way or another</b></p> <p>21 <b>whether or not it would be necessary for you to see</b></p> <p>22 <b>what Mr. Mahoney said under oath at deposition in</b></p> <p>23 <b>this case, is that correct?</b></p> <p>24 A. Necessary? No, I can't answer that</p> | Page 67 | <p>1 BY MR. BAZAREK:</p> <p>2 <b>Q. Dr. Redlich, I'm not saying you're lazy</b></p> <p>3 <b>at all. I'm just wondering what efforts or lack of</b></p> <p>4 <b>efforts that you made in your review of this case.</b></p> <p>5 <b>That's all I'm asking about. But I'm not saying</b></p> <p>6 <b>you're lazy at all. I know you're not. I know</b></p> <p>7 <b>you're not lazy. I know you're very smart, highly</b></p> <p>8 <b>intelligent, and you've been -- it looks like</b></p> <p>9 <b>you've been at this for -- consulting on contested</b></p> <p>10 <b>confession cases for 20 years, right?</b></p> <p>11 A. Yes.</p> <p>12 <b>Q. In all these contested confession cases</b></p> <p>13 <b>that you've worked on, have you ever actually spoke</b></p> <p>14 <b>to, you know, the individual who was bringing the</b></p> <p>15 <b>lawsuit?</b></p> <p>16 A. So, to be clear, I haven't worked on</p> <p>17 that many. It has been a long time. It has been</p> <p>18 20 years, but I don't really take on many cases.</p> <p>19 And the answer to your question is no, that I've</p> <p>20 never spoken to a person involved in these cases.</p> <p>21 <b>Q. Okay. Tell me, when you review a case</b></p> <p>22 <b>such as this one with Ben Baker and Clarissa Glenn,</b></p> <p>23 <b>do you consider prior pleas of guilty that an</b></p> <p>24 <b>individual -- strike that.</b></p>    |
| Page 66 | <p>1 question. I don't know what he said. I don't know</p> <p>2 if he even has a memory of these two defendants</p> <p>3 from 17 years before or --</p> <p>4 <b>Q. Right.</b></p> <p>5 A. -- or 18 years before. I have no idea.</p> <p>6 <b>Q. Right. And you made no efforts to find</b></p> <p>7 <b>out whether he knows something that might be</b></p> <p>8 <b>relevant to your review or not, right?</b></p> <p>9 MS. KLEINHAUS: Objection to form,</p> <p>10 argumentative.</p> <p>11 You can answer.</p> <p>12 BY THE WITNESS:</p> <p>13 A. I did not make any effort, no.</p> <p>14 BY MR. BAZAREK:</p> <p>15 <b>Q. Right. And you made no effort to talk</b></p> <p>16 <b>to Ben Baker or Clarissa Glenn, right?</b></p> <p>17 MS. KLEINHAUS: Objection, asked and answered.</p> <p>18 You can answer again.</p> <p>19 BY THE WITNESS:</p> <p>20 A. If you're implying that I was lazy and I</p> <p>21 didn't make an effort, I was very clear about why I</p> <p>22 did not do that. I have very good reasons why I</p> <p>23 chose not to do that, why it didn't even occur to</p> <p>24 me. I don't do that in these types of cases.</p>                                                                                                                                                                                               | Page 68 | <p>1 <b>Do you consider an individual's prior</b></p> <p>2 <b>history in terms of, like, pleading guilty to</b></p> <p>3 <b>crimes?</b></p> <p>4 A. Generally, I don't. If you're -- if</p> <p>5 it's -- if you're asking me about whether I look at</p> <p>6 the person's criminal history and whether they've</p> <p>7 been convicted of crimes previously, I do not. I</p> <p>8 don't feel that it -- I don't feel that it's</p> <p>9 relevant to the case at hand.</p> <p>10 <b>Q. So say, for instance, someone such as</b></p> <p>11 <b>Mr. Baker, where he had prior narcotics convictions</b></p> <p>12 <b>where he pled guilty, and that he pled guilty to an</b></p> <p>13 <b>attempted murder, and he pled guilty to other</b></p> <p>14 <b>crimes, that's not something that you feel you need</b></p> <p>15 <b>to evaluate when you offer opinions in this case?</b></p> <p>16 A. No, because, I mean, it's the same</p> <p>17 reason that, with some exceptions, a person's</p> <p>18 criminal history is not allowed at trial because</p> <p>19 it's prejudicial and it doesn't feed into my</p> <p>20 analysis of that specific case of why they're</p> <p>21 saying that they chose to plead guilty on that</p> <p>22 specific day, or if it was a reliable plea in that</p> <p>23 specific case because every case stands alone.</p> <p>24 <b>Q. So if I understand your testimony</b></p> |

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|---------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Page 69 | <p>1 correctly, say Ben Baker's actions -- I'm talking</p> <p>2 pre-2006 where he pled guilty, you would not</p> <p>3 consider and you don't think it has any relevance</p> <p>4 to a case you may be -- strike that. Strike that</p> <p>5 question.</p> <p>6 So in terms of the opinions that you're</p> <p>7 offering in this case, and we know you're making</p> <p>8 assessments, offering opinions about the pleas of</p> <p>9 guilty from September of 2006, to you it doesn't</p> <p>10 inform anything you're doing as to what Ben Baker</p> <p>11 may have done on other pleas of guilty that he made</p> <p>12 over the years for the numerous crimes that he</p> <p>13 committed?</p> <p>14 MS. KLEINHAUS: Objection to form.</p> <p>15 You can answer.</p> <p>16 BY THE WITNESS:</p> <p>17 A. Well, I will take issue with the crimes</p> <p>18 that he committed because I don't know what crimes</p> <p>19 he committed. I mean -- and I don't think I have</p> <p>20 his rap sheet, so I don't even really have a good</p> <p>21 sense of what crimes he was convicted of.</p> <p>22 I do know that he has alleged that he</p> <p>23 has been innocent of several of the ones that were</p> <p>24 involved with Sergeant Watts and people surrounding</p> | Page 71 | <p>1 Q. In the records that you reviewed, did --</p> <p>2 strike that.</p> <p>3 You reviewed certain medical records in</p> <p>4 this case, is that right?</p> <p>5 A. Yes, just for Ben Baker. I don't think</p> <p>6 I had anything for Clarissa.</p> <p>7 Q. So you were not provided with any</p> <p>8 medical records for Clarissa Glenn, is that</p> <p>9 correct?</p> <p>10 A. I can look if you'd like.</p> <p>11 Q. Well, we can -- on a break you can look,</p> <p>12 but I don't see any that you did from what I saw in</p> <p>13 your appendix.</p> <p>14 Okay. So in the medical records that</p> <p>15 you reviewed for Mr. Baker, did you see that he</p> <p>16 suffers from some type of cognitive impairment of</p> <p>17 some sort?</p> <p>18 A. I don't recall that, no.</p> <p>19 Q. Okay. Or that he has some type of</p> <p>20 learning disability? Anything like that?</p> <p>21 A. No. But what I will say is that my</p> <p>22 opinion in this case is based more on situational</p> <p>23 risk factors, three in particular: The package</p> <p>24 plea deal, the utility of going to trial, and the</p>                                                                      |
| Page 70 | <p>1 Sergeant Watts.</p> <p>2 But I'm sorry, I lost your specific</p> <p>3 question. Can you repeat it?</p> <p>4 MR. BAZAREK: Can you read it back, please?</p> <p>5 (WHEREUPON, the record was read by</p> <p>6 the reporter.)</p> <p>7 BY THE WITNESS:</p> <p>8 A. So in terms of his proclivity or not to</p> <p>9 commit crimes, no. And I don't even think it</p> <p>10 really speaks to his understanding of the plea and</p> <p>11 what may happen because there's been significant</p> <p>12 amounts of research that have demonstrated that,</p> <p>13 you know, there's this assumption by the courts</p> <p>14 that people's prior experiences in the court is</p> <p>15 predictive of their later experiences in terms of</p> <p>16 their understanding and appreciation, but studies</p> <p>17 have bore out that there are really no correlations</p> <p>18 there -- no significant correlations with that</p> <p>19 information. So I don't put that much weight -- I</p> <p>20 don't put any weight really on his prior</p> <p>21 experiences.</p> <p>22 BY MR. BAZAREK:</p> <p>23 Q. Okay.</p> <p>24 A. To make my opinion in this case.</p>                                                                                                            | Page 72 | <p>1 extreme plea discounts. So this is not a case</p> <p>2 where I think there are dispositional risk factors</p> <p>3 inherent to either Clarissa or Ben themselves that</p> <p>4 would make their plea either involuntary or</p> <p>5 unreliable.</p> <p>6 Q. Well -- and I know you only read Baker's</p> <p>7 medical records. But I'm talking, you've read</p> <p>8 their depositions, right? You've read Ben Baker's</p> <p>9 medical records.</p> <p>10 My question to you is, do you see</p> <p>11 anything in any of the records that you reviewed</p> <p>12 that Ben Baker and Clarissa Glenn have some type of</p> <p>13 cognitive impairment when someone is speaking to</p> <p>14 them or talking to them?</p> <p>15 MS. KLEINHAUS: Objection to form.</p> <p>16 You can answer.</p> <p>17 BY THE WITNESS:</p> <p>18 A. I would like to say that I was provided</p> <p>19 with what I assume to be a portion of Mr. Baker's</p> <p>20 medical records. I believe they were from the</p> <p>21 prison. So I don't have access to his entire</p> <p>22 medical history. I don't have access to</p> <p>23 Ms. Glenn's medical history.</p> <p>24 But as I've answered the question, I did</p> |

Ben Baker, et al. v. City of Chicago, et al.  
Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

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| Page 73 | <p>1 not see anything about Mr. Baker or Ms. Glenn in</p> <p>2 terms of cognitive impairments. But my opinions in</p> <p>3 this case are not based on dispositional risk</p> <p>4 factors, but situational risk factors.</p> <p>5 BY MR. BAZAREK:</p> <p>6 <b>Q. All right. And what do you mean by</b></p> <p>7 <b>"dispositional risk factors"?</b></p> <p>8 A. So characteristics that are inherent to</p> <p>9 the defendant, him or herself. So things like</p> <p>10 cognitive impairment, mental health problems, young</p> <p>11 age. Things that are part of -- part of that</p> <p>12 person's disposition, as opposed to situational</p> <p>13 things, things that are part of the situation risk</p> <p>14 factors.</p> <p>15 <b>Q. Okay. Okay. So let's talk about what</b></p> <p>16 <b>are situational risk factors?</b></p> <p>17 A. In this case, I would -- what I believe</p> <p>18 are the package plea deal that they -- the plea</p> <p>19 deal was kind of contingent on both of them</p> <p>20 accepting it, and the specifics of that package</p> <p>21 plea deal, i.e., that Clarissa would get probation,</p> <p>22 and that she could stay home to raise their three</p> <p>23 children and not have somebody else parent their</p> <p>24 school-aged children while she went to prison and</p> | Page 75 | <p>1 <b>Q. Well, would you agree that a plea of</b></p> <p>2 <b>guilty to a crime, it should be knowingly,</b></p> <p>3 <b>intelligently, and voluntarily done?</b></p> <p>4 A. Yes. That is what the law requires.</p> <p>5 <b>Q. Would you agree that Ben Baker and</b></p> <p>6 <b>Clarissa Glenn knew what they were pleading guilty</b></p> <p>7 <b>to?</b></p> <p>8 MS. KLEINHAUS: Objection to form.</p> <p>9 You can answer.</p> <p>10 BY THE WITNESS:</p> <p>11 A. That I cannot answer because what I do</p> <p>12 believe, and what my research has shown for about</p> <p>13 15 years now, is that the methods to assess whether</p> <p>14 guilty pleas are knowing, intelligent, and</p> <p>15 voluntary are not adequate.</p> <p>16 So Judge Toomin asking them questions,</p> <p>17 do you understand that you're giving up these</p> <p>18 rights, and then reading a litany of rights, or do</p> <p>19 you understand that this needs to be voluntary, and</p> <p>20 them answering yes, to me, that's not an indication</p> <p>21 that they actually understood or not. They may</p> <p>22 have understood. I don't know. But I cannot tell</p> <p>23 based on the standard plea colloquy questions that</p> <p>24 were asked of them.</p>                                                                                                              |
| Page 74 | <p>1 he went to prison; the futility of going to trial;</p> <p>2 and the extreme plea discounts. Those are the</p> <p>3 three that I identified and discussed in this</p> <p>4 report.</p> <p>5 I also talk about how -- the limited</p> <p>6 amount of time that there may have been to discuss</p> <p>7 the plea and make a decision about the plea for</p> <p>8 both of them because they were supposed to -- my</p> <p>9 understanding is that they were supposed to go to</p> <p>10 jury that morning, that day, and they pled</p> <p>11 guilty -- they ended up pleading guilty the same</p> <p>12 day.</p> <p>13 <b>Q. So are you faulting their counsel,</b></p> <p>14 <b>Mahoney, that he should have taken more time to</b></p> <p>15 <b>consider the deal?</b></p> <p>16 A. I'm not faulting anybody. I'm pointing</p> <p>17 out that they likely had limited amount of time to</p> <p>18 make this very important decision, which the</p> <p>19 Supreme Court, as I mentioned in my report, has</p> <p>20 called a grave and solemn act. So I'm not faulting</p> <p>21 anybody. I understand that this is quite common in</p> <p>22 pleas, that people don't have time to adequately</p> <p>23 assess it. But that doesn't mean that it's a</p> <p>24 sufficient amount of time.</p>                            | Page 76 | <p>1 <b>Q. All right. You agree, though, that Ben</b></p> <p>2 <b>Baker and Clarissa Glenn, they responded to Judge</b></p> <p>3 <b>Toomin as he was speaking to them both, right?</b></p> <p>4 A. Responded? Yes.</p> <p>5 <b>Q. Right. They -- Judge Toomin would ask</b></p> <p>6 <b>them questions, and they would answer him, right?</b></p> <p>7 A. Yes.</p> <p>8 <b>Q. Does that tell you that there was an</b></p> <p>9 <b>understanding that they had because they were able</b></p> <p>10 <b>to answer the judge's questions?</b></p> <p>11 A. No, that doesn't indicate understanding</p> <p>12 to me. And, in fact, that's what my 15 years or so</p> <p>13 of research has demonstrated. I don't know. Some</p> <p>14 defendants do understand, some don't. I don't know</p> <p>15 about these two specifically.</p> <p>16 <b>Q. Do you think if you would have spoken</b></p> <p>17 <b>with Ben and Clarissa Glenn directly and asked</b></p> <p>18 <b>them, hey, did you understand what Judge Toomin</b></p> <p>19 <b>said to you, do you think that would have been</b></p> <p>20 <b>helpful for you in formulating your opinions in</b></p> <p>21 <b>this case?</b></p> <p>22 A. No, because it's very similar to exactly</p> <p>23 the questions that Judge Toomin asked. That's not</p> <p>24 the kind of questions that I ask because -- I mean,</p> |

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| Page 77 | <p>1 I do ask those questions in my research studies</p> <p>2 that we've discussed before, but then I assess</p> <p>3 understanding, like, the plea comprehension measure</p> <p>4 that I've developed and have used in several</p> <p>5 studies now that demonstrates that for some</p> <p>6 defendants, not all, a deeper questioning, and, you</p> <p>7 know, do you -- questions that try to assess</p> <p>8 comprehension rather than their self-report of do</p> <p>9 you understand demonstrate that some defendants</p> <p>10 actually don't understand, and some don't</p> <p>11 understand that their plea needs to be voluntary</p> <p>12 and what that means.</p> <p>13 <b>Q. And are these questions that you ask --</b></p> <p>14 <b>are these available?</b></p> <p>15 MS. KLEINHAUS: Objection to form.</p> <p>16 You can answer.</p> <p>17 BY THE WITNESS:</p> <p>18 A. I'm not sure what you mean by</p> <p>19 "available."</p> <p>20 BY MR. BAZAREK:</p> <p>21 <b>Q. Well, you just said, hey -- basically,</b></p> <p>22 <b>what I'm hearing what you're saying, the judge, you</b></p> <p>23 <b>know, they're asking short questions-type thing.</b></p> <p>24 <b>But you've crafted -- Dr. Redlich has these</b></p> | Page 79 | <p>1 <b>endeavor -- it's not an endeavor.</b></p> <p>2 <b>Why don't you tell me -- just read the</b></p> <p>3 <b>questions. It sounds like you've done a lot of</b></p> <p>4 <b>work on this, and you've crafted these questions</b></p> <p>5 <b>that can really get to the bottom of things, right?</b></p> <p>6 MS. KLEINHAUS: I'm just going to object to</p> <p>7 form. I mean, if you want her to go through and</p> <p>8 read every question she's used in her research, I</p> <p>9 think we're going to need to provide her some time</p> <p>10 on the record to go, you know, find her materials.</p> <p>11 We can -- I mean, I think it would be quite</p> <p>12 lengthy, we can do that, but, I mean, she has to</p> <p>13 have a chance to go get her script and read off it.</p> <p>14 MR. BAZAREK: Yeah. Maybe we can get the</p> <p>15 script on a break.</p> <p>16 BY MR. BAZAREK:</p> <p>17 <b>Q. Can you tell me this, Dr. Redlich: How</b></p> <p>18 <b>many questions do you have in your questionnaire,</b></p> <p>19 <b>so to speak?</b></p> <p>20 A. So the plea comprehension measure</p> <p>21 specifically, it's a series of true/false, I don't</p> <p>22 know questions where the participant answers true,</p> <p>23 false, or I don't know. And I think there's about</p> <p>24 32 of them.</p>                                                               |
| Page 78 | <p>1 <b>questions that can really get to the heart of the</b></p> <p>2 <b>matter and show if it was really knowing and</b></p> <p>3 <b>intelligent and voluntary, right? Isn't that what</b></p> <p>4 <b>you just said?</b></p> <p>5 A. That's what my research --</p> <p>6 MS. KLEINHAUS: I'm sorry. I just need to</p> <p>7 object to the argumentative nature of the question.</p> <p>8 You can answer.</p> <p>9 BY THE WITNESS:</p> <p>10 A. Sorry. That's what my research -- part</p> <p>11 of my research has been focused on for many years</p> <p>12 now. And I'm happy to, you know, tell you which</p> <p>13 publications that you can go look. The</p> <p>14 publications are readily available, and they are</p> <p>15 listed and discussed in my report.</p> <p>16 BY MR. BAZAREK:</p> <p>17 <b>Q. Okay. So does it actually have the</b></p> <p>18 <b>questions?</b></p> <p>19 A. It probably has example questions. I</p> <p>20 wouldn't say it has all of the questions --</p> <p>21 <b>Q. Okay.</b></p> <p>22 A. -- that I use in this measure.</p> <p>23 <b>Q. Why don't you tell me -- why don't you</b></p> <p>24 <b>read to me the questions that you ask in this</b></p>                                            | Page 80 | <p>1 And, again, I want to point out a few</p> <p>2 things. One is what I'm saying is that some people</p> <p>3 do demonstrate understanding. So I'm not really</p> <p>4 sure of the purpose of this because I'm not</p> <p>5 claiming that all defendants using my measure</p> <p>6 demonstrate they don't understand. Right? But</p> <p>7 what I am saying is that I don't know about Ben and</p> <p>8 Clarissa.</p> <p>9 And I'm also not saying that I have the</p> <p>10 definitive answer. This is a question that's</p> <p>11 interested me, that I have spent significant time</p> <p>12 on, that I've conducted many studies over in the</p> <p>13 past 15 years that have come up with very</p> <p>14 consistent answers, but I'm not claiming that --</p> <p>15 you seem to be insinuating that I have the</p> <p>16 definitive answers, but that's not really what</p> <p>17 science is all about and research. Research is</p> <p>18 answering a lot of different questions, and I can't</p> <p>19 prove things. Science doesn't prove things.</p> <p>20 <b>Q. I'm not saying that you have the</b></p> <p>21 <b>definitive answers, but what I'm hearing you say,</b></p> <p>22 <b>Dr. Redlich, is you're basically saying what</b></p> <p>23 <b>happened with Ben and Clarissa Glenn in front of</b></p> <p>24 <b>Judge Toomin, it was not sufficient, right? Isn't</b></p> |

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| Page 81 | <p>1 <b>that what you're saying?</b></p> <p>2 A. Not sufficient for what purposes?</p> <p>3 <b>Q. It was not sufficient to know whether or</b></p> <p>4 <b>not it was a knowing and voluntary and intelligent</b></p> <p>5 <b>plea of guilty?</b></p> <p>6 MS. KLEINHAUS: Just objection to form, that</p> <p>7 it's compound.</p> <p>8 You can answer.</p> <p>9 BY THE WITNESS:</p> <p>10 A. That is what my -- some of my research</p> <p>11 has demonstrated with certain defendants. With</p> <p>12 some defendants who just pled guilty. We have</p> <p>13 other measures where we ask them to define words</p> <p>14 that were -- that they were part of the plea</p> <p>15 colloquy, like the word "plea" itself. And we find</p> <p>16 things like about 25 percent of adults who just</p> <p>17 pled guilty cannot adequately define the word</p> <p>18 "plea." So I can get you a list of all the</p> <p>19 vocabulary words that we ask them to define, but,</p> <p>20 you know, you're welcome to read my publications,</p> <p>21 and I can certainly identify the ones that I think</p> <p>22 are relevant to this conversation.</p> <p>23 <b>Q. Yeah, I only want to talk about</b></p> <p>24 <b>relevant. But you said there was a plea</b></p> | Page 83 | <p>1 A. No. No, the interviewer who is asking</p> <p>2 the questions records their verbal answers. But a</p> <p>3 lot of the questions are standardized.</p> <p>4 THE VIDEOGRAPHER: I'm sorry. I have to</p> <p>5 interrupt. This is the videographer. My computers</p> <p>6 just crashed. So if I could take us off the record</p> <p>7 and get us back up.</p> <p>8 MR. BAZAREK: Yeah.</p> <p>9 THE VIDEOGRAPHER: Going off the record the</p> <p>10 11:07 a.m.</p> <p>11 (WHEREUPON, a discussion was had off</p> <p>12 the record.)</p> <p>13 THE VIDEOGRAPHER: Back on the record at</p> <p>14 11:13 a.m.</p> <p>15 BY MR. BAZAREK:</p> <p>16 <b>Q. Going back to -- strike that.</b></p> <p>17 <b>I know you said you don't find it</b></p> <p>18 <b>necessary to speak with Ben Baker and Clarissa</b></p> <p>19 <b>Glenn, but it sounds like, in terms of the</b></p> <p>20 <b>questions that you have crafted, it would take them</b></p> <p>21 <b>each about an hour to provide that information, is</b></p> <p>22 <b>that right?</b></p> <p>23 A. It depends. I mean, I do want to point</p> <p>24 out, though, that my studies, I make it a point to</p>                                            |
| Page 82 | <p>1 <b>comprehension -- 32 questions, true or false,</b></p> <p>2 <b>right?</b></p> <p>3 A. Yes.</p> <p>4 <b>Q. What else do you have?</b></p> <p>5 A. The plea vocabulary questions.</p> <p>6 <b>Q. How many questions are on the plea</b></p> <p>7 <b>vocabulary?</b></p> <p>8 A. I think there's 15 or 16 words we ask</p> <p>9 them to define. It depends on the specific sample</p> <p>10 and that specific study.</p> <p>11 <b>Q. Yeah.</b></p> <p>12 A. We have questions that go to</p> <p>13 voluntariness, of perceived coercion measure. I</p> <p>14 have -- like I said, these interviews take an hour</p> <p>15 or more.</p> <p>16 <b>Q. Okay. To administer all the tests --</b></p> <p>17 <b>strike that.</b></p> <p>18 <b>To administer all the questions, it</b></p> <p>19 <b>would take about an hour to fill them all out, is</b></p> <p>20 <b>that right?</b></p> <p>21 A. To ask them verbally. They don't fill</p> <p>22 them out.</p> <p>23 <b>Q. Okay. But they are committed to</b></p> <p>24 <b>writing, the questions that you ask, correct?</b></p>                                                                                                                                                                               | Page 84 | <p>1 try and ask these questions very soon after the</p> <p>2 plea. Not 17, 18 years later. I don't see the</p> <p>3 utility in that.</p> <p>4 <b>Q. Well, is that because you think that --</b></p> <p>5 <b>strike that.</b></p> <p>6 <b>So does that mean you discount</b></p> <p>7 <b>everything they say in a deposition? You don't</b></p> <p>8 <b>really care what they say because it's many years</b></p> <p>9 <b>later?</b></p> <p>10 MS. KLEINHAUS: Objection to form,</p> <p>11 mischaracterizes her testimony.</p> <p>12 You can answer.</p> <p>13 BY THE WITNESS:</p> <p>14 A. I'm speaking specifically about the plea</p> <p>15 comprehension and the ability to define the plea</p> <p>16 vocabulary words. Not their own perceptions of</p> <p>17 their case. So, you know, I don't know what</p> <p>18 happened in the past 18 years in terms of, you</p> <p>19 know, what they knew and understood then as opposed</p> <p>20 to what they understand now.</p> <p>21 And, again, I do want to reiterate that</p> <p>22 this is not a case of dispositional risk factors,</p> <p>23 that I'm opining that either one of them did not</p> <p>24 understand words that were used in the plea</p> |

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| <p style="text-align: right;">Page 85</p> <p>1 colloquy. I don't know. Okay? I just don't know.</p> <p>2 I don't see any risk factors that they would or</p> <p>3 wouldn't understand. What I'm rather seeing are</p> <p>4 these situational risk factors that led to my</p> <p>5 opinion in this case. So I'm not saying that they</p> <p>6 did or didn't understand. I really have no idea.</p> <p>7 BY MR. BAZAREK:</p> <p>8 <b>Q. So why wouldn't you want to look at that</b></p> <p>9 <b>part of it?</b></p> <p>10 A. Why wouldn't I want to look at what?</p> <p>11 <b>Q. The dispositional. Why wouldn't you</b></p> <p>12 <b>want to look at that?</b></p> <p>13 A. I did want to look at that, and I did</p> <p>14 look at it. There -- just I didn't see any risk</p> <p>15 factors.</p> <p>16 <b>Q. Okay. So then you do agree that</b></p> <p>17 <b>Mr. Baker and Ms. Glenn, from everything that you</b></p> <p>18 <b>can see, they were -- they comprehended their pleas</b></p> <p>19 <b>of guilty, right? They understood what they were</b></p> <p>20 <b>doing?</b></p> <p>21 MS. KLEINHAUS: Objection to form, calls for</p> <p>22 speculation.</p> <p>23 You can answer.</p> <p>24</p>                                                                                                                                      | <p style="text-align: right;">Page 87</p> <p>1 people being undereducated, and I don't know if</p> <p>2 that was the case, but neither one of them finished</p> <p>3 high school except for with the GED.</p> <p>4 <b>Q. What's a true guilty plea?</b></p> <p>5 MS. KLEINHAUS: Objection to form.</p> <p>6 You can answer.</p> <p>7 BY THE WITNESS:</p> <p>8 A. A true guilty plea is a guilty plea in</p> <p>9 which the person is guilty -- factually guilty of</p> <p>10 the crime.</p> <p>11 BY MR. BAZAREK:</p> <p>12 <b>Q. So if Ben Baker had a true guilty plea</b></p> <p>13 <b>before Judge Toomin in September of '06, would that</b></p> <p>14 <b>change any of your opinions in this case?</b></p> <p>15 A. If he had a true guilty plea? I mean,</p> <p>16 that's the issue at hand. That's -- I mean, I</p> <p>17 didn't say he definitively had a false guilty plea</p> <p>18 because that's the issue for the jury.</p> <p>19 But I -- yeah, I mean, if there was some</p> <p>20 magic -- if you had the ability to magically say</p> <p>21 that this is a true and this is a false guilty</p> <p>22 plea, then I probably wouldn't say in the case of</p> <p>23 Ben, because right now we're just talking about</p> <p>24 Ben, that his case was consistent with other false</p>                                   |
| <p style="text-align: right;">Page 86</p> <p>1 BY THE WITNESS:</p> <p>2 A. So what I said is that I don't know if</p> <p>3 they understood or not. I'm not seeing any</p> <p>4 specific reasons why they didn't understand, but I</p> <p>5 have no idea if 18 years ago they understood or</p> <p>6 not.</p> <p>7 BY MR. BAZAREK:</p> <p>8 <b>Q. But you, in your review of this case,</b></p> <p>9 <b>have found nothing to suggest that they didn't</b></p> <p>10 <b>understand, correct?</b></p> <p>11 A. You know, from the materials that were</p> <p>12 given to me, I didn't see any mental health</p> <p>13 problems from Mr. Baker from the medical records.</p> <p>14 I did see that both of them dropped out of high</p> <p>15 school, but I believe that Mr. Baker had gotten his</p> <p>16 GED by the time that he had pled guilty. I don't</p> <p>17 think that was the case for Ms. Glenn. I believe</p> <p>18 that she got her GED later than the plea.</p> <p>19 Although, you know, getting your GED and actually</p> <p>20 being in high school and finishing the classes is</p> <p>21 not exactly the same thing. I'm not an expert on</p> <p>22 that, but that's my opinion. And it's just one of</p> <p>23 the factors that could speak to whether or not they</p> <p>24 understood that. Sometimes I will talk about</p> | <p style="text-align: right;">Page 88</p> <p>1 guilty plea cases because somehow you have the</p> <p>2 objective information that it's a true guilty plea.</p> <p>3 But that's a hypothetical.</p> <p>4 <b>Q. Yeah, I'm not talking about magic. I'm</b></p> <p>5 <b>just asking you to assume a fact.</b></p> <p>6 <b>If Ben Baker, you know, gave a true</b></p> <p>7 <b>guilty plea in September of 2006, would that change</b></p> <p>8 <b>any of your opinions in this case?</b></p> <p>9 MS. KLEINHAUS: Objection to form.</p> <p>10 You can answer.</p> <p>11 BY THE WITNESS:</p> <p>12 A. I believe that I just answered that</p> <p>13 question. That that's the whole issue in the case.</p> <p>14 So if -- but there's no way -- I mean, it just</p> <p>15 comes -- this is what the jury is going to have to</p> <p>16 do, or the judge, or whomever is weighing the facts</p> <p>17 of this case because there's no way to say this is</p> <p>18 absolutely true and this is absolutely false.</p> <p>19 BY MR. BAZAREK:</p> <p>20 <b>Q. I'm asking you to presume --</b></p> <p>21 A. So that's the magic I'm saying.</p> <p>22 <b>Q. Okay. What I'm asking you to do, if, in</b></p> <p>23 <b>fact, it was a true guilty plea of Ben Baker in</b></p> <p>24 <b>September of 2006, does that change any of your</b></p> |

