

# Exhibit 14



Transcript of the Deposition of  
**Robert Lindsey**

**Case:** Robert Lindsey, et al. v. City of Chicago, et al.

**Taken On:** April 8, 2025

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Robert Lindsey, et al. v. City of Chicago, et al.  
Deposition of Robert Lindsey - Taken 4/8/2025

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

ROBERT LINDSEY and GERMIN )  
SIMS, )  
 )  
Plaintiffs, )  
 )  
-vs- ) No. 19-cv-2347  
 )  
CITY of CHICAGO, et al., )  
 )  
Defendants. )

The videotaped deposition of  
ROBERT LINDSEY called by the Plaintiff for  
examination, taken pursuant to the Federal Rules  
of Civil Procedure of the United States District  
Courts pertaining to the taking of depositions  
before MAUREEN A. WOODMAN, a notary public