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| <p style="text-align: right;">Page 89</p> <p>1 <b>opinions?</b></p> <p>2 A. And I said that it would. And I don't</p> <p>3 think I would even be here if we had that</p> <p>4 hypothetical. The whole reason I'm here is to give</p> <p>5 an opinion about the likelihood of this being a</p> <p>6 true or false guilty plea. I'm not saying it's</p> <p>7 true or false, but that's the whole reason I'm</p> <p>8 here.</p> <p>9 <b>Q. Right, but --</b></p> <p>10 A. It's what the jury has -- what they have</p> <p>11 to decide.</p> <p>12 <b>Q. Right. But I just heard you say that it</b></p> <p>13 <b>would change your opinion if it was a true guilty</b></p> <p>14 <b>plea, right?</b></p> <p>15 A. If there was some magic way of saying</p> <p>16 that this is objectively a true guilty plea, which</p> <p>17 this is just a hypothetical. But, yes, my opinion</p> <p>18 is that these are consistent with false guilty</p> <p>19 pleas. And if you're telling me it's a true guilty</p> <p>20 plea, then, no, it would no longer be consistent</p> <p>21 with the false guilty plea cases because you're</p> <p>22 telling me it's true.</p> <p>23 <b>Q. Right.</b></p> <p>24 A. Even though we don't know that for sure</p> | <p style="text-align: right;">Page 91</p> <p>1 <b>Q. Are there hallmarks of a guilty plea?</b></p> <p>2 A. A true guilty plea. Yes, and I've said</p> <p>3 before that in some ways they overlap with the risk</p> <p>4 factors of false guilty pleas because the key</p> <p>5 factor -- the key differentiating factor is whether</p> <p>6 the person is factually innocent or factually</p> <p>7 guilty. But there's a lot of other factors that</p> <p>8 would affect why a person, either guilty or</p> <p>9 innocent, would plead guilty. And so it could be</p> <p>10 things like the discount, the leniency that they</p> <p>11 receive. It could be factors that they are --</p> <p>12 don't understand. Or it could be that they got a</p> <p>13 package plea deal. It could be that, you know,</p> <p>14 they don't perceive their chances of winning at</p> <p>15 trial.</p> <p>16 <b>Q. What are -- okay. What are the</b></p> <p>17 <b>hallmarks of a true guilty plea?</b></p> <p>18 MS. KLEINHAUS: Objection, asked and answered,</p> <p>19 calls for speculation.</p> <p>20 You can answer again.</p> <p>21 BY THE WITNESS:</p> <p>22 A. They are the factors that I just listed.</p> <p>23 BY MR. BAZAREK:</p> <p>24 <b>Q. Well, one of the hallmarks of a true</b></p>                                                                                  |
| <p style="text-align: right;">Page 90</p> <p>1 because this is just a hypothetical.</p> <p>2 <b>Q. And if, in fact, Clarissa Glenn gave a</b></p> <p>3 <b>true guilty plea in September of '06, would that</b></p> <p>4 <b>change any of your opinions in this case?</b></p> <p>5 MS. KLEINHAUS: Objection to form.</p> <p>6 You can answer.</p> <p>7 BY THE WITNESS:</p> <p>8 A. I have the same answer.</p> <p>9 BY MR. BAZAREK:</p> <p>10 <b>Q. And the answer is your opinions would</b></p> <p>11 <b>change, right?</b></p> <p>12 A. In the hypothetical as you've described</p> <p>13 it with the -- you know, with -- obviating the</p> <p>14 reason that I need to be here in the first place,</p> <p>15 yes.</p> <p>16 <b>Q. Okay. What are the hallmarks of a true</b></p> <p>17 <b>guilty plea?</b></p> <p>18 A. So that the person is guilty. That it</p> <p>19 reduces the amount of -- I'm sorry. Are you asking</p> <p>20 about the risk factors or the guilty plea itself?</p> <p>21 <b>Q. Do you ever use that term in your work,</b></p> <p>22 <b>"hallmark"? You use that, right?</b></p> <p>23 A. Yes, in my report, yes. False guilty</p> <p>24 pleas.</p>                                                              | <p style="text-align: right;">Page 92</p> <p>1 <b>guilty plea is that someone's guilty, right?</b></p> <p>2 A. Yes.</p> <p>3 <b>Q. I mean, that was the first thing you</b></p> <p>4 <b>said. Then I heard you describing things. I</b></p> <p>5 <b>wasn't sure if you were talking about true guilty</b></p> <p>6 <b>pleas, or false guilty pleas, you were describing a</b></p> <p>7 <b>combo. So it was confusing to me.</b></p> <p>8 <b>So that's why I'm going back to that</b></p> <p>9 <b>question. I heard you say that you're guilty. So</b></p> <p>10 <b>is that hallmark No. 1, that you're guilty, for a</b></p> <p>11 <b>true guilty plea?</b></p> <p>12 A. Yes. And I'm sorry that I confused you.</p> <p>13 But what I was saying is that there's a lot of</p> <p>14 overlap between true and false guilty pleas.</p> <p>15 <b>Q. Right. Okay. So let's just focus on</b></p> <p>16 <b>true guilty pleas, okay? And we can talk about</b></p> <p>17 <b>overlap. We can talk about false guilty pleas. I</b></p> <p>18 <b>just want to focus on true guilty pleas, okay?</b></p> <p>19 A. Okay.</p> <p>20 <b>Q. All right. So, number one, it's that</b></p> <p>21 <b>the person is guilty, right?</b></p> <p>22 A. Yes.</p> <p>23 <b>Q. And what are the other, like, hallmarks</b></p> <p>24 <b>for a true guilty plea other than that the person</b></p> |

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1 **is guilty?**

2 A. I just want to make sure I'm

3 understanding your question. I think what you're

4 asking me about is why would a guilty person plead

5 guilty. Is that what you're asking me?

6 **Q. How do you define "hallmark" when you**

7 **used the term in your report? What do you mean**

8 **when you use the word "hallmark"?**

9 A. I think that's the way that I'm saying

10 about the situational and dispositional risk

11 factors. I think that's what you're asking me.

12 What are the situational and dispositional risk

13 factors that would lead a truly guilty person to

14 plead guilty, and what are those same factors that

15 would make an innocent person to plead guilty.

16 **Q. Okay. Yeah, let's go with that. Are**

17 **hallmarks and risk factors -- does that mean the**

18 **same thing?**

19 A. Not necessarily. I mean, I think I'm

20 also talking about the study that I had done

21 recently published in 2023 where we looked at -- we

22 compared cases from the National Registry of

23 Exonerations -- so these were people who were

24 wrongly convicted and then officially exonerated,

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1 and they were either wrongly convicted by plea, so

2 false guilty pleas, or they were wrongly convicted

3 at trial. And so we compared those.

4 And so some of the hallmarks I'm

5 describing are coming from that case -- from that

6 study, excuse me, where we found, for example,

7 that -- I think I talk about how drug cases, among

8 the false guilty pleas, were five times more common

9 than the wrongful convictions by trial, and we talk

10 about -- I talk about the no crime type of wrongful

11 conviction which is when a person is wrongly

12 convicted but no crime actually occurred.

13 **Q. Okay. What you just testified to, is**

14 **that -- there's a reference in your report of**

15 **March 27, 2024, and on Page 2, there's a reference**

16 **about 800 innocent plea takers have been**

17 **exonerated.**

18 **Is that what you're talking to --**

19 **talking about, or something else?**

20 A. No, that's not what I'm talking about.

21 That 800 figure is the figure of people who the

22 National Registry of Exonerations has cataloged

23 as -- in their data set -- or in their registry, I

24 should say.

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1 What I was talking about is more on --

2 **Q. What are you reading right now as**

3 **we're -- what are you looking at?**

4 A. My report. My report.

5 **Q. Your report from March 27, 2024,**

6 **correct?**

7 A. Yes, yes.

8 **Q. Okay.**

9 A. So if you go to Page 3, so the

10 paragraph -- the first full paragraph that begins

11 with, "There are many reasons..." If you read the

12 last few sentences of that paragraph, in a recent

13 paper, my colleagues and I examined the factors

14 that distinguished --" those sentences. The next

15 sentence, and then the sentence after that.

16 MR. BAZAREK: Okay. So let's just -- we're

17 going to mark the Doctor's report. And I also know

18 it contains her CV. It's 57 pages. We're going to

19 mark that as Deposition Exhibit No. 1, so everyone

20 knows.

21 (WHEREUPON, a certain document was

22 marked Exhibit No. 1, for

23 identification, as of 4-25-24.)

24

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1 BY MR. BAZAREK:

2 **Q. All right. So I want to go back to --**

3 MS. KLEINHAUS: You want that showing, Bill?

4 MR. BAZAREK: Yeah, just for -- you know, let

5 me ask the doctor.

6 BY MR. BAZAREK:

7 **Q. Doctor, are we looking at the first page**

8 **of your report?**

9 A. Yes.

10 **Q. Okay. And then if I have this**

11 **correctly, if we go to page --**

12 A. I will say that, you know, I can

13 recognize this as my report. I can read certain

14 words, but if you want me to look at that, I'm

15 going to need it to be a lot bigger. But I have

16 the report in front of me.

17 **Q. Yeah, you can review it in front of you.**

18 **I just wanted to confirm the report that you**

19 **drafted.**

20 **Why don't we go to Page -- we'll go to**

21 **Page 14 of that report. And that's your signature,**

22 **right? You signed this report?**

23 A. Yes.

24 **Q. Okay. And it's 14 pages, right?**

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|         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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| Page 97 | <p>1 A. Yes.</p> <p>2 <b>Q. And if we go to Page 13, you see there's</b></p> <p>3 <b>a Section 4, it says, "Overall Summary." Do you</b></p> <p>4 <b>see that?</b></p> <p>5 A. Yes.</p> <p>6 <b>Q. Okay. And the Overall Summary, are</b></p> <p>7 <b>these your opinions in Section 4, Overall Summary?</b></p> <p>8 A. That's a summary of my opinions, yes.</p> <p>9 <b>Q. Okay. So let's go back to a true guilty</b></p> <p>10 <b>plea. Other than the person's guilty, what are</b></p> <p>11 <b>other hallmarks of a true guilty plea?</b></p> <p>12 A. So that they receive leniency for their</p> <p>13 crime. That the -- that the time is, you know,</p> <p>14 shorter; the prison time or jail time or whatever</p> <p>15 it may be, probation time. The factors that I</p> <p>16 listed before.</p> <p>17 I mean, I will say, like, the</p> <p>18 specific -- the false guilty plea hallmarks that I</p> <p>19 just talked about before, that was from that</p> <p>20 specific study.</p> <p>21 <b>Q. I'm not talking about false guilty</b></p> <p>22 <b>pleas. I'm talking about true guilty pleas.</b></p> <p>23 A. Yeah, well, I know, but I'm just saying</p> <p>24 that I did not do the same study with -- that</p>                                                                                                                                                                   | Page 99  | <p>1 guilty pleas, I'm presuming that most people that</p> <p>2 I'm interviewing are truly guilty.</p> <p>3 <b>Q. And that would include --</b></p> <p>4 A. That's what I'm saying.</p> <p>5 <b>Q. Okay. Have you ever just done a study</b></p> <p>6 <b>on true guilty pleas?</b></p> <p>7 A. So the studies that we were discussing</p> <p>8 before, the interview studies, that's what I'm</p> <p>9 saying. I'm saying that -- I presume that most</p> <p>10 people who plead guilty are guilty, but it's not</p> <p>11 like there's a registry of true guilty pleas that</p> <p>12 is similar to the study that I just -- the 2023</p> <p>13 study that I just described. That's all I'm</p> <p>14 saying.</p> <p>15 So when I interview people, like we</p> <p>16 talked about the interview, and the plea</p> <p>17 comprehension, I presume that most of them, if not</p> <p>18 all, are truly guilty, but I don't know that for</p> <p>19 sure because there's no magic that says you're</p> <p>20 truly guilty, you're falsely guilty. Although, you</p> <p>21 know, what I'm saying is that -- I'll rescind that</p> <p>22 a little bit because what I'm saying is that the</p> <p>23 National Registry of Exonerations gets close to</p> <p>24 having this objective measure of being a true</p>                                                            |
| Page 98 | <p>1 specific study with people who were truly guilty</p> <p>2 and people who were rightly convicted at trial. So</p> <p>3 when I'm talking about true guilty pleas, I'm just</p> <p>4 talking more generally. When I'm talking about the</p> <p>5 hallmarks of false guilty pleas, which is what I'm</p> <p>6 talking about in my report, I'm talking -- some of</p> <p>7 what I'm talking about are the situational and</p> <p>8 dispositional risk factors, and the information</p> <p>9 that I learned from that very specific study that</p> <p>10 only focused on people who were wrongly convicted</p> <p>11 and false guilty pleas.</p> <p>12 <b>Q. So you've never done any studies on true</b></p> <p>13 <b>guilty pleas, is that your testimony?</b></p> <p>14 A. No, that's not my testimony. What I'm</p> <p>15 saying is that I didn't do that specific study</p> <p>16 where I looked at people who were truly guilty and</p> <p>17 people who were rightly convicted at trial. I have</p> <p>18 done studies asking people who I presume to be</p> <p>19 truly guilty. But the false guilty plea study with</p> <p>20 the trials that I just described in the Redlich</p> <p>21 2023, these were cases that were in the National</p> <p>22 Registry of Exonerations and that had received this</p> <p>23 official exoneration status.</p> <p>24 So, you know, when we talk about true</p> | Page 100 | <p>1 wrongful conviction, either by plea or by trial,</p> <p>2 because they have very official criteria of</p> <p>3 exonerations.</p> <p>4 <b>Q. And do you know any of the circumstances</b></p> <p>5 <b>of the individual cases for the National Registry</b></p> <p>6 <b>of Exonerations?</b></p> <p>7 A. Well, they provide summaries, and I'm</p> <p>8 familiar with many of the cases, but not all.</p> <p>9 There's over -- there's over 3,500 cases now. But</p> <p>10 I do know that they have very official set criteria</p> <p>11 that there has to be new evidence of innocence to</p> <p>12 officially exonerate the person.</p> <p>13 <b>Q. When you're doing a study, you're</b></p> <p>14 <b>looking at those groups of cases -- you're just</b></p> <p>15 <b>looking at them as a whole, correct? You're not</b></p> <p>16 <b>looking at them individually, right?</b></p> <p>17 A. Yes, that study that I just described,</p> <p>18 the 2023 one, yes, we're looking at the cases</p> <p>19 that -- we downloaded the data at that time. I</p> <p>20 think it was in, like, maybe 2020 or 2021. So it's</p> <p>21 not the same cases that you would see today</p> <p>22 because, you know, we just downloaded it at that</p> <p>23 time, and we looked at the cases that were wrongful</p> <p>24 convictions, exonerations by false guilty pleas</p> |

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| Page 101 | <p>1 versus wrongful convictions, exonerations by trial.</p> <p>2 <b>Q. So I want to make sure -- I want to go</b></p> <p>3 <b>back to my question about true guilty pleas.</b></p> <p>4 <b>Am I correct that you have never --</b></p> <p>5 <b>strike.</b></p> <p>6 <b>You've already said you presumed the</b></p> <p>7 <b>people that you talked to, you know, most of them</b></p> <p>8 <b>are or all of them are guilty, right? That have</b></p> <p>9 <b>pled guilty, correct?</b></p> <p>10 MS. KLEINHAUS: Objection to form,</p> <p>11 mischaracterizes.</p> <p>12 You can answer.</p> <p>13 BY THE WITNESS:</p> <p>14 A. Typically, in these studies, I have in</p> <p>15 the past asked in an interview study about their</p> <p>16 guilt or innocence. This was a -- the large scale</p> <p>17 study that I published in 2010, I believe. But</p> <p>18 that was over 1,000 people -- defendants with</p> <p>19 mental health problems. That one was specific with</p> <p>20 people with mental health problems.</p> <p>21 <b>Q. What was the name of that study from</b></p> <p>22 <b>2010?</b></p> <p>23 A. I can get you the authors. It was,</p> <p>24 like, Redlich -- I can't remember if the second --</p>                                                                   | Page 103 | <p>1 MS. KLEINHAUS: Objection to form.</p> <p>2 You can answer.</p> <p>3 BY THE WITNESS:</p> <p>4 A. That's what I'm trying to tell you. If</p> <p>5 I'm understanding your question correctly.</p> <p>6 BY MR. BAZAREK:</p> <p>7 <b>Q. Right. Do you ever ask that question?</b></p> <p>8 A. So in the study with the offenders with</p> <p>9 mental illness, we don't ask about the specific</p> <p>10 crime of -- I'm sorry. Let me take a step back and</p> <p>11 try to explain it.</p> <p>12 So in that study with the -- the 2010</p> <p>13 study with offenders with mental illness, we ask if</p> <p>14 they ever falsely pled guilty or -- you know, did</p> <p>15 they ever plead guilty to a crime they did not</p> <p>16 commit. So we weren't talking about the reason why</p> <p>17 they were -- were or were not in the legal system</p> <p>18 at that point.</p> <p>19 My other studies, where I'm not asking</p> <p>20 that question, it is focused on the very specific</p> <p>21 offense usually. About they just pled guilty, and</p> <p>22 we're asking, you know, was it voluntary? Did</p> <p>23 you enter -- you know, the plea comprehension</p> <p>24 questions, the vocabulary questions. Things like</p>                                                                                           |
| Page 102 | <p>1 I think it was Redlich, Summers, Hoover, and</p> <p>2 Hoover, I think.</p> <p>3 <b>Q. Did the study have a name? Was it</b></p> <p>4 <b>called something? That's all I'm asking, in 2010.</b></p> <p>5 A. Yeah. Let me find it. All my studies</p> <p>6 have titles. I just don't know what they are.</p> <p>7 Self-Reported False Confessions and</p> <p>8 False Guilty Pleas Among Offenders with Mental</p> <p>9 Illness. So that one focused on people with mental</p> <p>10 health problems. All of the sample had mental</p> <p>11 health problems.</p> <p>12 But, generally, in these studies that</p> <p>13 I'm interviewing people who just pled guilty, I'm</p> <p>14 not asking if they're guilty or innocent.</p> <p>15 <b>Q. So you never ask that question in your</b></p> <p>16 <b>studies, is that right?</b></p> <p>17 A. Because the focus of those studies is</p> <p>18 not about guilt or innocence. It's more about the</p> <p>19 validity -- what I call the validity of guilty plea</p> <p>20 decisions. So are they knowing, intelligent, and</p> <p>21 voluntary.</p> <p>22 <b>Q. In any of the studies that you've done</b></p> <p>23 <b>when you're actually speaking to an individual, do</b></p> <p>24 <b>you ever ask that question, did you do it?</b></p> | Page 104 | <p>1 that. But I'm not asking them, the plea that you</p> <p>2 just took yesterday, were you innocent of it? I</p> <p>3 don't think I've ever asked that question, no.</p> <p>4 <b>Q. Okay. And have you ever asked this</b></p> <p>5 <b>question: Were you guilty of the crime that you</b></p> <p>6 <b>pled guilty to?</b></p> <p>7 A. So with the study with the offenders</p> <p>8 with mental illness --</p> <p>9 <b>Q. Any study. Any study. I'm not limiting</b></p> <p>10 <b>it to the 2010.</b></p> <p>11 A. That's the only study. I'm telling you,</p> <p>12 that's the only study, is we asked them, did you</p> <p>13 ever plead guilty to a crime that you did not</p> <p>14 commit. That's the question. That was the</p> <p>15 question. And we asked how many crimes -- how many</p> <p>16 times have you pled guilty? So we were able -- so</p> <p>17 let's say they said, I pled guilty ten times in the</p> <p>18 past. Okay. Have you ever pled guilty to a crime</p> <p>19 you didn't commit? Yes. How many times? Once.</p> <p>20 So of the ten times, they falsely pled guilty once.</p> <p>21 And we created measures around that.</p> <p>22 <b>Q. All right. So if I'm hearing you</b></p> <p>23 <b>correctly, you've never asked a direct question,</b></p> <p>24 <b>did you commit a crime?</b></p> |

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| <p style="text-align: right;">Page 105</p> <p>1 A. I believe that I did.</p> <p>2 <b>Q. Like -- let me ask you this: Did you</b></p> <p>3 <b>ever ask this question: When you pled guilty to</b></p> <p>4 <b>that narcotics offense, were you guilty?</b></p> <p>5 MS. KLEINHAUS: Objection to form, asked and</p> <p>6 answered.</p> <p>7 You can answer it again.</p> <p>8 MR. BAZAREK: No, she hasn't.</p> <p>9 BY THE WITNESS:</p> <p>10 A. So we ask more generally. So I'm not</p> <p>11 asking about specific crimes, like the one that</p> <p>12 they, you know -- in that study, it was -- some</p> <p>13 people were in jail. Some people were not in jail.</p> <p>14 We weren't asking about their most recent offenses</p> <p>15 that they may or may not have even pled guilty to</p> <p>16 at that point. Okay? So I'm just asking</p> <p>17 generally. In the past, how many times have you</p> <p>18 pled guilty to a crime? Ten times. Of those --</p> <p>19 essentially, I'm asking next, of those times, how</p> <p>20 many times -- did you ever plead guilty to a crime</p> <p>21 you didn't commit. And if they say once or twice,</p> <p>22 then the answer is that they pled guilty -- truly</p> <p>23 guilty eight times.</p> <p>24</p> | <p style="text-align: right;">Page 107</p> <p>1 A. I don't know.</p> <p>2 <b>Q. How many guilty pleas for drug crimes</b></p> <p>3 <b>were made in the United States in 2006?</b></p> <p>4 A. I have no idea.</p> <p>5 <b>Q. During 2006, in the courts of Cook</b></p> <p>6 <b>County, how many pleas for drug crimes were made?</b></p> <p>7 A. I have no idea. But I will refer you to</p> <p>8 my report on Page 3 where I talk about all of the</p> <p>9 reasons why the number of known false guilty pleas</p> <p>10 is underestimated.</p> <p>11 Would you like me to talk about those</p> <p>12 reasons?</p> <p>13 <b>Q. Have you ever observed any criminal</b></p> <p>14 <b>court proceedings in Cook County?</b></p> <p>15 A. No, I don't believe I have.</p> <p>16 <b>Q. When was the last time you actually</b></p> <p>17 <b>observed a criminal court proceeding?</b></p> <p>18 A. COVID is the answer on that. But I'm</p> <p>19 going to say 2019 maybe when I was doing that study</p> <p>20 that we talked about before.</p> <p>21 <b>Q. In Northern Virginia?</b></p> <p>22 A. In Virginia, yeah.</p> <p>23 <b>Q. So that's -- tell me, during 2006,</b></p> <p>24 <b>anywhere in the world did you observe any criminal</b></p> |
| <p style="text-align: right;">Page 106</p> <p>1 BY MR. BAZAREK:</p> <p>2 <b>Q. Yeah. Okay. I understand what you're</b></p> <p>3 <b>saying. But you don't ask a direct question of</b></p> <p>4 <b>someone. For instance, oh, when you pled guilty to</b></p> <p>5 <b>a drug crime, were you guilty of it? You don't ask</b></p> <p>6 <b>that question, right?</b></p> <p>7 MS. KLEINHAUS: Objection to form, asked and</p> <p>8 answered.</p> <p>9 You can answer again.</p> <p>10 BY THE WITNESS:</p> <p>11 A. I'm not asking about specific crimes.</p> <p>12 Like, of the drug crime or anything like that. I'm</p> <p>13 just saying of your past crimes -- I don't even</p> <p>14 know what they are, I don't know if they're drugs,</p> <p>15 or, you know, trespassing. I don't know what they</p> <p>16 are. I'm just -- like, these are very general</p> <p>17 questions to get at what we called event rates of</p> <p>18 false guilty pleas and, like, individual rates.</p> <p>19 BY MR. BAZAREK:</p> <p>20 <b>Q. During 2000 -- sorry. Were you done?</b></p> <p>21 A. Yes, I'm done.</p> <p>22 <b>Q. Okay. During 2006, how many guilty</b></p> <p>23 <b>pleas for felony offenses were taken in the state</b></p> <p>24 <b>of Illinois?</b></p>  | <p style="text-align: right;">Page 108</p> <p>1 <b>court proceedings?</b></p> <p>2 A. Not to my recollection. It's possible.</p> <p>3 I really don't know. That was how many years ago?</p> <p>4 Eighteen years ago?</p> <p>5 <b>Q. Yeah. As you sit at this deposition,</b></p> <p>6 <b>what's the earliest time that you ever observed</b></p> <p>7 <b>criminal court proceedings where individuals were</b></p> <p>8 <b>pleading guilty to a crime?</b></p> <p>9 A. Are you asking me about plea hearings?</p> <p>10 Like, plea hearings?</p> <p>11 <b>Q. Yes, yeah.</b></p> <p>12 A. You know, it's very possible in 2006 I</p> <p>13 was observing some criminal court hearings at</p> <p>14 least. Yeah, we were doing the study -- the 2010</p> <p>15 study -- that was published in 2010, we were in</p> <p>16 court probably, like, 2008 or so. I'm going to,</p> <p>17 you know, estimate. I don't know the very first</p> <p>18 time I ever saw a plea hearing.</p> <p>19 <b>Q. Okay. And so you're guessing if you say</b></p> <p>20 <b>it was in 2008?</b></p> <p>21 A. Yeah. I'm guessing, yeah.</p> <p>22 <b>Q. Okay.</b></p> <p>23 A. For a plea hearing. Not all criminal</p> <p>24 court hearings, but yeah.</p>                  |

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| <p style="text-align: right;">Page 109</p> <p>1       <b>Q. Okay. And then do you ever watch plea</b><br/> 2       <b>hearings on videotape?</b><br/> 3       A. No.<br/> 4       <b>Q. So it's always in person for you?</b><br/> 5       A. Yes.<br/> 6       <b>Q. Okay. And if I'm hearing you correctly,</b><br/> 7       <b>you have observed no plea hearings since 2019,</b><br/> 8       <b>correct?</b><br/> 9       A. I think so. I'm not sure. We certainly<br/> 10       haven't gone back into the courtroom and collected<br/> 11       systematic observation data like we did before.<br/> 12       <b>Q. And when you say "we," are you referring</b><br/> 13       <b>to colleagues of yours?</b><br/> 14       A. No. These were my students. My<br/> 15       doctoral students.<br/> 16       <b>Q. Okay.</b><br/> 17       A. And there was one -- there was one<br/> 18       colleague who -- she's at the -- a different<br/> 19       university in California.<br/> 20       <b>Q. Okay. And I didn't ask you this: Where</b><br/> 21       <b>are you right now?</b><br/> 22       A. You did. I was in Fairfax, Virginia.<br/> 23       <b>Q. Oh, I did ask.</b><br/> 24       A. Yeah.</p>                                                                                                                                                                    | <p style="text-align: right;">Page 111</p> <p>1       They're paid to be a graduate student and to work<br/> 2       on research and to meet their milestones and to get<br/> 3       their Ph.D.<br/> 4       But this will a -- I will also say that<br/> 5       this study in particular that we're talking about<br/> 6       was funded by the National Science Foundation, and<br/> 7       it did fund a doctoral student, a graduate research<br/> 8       assistant.<br/> 9       <b>Q. And then when you were doing the</b><br/> 10       <b>interviews in 2019, how many of the students were</b><br/> 11       <b>part of your team?</b><br/> 12       A. There was also what's called a<br/> 13       post-doctoral fellow. So this was someone who had<br/> 14       her Ph.D., and she came to work with me. So we had<br/> 15       about -- doing the interviews, there were about<br/> 16       three or four of us doing the interviews, yeah.<br/> 17       <b>Q. Okay.</b><br/> 18       A. Including myself.<br/> 19       <b>Q. So I know from your report that you've</b><br/> 20       <b>done some research on true and false guilty pleas,</b><br/> 21       <b>right?</b><br/> 22       A. Yes.<br/> 23       <b>Q. That's what it says on Page 2. Okay.</b><br/> 24       A. Yeah.</p>                                                                                                                                                                                                |
| <p style="text-align: right;">Page 110</p> <p>1       <b>Q. And then where -- you're at George</b><br/> 2       <b>Mason? Do I have that right?</b><br/> 3       A. Yes.<br/> 4       <b>Q. Okay. And then where you have the</b><br/> 5       <b>students assisting you -- what's the name of the</b><br/> 6       <b>class where you have these students helping you</b><br/> 7       <b>out?</b><br/> 8       A. It's not like that. It's not a class.<br/> 9       It's -- in graduate school, you mentor students --<br/> 10       doctoral students. And so these are the students<br/> 11       who I mentor.<br/> 12       <b>Q. Okay.</b><br/> 13       A. And who want to work with me, who -- I<br/> 14       mean, on that research team specifically, most were<br/> 15       doctoral students. There was one what's called a<br/> 16       postbaccalaureate student, someone who's finished<br/> 17       undergrad and is taking a little time off before<br/> 18       they go on to graduate school.<br/> 19       <b>Q. And are they paid for this or is it just</b><br/> 20       <b>volunteer work they do?</b><br/> 21       A. So they're paid as graduate students.<br/> 22       They have either a graduate research assistantship,<br/> 23       or a graduate teaching assistantship. And they're<br/> 24       not paid specifically to work on this study.</p> | <p style="text-align: right;">Page 112</p> <p>1       <b>Q. And then you write, this is on Page 2,</b><br/> 2       <b>"This research supports three fundamental positions</b><br/> 3       <b>about guilty pleas in our criminal legal system</b><br/> 4       <b>which are relevant to the case at hand." And then</b><br/> 5       <b>Point No. 1, you say, "Not every defendant who</b><br/> 6       <b>pleads guilty is factually guilty." Right?</b><br/> 7       A. So I will point out that what I'm<br/> 8       describing in Section II is some of my research,<br/> 9       but it's also research that other people have done.<br/> 10       So this is just not -- you know, this is the<br/> 11       research, the science on guilty pleas.<br/> 12       <b>Q. Okay.</b><br/> 13       A. Yeah.<br/> 14       <b>Q. And so what's -- can you just generally</b><br/> 15       <b>describe what the research is for Point No. 1, "Not</b><br/> 16       <b>every defendant who pleads guilty is factually</b><br/> 17       <b>guilty"?</b><br/> 18       A. So it's demonstrating that we know that<br/> 19       false guilty pleas exist, and that innocent<br/> 20       defendants will take guilty pleas, and the reasons<br/> 21       why the number of known false guilty pleas is very<br/> 22       likely to be an underestimation of the ones that we<br/> 23       currently know about, which is the ones in the<br/> 24       National Registry of Exonerations, which are, you</p> |

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| <p style="text-align: right;">Page 113</p> <p>1 know, just U.S. and just since 1989.</p> <p>2 And I talk about the reasons why</p> <p>3 people -- innocent defendants would plead guilty.</p> <p>4 <b>Q. Okay. How many true guilty pleas</b></p> <p>5 <b>occurred in the United States during 2006?</b></p> <p>6 MS. KLEINHAUS: Objection, asked and answered.</p> <p>7 You can answer again.</p> <p>8 BY THE WITNESS:</p> <p>9 A. I don't know. But what I like to say is</p> <p>10 if we had a method to say, at the outset, before</p> <p>11 somebody pleads guilty, this is a true guilty plea</p> <p>12 and this is a false guilty plea, then hopefully we</p> <p>13 wouldn't have false guilty pleas, and hopefully the</p> <p>14 judge would not allow an innocent person to plead</p> <p>15 guilty. Or the defense attorney or something. But</p> <p>16 that's an impossible question to answer, especially</p> <p>17 before the person pleads guilty.</p> <p>18 BY MR. BAZAREK:</p> <p>19 <b>Q. How many true guilty pleas were taken in</b></p> <p>20 <b>Illinois during 2006?</b></p> <p>21 MS. KLEINHAUS: Objection, asked and answered.</p> <p>22 You can answer again.</p> <p>23 BY THE WITNESS:</p> <p>24 A. I don't know. I don't even know the</p>                                                                                 | <p style="text-align: right;">Page 115</p> <p>1 one plea colloquy or one tender of plea form that's</p> <p>2 going to include all of those elements. And I</p> <p>3 usually, you know, look at different categories.</p> <p>4 So it's elements that relate to voluntariness, to</p> <p>5 knowingness, intelligence, to collateral</p> <p>6 consequences, and then we usually have kind of like</p> <p>7 an other category. And so within each of those</p> <p>8 categories, you know, nowhere near the number of</p> <p>9 things that could be asked or could be written down</p> <p>10 are there. And that's one of the reasons why we're</p> <p>11 saying it may not be sufficient.</p> <p>12 <b>Q. Any other reasons?</b></p> <p>13 A. I don't have it in my report, but</p> <p>14 another systematic reason relates to discovery</p> <p>15 rules around guilty pleas. I was trying to focus</p> <p>16 on what was relevant -- like you mentioned in that</p> <p>17 first paragraph, the opening paragraph of</p> <p>18 Section II, relevant to the Baker Glenn case.</p> <p>19 <b>Q. Okay.</b></p> <p>20 A. And, obviously, discovery is relevant to</p> <p>21 this case.</p> <p>22 <b>Q. Okay. And then you also write, Point</b></p> <p>23 <b>No. 3, "Not every defendant who pleads guilty makes</b></p> <p>24 <b>voluntary decisions."</b></p>                                                        |
| <p style="text-align: right;">Page 114</p> <p>1 denominator of how many guilty pleas there were as</p> <p>2 I've already mentioned.</p> <p>3 BY MR. BAZAREK:</p> <p>4 <b>Q. Okay. Moving on. You also write that,</b></p> <p>5 <b>"Not every defendant who pleads guilty has</b></p> <p>6 <b>sufficient information to make an informed plea</b></p> <p>7 <b>decision."</b></p> <p>8 <b>What's your basis for saying that?</b></p> <p>9 A. Well, for one, I was talking about how</p> <p>10 there are some systematic reasons why defendants</p> <p>11 don't have full, complete information. For</p> <p>12 example, collateral consequences need not be made</p> <p>13 known to defendants. They may or may not. It's up</p> <p>14 to the defense attorney. But my understanding is</p> <p>15 that defense attorneys don't usually discuss those</p> <p>16 issues.</p> <p>17 And then I talk about some of my</p> <p>18 research where -- for example, where we observed</p> <p>19 court hearings, or I did a study where we analyzed</p> <p>20 written tender of plea forms which are optional,</p> <p>21 but they are kind of the written version of plea</p> <p>22 colloquies. And we talk -- I talk about how in</p> <p>23 both of those studies, all of the things that we're</p> <p>24 coding for, say, there are 40 elements, there's no</p> | <p style="text-align: right;">Page 116</p> <p>1 A. Yes.</p> <p>2 <b>Q. What do you mean by that?</b></p> <p>3 A. So in this section, I describe the</p> <p>4 research that's been done about asking about</p> <p>5 voluntariness, the questions -- the ones I was</p> <p>6 saying before. But the court just simply asks, are</p> <p>7 you -- you know, are you making this decision</p> <p>8 voluntarily? You know, we found that 17 percent of</p> <p>9 the tender plea forms in the sample we examined</p> <p>10 didn't even mention voluntariness, which we found</p> <p>11 surprising since it's, you know, just such an</p> <p>12 important part of a ballot, any legal decision, is</p> <p>13 it voluntary. The first paragraph talks about how</p> <p>14 there's really no single clear definition of</p> <p>15 voluntary. And we give some examples, you know,</p> <p>16 from a federal case that talks about how if there</p> <p>17 was a pristine rule of no coercion, then many plea</p> <p>18 agreements would never go forward.</p> <p>19 Then we talk about some of the studies,</p> <p>20 the research that I had done where, you know, where</p> <p>21 people say that they pled -- that it was their</p> <p>22 choice, but when they're really -- and these are</p> <p>23 the questions that I was saying. This is exactly</p> <p>24 what the judge asked them. Did you plead guilty --</p> |

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| Page 117 | <p>1 you know, was it your choice to plead guilty, or</p> <p>2 did anybody threaten you or make promises? And so</p> <p>3 the fact that we got 93 percent, 96 percent of</p> <p>4 people saying this is exactly what they just said</p> <p>5 to the judge. So it's not surprising at all. But</p> <p>6 when we asked them further questions, like,</p> <p>7 44 percent did not know -- people who just pled</p> <p>8 guilty, they didn't know that their plea had to be</p> <p>9 voluntary. Or they said that a -- a third of them,</p> <p>10 I think, said that someone other than the judge --</p> <p>11 I'm sorry. Someone other than themselves makes the</p> <p>12 final plea decision after the court had agreed to</p> <p>13 accept their plea.</p> <p>14 So those are the kinds of things I was</p> <p>15 talking about before. We talk about why it can be</p> <p>16 coercive -- this decision can be coercive, Hobson's</p> <p>17 choice, and about the excessive plea discounts, and</p> <p>18 the research that's been done on that, and how the</p> <p>19 American Bar Association Task Force report which</p> <p>20 recently came out last year talked about these plea</p> <p>21 differentials, these discounts lead to coercion and</p> <p>22 pleas.</p> <p>23 <b>Q. Well, let me ask you this: For the</b></p> <p>24 <b>three fundamental positions that you referred to</b></p> | Page 119 | <p>1 <b>Q. Okay. So when you were reviewing the</b></p> <p>2 <b>Ben Baker and Clarissa Glenn matter, did you</b></p> <p>3 <b>undertake a study as to whether or not it was a</b></p> <p>4 <b>true guilty plea that both of them took?</b></p> <p>5 A. Yes. That was the whole purpose in me</p> <p>6 reviewing the materials. That was the analysis, I</p> <p>7 think -- part of the analysis. I was also looking</p> <p>8 at coercion.</p> <p>9 Can I ask, it's 1:00 o'clock my time.</p> <p>10 Are we going to be breaking for lunch?</p> <p>11 MR. BAZAREK: Yeah, sure. Of course. Of</p> <p>12 course. What time would you like, Doctor?</p> <p>13 THE WITNESS: I don't know. What time is</p> <p>14 typical? Like a half hour, is that sufficient?</p> <p>15 Forty-five minutes? An hour? What do people take</p> <p>16 usually?</p> <p>17 MR. BAZAREK: We can do whatever -- see what</p> <p>18 the other individuals -- I mean, I'm fine with</p> <p>19 taking 45, but I don't know.</p> <p>20 THE WITNESS: Yeah, I mean, I don't know. My</p> <p>21 feeling is I'd like -- I'm not sure how much more</p> <p>22 you have, but, I'm thinking about the end time for</p> <p>23 my day. So --</p> <p>24 MS. KLEINHAUS: Can we do a half hour instead</p> |
| Page 118 | <p>1 <b>and that we just discussed, how are any of those</b></p> <p>2 <b>three applicable to the Ben Baker and Clarissa</b></p> <p>3 <b>Glenn matter?</b></p> <p>4 A. Well, that's exactly what I tried to do</p> <p>5 in Section III. I take the research, and then I</p> <p>6 apply it to the specifics of their case.</p> <p>7 So why innocent people may give false</p> <p>8 guilty pleas. Why innocent people would plead</p> <p>9 guilty. Why it could be not voluntary. And, you</p> <p>10 know, I didn't talk about what we just -- what you</p> <p>11 were just asking me about in Section II, but I also</p> <p>12 talk about these package plea deals, and the</p> <p>13 excessive plea discounts. All of those things are</p> <p>14 relevant, which is why I said relevant, you know,</p> <p>15 in the first part, Section II. They're relevant to</p> <p>16 their case.</p> <p>17 <b>Q. Well --</b></p> <p>18 A. Yeah.</p> <p>19 <b>Q. But you would agree, guilty people plead</b></p> <p>20 <b>guilty to drug crimes, right?</b></p> <p>21 A. Guilty people plead guilty to drug</p> <p>22 crimes, is that what you said?</p> <p>23 <b>Q. Yes.</b></p> <p>24 A. Yes, I agree with that statement.</p>                                                                                                                                                                              | Page 120 | <p>1 of 45 minutes?</p> <p>2 MR. BAZAREK: Say it again.</p> <p>3 MS. KLEINHAUS: Can we take a half hour</p> <p>4 instead of 45 minutes?</p> <p>5 MR. BAZAREK: Yeah, fine with me. There's</p> <p>6 many attorneys, so this dep could be going for a</p> <p>7 while. So just so everyone knows.</p> <p>8 Why don't we come back at 12:35?</p> <p>9 MS. KLEINHAUS: Okay. Thank you.</p> <p>10 THE VIDEOGRAPHER: Going off the record at</p> <p>11 12:04 p.m.</p> <p>12 (WHEREUPON, there was a recess for</p> <p>13 lunch.)</p> <p>14 THE VIDEOGRAPHER: Okay. We're back on the</p> <p>15 record at 12:37 p.m.</p> <p>16 BY MR. BAZAREK:</p> <p>17 <b>Q. Dr. Redlich, on any of the studies that</b></p> <p>18 <b>you've undertaken that involved individuals who</b></p> <p>19 <b>plead guilty to a crime, have any of those studies</b></p> <p>20 <b>been peer-reviewed?</b></p> <p>21 THE COURT REPORTER: I'm sorry. What was the</p> <p>22 answer?</p> <p>23 BY THE WITNESS:</p> <p>24 A. All of them.</p>                                                                                                                                                                                                                                                  |

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| <p style="text-align: right;">Page 121</p> <p>1 BY MR. BAZAREK:</p> <p>2 <b>Q. And can you describe that process for</b></p> <p>3 <b>the peer review of your studies?</b></p> <p>4 A. Sure. I -- the social scientists and</p> <p>5 other scientists, you submit the article to a</p> <p>6 journal, and they send it out for peer review.</p> <p>7 It's blind peer-reviewed, so the person -- the</p> <p>8 three people -- it's usually three people,</p> <p>9 sometimes more, that are reviewing the article</p> <p>10 don't know who the authors are. They provide</p> <p>11 comments. Typically, you respond to the comments</p> <p>12 as opposed to it being accepted as-is. Sometimes</p> <p>13 it gets rejected, but then it's -- you respond to</p> <p>14 the comments, and the editor will then accept it or</p> <p>15 reject it. And so the ones that I have published</p> <p>16 were obviously accepted, and they've been</p> <p>17 peer-reviewed. There's a couple exceptions, ones</p> <p>18 that were in law reviews. I can think of one in</p> <p>19 particular.</p> <p>20 <b>Q. How many total studies on -- involving</b></p> <p>21 <b>pleas of guilty have you published that have been</b></p> <p>22 <b>peer-reviewed? Just a ballpark number.</b></p> <p>23 A. Like the empirical studies, the data</p> <p>24 collection, as opposed to, like, overviews, and,</p> | <p style="text-align: right;">Page 123</p> <p>1 to let take some time. But if you scroll down to</p> <p>2 2009, that's on Page 31. So I'm going to estimate</p> <p>3 20 to 25, and one article in particular was a law</p> <p>4 review and it was not peer-reviewed.</p> <p>5 <b>Q. In your work -- strike that.</b></p> <p>6 <b>How would you describe the work that</b></p> <p>7 <b>you're doing in this case in the matter of Ben</b></p> <p>8 <b>Baker and Clarissa Glenn? What are you in this</b></p> <p>9 <b>case?</b></p> <p>10 A. This is -- I would be serving as an</p> <p>11 expert witness, and this is a legal consultation</p> <p>12 case.</p> <p>13 <b>Q. Okay. And then -- I know I asked you</b></p> <p>14 <b>earlier about cases where you've worked with the</b></p> <p>15 <b>Loevy &amp; Loevy firm. So now I'm going to ask</b></p> <p>16 <b>questions that are not limited to the Loevy &amp; Loevy</b></p> <p>17 <b>firm.</b></p> <p>18 <b>So how many cases have you been retained</b></p> <p>19 <b>where -- as an expert for a civil or criminal</b></p> <p>20 <b>proceeding?</b></p> <p>21 A. For guilty pleas, or false confessions,</p> <p>22 or confessions as well?</p> <p>23 <b>Q. Let's break it down then. Let's do it</b></p> <p>24 <b>that way.</b></p> |
| <p style="text-align: right;">Page 122</p> <p>1 like, summaries of the research? Or, like, all of</p> <p>2 my publications?</p> <p>3 <b>Q. No. Thank you for clarifying that. One</b></p> <p>4 <b>where there's actually data, and you're actually</b></p> <p>5 <b>doing a full-blown study.</b></p> <p>6 A. Can I look at my CV?</p> <p>7 <b>Q. Sure.</b></p> <p>8 A. Or you want me to just ballpark?</p> <p>9 <b>Q. You can look at the CV.</b></p> <p>10 A. Okay.</p> <p>11 <b>Q. And when you're looking at the CV, let</b></p> <p>12 <b>us know what page you're on because I know it's</b></p> <p>13 <b>part of your -- it's included within your report.</b></p> <p>14 <b>That is in Exhibit 1, right? Your CV is in there</b></p> <p>15 <b>as well?</b></p> <p>16 A. Yes. Well, it's going to be multiple</p> <p>17 pages. Let me get that specific version of the CV.</p> <p>18 So if you look at Page 25 where it lists</p> <p>19 my publications, and first I have books. And then</p> <p>20 there are journal articles that start on Page 26.</p> <p>21 And so from the current time, all the way to I</p> <p>22 think 2009, I would say, is my first article that I</p> <p>23 published on guilty pleas. But all -- I can't</p> <p>24 really count. I mean, I can count, it's just going</p>                                                                            | <p style="text-align: right;">Page 124</p> <p>1 A. These are estimates because I don't</p> <p>2 really know. But for guilty pleas, I'm going to</p> <p>3 say -- and these are just cases where I've been</p> <p>4 paid. That's my distinction.</p> <p>5 For guilty pleas, I'm going to say</p> <p>6 five -- six. Six. I'll go with six.</p> <p>7 <b>Q. Okay.</b></p> <p>8 A. For confessions, I'm going to say 15 to</p> <p>9 20. And sometimes I work on false -- you know,</p> <p>10 alleged false confession, false guilty plea cases.</p> <p>11 So both of them occur in the same case.</p> <p>12 <b>Q. That's a combo?</b></p> <p>13 A. Yeah, like a combo, yeah.</p> <p>14 <b>Q. And then what would the -- okay. You've</b></p> <p>15 <b>given the numbers, 15 to 20 on confessions, six on</b></p> <p>16 <b>the guilty pleas.</b></p> <p>17 <b>What about the combo, false confession</b></p> <p>18 <b>and a guilty plea?</b></p> <p>19 A. Those would be included in those</p> <p>20 numbers. They're not separate.</p> <p>21 <b>Q. Okay.</b></p> <p>22 A. Yeah.</p> <p>23 <b>Q. And what was your -- or strike that.</b></p> <p>24 <b>These numbers that you just gave, you</b></p>                                                                                               |

34 (Pages 121 to 124)

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| <p style="text-align: right;">Page 125</p> <p>1 know, the six for the guilty pleas and the 15 to</p> <p>2 20, what time frame are we talking about for that,</p> <p>3 you being an expert witness?</p> <p>4 A. So the confessions go back to 2004, but</p> <p>5 the guilty pleas probably started maybe in 2017</p> <p>6 maybe.</p> <p>7 Q. And in the six cases where you've been</p> <p>8 retained as an expert in guilty pleas, who are you</p> <p>9 an expert for?</p> <p>10 A. Are you asking, like, the defense or the</p> <p>11 plaintiff or something like that?</p> <p>12 Q. Right. Well, first of all, are they</p> <p>13 civil cases? Are they criminal cases? Are they</p> <p>14 both? What are they for those six?</p> <p>15 A. For the six? They're mostly civil for</p> <p>16 guilty plea. I think that's partially by design.</p> <p>17 There was one criminal one. And there was one that</p> <p>18 was more of like a -- it was a conviction integrity</p> <p>19 unit, and I wrote a report for them. So, like, a</p> <p>20 formal case.</p> <p>21 Q. So for all the guilty plea cases where</p> <p>22 you've been retained as an expert, you were</p> <p>23 providing, you know, expert testimony and expert</p> <p>24 report for an individual who had been charged with</p> | <p style="text-align: right;">Page 127</p> <p>1 retained as an expert for?</p> <p>2 A. By the defense.</p> <p>3 Q. And on the false confession cases that</p> <p>4 you were retained in the civil cases, who were you</p> <p>5 an expert for?</p> <p>6 A. The plaintiff.</p> <p>7 Q. Okay. And the plaintiff that you were</p> <p>8 an expert for was previously a criminal defendant</p> <p>9 in a criminal case, correct?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. So have you ever testified on</p> <p>12 behalf of a prosecuting office?</p> <p>13 A. In criminal cases, I've never been asked</p> <p>14 by a prosecutor -- prosecuting office.</p> <p>15 Q. Okay. And so then you've -- okay.</p> <p>16 So you've never testified on behalf of</p> <p>17 prosecutors in any criminal court proceeding,</p> <p>18 correct?</p> <p>19 A. I've never had the opportunity.</p> <p>20 Q. Have you ever testified on behalf of law</p> <p>21 enforcement officers at any time?</p> <p>22 A. I don't understand the question.</p> <p>23 Q. Well, you've been hired as an expert for</p> <p>24 defendants in criminal court proceedings, right?</p>                                                                        |
| <p style="text-align: right;">Page 126</p> <p>1 a crime, is that right?</p> <p>2 MS. KLEINHAUS: Objection to form.</p> <p>3 You can answer.</p> <p>4 BY THE WITNESS:</p> <p>5 A. So for the guilty plea cases, yeah,</p> <p>6 these were all cases that the person had already</p> <p>7 pled guilty.</p> <p>8 BY MR. BAZAREK:</p> <p>9 Q. Okay. And so you were an expert on</p> <p>10 behalf of an individual who had been charged with a</p> <p>11 crime, right?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. And then for the false confession</p> <p>14 cases, were those criminal proceedings or were they</p> <p>15 civil proceedings?</p> <p>16 A. A mix of both.</p> <p>17 Q. Okay. And for the criminal proceedings</p> <p>18 where you were retained as an expert, were you --</p> <p>19 who were you an expert for?</p> <p>20 A. I'm sorry. For the criminal or the</p> <p>21 civil? I didn't --</p> <p>22 Q. Yeah, let me ask the question again.</p> <p>23 On the cases where you were retained as</p> <p>24 an expert on the criminal cases, who were you</p>                                                                                                                                                                                                                              | <p style="text-align: right;">Page 128</p> <p>1 A. You mean as -- sorry. I'll let you</p> <p>2 finish. Go ahead.</p> <p>3 Q. Right. You've been retained to be an</p> <p>4 expert for individuals that are defendants in a</p> <p>5 criminal court proceeding, right?</p> <p>6 A. Yes.</p> <p>7 Q. And you've been retained as an expert</p> <p>8 for plaintiffs that were previously defendants in</p> <p>9 some type of criminal court proceeding, right?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. So I'm asking you -- right, you</p> <p>12 understand Ben Baker and Clarissa Glenn are suing</p> <p>13 former and current law enforcement officers, right?</p> <p>14 A. Yes. So I'm asking law enforcement as</p> <p>15 defendants in a civil case?</p> <p>16 Q. Yes, that's -- yeah, yeah. Have you</p> <p>17 ever testified on behalf of law enforcement</p> <p>18 officers that were defendants in a civil case?</p> <p>19 A. I don't think I ever had the</p> <p>20 opportunity. Nobody's ever asked, really.</p> <p>21 Q. Do --</p> <p>22 A. Not that I recall. I mean, there might</p> <p>23 have been one time that I had a conversation, but</p> <p>24 it didn't sound like a case -- I turn down many,</p> |

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| <p style="text-align: right;">Page 129</p> <p>1 many cases. So, you know, please understand. So I</p> <p>2 think on the criminal side, no. On the civil side,</p> <p>3 there was one instance I remember speaking with --</p> <p>4 I guess it's a prosecutor, I don't know, and they</p> <p>5 were representing -- or I guess they were defense</p> <p>6 attorneys representing law enforcement. I'm sorry.</p> <p>7 And it didn't sound like a case I wanted to get</p> <p>8 involved with. It didn't -- you know, there's many</p> <p>9 reasons I'll turn down a case. I mean, the timing</p> <p>10 is a huge one. So, you know, they say we need you</p> <p>11 tomorrow. I say, no, thank you. And, you know,</p> <p>12 it's -- I base my initial declinations on a lot of</p> <p>13 different reasons.</p> <p>14 <b>Q. How does someone know how to find you to</b></p> <p>15 <b>retain you for your services? Do you advertise?</b></p> <p>16 A. No, no, no.</p> <p>17 <b>Q. Someone goes to the phone book? How do</b></p> <p>18 <b>they know? Word of mouth? How do they know to use</b></p> <p>19 <b>you as an expert or have you consider their case as</b></p> <p>20 <b>an expert?</b></p> <p>21 A. Well, I think largely it's because of</p> <p>22 the research that I published. So they find the</p> <p>23 research, and they can easily Google me, and then</p> <p>24 they need me -- you know, they can email me or they</p> | <p style="text-align: right;">Page 131</p> <p>1 A. Oh, no. I didn't know anything about it</p> <p>2 until I was contacted by somebody.</p> <p>3 <b>Q. Who contacted you?</b></p> <p>4 THE WITNESS: Am I allowed to answer that,</p> <p>5 Tess?</p> <p>6 MS. KLEINHAUS: I'm going to -- yeah. I guess</p> <p>7 I'm going to direct you not to answer that because</p> <p>8 it goes to your communications with attorneys.</p> <p>9 MR. BAZAREK: No, it doesn't. You're saying,</p> <p>10 Ms. Kleinhaus, that if -- I'm not asking about</p> <p>11 conversations, at least not for that question. So</p> <p>12 you're telling me -- or, strike that. You're</p> <p>13 instructing the witness not to answer, like, who</p> <p>14 contacted her about this case?</p> <p>15 MS. KLEINHAUS: I mean, I guess -- okay. You</p> <p>16 can say who contacted you. I mean, that's the</p> <p>17 extent of, I guess, what you're allowed to testify</p> <p>18 to. Go ahead.</p> <p>19 BY THE WITNESS:</p> <p>20 A. It was Josh Tepfer.</p> <p>21 BY MR. BAZAREK:</p> <p>22 <b>Q. Did you know Josh Tepfer before he</b></p> <p>23 <b>contacted you?</b></p> <p>24 A. Yes.</p>                                                                              |
| <p style="text-align: right;">Page 130</p> <p>1 can call me, or sometimes I'll get referrals from</p> <p>2 other people.</p> <p>3 <b>Q. What percentage of your income in 2023</b></p> <p>4 <b>was for expert?</b></p> <p>5 A. I'm going to say 3 percent maybe.</p> <p>6 <b>Q. Okay. And is that number the same over</b></p> <p>7 <b>the years? Has it picked up? Is there less work</b></p> <p>8 <b>you're getting for expert work?</b></p> <p>9 A. I could have lots and lots of work. I</p> <p>10 turn down cases all the time. I don't enjoy this.</p> <p>11 This is not how I want to spend my day. So I --</p> <p>12 sorry. No offense, but I don't take on many cases.</p> <p>13 <b>Q. So what made you take this case on?</b></p> <p>14 MS. KLEINHAUS: I'm just going to object to</p> <p>15 the extent it goes into any work product or</p> <p>16 conversations with attorneys.</p> <p>17 But if you can answer it without that,</p> <p>18 then go ahead.</p> <p>19 BY THE WITNESS:</p> <p>20 A. The case interested me.</p> <p>21 BY MR. BAZAREK:</p> <p>22 <b>Q. And when you say it interested you, were</b></p> <p>23 <b>you following the news? Or what -- how did it</b></p> <p>24 <b>interest you?</b></p>                                                                                                                                                                                                                | <p style="text-align: right;">Page 132</p> <p>1 <b>Q. How did you know him?</b></p> <p>2 A. Because of my work on false confessions</p> <p>3 in juveniles.</p> <p>4 <b>Q. Okay. So you've worked with Mr. Tepfer</b></p> <p>5 <b>in the past, and that has nothing to do with your</b></p> <p>6 <b>expert work in this case, is that right?</b></p> <p>7 MS. KLEINHAUS: Objection to form.</p> <p>8 You can answer.</p> <p>9 BY THE WITNESS:</p> <p>10 A. I can't honestly -- I cannot recall a</p> <p>11 case that I worked on with Josh. It's more that --</p> <p>12 I met Josh, I think he was a student at</p> <p>13 Northwestern Law School with Steve Drizzen, and it</p> <p>14 was more legal scholarship. I've seen Josh at</p> <p>15 conferences. I remember being at one at Rutgers</p> <p>16 University in 2009 that we both published a paper.</p> <p>17 And so I've run into him in those circles, and</p> <p>18 not -- I can't think of any cases that I've worked</p> <p>19 on with Mr. Tepfer.</p> <p>20 BY MR. BAZAREK:</p> <p>21 <b>Q. Is Mr. Tepfer a friend of yours?</b></p> <p>22 A. He's an acquaintance. I've known him</p> <p>23 for many years, I guess.</p> <p>24 <b>Q. Have you socialized with Mr. Tepfer?</b></p> |

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1 A. At a conference? Like -- I mean, just  
2 like what people do at a conference. Not outside  
3 of a conference, no.

4 **Q. Okay. When you're at a conference,**  
5 **maybe you shared a meal with him, had a few drinks?**  
6 **That type of thing?**

7 A. Not even that. I would say, you know,  
8 mostly it's just like conversation -- friendly  
9 conversations that lasted ten minutes or so. But,  
10 no.

11 **Q. Are you friends with Mr. Tepfer on**  
12 **Facebook?**

13 A. Yes.

14 **Q. Yeah. And do you communicate with**  
15 **Mr. Tepfer on Facebook?**

16 A. No, I don't post on Facebook.

17 **Q. Okay. But, you know, if he -- say,**  
18 **Mr. Tepfer, has pictures of him with his kids,**  
19 **or -- did you give a heart or a, you know,**  
20 **thumbs-up-type thing where you respond to posts**  
21 **that he may make on Facebook?**

22 A. I don't -- I don't really -- I kind of  
23 lurk on Facebook. I don't really like anybody's  
24 photos. It's nothing specific to him, but I don't

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1 really tend to do that. And he doesn't post that  
2 much from what I'm scrolling through. So --

3 **Q. Are you Facebook friends with any other**  
4 **attorneys at Loevy & Loevy besides Mr. Tepfer?**

5 A. No. Not to my knowledge, no.

6 **Q. And you said you met Mr. Tepfer you**  
7 **think at Northwestern?**

8 A. Yes.

9 **Q. Yeah. Are you a mentor to him?**

10 A. No, no.

11 **Q. Okay. And then describe your**  
12 **interactions with Mr. Tepfer at Northwestern.**

13 A. This was many, many years ago. This was  
14 when he was a student, and this was when I was -- I  
15 was pretty early in my career at the time.

16 **Q. And I'm sure it's somewhere on your CV.**  
17 **What did you do at Northwestern?**

18 A. Oh, I just remember there was a  
19 conference there that the -- I don't know if you  
20 would call it a conference, but a meeting that the  
21 Center For Wrongful Convictions had put on. This  
22 was -- this was early 2000s, I would say.

23 **Q. Did you speak at the conference?**

24 A. It wasn't really a conference. As I

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1 said, it was more like a meeting where many people  
2 were sitting around a table. And, to be honest, I  
3 can't tell you much more than that because it was  
4 20 years ago.

5 **Q. Okay. When Mr. Tepfer contacted you**  
6 **about this case, was it over the telephone or was**  
7 **it via email? What was it?**

8 A. Telephone.

9 **Q. Did Mr. Tepfer provide -- at any time**  
10 **did he ever provide you with data or other**  
11 **information that you relied on in forming your**  
12 **opinions in this case?**

13 MS. KLEINHAUS: Objection to form. Do you  
14 mean other than what's in the appendix?  
15 BY MR. BAZAREK:

16 **Q. Yeah, I'm not -- yeah. I'm not talking**  
17 **about -- I know you received documents, whether you**  
18 **got them in an email or they came in the mail. I'm**  
19 **talking about, like, factual data.**

20 **I'll give you an example. Dr. Redlich,**  
21 **Ben Baker and Clarissa Glenn, they were framed by**  
22 **members of Ron Watts's tactical team. Did he ever**  
23 **say anything like that to you, as an example?**

24 MS. KLEINHAUS: Just object to the form to the

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1 extent it goes beyond asking her if she was given  
2 any facts or assumptions by any attorneys for  
3 plaintiffs.

4 With that caveat, you can answer.

5 BY THE WITNESS:

6 A. No, Josh did not do anything like that.  
7 That sounds like it would be stepping outside of  
8 his ethical bounds. And I've disclosed everything  
9 in Appendix A, and he did share with me a podcast  
10 that he had done that I put on Appendix A.

11 BY MR. BAZAREK:

12 **Q. Okay. So it's your testimony then that**  
13 **he never gave you any assumptions for you to have**  
14 **in your review of this case, is that correct?**

15 A. No. I think he fully appreciates and  
16 understands the parameters of an expert witness,  
17 and he doesn't want to bias me in any way, and, you  
18 know, that wouldn't serve his case.

19 **Q. Are you biased?**

20 A. I don't think so.

21 **Q. So let's look at Page 8 of your report.**  
22 **And that's Section III, right? It says, "Ben**  
23 **Baker's and Clarissa Glenn's Cases."**

24 A. Okay.

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| <p style="text-align: right;">Page 137</p> <p>1       <b>Q. So I'll just read that first sentence.</b></p> <p>2       <b>It says, "Ben Baker and Clarissa Glenn are two of</b></p> <p>3       <b>hundreds of individuals wrongly convicted as part</b></p> <p>4       <b>of the Watts scandal."</b></p> <p>5       <b>Is that a neutral sentence, would you</b></p> <p>6       <b>say?</b></p> <p>7       MS. KLEINHAUS: Objection to form.</p> <p>8       You can answer.</p> <p>9       BY THE WITNESS:</p> <p>10      A. From my understanding, it's an</p> <p>11      objectively true statement. So I think it is a</p> <p>12      neutral statement.</p> <p>13      BY MR. BAZAREK:</p> <p>14      <b>Q. What's the source of your information</b></p> <p>15      <b>that Ben Baker and Clarissa Glenn were wrongfully</b></p> <p>16      <b>convicted?</b></p> <p>17      A. That their case was overturned, and they</p> <p>18      got the Certificates of Innocence.</p> <p>19      <b>Q. But you're not testifying that they're</b></p> <p>20      <b>innocent of anything in this case, correct?</b></p> <p>21      A. I'm -- I said wrongly convicted. You</p> <p>22      can be wrongly convicted for lots of different</p> <p>23      reasons, and all I know is that objectively they</p> <p>24      received Certificates of Innocence. That's what</p> | <p style="text-align: right;">Page 139</p> <p>1       BY MR. BAZAREK:</p> <p>2       <b>Q. You have no idea as to whether or not</b></p> <p>3       <b>Ben and -- Ben Baker and Clarissa Glenn had heroin</b></p> <p>4       <b>inside their car on December 11, 2005, true?</b></p> <p>5       MS. KLEINHAUS: Objection to form.</p> <p>6       You can answer.</p> <p>7       BY THE WITNESS:</p> <p>8       A. What I would say is that given the</p> <p>9       materials that I've read and the conflicting</p> <p>10      versions of Ben and Clarissa versus the law</p> <p>11      enforcement officers' depositions -- their</p> <p>12      depositions, the podcast that I listened to, I</p> <p>13      would lean more towards crediting Ben and</p> <p>14      Clarissa's accounts.</p> <p>15      And they also have other cases beyond</p> <p>16      this -- or Mr. Baker does, not Ms. Glenn, that were</p> <p>17      also overturned that I believe involved</p> <p>18      Mr. Watts -- Sergeant Watts.</p> <p>19      BY MR. BAZAREK:</p> <p>20      <b>Q. So you're making credibility assessments</b></p> <p>21      <b>in your review of this case?</b></p> <p>22      MS. KLEINHAUS: Objection to form,</p> <p>23      mischaracterizes her testimony.</p> <p>24</p>                                                       |
| <p style="text-align: right;">Page 138</p> <p>1       they call them. So --</p> <p>2       <b>Q. Do you know what the circumstances were</b></p> <p>3       <b>in terms of them receiving any Certificate of</b></p> <p>4       <b>Innocence?</b></p> <p>5       MS. KLEINHAUS: Objection to form.</p> <p>6       You can answer.</p> <p>7       BY THE WITNESS:</p> <p>8       A. I don't recall reading anything in the</p> <p>9       materials I was given about that.</p> <p>10      BY MR. BAZAREK:</p> <p>11      <b>Q. Okay. But you're also writing they're</b></p> <p>12      <b>two of hundreds of individuals wrongfully</b></p> <p>13      <b>convicted.</b></p> <p>14      <b>Are you providing an opinion in this</b></p> <p>15      <b>case that Ben Baker was wrongfully convicted, and</b></p> <p>16      <b>that Clarissa Glenn were wrongfully convicted?</b></p> <p>17      MS. KLEINHAUS: Objection, asked and answered.</p> <p>18      You can answer it again.</p> <p>19      BY THE WITNESS:</p> <p>20      A. So my understanding is that their cases</p> <p>21      were overturned. So I would label them as wrongly</p> <p>22      convicted, and so would the court. I think the</p> <p>23      court has said -- and I'm not saying -- there are</p> <p>24      many reasons why somebody can be wrongly convicted.</p>                   | <p style="text-align: right;">Page 140</p> <p>1       BY MR. BAZAREK:</p> <p>2       <b>Q. Right?</b></p> <p>3       A. Credited, credibility, are they the same</p> <p>4       word? I'm not sure.</p> <p>5       <b>Q. Credibility assessment, have you ever</b></p> <p>6       <b>heard those two words said together?</b></p> <p>7       A. Sure. But what I would like for you to</p> <p>8       tell me what you mean by them so that we are on the</p> <p>9       same page.</p> <p>10      <b>Q. I just heard you testify that your --</b></p> <p>11      <b>you find -- I think this is what you're saying.</b></p> <p>12      <b>You find Ben Baker and Clarissa Glenn more</b></p> <p>13      <b>believable than the cops, right? Isn't that what</b></p> <p>14      <b>you're saying?</b></p> <p>15      A. I said I would lean more towards them.</p> <p>16      <b>Q. Right.</b></p> <p>17      A. Yes.</p> <p>18      <b>Q. So you're making credibility assessments</b></p> <p>19      <b>about who's telling the truth in this case, right?</b></p> <p>20      MS. KLEINHAUS: Objection to form, vague.</p> <p>21      BY THE WITNESS:</p> <p>22      A. That leads into my opinion -- my</p> <p>23      summarized opinion that this case bears many of the</p> <p>24      hallmarks of a false confession case -- I'm sorry,</p> |

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| <p style="text-align: right;">Page 141</p> <p>1 false guilty plea case. And so part of that</p> <p>2 reasoning, and how I got to that expert opinion, is</p> <p>3 that I am more crediting of their statements than</p> <p>4 the police, yes.</p> <p>5 BY MR. BAZAREK:</p> <p>6 <b>Q. Right.</b></p> <p>7 A. Based on the materials that I've</p> <p>8 reviewed.</p> <p>9 <b>Q. And I know you read Ben Baker's</b></p> <p>10 <b>deposition.</b></p> <p>11 <b>Do you remember when I was asking him</b></p> <p>12 <b>questions about his interrogatory answers? Do you</b></p> <p>13 <b>remember that?</b></p> <p>14 A. No.</p> <p>15 <b>Q. No? Are you aware that Ben Baker</b></p> <p>16 <b>falsified multiple interrogatory answers in this</b></p> <p>17 <b>proceeding that's in federal court? Are you aware</b></p> <p>18 <b>of that?</b></p> <p>19 MS. KLEINHAUS: Objection to form, foundation.</p> <p>20 You can answer.</p> <p>21 BY THE WITNESS:</p> <p>22 A. I don't know what you mean by</p> <p>23 "falsified." Like, I don't know what you mean. I</p> <p>24 don't know anything about that. So I would need</p>                                       | <p style="text-align: right;">Page 143</p> <p>1 see that as lying. So if you're talking those</p> <p>2 kinds of falsifications, no, it wouldn't change my</p> <p>3 opinion. I just don't -- I don't know what you're</p> <p>4 talking about.</p> <p>5 <b>Q. Okay. Are you aware that Ben Baker was</b></p> <p>6 <b>charged federally for drug crimes? Are you aware</b></p> <p>7 <b>of that, or you never heard that? I'm the first</b></p> <p>8 <b>person telling you that?</b></p> <p>9 MS. KLEINHAUS: Objection to form.</p> <p>10 Sorry. Go ahead.</p> <p>11 BY THE WITNESS:</p> <p>12 A. Do you mean after his guilty plea in</p> <p>13 2006?</p> <p>14 BY MR. BAZAREK:</p> <p>15 <b>Q. After he got out of prison --</b></p> <p>16 A. Yes.</p> <p>17 <b>Q. He got out of prison in 2016, right?</b></p> <p>18 A. Yes, I think so.</p> <p>19 <b>Q. Are you aware that he was arrested by</b></p> <p>20 <b>federal authorities for narcotics trafficking, and</b></p> <p>21 <b>that he was selling drugs out of the house that he</b></p> <p>22 <b>shared with his wife and kids?</b></p> <p>23 A. Yes.</p> <p>24 MS. KLEINHAUS: Objection to form.</p> |
| <p style="text-align: right;">Page 142</p> <p>1 more information, but I'm not sure what you're</p> <p>2 talking about.</p> <p>3 BY MR. BAZAREK:</p> <p>4 <b>Q. Well, you said you read his deposition.</b></p> <p>5 A. I did.</p> <p>6 <b>Q. But you -- do you recall -- as you sit</b></p> <p>7 <b>here at this deposition do you recall any questions</b></p> <p>8 <b>asked of Ben Baker about his interrogatory answers?</b></p> <p>9 <b>Do you recall that?</b></p> <p>10 MS. KLEINHAUS: Objection, asked and answered.</p> <p>11 You can answer again.</p> <p>12 BY THE WITNESS:</p> <p>13 A. No, I don't remember that.</p> <p>14 BY MR. BAZAREK:</p> <p>15 <b>Q. If Ben Baker falsified multiple answers</b></p> <p>16 <b>in his interrogatories, would that change any of</b></p> <p>17 <b>your opinions in this case?</b></p> <p>18 A. I'm not sure what you mean by</p> <p>19 "falsified."</p> <p>20 <b>Q. Okay.</b></p> <p>21 A. I mean, it depends on what answers</p> <p>22 and -- you know, like, sometimes people try to say</p> <p>23 that people are lying in their plea hearings when</p> <p>24 they say it was voluntary or something. I don't</p> | <p style="text-align: right;">Page 144</p> <p>1 Go ahead.</p> <p>2 BY THE WITNESS:</p> <p>3 A. I'm sorry. I need to wait. I keep</p> <p>4 forgetting.</p> <p>5 Yes, I do remember reading something</p> <p>6 about that, but it doesn't really feed into my</p> <p>7 analysis, as we've discussed before.</p> <p>8 BY MR. BAZAREK:</p> <p>9 <b>Q. Okay. So if someone is a cunning liar</b></p> <p>10 <b>and they don't disclose information on</b></p> <p>11 <b>interrogatory answers, you're still going to kind</b></p> <p>12 <b>of believe what they have to say. Is that what</b></p> <p>13 <b>you're telling us?</b></p> <p>14 MS. KLEINHAUS: Objection to form,</p> <p>15 argumentative, incomplete hypothetical, calls for</p> <p>16 speculation.</p> <p>17 BY THE WITNESS:</p> <p>18 A. Yeah, I don't know anybody that -- I</p> <p>19 don't know about Ben Baker being a cunning liar.</p> <p>20 I'm not going to take that just because you say it.</p> <p>21 I don't know what that means.</p> <p>22 BY MR. BAZAREK:</p> <p>23 <b>Q. Okay. You don't know what a cunning</b></p> <p>24 <b>liar is?</b></p>                                      |

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| Page 145 | <p>1 A. No. I do know what a cunning liar is.</p> <p>2 I don't know that Ben Baker is a cunning liar</p> <p>3 because you characterized him as such.</p> <p>4 <b>Q. Okay.</b></p> <p>5 A. I don't know that.</p> <p>6 <b>Q. Do you think it's important to -- when</b></p> <p>7 <b>you take an oath to be truthful?</b></p> <p>8 MS. KLEINHAUS: Just objection to the</p> <p>9 extent -- I mean, it's argumentative and harassing</p> <p>10 of the witness.</p> <p>11 BY THE WITNESS:</p> <p>12 A. So the question is do I think it's</p> <p>13 important to be truthful during the taking of the</p> <p>14 oath?</p> <p>15 BY MR. BAZAREK:</p> <p>16 <b>Q. Yes.</b></p> <p>17 A. Yes.</p> <p>18 <b>Q. Okay. In fact, I see your report,</b></p> <p>19 <b>you -- let's see. Page 13, "I declare under</b></p> <p>20 <b>penalty of perjury that the foregoing is true and</b></p> <p>21 <b>correct."</b></p> <p>22 <b>Those are your words, right?</b></p> <p>23 A. Yes.</p> <p>24 <b>Q. Okay. And that's important. You took</b></p>                                                                                                                                                                                              | Page 147 | <p>1 A. I don't recall.</p> <p>2 <b>Q. I mean, did you, like, read it in the</b></p> <p>3 <b>paper? Did you do your own investigation to find</b></p> <p>4 <b>that out?</b></p> <p>5 MS. KLEINHAUS: Objection, asked and answered.</p> <p>6 You can answer again.</p> <p>7 BY THE WITNESS:</p> <p>8 A. If I did do that, I would have disclosed</p> <p>9 it in Appendix A.</p> <p>10 BY MR. BAZAREK:</p> <p>11 <b>Q. Well, okay. But there's no -- there's</b></p> <p>12 <b>no citation to Paragraph 1, correct?</b></p> <p>13 A. Not every single sentence that I have in</p> <p>14 my report has a citation.</p> <p>15 <b>Q. Right. I'm not asking --</b></p> <p>16 A. I'm sorry. I don't remember where I got</p> <p>17 that information from.</p> <p>18 <b>Q. Okay. Did you get it from Josh Tepfer?</b></p> <p>19 MS. KLEINHAUS: Objection to form, asked and</p> <p>20 answered, harassing, argumentative.</p> <p>21 You can answer again.</p> <p>22 MR. BAZAREK: First off, Ms. Kleinhaus, that</p> <p>23 has not been answered.</p> <p>24</p>                                                                                                                                            |
| Page 146 | <p>1 <b>an oath under penalty of perjury that your report</b></p> <p>2 <b>was truthful, right?</b></p> <p>3 A. I don't view it as important, but I know</p> <p>4 my words are true. So I don't see it as important.</p> <p>5 <b>Q. All right. So let's go back to -- give</b></p> <p>6 <b>me a second.</b></p> <p>7 <b>In that first sentence, you referred to</b></p> <p>8 <b>the Watts scandal. What is the Watts scandal?</b></p> <p>9 A. Oh, I'm sorry. We're back on Page --</p> <p>10 what page was that? Here, Page 8.</p> <p>11 <b>Q. Yeah.</b></p> <p>12 A. The Watts -- it's the next sentence that</p> <p>13 I wrote. Should I read it for you?</p> <p>14 <b>Q. So -- just so I'm clear, when you say</b></p> <p>15 <b>"the Watts scandal," you mean the next sentence?</b></p> <p>16 <b>Is that your understanding of what the Watts</b></p> <p>17 <b>scandal is?</b></p> <p>18 A. The next three sentences -- the whole</p> <p>19 paragraph. The rest of the paragraph, I would</p> <p>20 say -- well, yeah. The next three sentences for</p> <p>21 sure.</p> <p>22 <b>Q. What's the source of your information</b></p> <p>23 <b>for that first paragraph? Where are you getting</b></p> <p>24 <b>that from?</b></p> | Page 148 | <p>1 BY MR. BAZAREK:</p> <p>2 <b>Q. It was a simple question. Where do you</b></p> <p>3 <b>get the information from that you put in</b></p> <p>4 <b>Paragraph 1?</b></p> <p>5 A. The answer is I don't remember. So I</p> <p>6 did answer the question.</p> <p>7 <b>Q. Would anything help you remember?</b></p> <p>8 A. No. But what I can say is that I would</p> <p>9 never put this detailed information from something</p> <p>10 that was verbally said to me on a phone call.</p> <p>11 <b>Q. Do you have access to the federal docket</b></p> <p>12 <b>that you can review cases online for information?</b></p> <p>13 A. No. I wouldn't -- I mean, I might have</p> <p>14 access, but I don't know how to do that, no.</p> <p>15 <b>Q. So I know you don't remember, but you</b></p> <p>16 <b>either -- either someone told you that, or you just</b></p> <p>17 <b>searched the Internet and you found some</b></p> <p>18 <b>information?</b></p> <p>19 MS. KLEINHAUS: Objection, mischaracterizes</p> <p>20 her testimony, asked and answered.</p> <p>21 You can answer again.</p> <p>22 BY THE WITNESS:</p> <p>23 A. I don't remember, but I didn't search</p> <p>24 the Internet.</p> |

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| <p style="text-align: right;">Page 149</p> <p>1 BY MR. BAZAREK:</p> <p>2 <b>Q. On Page 8, you write, "Mr. Baker's case</b></p> <p>3 <b>is a complex one."</b></p> <p>4 <b>Why is it complex?</b></p> <p>5 A. It involves multiple arrests and cases.</p> <p>6 <b>Q. Does anything else make it complex?</b></p> <p>7 A. Not in particular.</p> <p>8 <b>Q. On Page 9, I have a question. Well, let</b></p> <p>9 <b>me -- let me take a step back.</b></p> <p>10 <b>Why don't we just go to the section</b></p> <p>11 <b>about the alleged event?</b></p> <p>12 A. Okay.</p> <p>13 <b>Q. So why do you call it The Alleged Event?</b></p> <p>14 <b>Why do you use that phrase, "the alleged event"?</b></p> <p>15 A. Because it's in dispute about what</p> <p>16 happened. There's two versions of it.</p> <p>17 <b>Q. Okay. So at least for this section,</b></p> <p>18 <b>you're not crediting one side over the other, is</b></p> <p>19 <b>that right?</b></p> <p>20 A. Let me take a minute to read it.</p> <p>21 No, I think I'm being very descriptive</p> <p>22 here, or I'm just saying what they say and what the</p> <p>23 police officers say. Or just kind of the facts,</p> <p>24 that they were charged felony offenses.</p>                                                                                    | <p style="text-align: right;">Page 151</p> <p>1 <b>paragraph, your recitation of the alleged events,</b></p> <p>2 <b>where is what Officer Jones said occurred</b></p> <p>3 <b>indicated?</b></p> <p>4 MS. KLEINHAUS: Objection that the report</p> <p>5 speaks for itself.</p> <p>6 Go ahead.</p> <p>7 BY THE WITNESS:</p> <p>8 A. That -- I talk about that later. And</p> <p>9 this was -- maybe that's why I call it the alleged</p> <p>10 event, in that this was the version of what Baker</p> <p>11 and Glenn are alleging to have happened.</p> <p>12 BY MR. BAZAREK:</p> <p>13 <b>Q. Okay. So this is what Baker and Glenn</b></p> <p>14 <b>allege. There's nothing in here that reflects what</b></p> <p>15 <b>Officers -- Officer Jones's account of what</b></p> <p>16 <b>occurred, correct? Do you agree with that?</b></p> <p>17 A. In this specific paragraph? Yes.</p> <p>18 <b>Q. Yes.</b></p> <p>19 A. In the whole report, no.</p> <p>20 <b>Q. Yeah. In that specific paragraph where</b></p> <p>21 <b>you describe, in your words, the alleged event?</b></p> <p>22 A. Yes.</p> <p>23 <b>Q. The December 11, 2005. Okay. Right,</b></p> <p>24 <b>because you remember -- I'm sure you remember this.</b></p> |
| <p style="text-align: right;">Page 150</p> <p>1 <b>Q. So you write, "Sergeant Watts --" this</b></p> <p>2 <b>is in the middle of the paragraph. "Sergeant Watts</b></p> <p>3 <b>then falsely claimed that he found it on the</b></p> <p>4 <b>driver's door of the car."</b></p> <p>5 <b>Do you see that?</b></p> <p>6 A. So I'm quoting what Glenn said in her</p> <p>7 deposition. That's what she said.</p> <p>8 <b>Q. Was it in her deposition or her</b></p> <p>9 <b>affidavit?</b></p> <p>10 A. I'm sorry. Her affidavit, yeah.</p> <p>11 <b>Q. Okay. And that's your understanding of</b></p> <p>12 <b>what Glenn said in the affidavit? And you used</b></p> <p>13 <b>that in formulating your opinions, correct?</b></p> <p>14 A. Among many, many other things, yes. I</p> <p>15 mean, that's just her version of events.</p> <p>16 <b>Q. Is there anywhere in the alleged event</b></p> <p>17 <b>where you provide what Officer Alvin Jones said</b></p> <p>18 <b>occurred?</b></p> <p>19 A. I do. It might have been at the plea.</p> <p>20 I know I remember that I describe what the</p> <p>21 prosecutor would have proffered as evidence and</p> <p>22 what the police would have testified to at trial,</p> <p>23 which is their version of events.</p> <p>24 <b>Q. What I'm asking you for, in this</b></p> | <p style="text-align: right;">Page 152</p> <p>1 <b>Officer Jones, his account is Clarissa Glenn gave</b></p> <p>2 <b>the bag of dope to Ben, right? Do you remember</b></p> <p>3 <b>that?</b></p> <p>4 MS. KLEINHAUS: Objection to form.</p> <p>5 Go ahead.</p> <p>6 BY THE WITNESS:</p> <p>7 A. I remember it specifically from the plea</p> <p>8 hearing.</p> <p>9 BY MR. BAZAREK:</p> <p>10 <b>Q. Okay.</b></p> <p>11 A. I don't remember specifically from his</p> <p>12 deposition.</p> <p>13 <b>Q. Okay. Well, that's kind of a --</b></p> <p>14 <b>wouldn't that be an important point to consider</b></p> <p>15 <b>where -- the officers' account of what occurred?</b></p> <p>16 A. Yes.</p> <p>17 <b>Q. Okay. So why don't you put in the</b></p> <p>18 <b>alleged events the officers' account of what</b></p> <p>19 <b>occurred?</b></p> <p>20 MS. KLEINHAUS: Objection to form.</p> <p>21 Go ahead.</p> <p>22 BY THE WITNESS:</p> <p>23 A. Because I feel that I do that at other</p> <p>24 points, and that I was saying this is what Ben and</p>                                                                                                                                                                  |

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| Page 153 | <p>1 Clarissa are alleging happened.</p> <p>2 BY MR. BAZAREK:</p> <p>3 <b>Q. Okay. By the way, did you ever read any</b></p> <p>4 <b>transcript from a court proceeding where Judge</b></p> <p>5 <b>Toomin found that the officers' testimony was</b></p> <p>6 <b>credible as it relates to Ben Baker?</b></p> <p>7 A. So in the plea hearing itself, he</p> <p>8 references -- Judge Toomin references those kinds</p> <p>9 of conversations and those decisions that he made,</p> <p>10 and that he was also going to not allow that</p> <p>11 testimony in if Ben and Clarissa went to trial.</p> <p>12 But I did not see the verbatim transcripts of the</p> <p>13 original decision by Judge Toomin, no.</p> <p>14 <b>Q. All right. But you're aware that Ben</b></p> <p>15 <b>Baker went to trial on another narcotics offense</b></p> <p>16 <b>and he was found guilty, right?</b></p> <p>17 A. Yes. And I believe that case was</p> <p>18 overturned later.</p> <p>19 <b>Q. You mean the conviction was vacated is</b></p> <p>20 <b>what you mean?</b></p> <p>21 A. Yes.</p> <p>22 <b>Q. Yeah. Okay. And I'm not going to take</b></p> <p>23 <b>much time on it, but the section for The Guilty</b></p> <p>24 <b>Pleas, this is your understanding of what occurred</b></p> | Page 155 | <p>1 they made it very clear that they both decided to</p> <p>2 plead guilty because it would allow Clarissa to</p> <p>3 stay at home -- to get probation and to stay at</p> <p>4 home and to raise their children.</p> <p>5 And then so -- you know, if it were --</p> <p>6 for example, a hypothetical, I don't know because</p> <p>7 this didn't happen, but if Clarissa did not get</p> <p>8 that deal, it's possible that Ben may have</p> <p>9 proceeded to trial and take his chances. Although,</p> <p>10 as I talk about in other parts of my report, I also</p> <p>11 think that would be unlikely for other reasons.</p> <p>12 But, clearly, you know, they wanted to protect --</p> <p>13 I'm quoting, "...to protect my wife and children</p> <p>14 from the risk of my wife's imprisonment and upon</p> <p>15 the agreement that she would only be sentenced to</p> <p>16 one-year probation." But in order for her to get</p> <p>17 that deal, Ben also had to plead guilty. And I</p> <p>18 discussed why this would be a coercive situation</p> <p>19 and quote some courts that also believe it to be a</p> <p>20 coercive situation, and, you know, amicus brief</p> <p>21 submitted by the American Psychological Association</p> <p>22 in a Michigan Supreme Court case that also dealt</p> <p>23 with the coerciveness -- possible coerciveness of a</p> <p>24 package plea deal, and the research that -- why we</p> |
| Page 154 | <p>1 <b>on September 18th, 2006?</b></p> <p>2 A. Yes, more or less.</p> <p>3 <b>Q. Okay. And then where are you getting</b></p> <p>4 <b>that information from that you included in The</b></p> <p>5 <b>Guilty Plea section?</b></p> <p>6 A. I would say the plea hearing transcript.</p> <p>7 <b>Q. Okay. Any other source for that</b></p> <p>8 <b>information?</b></p> <p>9 A. No.</p> <p>10 <b>Q. Okay. I know you've talked -- I'm going</b></p> <p>11 <b>to go now to the section, Risk Factors Leading to</b></p> <p>12 <b>Baker-Glenn False Guilty Pleas.</b></p> <p>13 <b>And I remember earlier in the deposition</b></p> <p>14 <b>you mentioned three things, and it was the package</b></p> <p>15 <b>plea deal, right? That was number one. Futility</b></p> <p>16 <b>of going to trial, and extreme plea discounts.</b></p> <p>17 <b>And you have opinions about those three</b></p> <p>18 <b>things as it relates to this case, correct?</b></p> <p>19 A. Yes.</p> <p>20 <b>Q. Okay. So what are your opinions about</b></p> <p>21 <b>this package plea deal and how that helped lead to</b></p> <p>22 <b>a false guilty plea for Ben Baker and Clarissa</b></p> <p>23 <b>Glenn?</b></p> <p>24 A. So as I quote both of them, you know,</p>                            | Page 156 | <p>1 as humans and evolutionarily have developed to</p> <p>2 protect the people that we love.</p> <p>3 <b>Q. Right. But you could also have a true</b></p> <p>4 <b>guilty plea, and you were offered a package plea</b></p> <p>5 <b>deal, right?</b></p> <p>6 A. Yes, but that -- I'm talking about the</p> <p>7 coerciveness here.</p> <p>8 <b>Q. Right.</b></p> <p>9 A. I'm not talking about the reliability.</p> <p>10 <b>Q. But you would agree that guilty people</b></p> <p>11 <b>can have a true guilty plea where they receive a</b></p> <p>12 <b>package deal, right?</b></p> <p>13 A. So as I said earlier, there are -- is</p> <p>14 overlap between the factors that would lead a</p> <p>15 guilty person to plead guilty and that would lead</p> <p>16 an innocent person to plead guilty. This is a good</p> <p>17 example.</p> <p>18 And here I'm talking about the</p> <p>19 coerciveness of the situation, and that why this</p> <p>20 package deal would lead an innocent person to plead</p> <p>21 guilty. Yes, it would lead a guilty person. But</p> <p>22 even -- it's so, so tempting and such a good deal,</p> <p>23 and they get to raise -- you know, Clarissa gets to</p> <p>24 raise her children, that it would lead an innocent</p>                                                                                                                                                                          |

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| <p style="text-align: right;">Page 157</p> <p>1 person to accept that deal rather than go to trial.</p> <p>2 <b>Q. Right. But also guilty people can</b></p> <p>3 <b>accept a package plea deal, right?</b></p> <p>4 MS. KLEINHAUS: Objection, asked and answered.</p> <p>5 She just answered that.</p> <p>6 BY THE WITNESS:</p> <p>7 A. Of course. But what I'm saying is that</p> <p>8 in this situation -- not even in this situation.</p> <p>9 The package plea deal would be even enticing to an</p> <p>10 innocent person.</p> <p>11 BY MR. BAZAREK:</p> <p>12 <b>Q. Right. Remember you talked about</b></p> <p>13 <b>overlap? I think you've said that numerous times,</b></p> <p>14 <b>overlap, right? Between true guilty pleas and</b></p> <p>15 <b>false guilty pleas, right, there's overlap? Right?</b></p> <p>16 A. I just said that, yes.</p> <p>17 <b>Q. Okay. And so let's go to your next --</b></p> <p>18 <b>the next point, the Futility of Going to Trial.</b></p> <p>19 <b>How does that factor into your analysis</b></p> <p>20 <b>and opinions in this case?</b></p> <p>21 A. So one of the main reasons that people,</p> <p>22 including innocent people, will accept a guilty</p> <p>23 plea is because they perceive that they have no</p> <p>24 chance of winning at trial. So earlier you just</p>                                                     | <p style="text-align: right;">Page 159</p> <p>1 and I don't think I'm making it very clearly</p> <p>2 because I don't think you understand, is that</p> <p>3 there's a baseline for guilty people. Okay? So</p> <p>4 that they're going to be pleading guilty under</p> <p>5 these circumstances. But even -- these</p> <p>6 circumstances that I'm talking about would even</p> <p>7 increase the likelihood of an innocent person</p> <p>8 falsely pleading --</p> <p>9 <b>Q. I know what you want to talk about.</b></p> <p>10 <b>What I'm asking you, and I do understand, guilty</b></p> <p>11 <b>people can understand the futility of going to</b></p> <p>12 <b>trial because they're guilty, right?</b></p> <p>13 A. Yes.</p> <p>14 <b>Q. That's all I'm saying. Okay.</b></p> <p>15 A. Not that it's a given. What I'm</p> <p>16 saying -- the point I'm making in my report is that</p> <p>17 these factors -- these situational factors increase</p> <p>18 the likelihood of an innocent person falsely</p> <p>19 pleading guilty because guilty people, in the</p> <p>20 studies that I and others have done, very</p> <p>21 consistently guilty people plead guilty more often</p> <p>22 than innocent people.</p> <p>23 <b>Q. Ben Baker, he pled guilty --</b></p> <p>24 MS. KLEINHAUS: I'm sorry. Were you finished</p> |
| <p style="text-align: right;">Page 158</p> <p>1 mentioned that Ben Baker had gone to trial with</p> <p>2 Judge Toomin and was convicted. Having that</p> <p>3 experience would be very meaningful to him, and as</p> <p>4 it's been shown in research to other defendants --</p> <p>5 other innocent defendants, why they would plead</p> <p>6 guilty rather than taking their chances at trial.</p> <p>7 Another factor here is that it's really</p> <p>8 just the police version of events versus their</p> <p>9 version of events. And for good reason, the police</p> <p>10 are given more credibility than defendants</p> <p>11 typically. Right?</p> <p>12 I would also say that Judge Toomin</p> <p>13 had -- was going to not admit the evidence -- or</p> <p>14 not admit the -- I don't know if it's evidence, but</p> <p>15 the information about the alleged actions of the --</p> <p>16 of Sergeant Watts and other detectives that Ben</p> <p>17 could have used in his defense. But the judge</p> <p>18 would not allow that in. So that was another</p> <p>19 factor that would speak to the futility of going to</p> <p>20 trial. And he knows that.</p> <p>21 <b>Q. And you would agree that guilty people</b></p> <p>22 <b>can also understand the futility of going to trial,</b></p> <p>23 <b>right?</b></p> <p>24 A. I think the point I'm trying to make,</p> | <p style="text-align: right;">Page 160</p> <p>1 with your answer, Dr. Redlich?</p> <p>2 THE WITNESS: No, I wasn't.</p> <p>3 BY MR. BAZAREK:</p> <p>4 <b>Q. I apologize. I thought you were done.</b></p> <p>5 A. That's okay. What I'm saying is that</p> <p>6 these are the factors that lead to even innocent</p> <p>7 people pleading guilty. So it's like a given that</p> <p>8 they induce guilty people to plead guilty.</p> <p>9 <b>Q. Right. Because guilty people plead</b></p> <p>10 <b>guilty all the time, right?</b></p> <p>11 A. I hope so. I hope that most people who</p> <p>12 plead guilty are guilty; otherwise, our system is</p> <p>13 extremely broken.</p> <p>14 <b>Q. And what about this extreme plea</b></p> <p>15 <b>discount? How does that factor into your opinion</b></p> <p>16 <b>in this case?</b></p> <p>17 A. So this is an exercise where I</p> <p>18 demonstrate that the plea discount for Mr. Baker</p> <p>19 was 94 percent discount. So, you know, think of it</p> <p>20 as if something cost \$100, you would be able to buy</p> <p>21 it for \$4. And that for Ms. Baker -- Ms. Glenn,</p> <p>22 her discount was essentially 100 percent because</p> <p>23 she's not getting any time. She's just getting one</p> <p>24 year of probation.</p>                                             |

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1 And then I go on to talk about, again,  
2 as I referenced the research in Section II of my  
3 report, that these excessive plea discounts have  
4 been determined, described as being -- as coercive,  
5 as leading innocent people, as well as guilty  
6 people, to plead guilty. And this is something  
7 that was discussed by the American Bar Association  
8 plea bargaining task report that came out in 2023.  
9 And these numbers, the way that I've  
10 calculated it, are from -- directly from the judge  
11 and what he's saying to Mr. Baker and Ms. Glenn at  
12 their plea hearing and what they actually received  
13 as part of the plea deal.  
14 **Q. And guilty people can take extreme**  
15 **discounts, too, right?**  
16 A. Can they plead guilty under extreme  
17 discounts? Yes.  
18 **Q. Okay. So let's look at the -- going to**  
19 **Section IV, this is your kind of wrap-up. You're**  
20 **just summarizing what you have?**  
21 A. Yes.  
22 **Q. I'm sorry. You're giving an overall**  
23 **summary of your opinions in this case, correct?**  
24 A. Yes.

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1 **Q. Okay. So I want to make sure I**  
2 **understand. I see that word hallmarks again. And**  
3 **you write, this is on Page 13, "Mr. Baker's and**  
4 **Ms. Glenn's guilty pleas bear many of the hallmarks**  
5 **of a false guilty plea..." So let me stop there.**  
6 **What specifically -- how many total**  
7 **hallmarks are there? Let's start there.**  
8 A. Well, I talk about the three situational  
9 risk factors. I talk about them being -- false  
10 guilty pleas being more common in drug cases and  
11 the no crime type of wrongful convictions. I talk  
12 about the -- well, I won't say that one. So  
13 there's five.  
14 **Q. There's five hallmarks? I want to make**  
15 **sure I have them right.**  
16 A. I don't know. I'd have to read my  
17 report in detail again. But we can go with five.  
18 **Q. Okay. Well, I mean, it's your report.**  
19 **You wrote this, what, about a month ago? What are**  
20 **the five -- why don't we just go through them one**  
21 **through five? What are the five hallmarks? I want**  
22 **to make sure I understand.**  
23 MS. KLEINHAUS: Take as much time as you need,  
24 Dr. Redlich.

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1 THE WITNESS: Thank you.  
2 BY MR. BAZAREK:  
3 **Q. Take all the time you need.**  
4 A. So it's the package plea deal with  
5 Ms. Glenn. That one. I mean, the fact that --  
6 it's elements within that as well that are specific  
7 to this case, but that are common in other -- you  
8 know, maybe slightly different forms, but in  
9 similar enough forms. So the fact that -- so the  
10 elements of the package plea deal, right? So  
11 there's the fact that she's getting probation.  
12 That she gets to stay home and raise their three  
13 school-aged children. The fact that, you know,  
14 he's getting -- they're both getting extreme  
15 discounts of 90 percent -- 94 percent and  
16 100 percent. The fact that Mr. Ben had already  
17 been convicted at trial.  
18 **Q. Now are we talking about Ben Baker now?**  
19 **Did you do all the hallmarks for Clarissa Glenn?**  
20 A. I'm kind of mixing them up. Some apply  
21 to both, and some -- I mean, I think that one  
22 applies to Ms. Baker -- I'm sorry, Ms. Glenn as  
23 well because she observed her husband being  
24 wrongfully convicted, and I do have a quote to

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1 that. I only -- this is Glenn, affidavit No. 18,  
2 "I only pled guilty to this charge because Ben had  
3 already been wrongfully convicted and sentenced to  
4 14 years." So it doesn't necessarily have to be  
5 that specific defendant. Of course, Ben knows  
6 that, and Clarissa knows it, too, because she  
7 observed it. And, you know, that's her husband.  
8 So that's another factor.  
9 Another factor is that Mr. Baker says,  
10 Judge Toomin told me that law enforcement testimony  
11 was better than that of a pope. So it's their idea  
12 of the futility of going to trial, and that it  
13 would be their word against the police officers'  
14 word. And he already knows that he was convicted  
15 at the first trial. The judge denied the  
16 evidence -- or the information coming in about the  
17 allegations against Watts and his fellow officers.  
18 **Q. Is your -- go ahead. Sorry.**  
19 A. And then I was going to talk about the  
20 extreme plea discounts. And then also that false  
21 guilty pleas are more common among drug cases and  
22 the no crime type of wrongful conviction.  
23 So I didn't count those. I don't know  
24 how many there are, but there's more than five.

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| Page 165 | <p>1 <b>Q. There's more than -- I want to make sure</b></p> <p>2 <b>I understand. Is -- when you use the word</b></p> <p>3 <b>"hallmarks" in your report, specifically in the</b></p> <p>4 <b>first paragraph of the overall summary, are</b></p> <p>5 <b>hallmarks different than your use of the word</b></p> <p>6 <b>factors in that same first sentence? Or do they</b></p> <p>7 <b>mean the same?</b></p> <p>8 A. In that sentence, I think they mean the</p> <p>9 same. Well, I mean, I think I was talking about</p> <p>10 risk factors. Hallmarks are a little bit</p> <p>11 different.</p> <p>12 <b>Q. Yeah. I'm just trying to -- I'm trying</b></p> <p>13 <b>to understand. I know you've gone through your</b></p> <p>14 <b>report. I appreciate that. I thought I had a</b></p> <p>15 <b>pretty straightforward question. I wanted you to,</b></p> <p>16 <b>you know, identify the hallmarks. And first you</b></p> <p>17 <b>testified it was five, and then later on -- you</b></p> <p>18 <b>said there is more.</b></p> <p>19 Are you able to do that? These are the</p> <p>20 hallmarks, one, two, three, four, five, can you do</p> <p>21 that?</p> <p>22 A. I just did that. I just went over them.</p> <p>23 I didn't enumerate them.</p> <p>24 <b>Q. Okay.</b></p> | Page 167 | <p>1 hearing that background noise?</p> <p>2 MR. SULLIVAN: A little bit.</p> <p>3 MR. BAZAREK: It sounds like someone's running</p> <p>4 a shower.</p> <p>5 THE COURT REPORTER: Yeah.</p> <p>6 THE WITNESS: I'm not.</p> <p>7 MS. KLEINHAUS: I feel left out. I'm not</p> <p>8 hearing that.</p> <p>9 MS. EKL: I hear it.</p> <p>10 THE COURT REPORTER: Chris, is there anything</p> <p>11 you can do about that?</p> <p>12 THE VIDEOGRAPHER: I don't hear it. I'll</p> <p>13 check the recording.</p> <p>14 THE COURT REPORTER: Okay. I'll just deal</p> <p>15 with it.</p> <p>16 MR. BAZAREK: Are we trying to figure it out,</p> <p>17 or are we rolling?</p> <p>18 THE COURT REPORTER: No, we're rolling.</p> <p>19 THE VIDEOGRAPHER: We're still rolling.</p> <p>20 BY MR. BAZAREK:</p> <p>21 <b>Q. All right. Dr. Redlich, I know we</b></p> <p>22 <b>talked about this. Look at the bottom of Page 8 of</b></p> <p>23 <b>your report.</b></p> <p>24 A. Okay.</p>                                                                                                                                                                                                                              |
| Page 166 | <p>1 A. But I just went over them. Given the</p> <p>2 three risk factors, the package plea deal, the</p> <p>3 futility of trial, and excessive plea discount,</p> <p>4 there are some risk factors, which I named. I</p> <p>5 didn't number them because I lost count. And then</p> <p>6 there's the drug cases and the no crime type.</p> <p>7 MR. BAZAREK: Okay. Let's -- what time is it?</p> <p>8 Let's take a ten-minute break.</p> <p>9 MS. KLEINHAUS: Okay.</p> <p>10 THE VIDEOGRAPHER: We're going off the record</p> <p>11 at 1:42 p.m.</p> <p>12 (WHEREUPON, a recess was had.)</p> <p>13 THE VIDEOGRAPHER: Back on the record at</p> <p>14 1:59 p.m.</p> <p>15 BY MR. BAZAREK:</p> <p>16 <b>Q. Dr. Redlich, earlier you had testified</b></p> <p>17 <b>that false guilty pleas are more common in drug</b></p> <p>18 <b>cases, is that correct?</b></p> <p>19 A. The results of my 2023 study showed</p> <p>20 that, yes. They're five times more -- so let me</p> <p>21 put it another way. In comparison to wrongful</p> <p>22 convictions by trial, they were five times more</p> <p>23 common.</p> <p>24 THE COURT REPORTER: Excuse me. Is anyone</p>                                                                                                                   | Page 168 | <p>1 <b>Q. And I'll just -- the last paragraph, and</b></p> <p>2 <b>you write, "Mr. Baker's case is a complex one as it</b></p> <p>3 <b>involves multiple arrest cases, whereas Ms. Glenn</b></p> <p>4 <b>did not have a criminal record prior to the case at</b></p> <p>5 <b>hand."</b></p> <p>6 <b>Do you see that?</b></p> <p>7 A. Yes.</p> <p>8 <b>Q. Okay. And you recall earlier in this</b></p> <p>9 <b>deposition I was asking you about Mr. Baker's</b></p> <p>10 <b>arrest history, right?</b></p> <p>11 A. Right.</p> <p>12 <b>Q. And do you remember you testified, that</b></p> <p>13 <b>doesn't matter. It doesn't matter what he has.</b></p> <p>14 <b>It's about what happened for this case.</b></p> <p>15 <b>Do you remember that exchange we had?</b></p> <p>16 MS. KLEINHAUS: Objection to form,</p> <p>17 argumentative.</p> <p>18 You can answer.</p> <p>19 BY THE WITNESS:</p> <p>20 A. Yes. But what my point is here is that</p> <p>21 Ms. Glenn's case wasn't complicated because it</p> <p>22 didn't involve multiple arrests and cases, where</p> <p>23 Mr. Glenn's -- I'm sorry, Mr. Baker's case, the</p> <p>24 plea -- the September 26, 2006 plea was influenced</p> |

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| Page 169 | <p>1 by all these other cases that were going on, and a</p> <p>2 lot of the materials I reviewed would talk about</p> <p>3 these other cases, the bullet case, the mailbox</p> <p>4 case, you know, and it made it more complicated.</p> <p>5 Where Ms. Glenn's case wasn't as complicated</p> <p>6 because it didn't have all of those other factors</p> <p>7 affecting this plea. That's all I meant.</p> <p>8 BY MR. BAZAREK:</p> <p>9 <b>Q. Well, right. But you still reference</b></p> <p>10 <b>that Glenn has no criminal record. So why don't</b></p> <p>11 <b>you mention that Ben Baker has multiple arrests</b></p> <p>12 <b>over his adult life, and he has multiple</b></p> <p>13 <b>convictions for various offenses?</b></p> <p>14 MS. KLEINHAUS: Is there a question there or</p> <p>15 are you just telling her that?</p> <p>16 MR. BAZAREK: I thought there was a question.</p> <p>17 But let's read it. Let's read it back.</p> <p>18 (WHEREUPON, the record was read by</p> <p>19 the reporter.)</p> <p>20 MS. KLEINHAUS: I'm sorry. My objection is to</p> <p>21 form, and the document speaks for itself.</p> <p>22 Go ahead.</p> <p>23 BY THE WITNESS:</p> <p>24 A. I think you're confusing what I wrote</p> | Page 171 | <p>1 BY THE WITNESS:</p> <p>2 A. Because by saying she had no criminal</p> <p>3 record, which is the same thing as saying it's not</p> <p>4 a complicated case. That's all I meant.</p> <p>5 (WHEREUPON, a certain document was</p> <p>6 marked Exhibit No. 2, for</p> <p>7 identification, as of 4-25-24.)</p> <p>8 BY MR. BAZAREK:</p> <p>9 <b>Q. Okay. Let's take a look at Deposition</b></p> <p>10 <b>Exhibit No. 2, and it's City-BG-062597 to 062603.</b></p> <p>11 A. You'll have to bring that up. I did not</p> <p>12 prepare to -- I did not read that again in</p> <p>13 preparation for this deposition.</p> <p>14 <b>Q. We can -- hopefully, we can show it to</b></p> <p>15 <b>you. We'll just show it to you on the screen.</b></p> <p>16 MS. EKL: Can you describe the document? I</p> <p>17 took off the Bates stamps because it was making it</p> <p>18 difficult for me to --</p> <p>19 MR. BAZAREK: Oh, sure. It's Ben Baker's</p> <p>20 arrest history, also known as the rap sheet. It</p> <p>21 looks like it's dated 2/7/24.</p> <p>22 MS. EKL: Got it. Okay. Give me one second.</p> <p>23 MR. BAZAREK: Okay.</p> <p>24</p> |
| Page 170 | <p>1 and reading more into it than what I meant. All I</p> <p>2 meant was that Mr. Baker's case, the present one</p> <p>3 that I was asked to opine on, is complicated</p> <p>4 because it's -- there's multiple arrests or cases</p> <p>5 that impinge upon this specific case, whereas</p> <p>6 Ms. Glenn doesn't have that. And I could have said</p> <p>7 whereas Ms. Glenn does not have multiple arrests or</p> <p>8 cases. I just chose to say she does not have a</p> <p>9 criminal record which is to me the same exact</p> <p>10 thing. Making it less complicated. That's all I</p> <p>11 meant.</p> <p>12 BY MR. BAZAREK:</p> <p>13 <b>Q. Okay.</b></p> <p>14 A. I didn't mean to say that -- you know,</p> <p>15 in my mind, it's not a contradiction to what I said</p> <p>16 before. You're reading one into it that I did not</p> <p>17 say or mean.</p> <p>18 <b>Q. Right. I understand what you meant.</b></p> <p>19 <b>All I'm asking is why didn't you include</b></p> <p>20 <b>Mr. Baker's criminal arrest history and prior</b></p> <p>21 <b>convictions in that sentence?</b></p> <p>22 MS. KLEINHAUS: Okay. In that case, asked and</p> <p>23 answered.</p> <p>24 You can answer it again.</p>               | Page 172 | <p>1 BY MR. BAZAREK:</p> <p>2 <b>Q. Okay.</b></p> <p>3 A. I need that. So I looked at that? It's</p> <p>4 on my list.</p> <p>5 <b>Q. No, I didn't see it on your list.</b></p> <p>6 A. Okay. I thought it was something I</p> <p>7 looked at.</p> <p>8 <b>Q. No. So is this -- this is a Chicago</b></p> <p>9 <b>Police Department arrest history for a convicted</b></p> <p>10 <b>felon named Ben Baker.</b></p> <p>11 <b>Do you see that?</b></p> <p>12 A. Yes.</p> <p>13 <b>Q. Okay. Is this the first time you've</b></p> <p>14 <b>reviewed or even saw Ben Baker's arrest history?</b></p> <p>15 A. I don't remember seeing this. Yeah, so</p> <p>16 I guess so, yeah.</p> <p>17 <b>Q. Okay. So is it your testimony then you</b></p> <p>18 <b>don't know how many prior convictions Ben Baker has</b></p> <p>19 <b>that occurred prior to 2006?</b></p> <p>20 A. No. I think I said that. Yeah, I don't</p> <p>21 know.</p> <p>22 <b>Q. Okay. And do you have any information</b></p> <p>23 <b>on what Ben Baker had been arrested for prior to</b></p> <p>24 <b>2004?</b></p>                                                                  |

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| <p style="text-align: right;">Page 173</p> <p>1 MS. KLEINHAUS: Objection --</p> <p>2 BY THE WITNESS:</p> <p>3 A. I mean, I'll --</p> <p>4 MS. KLEINHAUS: You can answer.</p> <p>5 BY THE WITNESS:</p> <p>6 A. I'll just say I do know about one</p> <p>7 conviction, the one that happened in my report, the</p> <p>8 one that happened with Judge Toomin a few months</p> <p>9 earlier. So I do know about that. And I do</p> <p>10 remember reading -- not seeing this sheet, not</p> <p>11 seeing the whole rap sheet, but I remember seeing</p> <p>12 something in one of the depositions or questioning</p> <p>13 of Mr. Baker about attempted murder conviction.</p> <p>14 But I didn't know anything about it. And, as I</p> <p>15 said, they're just not relevant to my analysis of</p> <p>16 the guilty plea in this specific case.</p> <p>17 MR. BAZAREK: Okay. We can take that down.</p> <p>18 (WHEREUPON, a certain document was</p> <p>19 marked Exhibit No. 3, for</p> <p>20 identification, as of 4-25-24.)</p> <p>21 BY MR. BAZAREK:</p> <p>22 <b>Q. And let's look at -- I want to show you</b></p> <p>23 <b>one more exhibit. And this is your invoice for the</b></p> <p>24 <b>work that you did in this case. It was your</b></p> | <p style="text-align: right;">Page 175</p> <p>1 BY THE WITNESS:</p> <p>2 A. Yeah. So this would have been much</p> <p>3 earlier. I don't know when. And I don't charge</p> <p>4 for those types of initial phone calls. Most of</p> <p>5 them I don't take the cases on.</p> <p>6 BY MR. BAZAREK:</p> <p>7 <b>Q. Well, okay. Now I'm confused. Was</b></p> <p>8 <b>it -- were you being contacted about the</b></p> <p>9 <b>Baker-Glenn case when he called you on the phone or</b></p> <p>10 <b>it was just something else?</b></p> <p>11 MS. KLEINHAUS: I'm just going to direct you</p> <p>12 not to get into the contents of your conversations</p> <p>13 with Mr. Tepfer and the scope of it.</p> <p>14 I think she's answered the question that</p> <p>15 he's the person who initially contacted her and</p> <p>16 that it was well before the dates on this invoice.</p> <p>17 I think going beyond that invades the privileges</p> <p>18 under Rule 26.</p> <p>19 MR. BAZAREK: Well, Ms. Kleinhaus, I would</p> <p>20 agree with you if he's contacting her about the</p> <p>21 Baker-Glenn case, but based on Dr. Redlich's</p> <p>22 testimony, it sounds like he could have been</p> <p>23 calling her for something else.</p> <p>24 MS. KLEINHAUS: She's already testified that</p>                           |
| <p style="text-align: right;">Page 174</p> <p>1 <b>response to a subpoena. I don't know if we can</b></p> <p>2 <b>show that. It's dated April 12, 2024.</b></p> <p>3 <b>And, I mean, obviously, I can read it,</b></p> <p>4 <b>but it looks like you put in 18.75 hours in your</b></p> <p>5 <b>review of this case, is that right?</b></p> <p>6 A. Yes.</p> <p>7 <b>Q. And remember earlier in your deposition</b></p> <p>8 <b>you talked about your Facebook friend Mr. Tepfer</b></p> <p>9 <b>had called you on the phone about this case?</b></p> <p>10 A. Yes.</p> <p>11 <b>Q. So, yeah, I don't see any reference to</b></p> <p>12 <b>that on this invoice. So when did he call you?</b></p> <p>13 A. So this was a long time ago. It wasn't</p> <p>14 specific to the Baker-Glenn case. It was just</p> <p>15 asking about --</p> <p>16 MS. KLEINHAUS: If you can just not -- I'm</p> <p>17 sorry. If you can just not reveal the contents of</p> <p>18 your conversation --</p> <p>19 THE WITNESS: Okay.</p> <p>20 MS. KLEINHAUS: -- with Mr. Tepfer. You can</p> <p>21 say when he first contacted you about this report</p> <p>22 and I guess whether or not that's reflected on an</p> <p>23 invoice.</p> <p>24</p>                         | <p style="text-align: right;">Page 176</p> <p>1 he was the one who first contacted her about the</p> <p>2 expert work in the Baker-Glenn case. So I'm</p> <p>3 directing her not to go into any further detail</p> <p>4 about the contents. I don't think the contents are</p> <p>5 discoverable under Rule 26.</p> <p>6 THE WITNESS: Can I clarify? Because I don't</p> <p>7 think I testified that he was the one who contacted</p> <p>8 me about Baker-Glenn specifically. At that point</p> <p>9 in time, we were talking about the Watts case, and</p> <p>10 he was the first time that I heard about -- sorry.</p> <p>11 MS. KLEINHAUS: No, that's okay. I think</p> <p>12 that's sufficient.</p> <p>13 BY MR. BAZAREK:</p> <p>14 <b>Q. Okay. So then let me make -- and,</b></p> <p>15 <b>again, that's not -- it would have occurred prior</b></p> <p>16 <b>to December 19th, 2023, correct?</b></p> <p>17 A. Correct.</p> <p>18 <b>Q. All right. And then what -- if you know</b></p> <p>19 <b>or recall about when was it in relation to</b></p> <p>20 <b>December 19, 2023? Was it a year before? Two</b></p> <p>21 <b>years before? Three years before? Six months?</b></p> <p>22 A. I don't know for sure.</p> <p>23 <b>Q. Okay. Tell me, when you review a case,</b></p> <p>24 <b>do you take notes?</b></p> |

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| <p style="text-align: right;">Page 177</p> <p>1 A. No, not really.</p> <p>2 <b>Q. How do you keep it all straight in your</b></p> <p>3 <b>head? You said this is a complex case.</b></p> <p>4 A. Well, I do take notes on, like, the</p> <p>5 number of the time that I've spent working, like,</p> <p>6 on that specific day. That I need to take notes on</p> <p>7 otherwise I would never remember.</p> <p>8 <b>Q. So, for instance, you know, there's an</b></p> <p>9 <b>appendix and it lists the materials that you</b></p> <p>10 <b>reviewed in your case -- in this case, right?</b></p> <p>11 A. Yes.</p> <p>12 <b>Q. Okay. So if you're, say, reviewing a</b></p> <p>13 <b>deposition, Ben Baker's deposition -- remember I</b></p> <p>14 <b>asked you questions about what he said at his</b></p> <p>15 <b>deposition? Do you remember that?</b></p> <p>16 A. Yes.</p> <p>17 <b>Q. Okay. So when you're reviewing a</b></p> <p>18 <b>deposition, do you take notes of some point you</b></p> <p>19 <b>want to remember or something that you'll rely on</b></p> <p>20 <b>in forming your opinions in this case?</b></p> <p>21 A. Not notes, but sometimes I will</p> <p>22 highlight.</p> <p>23 <b>Q. So, say, a deposition, you'll highlight</b></p> <p>24 <b>certain portions, is that correct?</b></p> | <p style="text-align: right;">Page 179</p> <p>1 <b>that's included in your report? I just forget? Is</b></p> <p>2 <b>it in your report?</b></p> <p>3 A. Yeah.</p> <p>4 <b>Q. Okay. So let's -- and I want to go</b></p> <p>5 <b>back -- I'll just read it to you. On Page 8 of</b></p> <p>6 <b>your report, it's Section III, "Ben Baker and</b></p> <p>7 <b>Clarissa Glenn are two of hundreds of individuals</b></p> <p>8 <b>wrongfully convicted as part of the Watts scandal."</b></p> <p>9 <b>So where in the materials that you</b></p> <p>10 <b>reviewed in your appendix is that information?</b></p> <p>11 A. As I've said, I don't remember.</p> <p>12 <b>Q. Well, I'm --</b></p> <p>13 MS. KLEINHAUS: I'm going to object to this</p> <p>14 line of questioning. You've done it twice already</p> <p>15 about the source of this material. She's told you</p> <p>16 she doesn't know. So it's harassing to ask someone</p> <p>17 the same question over and over again for hours.</p> <p>18 BY MR. BAZAREK:</p> <p>19 <b>Q. Well, did -- okay. Dr. Redlich, that</b></p> <p>20 <b>sentence that I just read to you, is it found</b></p> <p>21 <b>anywhere in the items that are referenced in your</b></p> <p>22 <b>appendix?</b></p> <p>23 MS. KLEINHAUS: Objection to form, foundation.</p> <p>24 You can answer.</p> |
| <p style="text-align: right;">Page 178</p> <p>1 A. Yeah.</p> <p>2 <b>Q. And do you do the same thing with</b></p> <p>3 <b>affidavits or other materials, you'll highlight</b></p> <p>4 <b>something?</b></p> <p>5 A. Yeah. I mean, some I won't highlight</p> <p>6 anything because I don't find it relevant. Like, I</p> <p>7 don't know if it's relevant until I read it.</p> <p>8 <b>Q. Well, did you highlight any materials</b></p> <p>9 <b>that you've identified in the appendix?</b></p> <p>10 A. I'm going to look at my appendix again.</p> <p>11 I would probably -- yeah, I would say</p> <p>12 so.</p> <p>13 <b>Q. Would you review, like, all the</b></p> <p>14 <b>materials -- strike that.</b></p> <p>15 <b>Would you highlight certain portions of</b></p> <p>16 <b>all the materials you reviewed in your -- that are</b></p> <p>17 <b>listed in your appendix?</b></p> <p>18 A. No, no. I'm sure that I didn't. Like</p> <p>19 the Baker medical records, I didn't find helpful at</p> <p>20 all. Yeah, there was -- you know, the podcast I</p> <p>21 just listened to. Yeah.</p> <p>22 <b>Q. Let me -- it's good that you have the</b></p> <p>23 <b>appendix up because I do have a question for you.</b></p> <p>24 <b>And right now you're looking at the appendix, and</b></p>                | <p style="text-align: right;">Page 180</p> <p>1 BY THE WITNESS:</p> <p>2 A. I don't remember. I mean, I'm looking</p> <p>3 at the list. Maybe from the podcast. It might</p> <p>4 have been updated. I know that I had a similar</p> <p>5 statement in my Waddy report. Maybe even the same</p> <p>6 statement. I don't remember.</p> <p>7 BY MR. BAZAREK:</p> <p>8 <b>Q. Okay. All right. So you're just</b></p> <p>9 <b>parroting what Mr. -- Mr. Tepfer is saying during a</b></p> <p>10 <b>podcast?</b></p> <p>11 MS. KLEINHAUS: Objection to form,</p> <p>12 argumentative and harassing.</p> <p>13 BY THE WITNESS:</p> <p>14 A. I didn't say anything like that.</p> <p>15 BY MR. BAZAREK:</p> <p>16 <b>Q. Well, are those your words that you're</b></p> <p>17 <b>using in that first sentence or are those</b></p> <p>18 <b>Mr. Tepfer's words?</b></p> <p>19 A. I wrote the statement. I don't remember</p> <p>20 the source of the statement.</p> <p>21 I'm feeling harassed with these</p> <p>22 questions in that I've answered it several times.</p> <p>23 Like, at least ten times. I don't recall where</p> <p>24 that statement came from.</p>                                                                                                                                                                     |

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| <p style="text-align: right;">Page 181</p> <p>1       <b>Q. How would you figure out where that</b><br/> 2       <b>statement came from?</b><br/> 3       A. I guess it's lost to the sands of time.<br/> 4       I don't know. I really don't know. I could look<br/> 5       in my Waddy report and see if the statement -- I<br/> 6       know that I had a similar statement, if not the<br/> 7       same statement. I'm not sure.<br/> 8       <b>Q. But you would agree there's some source</b><br/> 9       <b>for the information you wrote in that first</b><br/> 10       <b>sentence? You didn't make it up out of whole</b><br/> 11       <b>cloth, right?</b><br/> 12       A. I agree with that.<br/> 13       MR. BAZAREK: That's all I have at this time.<br/> 14       EXAMINATION<br/> 15       BY MR. SULLIVAN:<br/> 16       <b>Q. Hi, Dr. Redlich -- Redlich. I knew I</b><br/> 17       <b>was going to do that. I just knew it.</b><br/> 18       My name is Sean Sullivan. I represent<br/> 19       one of the defendants, Kallatt Mohammed. I have<br/> 20       just a relatively few follow-up questions. Mainly,<br/> 21       I want to make sure I come away today with a clear<br/> 22       understanding of what the opinions are that you<br/> 23       intend to offer to a jury at the trial in this<br/> 24       case.</p>                                                                         | <p style="text-align: right;">Page 183</p> <p>1       A. No, that's the juror's -- jury's<br/> 2       responsibility.<br/> 3       <b>Q. Same question for Clarissa Glenn.</b><br/> 4       A. Yes, it's the jury's responsibility.<br/> 5       So, no, I'm not intending to.<br/> 6       <b>Q. Okay. And then at another point in your</b><br/> 7       <b>deposition today, I thought I heard you say that</b><br/> 8       <b>you're here to give an opinion about the likelihood</b><br/> 9       <b>that the pleas were true guilty pleas or false</b><br/> 10       <b>guilty pleas.</b><br/> 11       <b>So, first, did I hear that correctly</b><br/> 12       <b>from you?</b><br/> 13       A. I don't recall. I'm not sure. I might<br/> 14       have said that. I don't remember the context or<br/> 15       the exact words.<br/> 16       <b>Q. Okay. Is that a correct statement of</b><br/> 17       <b>the opinions you intend to offer to the jury? Do</b><br/> 18       <b>you intend to offer an opinion about the likelihood</b><br/> 19       <b>that either Ben Baker or Clarissa Glenn's guilty</b><br/> 20       <b>pleas were true or false?</b><br/> 21       A. Not per se, no. My job -- I see my job<br/> 22       to educate the jury about the risk factors that can<br/> 23       lead to -- can lead to false guilty pleas and how<br/> 24       they may or may not be present in the case of</p> |
| <p style="text-align: right;">Page 182</p> <p>1       And I recall at one point during today's<br/> 2       deposition you mentioned that you weren't intending<br/> 3       to give an opinion about the ultimate issue in the<br/> 4       case, which would be for the jury.<br/> 5       Do you recall that?<br/> 6       A. Yes.<br/> 7       <b>Q. And then sometime around then, or maybe</b><br/> 8       <b>a little later in the deposition, I think you</b><br/> 9       <b>identified what you viewed as the ultimate issue in</b><br/> 10       <b>this case, at least in the subject area where</b><br/> 11       <b>you're going to be offering testimony, is whether</b><br/> 12       <b>the Baker and Glenn guilty pleas were true guilty</b><br/> 13       <b>pleas or false guilty pleas, correct?</b><br/> 14       A. Yes, and whether they were coerced or<br/> 15       not.<br/> 16       <b>Q. Okay. Do you view those as two</b><br/> 17       <b>different things?</b><br/> 18       A. Yes. So there's voluntariness and<br/> 19       reliability, and the reliability, I'm speaking<br/> 20       about whether it's true or false.<br/> 21       <b>Q. Okay. So let me just ask you then. Are</b><br/> 22       <b>you intending to offer any opinion in this trial as</b><br/> 23       <b>to whether Ben Baker's guilty plea was a true</b><br/> 24       <b>guilty plea or a false guilty plea?</b></p> | <p style="text-align: right;">Page 184</p> <p>1       Clarissa and Ben.<br/> 2       <b>Q. Okay. Because in reviewing your report</b><br/> 3       <b>and listening to your testimony today, I don't</b><br/> 4       <b>think you offered any information about the</b><br/> 5       <b>likelihood, one way or the other, that either of</b><br/> 6       <b>their pleas was true or false, correct?</b><br/> 7       MS. KLEINHAUS: Objection to form.<br/> 8       You can answer.<br/> 9       BY THE WITNESS:<br/> 10       A. Well, I do say that there's many<br/> 11       hallmarks for false guilty plea cases, and that<br/> 12       their -- in my overall summary, I say, "...their<br/> 13       decisions to plead guilty are consistent with the<br/> 14       factors present in their cases which are common to<br/> 15       hundreds of false guilty plea cases of other<br/> 16       defendants who are later exonerated..."<br/> 17       BY MR. SULLIVAN:<br/> 18       <b>Q. Okay. In that paragraph, since you've</b><br/> 19       <b>gone to reference that, you state in that paragraph</b><br/> 20       <b>what the likelihood is that Mr. Baker's guilty plea</b><br/> 21       <b>was either true or false?</b><br/> 22       MS. KLEINHAUS: Objection to form.<br/> 23       You can answer.<br/> 24       MR. SULLIVAN: What's wrong with the form?</p>                                               |

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| <p style="text-align: right;">Page 185</p> <p>1 I'll fix it.</p> <p>2 BY THE WITNESS:</p> <p>3 A. No, I didn't say anything about that.</p> <p>4 MS. KLEINHAUS: Sorry. My answer is just</p> <p>5 vague as to the term "likelihood."</p> <p>6 BY MR. SULLIVAN:</p> <p>7 Q. Okay. And, again, maybe this is because</p> <p>8 I didn't hear your answer correctly, but I want to</p> <p>9 make sure that if you intend to give an opinion</p> <p>10 that either Mr. Baker's or Ms. Glenn's guilty plea</p> <p>11 was, you know, more likely false or more likely</p> <p>12 true, I want to know exactly what that opinion is</p> <p>13 and what it's based on.</p> <p>14 So can you point to me anywhere in your</p> <p>15 report where you express any opinion about the</p> <p>16 likelihood as to either of these plaintiffs' guilty</p> <p>17 pleas being true or false?</p> <p>18 A. Is that what you mean by "likelihood"?</p> <p>19 Like, more likely than not or something -- is that</p> <p>20 what you --</p> <p>21 Q. Let me ask it this way: You don't know</p> <p>22 one way or another whether one possibility between</p> <p>23 a true guilty plea and a false guilty plea is more</p> <p>24 likely than the other for Mr. Baker?</p> | <p style="text-align: right;">Page 187</p> <p>1 A. No. On a scale of 100, no.</p> <p>2 Q. Well, on any scale?</p> <p>3 A. No.</p> <p>4 Q. Okay. And then we have -- you had some</p> <p>5 discussion, and there's some mention in your</p> <p>6 report, about the sort of standard reviews of</p> <p>7 guilty pleas being knowing, intelligent, and</p> <p>8 voluntary.</p> <p>9 Do you recall that?</p> <p>10 A. No. Can you be more specific? The</p> <p>11 colloquy?</p> <p>12 Q. That's what I'm going to get to. But</p> <p>13 are those the three things that are generally</p> <p>14 examined to determine whether to accept by a judge</p> <p>15 a guilty plea: Normal, voluntary, and</p> <p>16 intelligence?</p> <p>17 A. And a factual basis of guilt.</p> <p>18 Q. Okay. And then you spent some time</p> <p>19 talking about, you know, whether there was any way</p> <p>20 for you to assess whether either Mr. Baker or</p> <p>21 Ms. Glenn, you know, had a failure of understanding</p> <p>22 about what they were doing, what the consequences</p> <p>23 were, and things like that.</p> <p>24 Do you recall that? Do you remember</p>                                                                                      |
| <p style="text-align: right;">Page 186</p> <p>1 MS. KLEINHAUS: Objection to form.</p> <p>2 You can answer.</p> <p>3 BY THE WITNESS:</p> <p>4 A. I would talk about now how there are</p> <p>5 factors consistent with other false guilty plea</p> <p>6 cases and let the jury come to their own</p> <p>7 conclusion.</p> <p>8 BY MR. SULLIVAN:</p> <p>9 Q. So you don't know one way or another</p> <p>10 whether it's more likely or less likely that</p> <p>11 Mr. Baker's guilty plea was a false guilty plea?</p> <p>12 MS. KLEINHAUS: Just objection to form,</p> <p>13 incomplete hypothetical.</p> <p>14 You can answer.</p> <p>15 BY THE WITNESS:</p> <p>16 A. Do I know with 100 percent certainty?</p> <p>17 BY MR. SULLIVAN:</p> <p>18 Q. That wasn't my question.</p> <p>19 A. No. I'm not sure what the question is.</p> <p>20 Would I testify to that? No.</p> <p>21 Q. Would you testify to any division of</p> <p>22 probability with respect to Mr. Baker or Ms. Glenn</p> <p>23 between it being a true guilty plea or a false</p> <p>24 guilty plea?</p>                                                                                                                                                                        | <p style="text-align: right;">Page 188</p> <p>1 that testimony?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. Am I correct that that area of</p> <p>4 understanding goes towards the knowing element of a</p> <p>5 guilty plea?</p> <p>6 A. I would say knowing and intelligence.</p> <p>7 Q. Okay. So -- all right. So that leaves</p> <p>8 voluntary and factual basis.</p> <p>9 Are the three main factors -- risk</p> <p>10 hazards -- risk factors that you identified with</p> <p>11 respect to Mr. Baker and Ms. Glenn all directed</p> <p>12 towards the voluntariness aspect?</p> <p>13 A. And the factual basis.</p> <p>14 Q. Okay. Well, let me explore those one at</p> <p>15 a time, and that will help me understand.</p> <p>16 You have some criticism -- I'll call it</p> <p>17 criticism -- in your report about the manner in</p> <p>18 which courts make that assessment. As you referred</p> <p>19 to a minute ago, the colloquy between the court and</p> <p>20 the defendant asking a series of questions for the</p> <p>21 judge to make a determination about knowing,</p> <p>22 voluntary, and intelligent.</p> <p>23 So my question is in your experience in</p> <p>24 any of the jurisdictions where you've been involved</p> |

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| <p style="text-align: right;">Page 189</p> <p>1 in cases, observed criminal proceedings, is that</p> <p>2 method of assessing pleas -- is it the pretty</p> <p>3 standard way that the courts do that?</p> <p>4 A. Yes.</p> <p>5 Q. Okay.</p> <p>6 A. Yes.</p> <p>7 Q. Are you aware of any jurisdiction,</p> <p>8 whether because you worked in that or observed that</p> <p>9 jurisdiction or through other means, where courts</p> <p>10 have determined that method of assessing a plea is</p> <p>11 deficient or, you know, not acceptable as a way to</p> <p>12 take in guilty pleas?</p> <p>13 A. I have observed specific judges when</p> <p>14 they themselves feel that it's insufficient, and</p> <p>15 they feel like the defendant doesn't understand,</p> <p>16 and they're not satisfied with their yes responses,</p> <p>17 they will go into expanded definitions or expanded</p> <p>18 colloquy. And I'll also say that right now, I'm on</p> <p>19 an advisory panel of the National Center for State</p> <p>20 Courts, and they are -- and I'm with a bunch of</p> <p>21 other judges -- not other, but judges, three or</p> <p>22 four judges, and we are trying to address this</p> <p>23 issue. So I do believe that it is an issue on the</p> <p>24 radar of important groups, like the National Center</p> | <p style="text-align: right;">Page 191</p> <p>1 but, yes, I agree with that statement for sure.</p> <p>2 Q. Okay. And, in fact, logically, most, if</p> <p>3 not all, defendants who get convicted at trial pled</p> <p>4 not guilty, right?</p> <p>5 MS. KLEINHAUS: Objection, foundation.</p> <p>6 You can answer.</p> <p>7 BY THE WITNESS:</p> <p>8 A. Yes, because they all enjoy the</p> <p>9 presumption of innocence and have the</p> <p>10 constitutional right to a trial.</p> <p>11 BY MR. SULLIVAN:</p> <p>12 Q. Absolutely right. And I'm not</p> <p>13 criticizing for that.</p> <p>14 So let's go to the three factors that</p> <p>15 you outlined as being relevant to the Baker and</p> <p>16 Glenn case: The futility of trial, the package</p> <p>17 plea, and the sentence discount.</p> <p>18 And I apologize if you've covered this</p> <p>19 in your prior answers, but you identify them as</p> <p>20 risk factors, and I'm wondering if you could just</p> <p>21 explain what you mean by a risk factor.</p> <p>22 A. Here, specifically, I'm talking about a</p> <p>23 factor that would increase their risk of a false</p> <p>24 guilty plea from an innocent defendant.</p> |
| <p style="text-align: right;">Page 190</p> <p>1 for State Courts.</p> <p>2 I'll also add that in research that I've</p> <p>3 done and that other people have done, in surveys of</p> <p>4 judges and attorneys when they're asking, do you</p> <p>5 think defendants understand the colloquy, maybe not</p> <p>6 those exact questions, but getting at those</p> <p>7 questions, significant percentages of them will say</p> <p>8 no, I don't think that defendants understand. But</p> <p>9 it is the standard way of conducting colloquies.</p> <p>10 THE COURT REPORTER: You're on mute.</p> <p>11 BY MR. SULLIVAN:</p> <p>12 Q. I set my hand down on the space bar.</p> <p>13 A. You're on mute again.</p> <p>14 Q. Okay. All right. So I was directing</p> <p>15 you to Page 2 --</p> <p>16 A. Okay.</p> <p>17 Q. -- of your report, and the statement I</p> <p>18 wanted to ask you about where you say, "Not every</p> <p>19 defendant who pleads guilty is factually guilty,"</p> <p>20 right?</p> <p>21 A. Yes.</p> <p>22 Q. Would you agree that not every defendant</p> <p>23 who pleads not guilty is factually not guilty?</p> <p>24 A. I think I know what you're getting at,</p>                                                                                                                                   | <p style="text-align: right;">Page 192</p> <p>1 Q. Okay. And Mr. Bazarek and you discussed</p> <p>2 that those same factors that you went through would</p> <p>3 influence a guilty defendant to plead guilty as</p> <p>4 well, right? We're in agreement on that?</p> <p>5 A. Yes.</p> <p>6 Q. And whether they're factually guilty or</p> <p>7 factually not guilty, a defendant who chooses to</p> <p>8 plead guilty is giving up certain rights, correct?</p> <p>9 A. Correct.</p> <p>10 Q. They have a right to take their case to</p> <p>11 trial and make the government prove them guilty</p> <p>12 beyond a reasonable doubt, right?</p> <p>13 A. Yes.</p> <p>14 Q. They have a right to have a jury make</p> <p>15 that determination?</p> <p>16 A. Yes.</p> <p>17 Q. And they have a right to present</p> <p>18 witnesses in their own defense?</p> <p>19 A. Yes.</p> <p>20 Q. And so for those factually guilty</p> <p>21 defendants who plead guilty, they're giving up</p> <p>22 those same rights that, you know, a potentially</p> <p>23 factually not guilty defendant is giving up, right?</p> <p>24 A. Yes.</p>                                                                     |

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| <p style="text-align: right;">Page 193</p> <p>1 <b>Q. And they have to make a similar decision</b><br/>2 <b>about risk/reward, cost/benefit, true?</b><br/>3 MS. KLEINHAUS: Objection, form.<br/>4 You can answer.<br/>5 BY THE WITNESS:<br/>6 A. Yes.<br/>7 BY MR. SULLIVAN:<br/>8 <b>Q. Let's point to the trial futility as one</b><br/>9 <b>example. A factually guilty -- well, strike that.</b><br/>10 <b>Any defendant who's pleading guilty,</b><br/>11 <b>regardless of whether they're factually guilty or</b><br/>12 <b>not guilty, part of the assessment of trial</b><br/>13 <b>futility is looking at the evidence against them,</b><br/>14 <b>correct?</b><br/>15 THE COURT REPORTER: I'm sorry. What was the<br/>16 answer?<br/>17 BY THE WITNESS:<br/>18 A. I said when they have the evidence<br/>19 against them, yes.<br/>20 BY MR. SULLIVAN:<br/>21 <b>Q. Okay. So am I right that this factor of</b><br/>22 <b>trial futility, the existence of the futility or</b><br/>23 <b>the low probability of success at trial for a</b><br/>24 <b>particular defendant doesn't indicate one way or</b></p>                                                                                                                                              | <p style="text-align: right;">Page 195</p> <p>1 BY THE WITNESS:<br/>2 A. I think it can when it's examined in<br/>3 relation to all the other factors. And it's also,<br/>4 you know, a defendant is making a calculation. So<br/>5 the bargaining in the shadow of the trial theory,<br/>6 it is actually a numeric theory where, you know, if<br/>7 they believe that they have a 50 percent chance of<br/>8 conviction at trial versus a 75 percent chance<br/>9 versus a 95 percent chance, that is going to affect<br/>10 the plea that they're going to take.<br/>11 BY MR. SULLIVAN:<br/>12 <b>Q. And that's true whether they're</b><br/>13 <b>factually guilty or not guilty, right?</b><br/>14 A. Yes. But in their case, you know, I<br/>15 would -- I would imagine that -- and they said, you<br/>16 know, not just imagined, but they are -- Mr. Baker<br/>17 and Ms. Glenn believed that their chances of<br/>18 conviction at trial were very high because of what<br/>19 happened with Mr. Baker and the previous<br/>20 conviction, and because the evidence wasn't<br/>21 admissible, and, you know, because of the<br/>22 credibility issues. So they believed that their<br/>23 possibility of conviction was very high. And if it<br/>24 wasn't that high, then it's less likely that an</p>               |
| <p style="text-align: right;">Page 194</p> <p>1 <b>another whether their guilty plea is true or false</b><br/>2 <b>standing alone? Do you agree with that?</b><br/>3 A. I think what I'm saying in my report is<br/>4 that this factor increases the likelihood that an<br/>5 innocent person would plead guilty.<br/>6 <b>Q. I understand that. But this factor</b><br/>7 <b>standing alone doesn't tell you whether a</b><br/>8 <b>particular defendant's guilty plea is true or</b><br/>9 <b>false, correct?</b><br/>10 A. I'm processing what you're saying.<br/>11 <b>Q. Okay. All right.</b><br/>12 A. Standing alone, it wouldn't be<br/>13 definitive, no. It would be a factor in the<br/>14 totality of circumstances.<br/>15 <b>Q. Okay. Well, is there anything in</b><br/>16 <b>looking at the futility of going to trial, or, you</b><br/>17 <b>know, maybe short of being futile, a low</b><br/>18 <b>probability of being acquitted -- is there anything</b><br/>19 <b>in that assessment -- though it may explain a</b><br/>20 <b>reason why a particular defendant pleads guilty,</b><br/>21 <b>does it offer you any insight into whether that</b><br/>22 <b>guilty plea is true or false?</b><br/>23 MS. KLEINHAUS: Objection to form.<br/>24</p> | <p style="text-align: right;">Page 196</p> <p>1 innocent person would take that guilty plea. They<br/>2 might take their chances at trial.<br/>3 <b>Q. How much less?</b><br/>4 A. That I can't -- that's going to vary on<br/>5 a lot of different -- the totality of the<br/>6 circumstances analysis. You know, I can't put a<br/>7 stock number.<br/>8 <b>Q. Sure.</b><br/>9 A. But there is -- I mean, the bargaining<br/>10 in the shadow of the trial does have exact numbers<br/>11 compared to the discount that they would be<br/>12 receiving. And in this case, the discount was<br/>13 extremely high, 94 to 100 percent.<br/>14 <b>Q. So I'm just trying to understand. If we</b><br/>15 <b>take the futility of trial element, are you aware</b><br/>16 <b>of anything, any studies or theories that are able</b><br/>17 <b>to identify -- if we have one set futility number,</b><br/>18 <b>90 percent chance of conviction, based on the</b><br/>19 <b>evidence, the judge's rulings, and all of that.</b><br/>20 <b>Are you aware of any studies or theories</b><br/>21 <b>that can identify the difference in the impact of</b><br/>22 <b>that 90 percent on a factually guilty defendant or</b><br/>23 <b>versus a factually not guilty defendant?</b><br/>24 A. Yeah, there's lots of studies that have</p> |

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| <p style="text-align: right;">Page 197</p> <p>1 looked at it in -- I mean, not with actual</p> <p>2 defendants, but with giving people different</p> <p>3 scenarios, they're innocent, they're guilty.</p> <p>4 There's lots of studies demonstrating that innocent</p> <p>5 people are more likely to plead guilty when their</p> <p>6 chances of conviction at trial are harder -- are</p> <p>7 higher.</p> <p>8 <b>Q. No, I understand that. And that's true</b></p> <p>9 <b>of guilty defendants as well, correct? I mean, we</b></p> <p>10 <b>just -- we're kind of --</b></p> <p>11 A. Yeah, it's guilty and innocent</p> <p>12 defendants. And this is the degrees of difference</p> <p>13 between them, yes. And people have tested the</p> <p>14 shadow of the trial theory. So you're asking me</p> <p>15 about theoretical models. I'm telling you about</p> <p>16 the trial -- the bargaining in the shadow of the</p> <p>17 trial, and there have been many studies that have</p> <p>18 examined and tested for this.</p> <p>19 <b>Q. And have they identified the difference</b></p> <p>20 <b>between factually guilty and not guilty defendants</b></p> <p>21 <b>and how that say, you know, trial probability</b></p> <p>22 <b>affects their decision-making?</b></p> <p>23 A. So with not -- not actual defendants</p> <p>24 because in the real world, we don't know who's</p> | <p style="text-align: right;">Page 199</p> <p>1 guilty. I'd like to think that. I think that's</p> <p>2 true. But I can't off the top of my head give</p> <p>3 you -- so it increases -- as the trial conviction</p> <p>4 goes up, and as the discount gets larger, both</p> <p>5 guilty and innocent people are more likely to plead</p> <p>6 guilty. I can't remember off the top of my head</p> <p>7 specific numbers. These are not my studies, but</p> <p>8 other people's studies.</p> <p>9 <b>Q. Okay. Let me ask you a more general</b></p> <p>10 <b>question. Am I -- would the research that you do</b></p> <p>11 <b>be considered social science research?</b></p> <p>12 A. Yes.</p> <p>13 <b>Q. Okay. So am I correct that social</b></p> <p>14 <b>science research, similar to what you've been</b></p> <p>15 <b>involved in through your career, is designed to</b></p> <p>16 <b>examine large groups, societal groups, and impacts</b></p> <p>17 <b>on larger groups than individuals?</b></p> <p>18 A. It depends on the issue, but, in</p> <p>19 general, yes, we are trying to generalize to</p> <p>20 issues.</p> <p>21 <b>Q. Okay. And so are you aware of any</b></p> <p>22 <b>studies, or do you rely on any studies in your</b></p> <p>23 <b>field of expertise, that allow you to -- well,</b></p> <p>24 <b>strike that.</b></p> |
| <p style="text-align: right;">Page 198</p> <p>1 factually guilty and who's factually innocent. We</p> <p>2 can do that in a laboratory. So there's been lots</p> <p>3 of laboratory studies. But in the real world, we</p> <p>4 just don't know that, and that's the beauty of why</p> <p>5 lab studies and -- you know, the limitations of lab</p> <p>6 studies.</p> <p>7 <b>Q. So in the lab, are you telling me</b></p> <p>8 <b>there's studies that find that --</b></p> <p>9 A. Yes. I'm telling you that, yes.</p> <p>10 <b>Q. Okay. I haven't told you what I'm</b></p> <p>11 <b>asking about.</b></p> <p>12 A. But you've asked it several times.</p> <p>13 Sorry.</p> <p>14 <b>Q. So my question is studies that have</b></p> <p>15 <b>found -- identified the range of difference in the</b></p> <p>16 <b>impact of trial futility on a guilty defendant</b></p> <p>17 <b>versus a not guilty defendant?</b></p> <p>18 A. Yes.</p> <p>19 <b>Q. Okay. What is the difference in the</b></p> <p>20 <b>range?</b></p> <p>21 A. Well, it's very consistently that guilty</p> <p>22 people are pleading guilty at higher rates. So</p> <p>23 that's a very consistent finding, and that's why I</p> <p>24 presume that most defendants who plead guilty are</p>                                                                                                                             | <p style="text-align: right;">Page 200</p> <p>1 <b>We discussed earlier that you're not</b></p> <p>2 <b>offering any opinion about the likelihood of either</b></p> <p>3 <b>of these two plaintiffs' guilty pleas being true or</b></p> <p>4 <b>false, correct? You're talking about factors and</b></p> <p>5 <b>so forth, but you're not going to talk about the</b></p> <p>6 <b>likelihood that in this particular case, for these</b></p> <p>7 <b>individuals, their pleas were true or false, right?</b></p> <p>8 MS. KLEINHAUS: Objection to form.</p> <p>9 BY THE WITNESS:</p> <p>10 A. Correct.</p> <p>11 BY MR. SULLIVAN:</p> <p>12 <b>Q. Okay. So am I correct that there really</b></p> <p>13 <b>is no empirical studies or science in your field of</b></p> <p>14 <b>expertise that would allow you to make that</b></p> <p>15 <b>determination of whether -- of the likelihood</b></p> <p>16 <b>between either of these plaintiffs' pleas being</b></p> <p>17 <b>guilty or true?</b></p> <p>18 MS. KLEINHAUS: Objection to form.</p> <p>19 You can answer.</p> <p>20 BY THE WITNESS:</p> <p>21 A. I'm not sure I understand the question.</p> <p>22 BY MR. SULLIVAN:</p> <p>23 <b>Q. Sure. The type of social science</b></p> <p>24 <b>research that you engage in in your field does not</b></p>                                            |

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| <p style="text-align: right;">Page 201</p> <p>1 <b>provide data or tools with which you could make an</b><br/> 2 <b>assessment of the likelihood between Ben Baker's</b><br/> 3 <b>guilty plea being true or false in this case?</b><br/> 4 MS. KLEINHAUS: Objection to form, and<br/> 5 mischaracterizes her testimony.<br/> 6 You can answer.<br/> 7 BY THE WITNESS:<br/> 8 A. I don't think that's true. I think<br/> 9 that -- I mean, it can lead to educated opinions.<br/> 10 And I think once people have an understanding of<br/> 11 the science of false guilty pleas and why, the<br/> 12 factors that would influence somebody to plead<br/> 13 guilty -- I mean, that's what the jury does in all<br/> 14 cases. Nobody knows in a jury if somebody is<br/> 15 actually guilty or actually innocent. They must<br/> 16 decide beyond a reasonable doubt whether they think<br/> 17 this person is guilty or not. And so that's true I<br/> 18 think of every expert or every witness in a way.<br/> 19 BY MR. SULLIVAN:<br/> 20 <b>Q. Okay. I apologize if this is a little</b><br/> 21 <b>bit of a repeat.</b><br/> 22 <b>Are there any of the factors that you</b><br/> 23 <b>identify in your report that are not equally</b><br/> 24 <b>applicable to factually guilty and factually not</b></p> | <p style="text-align: right;">Page 203</p> <p>1 they're going to try to take their case to trial,<br/> 2 right, because they're innocent. They want to<br/> 3 fight their case. But these factors that I<br/> 4 discussed increase the likelihood of an innocent<br/> 5 person waiving all of those rights that they have<br/> 6 and the presumption of innocence and giving up<br/> 7 their right to trial.<br/> 8 <b>Q. Okay. And those three factors are</b><br/> 9 <b>applicable to factually guilty defendants also,</b><br/> 10 <b>correct?</b><br/> 11 MS. KLEINHAUS: Objection, asked and answered.<br/> 12 You can answer again.<br/> 13 BY THE WITNESS:<br/> 14 A. Yes.<br/> 15 BY MR. SULLIVAN:<br/> 16 <b>Q. Okay. And then the rest of your answer</b><br/> 17 <b>about increasing the likelihood of a factually not</b><br/> 18 <b>guilty defendant pleading guilty, that's an</b><br/> 19 <b>increase that you can't identify how much it</b><br/> 20 <b>increases, correct?</b><br/> 21 MS. KLEINHAUS: Objection to form. You mean,<br/> 22 like, numerically? Percentagewise?<br/> 23 MR. SULLIVAN: Yeah. Let's start with that.<br/> 24 MS. KLEINHAUS: Okay. I just need that</p>                                                                                   |
| <p style="text-align: right;">Page 202</p> <p>1 <b>guilty defendants?</b><br/> 2 MS. KLEINHAUS: Objection to form.<br/> 3 BY THE WITNESS:<br/> 4 A. So, I mean, I did make some comparisons<br/> 5 between the true and the false guilty pleas, like<br/> 6 the drug cases and the no crime cases. But true<br/> 7 guilty pleas happen in -- I'm sorry, not true<br/> 8 guilty pleas. Wrongful convictions like in drug<br/> 9 cases happen at trial as well as false guilty<br/> 10 pleas.<br/> 11 BY MR. SULLIVAN:<br/> 12 <b>Q. Right. I'm talking about the three</b><br/> 13 <b>factors, the trial futility, the discount, and the</b><br/> 14 <b>package plea.</b><br/> 15 <b>Are there any of those three risk</b><br/> 16 <b>factors that you focused on that are not applicable</b><br/> 17 <b>to a factually guilty defendant?</b><br/> 18 A. What I was trying to say earlier is that<br/> 19 those factors are almost like a given in truly<br/> 20 guilty cases, that they are going to raise the<br/> 21 likelihood of a guilty person pleading guilty. But<br/> 22 what they also do is raise the likelihood of an<br/> 23 innocent person, who otherwise would not plead<br/> 24 guilty because it's not in their best interest,</p>                                                              | <p style="text-align: right;">Page 204</p> <p>1 clarification versus relative or numerically.<br/> 2 So go ahead.<br/> 3 BY THE WITNESS:<br/> 4 A. In this specific case, I cannot assign a<br/> 5 percentage. But in the studies that I mentioned,<br/> 6 yes, there would be percentages. I don't know them<br/> 7 off the top of my head.<br/> 8 BY MR. SULLIVAN:<br/> 9 <b>Q. And are you able to provide a</b><br/> 10 <b>comparative between factually guilty and factually</b><br/> 11 <b>not guilty defendants, between how much any of</b><br/> 12 <b>those three factors increase the likelihood they</b><br/> 13 <b>will plead guilty?</b><br/> 14 A. I'm sorry. Can you repeat the question?<br/> 15 It's getting a little late in the day for me.<br/> 16 <b>Q. Sure. Well, Tess had asked whether I</b><br/> 17 <b>was talking numerically or then comparatively. So</b><br/> 18 <b>are you able to give a comparative between the</b><br/> 19 <b>increase in guilty pleas based on those factors</b><br/> 20 <b>among factually guilty versus the increase based on</b><br/> 21 <b>those factors among factually not guilty?</b><br/> 22 A. With those lab studies, yes, I believe<br/> 23 that I could.<br/> 24 <b>Q. Are those -- now did you participate in</b></p> |

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| <p style="text-align: right;">Page 205</p> <p>1 <b>those?</b></p> <p>2 A. No. The ones that I'm thinking of, no.</p> <p>3 <b>Q. Can you identify by title or author or</b></p> <p>4 <b>year?</b></p> <p>5 A. I can send you that information. There</p> <p>6 was a recent one published in Law and Human</p> <p>7 Behavior by Zottoli and colleagues that I think it</p> <p>8 was published in 2023.</p> <p>9 <b>Q. Go ahead. Sorry.</b></p> <p>10 A. Yeah. There's some research by Tina</p> <p>11 Zottoli, Z-O-T-T-O-L-L-I.</p> <p>12 <b>Q. And are those studies or that study</b></p> <p>13 <b>something you relied on in your -- for the</b></p> <p>14 <b>conclusions in your report?</b></p> <p>15 A. No.</p> <p>16 <b>Q. Are those studies or that study</b></p> <p>17 <b>something you intend to rely on as part of your</b></p> <p>18 <b>trial testimony?</b></p> <p>19 MS. KLEINHAUS: Objection, calls for</p> <p>20 speculation.</p> <p>21 You can answer.</p> <p>22 BY THE WITNESS:</p> <p>23 A. If you're going to ask me these</p> <p>24 questions, yes, I would prepare for it, yes.</p>                                                                                                                                                                                                                                                   | <p style="text-align: right;">Page 207</p> <p>1 <b>and conclusions as expressed in your report and in</b></p> <p>2 <b>your deposition here today, are those built on or</b></p> <p>3 <b>do they rely on in part your crediting Mr. Baker</b></p> <p>4 <b>and Ms. Glenn more than the police officers?</b></p> <p>5 A. I'm not really sure how to answer that</p> <p>6 question because what I did is I reviewed all of</p> <p>7 the materials, and my opinions are based on the</p> <p>8 review of all the materials.</p> <p>9 So in reviewing the materials, I -- you</p> <p>10 know, I don't know the truth of the matter, as</p> <p>11 we've discussed. And, again, that's, you know,</p> <p>12 something the jury is going to have to do beyond a</p> <p>13 reasonable doubt or not, if that's the standard in</p> <p>14 a civil case. I'm not sure. But, yeah, I mean --</p> <p>15 but my assessment, I did take that into account.</p> <p>16 BY MR. SULLIVAN:</p> <p>17 <b>Q. Okay.</b></p> <p>18 A. So the factors that -- you know, I think</p> <p>19 that's a natural part of any expert's review when</p> <p>20 there's a he said/she said. You know, I have to</p> <p>21 determine -- you know, that's just one of the</p> <p>22 factors in this case.</p> <p>23 <b>Q. Okay. So is it fair to say that after</b></p> <p>24 <b>your testimony and all the evidence is in, if the</b></p>    |
| <p style="text-align: right;">Page 206</p> <p>1 BY MR. SULLIVAN:</p> <p>2 <b>Q. Which questions? About whether there's</b></p> <p>3 <b>any -- anything that identifies these ranges of</b></p> <p>4 <b>outcomes?</b></p> <p>5 A. If there are precise percentage numbers,</p> <p>6 differentials between true and false guilty pleas</p> <p>7 relative to the probability of conviction at trial,</p> <p>8 yes.</p> <p>9 <b>Q. Okay. All right. The last little group</b></p> <p>10 <b>of questions I had. And, again, I might have</b></p> <p>11 <b>misheard some of your testimony.</b></p> <p>12 <b>Do your opinions about whether the</b></p> <p>13 <b>hallmarks or the risk factors that you're relying</b></p> <p>14 <b>on in this case in your report -- do those depend</b></p> <p>15 <b>at all or are they built at all on your own</b></p> <p>16 <b>assessment or conclusion about the believability of</b></p> <p>17 <b>Mr. Baker or Ms. Glenn or the police officers?</b></p> <p>18 A. Are my conclusions based on what?</p> <p>19 <b>Q. So there's some answers when you were</b></p> <p>20 <b>speaking with Mr. Bazarek about whether you would</b></p> <p>21 <b>credit Mr. Baker and Ms. Glenn more than the police</b></p> <p>22 <b>in this case.</b></p> <p>23 A. Yeah.</p> <p>24 <b>Q. And my question is whether your opinions</b></p> | <p style="text-align: right;">Page 208</p> <p>1 <b>jury accepts your opinions in this case and</b></p> <p>2 <b>incorporate that into their verdict, they will be</b></p> <p>3 <b>then relying in part on your assessment of how to</b></p> <p>4 <b>credit Mr. Baker and Ms. Glenn's testimony versus</b></p> <p>5 <b>the police officers?</b></p> <p>6 MS. KLEINHAUS: Objection to form, vague and</p> <p>7 compound, and calls for speculation.</p> <p>8 You can answer, if you know.</p> <p>9 BY THE WITNESS:</p> <p>10 A. I don't think so because what I'm</p> <p>11 really -- I think that my opinion is really based</p> <p>12 on these three situational risk factors, and, in</p> <p>13 part, on the other hallmarks that I mentioned about</p> <p>14 the study that I did that compared wrongful</p> <p>15 conviction cases, all people were innocent, and</p> <p>16 they were either convicted by plea or at trial and</p> <p>17 the findings that we had there.</p> <p>18 So I think I will rescind my other</p> <p>19 answer and say that my opinions in this case, which</p> <p>20 are that they -- that these guilty pleas by Baker</p> <p>21 and Glenn bear many of the hallmarks of a false</p> <p>22 guilty plea and they have a lot of commonalities</p> <p>23 with known proven false guilty pleas. Those are my</p> <p>24 opinions, and they're based on those three factors,</p> |

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| <p style="text-align: right;">Page 209</p> <p>1 and the subfactors within those three factors, and</p> <p>2 what I just mentioned.</p> <p>3 BY MR. SULLIVAN:</p> <p>4 <b>Q. So if you had -- in reviewing the</b></p> <p>5 <b>materials had credited the police officers'</b></p> <p>6 <b>testimony or information more than Mr. Baker and</b></p> <p>7 <b>Ms. Glenn, would your opinions be the same in this</b></p> <p>8 <b>case?</b></p> <p>9 A. Yes, they would.</p> <p>10 MS. KLEINHAUS: Objection, hypothetical. Go</p> <p>11 ahead.</p> <p>12 BY THE WITNESS:</p> <p>13 A. That's what I'm saying. I misspoke</p> <p>14 earlier. I'm tired. It's been a long day. And I</p> <p>15 don't believe that -- if I did credit their</p> <p>16 statements more -- their account -- it's really</p> <p>17 just the account of the event is what we're talking</p> <p>18 about.</p> <p>19 BY MR. SULLIVAN:</p> <p>20 <b>Q. That's a pretty important account,</b></p> <p>21 <b>right, one way or the other?</b></p> <p>22 A. But in everything that I reviewed, all</p> <p>23 the other information, then yeah.</p> <p>24 <b>Q. I'm sorry. I didn't understand the last</b></p>                                                                                                                                                   | <p style="text-align: right;">Page 211</p> <p>1 make a decision whether to take it. But if my</p> <p>2 assessment was such that would not help the defense</p> <p>3 or help the plaintiffs' side, and that's up to the</p> <p>4 attorneys whether or not they want to use it or</p> <p>5 not. But I'm not going to change my opinions. I</p> <p>6 can't make those assessments when I agree or not</p> <p>7 agree to take on a case.</p> <p>8 BY MR. SULLIVAN:</p> <p>9 <b>Q. Sure. How about before you issue a</b></p> <p>10 <b>report or testify? Had -- after you reviewed all</b></p> <p>11 <b>the materials, had you concluded that the police</b></p> <p>12 <b>officers' story was more credible than Mr. Baker</b></p> <p>13 <b>and Ms. Glenn's story, would you have agreed to</b></p> <p>14 <b>testify at trial in this case?</b></p> <p>15 MS. KLEINHAUS: Objection, calls for</p> <p>16 speculation.</p> <p>17 You can answer.</p> <p>18 BY THE WITNESS:</p> <p>19 A. I think I heard, like, a hypothetical in</p> <p>20 there, "had I." Is that what you're saying?</p> <p>21 BY MR. SULLIVAN:</p> <p>22 <b>Q. Right.</b></p> <p>23 A. Yeah. I don't know. I mean, I don't</p> <p>24 know because, again, the factors are still present.</p> |
| <p style="text-align: right;">Page 210</p> <p>1 <b>part.</b></p> <p>2 A. Yeah, just like I'm saying, I reviewed</p> <p>3 all of the information that was provided to me. If</p> <p>4 I had questions, I asked for additional</p> <p>5 information. And, you know, that was -- that I</p> <p>6 believe was relevant to the case, and I reviewed</p> <p>7 it, and I came up with the -- these conclusions</p> <p>8 that these risk factors that are present in their</p> <p>9 case are known to increase the rate of false</p> <p>10 confessions -- I'm sorry, false guilty pleas.</p> <p>11 <b>Q. So if in reviewing everything in the</b></p> <p>12 <b>case, doing all the work that you did, you had in</b></p> <p>13 <b>your own mind found the testimony about what</b></p> <p>14 <b>happened of the police to be more credible -- more</b></p> <p>15 <b>creditable than Mr. Baker and Ms. Glenn's, would</b></p> <p>16 <b>you have taken this case?</b></p> <p>17 MS. KLEINHAUS: Objection, calls for</p> <p>18 speculation.</p> <p>19 You can answer.</p> <p>20 BY THE WITNESS:</p> <p>21 A. I don't make any kind of assessment like</p> <p>22 that until I've already taken the case. I mean,</p> <p>23 when I agree to take a case or not take a case, I</p> <p>24 am given a minimal amount of details, and then I</p> | <p style="text-align: right;">Page 212</p> <p>1 MS. KLEINHAUS: I'm sorry, Sean. When you get</p> <p>2 to a good point, can we take a short break?</p> <p>3 MR. SULLIVAN: I'm finished, so I'll pass to</p> <p>4 whoever is next, and we can take a break first.</p> <p>5 MS. KLEINHAUS: Okay. That would be great.</p> <p>6 Can we just take, like, a short five-minute break,</p> <p>7 please? Thank you.</p> <p>8 MR. SULLIVAN: Thank you, Doctor.</p> <p>9 THE VIDEOGRAPHER: Going off the record at</p> <p>10 2:58 p.m.</p> <p>11 (WHEREUPON, a recess was had.)</p> <p>12 THE VIDEOGRAPHER: Back on the record at</p> <p>13 3:12 p.m.</p> <p>14 (WHEREUPON, Mr. Joel Flaxman left</p> <p>15 the deposition proceedings and</p> <p>16 Mr. Kenneth Flaxman entered.)</p> <p>17 MS. EKL: Am I up? Am I up? Can anyone hear</p> <p>18 me?</p> <p>19 Okay. Great. I don't see the doctor,</p> <p>20 that's why --</p> <p>21 THE WITNESS: I'm here.</p> <p>22 EXAMINATION</p> <p>23 BY MS. EKL:</p> <p>24 <b>Q. Good afternoon, Dr. Redlich. I have</b></p>                                                                                                                                                                                                |

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| <p style="text-align: right;">Page 213</p> <p>1 just a few questions. I know it's been a long day.</p> <p>2 A. Thank you.</p> <p>3 Q. I represent the City of Chicago, and I</p> <p>4 just wanted to follow up on one additional point,</p> <p>5 one of the factors that you discussed today.</p> <p>6 Specifically in regard to your opinions</p> <p>7 related to extreme discounts that you say were</p> <p>8 given to Ben Baker and Clarissa Glenn, I want to</p> <p>9 ask you some questions about that.</p> <p>10 A. Okay.</p> <p>11 Q. How is it that you are calculating that</p> <p>12 Ben Baker got a 95 percent discount and Clarissa</p> <p>13 Glenn got 100 percent discount in their sentences</p> <p>14 by pleading guilty versus going to trial?</p> <p>15 A. Sure. So the plea discount that I'm</p> <p>16 talking about specifically is a sentence discount.</p> <p>17 And so for Clarissa, given that she wasn't given a</p> <p>18 carceral sentence, her discount is essentially</p> <p>19 100 percent. The 90 versus 0 years.</p> <p>20 Whereas, Mr. Baker, what I did is -- so</p> <p>21 Mr. Baker and Ms. Glenn were each facing three</p> <p>22 counts of the Class X charges, and as described by</p> <p>23 Judge Toomin in their plea hearing, the maximum</p> <p>24 they could receive on each of those counts was</p> | <p style="text-align: right;">Page 215</p> <p>1 A. So this calculation is based on each of</p> <p>2 the charges, and it doesn't matter if it was -- I</p> <p>3 mean, I didn't do the consecutive. I assumed that</p> <p>4 they were concurrent. Sorry.</p> <p>5 Q. Well, if they were concurrent, and he</p> <p>6 was looking at the maximum sentence for any charge</p> <p>7 would be 30 years, that means the most he could</p> <p>8 have got for multiple findings of guilty would be</p> <p>9 30 years, correct?</p> <p>10 A. Oh, sorry. Yes, yes, yeah.</p> <p>11 Q. Okay. And for Ms. Glenn, what is your</p> <p>12 understanding about how -- about what she -- what</p> <p>13 the maximum number of years on the maximum charge</p> <p>14 would be that she was originally facing?</p> <p>15 A. She was also originally facing 30 years.</p> <p>16 Q. Okay. So you would agree with me that</p> <p>17 the maximum sentence she could have received,</p> <p>18 unless there was some basis for running the</p> <p>19 sentences consecutively, would be 30 years?</p> <p>20 A. All I know is that Judge Toomin -- and I</p> <p>21 do state specifically that I'm not an expert on</p> <p>22 Illinois sentencing law, and I don't know what the</p> <p>23 normal procedure -- what the normal sentence would</p> <p>24 have been. All I know is that Judge Toomin, as is</p> |
| <p style="text-align: right;">Page 214</p> <p>1 30 years. So three times 30 is 90 years. And then</p> <p>2 Mr. Baker also faced an additional maximum sentence</p> <p>3 of five years on that gun bullet charge. But he</p> <p>4 received a total of six years. So four years for</p> <p>5 the minimum for what he pled guilty to, which was</p> <p>6 the Class 1 -- one charge of the Class 1 count, and</p> <p>7 then the two years that he received for the bullet</p> <p>8 case. So that was six years. So the 94 percent</p> <p>9 comes from the 95 years times .94 equals 89 years.</p> <p>10 And that's where the six-year difference is, and</p> <p>11 that's the 94 percent.</p> <p>12 Q. Would you agree that a discount would be</p> <p>13 what they would be likely to receive after a trial</p> <p>14 versus what they actually did receive?</p> <p>15 MS. KLEINHAUS: Objection to form.</p> <p>16 You can answer.</p> <p>17 BY THE WITNESS:</p> <p>18 A. No, I wouldn't agree to that.</p> <p>19 BY MS. EKL:</p> <p>20 Q. Okay. So let me ask you this first off.</p> <p>21 In relation to Ben Baker's case, for example, are</p> <p>22 you familiar with Illinois sentencing laws and</p> <p>23 whether or not those sentences would actually run</p> <p>24 consecutive versus concurrently?</p>                                  | <p style="text-align: right;">Page 216</p> <p>1 standard in these plea colloquies, will say what</p> <p>2 the maximum sentence is for each of the charges.</p> <p>3 He makes it very specifically that it's each charge</p> <p>4 could be 30 years.</p> <p>5 Q. Right. But he doesn't say that they</p> <p>6 could run consecutively. So you're not adding</p> <p>7 30 plus 30 plus 30.</p> <p>8 A. But he does say each. He does make a</p> <p>9 point of saying each, yeah.</p> <p>10 Q. Okay. Do you know whether or not -- for</p> <p>11 instance, Ms. Glenn, whether or not her original</p> <p>12 charge that she was going to go to trial on was</p> <p>13 probationable?</p> <p>14 A. No, it wasn't.</p> <p>15 Q. And do you know whether or not Ben</p> <p>16 Baker's original charge was probationable?</p> <p>17 A. I'm sure it wasn't. The Class X -- the</p> <p>18 three Class X, no, no.</p> <p>19 Q. Okay. The minimum, though, was the six</p> <p>20 years, correct?</p> <p>21 A. No -- well, that was combined with the</p> <p>22 drug case. Yeah, because it was -- the minimum was</p> <p>23 the four years for the Class 1 possession of a</p> <p>24 controlled substance, and the two years was the</p>                                                                                                                                                      |

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| Page 217 | <p>1 minimum for the bullet case.</p> <p>2 <b>Q. Are you familiar with the laws in</b></p> <p>3 <b>Illinois -- and I will assume in other states as</b></p> <p>4 <b>well, but we're talking about Illinois law here --</b></p> <p>5 <b>that dictate what the court must consider during a</b></p> <p>6 <b>sentencing?</b></p> <p>7 A. No, I'm not. But I do want to back up a</p> <p>8 step and add that I still believe that regardless</p> <p>9 of whether Ms. Glenn faced 30 years or 90 years,</p> <p>10 her discount was still 100 percent because she</p> <p>11 didn't receive any time.</p> <p>12 <b>Q. And, again, that's assuming that her</b></p> <p>13 <b>case was not probationable, correct?</b></p> <p>14 A. Yes. I know that they had to reduce the</p> <p>15 amount of the heroin to less than five grams to</p> <p>16 make it probationable.</p> <p>17 <b>Q. Going back to my question that you</b></p> <p>18 <b>didn't answer. Are you aware of the fact that</b></p> <p>19 <b>sentencing judges in Illinois must consider certain</b></p> <p>20 <b>things in determining a sentence?</b></p> <p>21 A. I did answer that question. I said I'm</p> <p>22 not aware of those factors.</p> <p>23 <b>Q. Okay. So are you aware of the fact in</b></p> <p>24 <b>general that judges have to consider factors in</b></p> | Page 219 | <p>1 A. Yes. But can I say something else?</p> <p>2 <b>Q. Well, not unless there's a question</b></p> <p>3 <b>pending.</b></p> <p>4 <b>So as far as saying that Ms. Glenn</b></p> <p>5 <b>received 100 percent sentence reduction, you're</b></p> <p>6 <b>basing that on the fact that she received</b></p> <p>7 <b>probation, you're saying her original charge was</b></p> <p>8 <b>not probationable. Is that fair to say?</b></p> <p>9 A. Her original charges, as I understand</p> <p>10 them, were three Class X felonies, and they were</p> <p>11 not probationable.</p> <p>12 <b>Q. Okay.</b></p> <p>13 A. But these discounts, and as they are</p> <p>14 discussed in the literature and talked about in</p> <p>15 reforms that surround plea discounts, it's always</p> <p>16 with the maximum -- the statutory maximum that the</p> <p>17 person is at risk for. And this is why -- my</p> <p>18 understanding is why the judge is -- in all the</p> <p>19 plea hearings that I've observed will talk about</p> <p>20 the maximum sentence that they could receive. And</p> <p>21 that's what they should be telling defendants. Not</p> <p>22 what they could receive.</p> <p>23 And I don't know what Ms. Glenn and</p> <p>24 Mr. Baker were told, if anything, by the sentences</p> |
| Page 218 | <p>1 <b>aggravation as well as factors in mitigation when</b></p> <p>2 <b>they impose a sentence?</b></p> <p>3 A. Yes, in general. I don't know the</p> <p>4 specific states and -- I know in death penalty</p> <p>5 cases that's often the case. I don't know for each</p> <p>6 crime or each state, no.</p> <p>7 <b>Q. Okay. Well, would you assume that --</b></p> <p>8 <b>we'll just talk about Ms. Glenn for an example.</b></p> <p>9 <b>That if she had been -- if she had gone to trial</b></p> <p>10 <b>and was sentenced and the court was considering</b></p> <p>11 <b>factors in aggravation and mitigation, that one of</b></p> <p>12 <b>the factors that the court would have to consider</b></p> <p>13 <b>would be her criminal history?</b></p> <p>14 MS. KLEINHAUS: Objection to foundation.</p> <p>15 You can answer.</p> <p>16 BY THE WITNESS:</p> <p>17 A. Yes, I do know that criminal history is</p> <p>18 taken into account in sentencing decisions.</p> <p>19 BY MS. EKL:</p> <p>20 <b>Q. Okay. And would you agree with me that</b></p> <p>21 <b>a person with no criminal history is more likely to</b></p> <p>22 <b>receive a sentence at the lower end of the spectrum</b></p> <p>23 <b>than a person that has an extended criminal</b></p> <p>24 <b>history?</b></p>                                    | Page 220 | <p>1 they could have received if they were convicted at</p> <p>2 trial or anything like that. I'm just basing these</p> <p>3 plea discounts on the statutory maximums that they</p> <p>4 could have received.</p> <p>5 <b>Q. Okay. Not the likelihood of what they</b></p> <p>6 <b>would have actually received?</b></p> <p>7 A. I don't know if they knew that. I don't</p> <p>8 know if their defense attorney had an opinion about</p> <p>9 that. I don't know anything about that, no. And</p> <p>10 that's not what the plea discount discussion is</p> <p>11 based on.</p> <p>12 <b>Q. And you didn't review their defense</b></p> <p>13 <b>attorney's deposition transcript in this case,</b></p> <p>14 <b>correct?</b></p> <p>15 A. I didn't even know he was deposed, no.</p> <p>16 <b>Q. And you didn't talk to him to find out</b></p> <p>17 <b>whether or not he advised them of anything during</b></p> <p>18 <b>the conference -- any private conference with them</b></p> <p>19 <b>before they pled guilty, correct?</b></p> <p>20 MS. KLEINHAUS: Objection to form.</p> <p>21 You can answer.</p> <p>22 BY THE WITNESS:</p> <p>23 A. No, I don't know.</p> <p>24 BY MS. EKL:</p>                                                                                                 |

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| <p style="text-align: right;">Page 221</p> <p>1       <b>Q. Do you know the basis for the idea that</b><br/> 2       <b>someone who is facing a plea discount will plead</b><br/> 3       <b>guilty -- is more likely to plead guilty than not</b><br/> 4       <b>plead guilty? Can you let us know what the basis</b><br/> 5       <b>for that is?</b><br/> 6       MS. KLEINHAUS: Objection to form, vague, and<br/> 7       ambiguous.<br/> 8       You can answer.<br/> 9       BY THE WITNESS:<br/> 10      A. It goes back to the bargaining in the<br/> 11      shadow of the trial calculation that defendants are<br/> 12      forecasting their likelihood of conviction at<br/> 13      trial, and, you know, there's, like, this rational<br/> 14      actor -- it's a rational actor theory that if<br/> 15      the -- probably a conviction, plus the sentence<br/> 16      that they would receive at trial was -- or by plea<br/> 17      is greater than or less than what they would<br/> 18      receive at trial, that's the calculation that in<br/> 19      theory defendants are making.<br/> 20      BY MS. EKL:<br/> 21      <b>Q. And if someone like Ben Baker had a</b><br/> 22      <b>criminal history where he was familiar with kind of</b><br/> 23      <b>how sentencing hearings are conducted in terms of</b><br/> 24      <b>what's considered by the judge, would you expect</b></p> | <p style="text-align: right;">Page 223</p> <p>1       discount that someone is going to be more -- guilty<br/> 2       or innocent is going to be more likely to take this<br/> 3       bargain or this plea agreement if they believe<br/> 4       they're going to get a better bargain or plea<br/> 5       agreement than what would happen at trial?<br/> 6       MS. KLEINHAUS: Objection to form.<br/> 7       BY THE WITNESS:<br/> 8       A. It's contingent on their perceived<br/> 9       probability of conviction at trial. So it<br/> 10      depends -- like, if it's 90 percent, if it's<br/> 11      20 percent, if that affects the calculation and the<br/> 12      ratio of the plea sentence to the trial sentence --<br/> 13      to the would-be trial conviction sentence.<br/> 14      BY MS. EKL:<br/> 15      <b>Q. Can you point us to a single study that</b><br/> 16      <b>talks about how a person's perceived belief about</b><br/> 17      <b>what they'll receive if they go to trial should be</b><br/> 18      <b>based on the maximum sentence that they could</b><br/> 19      <b>receive without consideration of any other factors</b><br/> 20      <b>of what they would actually receive?</b><br/> 21      MS. KLEINHAUS: Objection to form.<br/> 22      BY THE WITNESS:<br/> 23      A. I can -- yeah, I can point you to<br/> 24      several studies in laboratory.</p> |
| <p style="text-align: right;">Page 222</p> <p>1       <b>that he would have shared that with Ms. Glenn, the</b><br/> 2       <b>likelihood of her receiving a penitentiary sentence</b><br/> 3       <b>versus a probationary sentence?</b><br/> 4       MS. KLEINHAUS: Objection, calls for<br/> 5       speculation.<br/> 6       You can answer.<br/> 7       BY THE WITNESS:<br/> 8       A. I don't -- I don't know how much they<br/> 9       talked. What I do know is that she was -- if she<br/> 10      went to trial, my understanding is that she would<br/> 11      have been facing three felony -- or Class X felony<br/> 12      charges, and they're not probationable.<br/> 13      BY MS. EKL:<br/> 14      <b>Q. Is the theory that someone would be more</b><br/> 15      <b>likely to take a plea based on their belief that</b><br/> 16      <b>they are receiving a discount from what they are</b><br/> 17      <b>likely to get sentenced to after a trial?</b><br/> 18      MS. KLEINHAUS: Objection to form.<br/> 19      You can answer.<br/> 20      BY THE WITNESS:<br/> 21      A. No. I'm not sure I understood your<br/> 22      question. Can you repeat the question?<br/> 23      BY MS. EKL:<br/> 24      <b>Q. Sure. Is the concept behind the plea</b></p>                                                                                                                           | <p style="text-align: right;">Page 224</p> <p>1       BY MS. EKL:<br/> 2       <b>Q. Okay. Go ahead.</b><br/> 3       A. So there was the work by Zottoli and her<br/> 4       colleagues that I just mentioned before. She --<br/> 5       within that one publication, I think there are two<br/> 6       or three different studies that you could look at.<br/> 7       There was an earlier study that was by Schneider<br/> 8       and Zottoli that I think is relevant. I'd have to<br/> 9       check on that. And Bartlett and Zottoli that is<br/> 10      also relevant. They're all pretty recent studies.<br/> 11      <b>Q. And these were all studies that you said</b><br/> 12      <b>were conducted in a lab. None of these related to</b><br/> 13      <b>using subjects that were in a real-life setting,</b><br/> 14      <b>correct?</b><br/> 15      MS. KLEINHAUS: Objection to form.<br/> 16      You can answer.<br/> 17      BY THE WITNESS:<br/> 18      A. So I've done some studies that have<br/> 19      examined the bargaining in the shadow of the trial<br/> 20      with actual defendants, but I don't know if they<br/> 21      were guilty or innocent, which is the conversation<br/> 22      I was having with Mr. Sullivan before. And that<br/> 23      was Bushway and Redlich, 2012. And then we did --<br/> 24      we did another study with defense attorneys,</p>     |

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| Page 225 | <p>1 prosecutors, and judges. And so we were asking</p> <p>2 them -- we were -- not directly, but we were</p> <p>3 looking at whether they were actually bargaining in</p> <p>4 the shadow of their trial. It was a hypothetical</p> <p>5 case. But that was Bushway, Redlich, and Norris,</p> <p>6 2014.</p> <p>7 BY MS. EKL:</p> <p>8 <b>Q. My question was specific to have studies</b></p> <p>9 <b>been conducted where the subject of the person, the</b></p> <p>10 <b>criminal defendant or somebody who was supposed to</b></p> <p>11 <b>represent the criminal defendant, and whether or</b></p> <p>12 <b>not that person in looking at the -- be motivated</b></p> <p>13 <b>to take the bargain was based on a real perception</b></p> <p>14 <b>of what they might get after trial versus the</b></p> <p>15 <b>maximum that was out there?</b></p> <p>16 MS. KLEINHAUS: Objection, asked and answered.</p> <p>17 Go ahead.</p> <p>18 BY THE WITNESS:</p> <p>19 A. The studies by Zottoli and colleagues</p> <p>20 that I mentioned, yes.</p> <p>21 BY MS. EKL:</p> <p>22 <b>Q. And when you say those are lab studies,</b></p> <p>23 <b>what do you mean by that? How were those conducted</b></p> <p>24 <b>in the lab?</b></p>                                                                                                                                | Page 227 | <p>1 BY MS. EKL:</p> <p>2 <b>Q. There's no study that shows that,</b></p> <p>3 <b>correct?</b></p> <p>4 MS. KLEINHAUS: Objection to form.</p> <p>5 Go ahead.</p> <p>6 BY THE WITNESS:</p> <p>7 A. I'm not sure about as directly as you're</p> <p>8 saying, but there are -- you know, I have</p> <p>9 interviewed defendants about the reasons that they</p> <p>10 took pleas, and I asked them -- I might have -- I</p> <p>11 can't remember if I asked them about their</p> <p>12 probability of conviction at trial. But, like,</p> <p>13 very specific to their maximum sentences, no, I</p> <p>14 can't think of any studies like that. But, again,</p> <p>15 that is what the judge -- in every plea hearing</p> <p>16 that I've observed, the judge will talk about what</p> <p>17 they're at maximum risk for, as they should in my</p> <p>18 opinion.</p> <p>19 BY MS. EKL:</p> <p>20 <b>Q. They're required by law to tell the</b></p> <p>21 <b>criminal defendants both the minimum and the</b></p> <p>22 <b>maximum that they could be facing.</b></p> <p>23 <b>But I'm trying to understand why you are</b></p> <p>24 <b>only using the maximum when you're trying to</b></p>                                                                                                                                                               |
| Page 226 | <p>1 A. Essentially, what I mean is that they're</p> <p>2 not with actual defendants. They weren't really --</p> <p>3 and they were online studies with participants who</p> <p>4 were completing surveys online. I believe -- I</p> <p>5 believe they were community members. There might</p> <p>6 have been one or two studies with college students,</p> <p>7 but I think that most of them were community</p> <p>8 members. But I did not prepare those studies. I</p> <p>9 didn't look at them recently.</p> <p>10 <b>Q. So, again, there's no study that you can</b></p> <p>11 <b>point us to -- I see Ms. Kleinhaus is laughing, but</b></p> <p>12 <b>I want to make sure that I get --</b></p> <p>13 A. I just mentioned several.</p> <p>14 <b>Q. No, no, no. You didn't let me finish my</b></p> <p>15 <b>question.</b></p> <p>16 A. Okay.</p> <p>17 <b>Q. There's no study that is actually</b></p> <p>18 <b>looking at a criminal defendant -- not a laboratory</b></p> <p>19 <b>survey that's conducted, but a criminal defendant's</b></p> <p>20 <b>perception in terms of the fact that they're</b></p> <p>21 <b>bargaining for what they think they will get after</b></p> <p>22 <b>trial versus what the maximum is that they can</b></p> <p>23 <b>possibly get in any scenario? There's no study --</b></p> <p>24 MS. KLEINHAUS: Objection. Sorry.</p> | Page 228 | <p>1 <b>determine what the plea discount is. And you're</b></p> <p>2 <b>saying, and correct me if I'm wrong, that it's</b></p> <p>3 <b>based on these laboratory studies that were</b></p> <p>4 <b>conducted and just the theory in general in</b></p> <p>5 <b>relation to the plea discounts.</b></p> <p>6 A. No, I'm not saying it's based on the</p> <p>7 studies that you asked me about. What I'm saying</p> <p>8 is that this is what the person is -- that's the</p> <p>9 maximum plea discount because that's the maximum</p> <p>10 statutory sentence that they're at risk for. So if</p> <p>11 I'm considering or anybody -- if a defendant is</p> <p>12 considering whether to plead guilty or not, they're</p> <p>13 thinking about, you know, the worst-case scenario.</p> <p>14 What am I -- what could I possibly get, and should</p> <p>15 I avoid that risk because that's really what we're</p> <p>16 talking about, risk/benefit decisions, by pleading</p> <p>17 guilty. Because the judge just told me if I'm</p> <p>18 convicted at trial, I might get 90 years, or</p> <p>19 30 years, or whatever it is.</p> <p>20 MS. EKL: Let's take a couple of minutes. We</p> <p>21 may be wrapping up.</p> <p>22 MS. KLEINHAUS: Great.</p> <p>23 MS. EKL: Just want to make sure.</p> <p>24 THE WITNESS: Another break? Are there other</p> |

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| Page 229 | <p>1 attorneys who are planning to ask me questions?</p> <p>2 MR. BAZAREK: I might have a couple follow-up,</p> <p>3 but not much.</p> <p>4 MS. EKL: If you want to go ahead, go ahead.</p> <p>5 That's fine. I'm good.</p> <p>6 MS. KLEINHAUS: Are there any attorneys who</p> <p>7 haven't already questioned Dr. Redlich who are</p> <p>8 going to? If so, please do so now. Otherwise,</p> <p>9 maybe Mr. Bazarek can wrap up.</p> <p>10 Okay. Seeing none, Bill, you're up.</p> <p>11 FURTHER EXAMINATION</p> <p>12 BY MR. BAZAREK:</p> <p>13 <b>Q. Dr. Redlich, have you ever evaluated an</b></p> <p>14 <b>individual who had a pending criminal matter as to</b></p> <p>15 <b>whether or not they were competent -- strike that.</b></p> <p>16 <b>Have you ever been asked to evaluate an</b></p> <p>17 <b>individual who had a pending criminal court</b></p> <p>18 <b>proceeding as to whether or not that individual was</b></p> <p>19 <b>competent to stand trial?</b></p> <p>20 A. No.</p> <p>21 <b>Q. Have you ever evaluated an individual</b></p> <p>22 <b>who had a pending criminal court proceeding as to</b></p> <p>23 <b>whether or not that individual was competent to</b></p> <p>24 <b>plead guilty?</b></p> | Page 231 | <p>1 BY MR. BAZAREK:</p> <p>2 <b>Q. And have you ever heard that phrase</b></p> <p>3 <b>reasonable degree of scientific certainty? Have</b></p> <p>4 <b>you ever heard that?</b></p> <p>5 A. Yes.</p> <p>6 <b>Q. What does that mean, reasonable degree</b></p> <p>7 <b>of scientific certainty?</b></p> <p>8 A. In the context that I've heard it in is</p> <p>9 in the forensic sciences.</p> <p>10 <b>Q. In your work as a scientist, do you use</b></p> <p>11 <b>that phrase?</b></p> <p>12 A. No.</p> <p>13 <b>Q. And why is that?</b></p> <p>14 A. Because it's not really a research</p> <p>15 phrase. It's more of a legal phrase, I would say.</p> <p>16 And I don't know if -- I don't think that other</p> <p>17 social scientists use that phrase, to my knowledge.</p> <p>18 Again, it's like, a forensic scientist who's</p> <p>19 talking about hair analysis, or tire treads, or</p> <p>20 something like that. I don't know.</p> <p>21 <b>Q. Right. And you would agree there's</b></p> <p>22 <b>nowhere in your report is there any opinions that</b></p> <p>23 <b>you hold to a reasonable degree of scientific</b></p> <p>24 <b>certainty, correct?</b></p>                                                                                              |
| Page 230 | <p>1 A. No. That's a clinical forensic</p> <p>2 psychologist, which I'm not trained to do.</p> <p>3 <b>Q. Okay. And so then you would agree</b></p> <p>4 <b>you've never been asked or evaluated anyone who is</b></p> <p>5 <b>going to plead guilty as to whether or not they</b></p> <p>6 <b>were making a knowing decision, an intelligent</b></p> <p>7 <b>decision, and a voluntary decision, is that</b></p> <p>8 <b>correct?</b></p> <p>9 A. That's correct.</p> <p>10 MS. KLEINHAUS: You mean before they plead?</p> <p>11 BY MR. BAZAREK:</p> <p>12 <b>Q. Before they plead, correct.</b></p> <p>13 A. Correct.</p> <p>14 <b>Q. You're a scientist, right? You</b></p> <p>15 <b>testified to that.</b></p> <p>16 A. Yes.</p> <p>17 <b>Q. Okay. When did you first become a</b></p> <p>18 <b>scientist?</b></p> <p>19 MS. KLEINHAUS: Objection, asked and answered.</p> <p>20 Answer again.</p> <p>21 BY THE WITNESS:</p> <p>22 A. If it's -- if it's at the point of my</p> <p>23 Ph.D., I received my Ph.D. in 1999.</p> <p>24</p>                                                                                                                                                                                          | Page 232 | <p>1 A. I don't know. I never thought about</p> <p>2 that. I don't say that, yeah.</p> <p>3 <b>Q. Right. Right. Okay. And I had a</b></p> <p>4 <b>question going back to your report.</b></p> <p>5 A. Okay.</p> <p>6 <b>Q. Give me a second.</b></p> <p>7 <b>So I see, if you go to Page -- on</b></p> <p>8 <b>Page 13 of your declaration, under penalty of</b></p> <p>9 <b>perjury, it was executed on March 19, 2024. That's</b></p> <p>10 <b>on Page 13 if you need the page.</b></p> <p>11 A. Yes.</p> <p>12 <b>Q. Did I read that right, March 19, 2024,</b></p> <p>13 <b>that's where you declared under penalty of perjury</b></p> <p>14 <b>the foregoing is true and correct?</b></p> <p>15 A. Right.</p> <p>16 <b>Q. My only question is in the letter -- if</b></p> <p>17 <b>you go to the first page, the letter to your friend</b></p> <p>18 <b>Joshua Tepfer, J.D., Scott Rauscher, J.D., Theresa</b></p> <p>19 <b>Kleinhaus, J.D., it's March 27, 2024.</b></p> <p>20 <b>So did something change from the time</b></p> <p>21 <b>you made your declaration until March 27, 2024?</b></p> <p>22 MS. KLEINHAUS: I'm just going to object to</p> <p>23 the extent this gets into any drafts which are</p> <p>24 protected under Rule 26 that you not describe</p> |

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| <p style="text-align: right;">Page 233</p> <p>1 anything with regard to drafts.</p> <p>2 If you're able to answer the question</p> <p>3 without describing or discussing drafts, then go</p> <p>4 ahead.</p> <p>5 BY THE WITNESS:</p> <p>6 A. I don't know. It was a draft. I don't</p> <p>7 know how to answer that question. I can</p> <p>8 certainly -- yeah.</p> <p>9 BY MR. BAZAREK:</p> <p>10 <b>Q. Yeah. I'm just trying to make heads or</b></p> <p>11 <b>tails out of it. You do the declaration on</b></p> <p>12 <b>March 19, but then the letter is dated March 27.</b></p> <p>13 A. Yeah.</p> <p>14 <b>Q. Can you explain that?</b></p> <p>15 MS. KLEINHAUS: Again, I'll direct her not to</p> <p>16 answer because I think it invades information</p> <p>17 that's protected by Rule 26.</p> <p>18 BY MR. BAZAREK:</p> <p>19 <b>Q. Is that right, Doctor? Is that</b></p> <p>20 <b>information protected by Rule 26?</b></p> <p>21 MS. KLEINHAUS: I think the question is, is</p> <p>22 she going to take my advice and not answer the</p> <p>23 question.</p> <p>24</p>                                                                                                                                                                       | <p style="text-align: right;">Page 235</p> <p>1 <b>of perjury on March --</b></p> <p>2 A. 19th, 2024. No, I do not hold any other</p> <p>3 opinions.</p> <p>4 MR. BAZAREK: Okay. Thank you, Dr. Redlich.</p> <p>5 MS. KLEINHAUS: Are we through? Okay.</p> <p>6 MR. BAZAREK: I don't have anything more.</p> <p>7 MS. KLEINHAUS: Okay. Dr. Redlich, you have</p> <p>8 an opportunity to either waive your signature or</p> <p>9 reserve it. Waiving means that you're not going to</p> <p>10 go through and review the question and answer, and</p> <p>11 reserving it means you'd like to take a look at the</p> <p>12 transcript before it's finalized to make sure that</p> <p>13 the court reporter took down everything correctly.</p> <p>14 You can't change any of your substantive answers.</p> <p>15 It's just a matter of whether there are any issues</p> <p>16 understanding what was said.</p> <p>17 Would you like to waive your signature</p> <p>18 or reserve your signature?</p> <p>19 THE WITNESS: Am I allowed to ask what's</p> <p>20 commonly done here?</p> <p>21 MS. KLEINHAUS: I guess my suggestion would be</p> <p>22 that you waive and that you don't need to go</p> <p>23 through it since we have it recorded on Zoom.</p> <p>24 THE WITNESS: Okay. Fine. I will waive my</p> |
| <p style="text-align: right;">Page 234</p> <p>1 BY MR. BAZAREK:</p> <p>2 <b>Q. Dr. Redlich, but for Ms. Kleinhaus</b></p> <p>3 <b>directing you not to answer the question, could you</b></p> <p>4 <b>answer the question?</b></p> <p>5 A. I'm not sure what that means. What are</p> <p>6 you asking? Could I answer?</p> <p>7 <b>Q. Well, I was asking for an explanation</b></p> <p>8 <b>between the inconsistency of your declaration and</b></p> <p>9 <b>the date of your final report.</b></p> <p>10 MS. KLEINHAUS: I'm directing her not to</p> <p>11 answer that because it's information that's</p> <p>12 protected under Rule 26.</p> <p>13 BY MR. BAZAREK:</p> <p>14 <b>Q. Okay. So my question, though, is,</b></p> <p>15 <b>Dr. Redlich, but for Ms. Kleinhaus instructing you</b></p> <p>16 <b>not to answer, would you be able to answer my</b></p> <p>17 <b>question?</b></p> <p>18 MS. KLEINHAUS: I think that gets at the same</p> <p>19 thing. So I'm going to direct her not to answer</p> <p>20 that.</p> <p>21 BY MR. BAZAREK:</p> <p>22 <b>Q. Do you hold any other opinions in this</b></p> <p>23 <b>case that are not included in your March 27, 2024</b></p> <p>24 <b>report that you declared was truthful under penalty</b></p> | <p style="text-align: right;">Page 236</p> <p>1 signature.</p> <p>2 MS. KLEINHAUS: Okay. We can go off the</p> <p>3 record.</p> <p>4 THE VIDEOGRAPHER: This is the end of the</p> <p>5 deposition. The time is 3:41 p.m. And the run</p> <p>6 time on this is 5 hours, 11 minutes, and</p> <p>7 20 seconds.</p> <p>8 THE COURT REPORTER: Are you ordering the</p> <p>9 transcript?</p> <p>10 MR. BAZAREK: Yeah. I'm ordering it, yes,</p> <p>11 yes. We'll talk about it.</p> <p>12 THE COURT REPORTER: Does anybody need a copy?</p> <p>13 MS. EKL: No.</p> <p>14 MR. SULLIVAN: Not right now.</p> <p>15 (The deposition concluded at 3:42 p.m.)</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |

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1 I, KAREN A. FAZIO, CSR No. 84-1834, a  
2 Notary Public within and for the County of Cook,  
3 State of Illinois, and a Certified Shorthand  
4 Reporter of said state, do hereby certify:

5  
6 That previous to the commencement of the  
7 examination of the witness, the witness was duly  
8 sworn to testify the whole truth concerning the  
9 matters herein;

10  
11 That the foregoing deposition transcript  
12 was reported stenographically by me, was thereafter  
13 reduced to typewriting under my personal direction  
14 and constitutes a true record of the testimony  
15 given and the proceedings had;

16  
17 That the said deposition was taken  
18 before me on the date and time specified;

19  
20 That I am not a relative or employee or  
21 attorney or counsel, nor a relative or employee of  
22 such attorney or counsel for any of the parties  
23 hereto, nor interested directly or indirectly in  
24 the outcome of this action.

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1                   IN WITNESS WHEREOF, I do hereunto set my  
2   hand of office at Chicago, Illinois, this 2nd day  
3   of May, 2024.

4

5

6

7

8

9

*Karen A. Fazio*



10

KAREN A. FAZIO, CSR No. 84-1834

11

Notary Public, Cook County, Illinois.

12

My commission expires 5/10/24

13

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Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

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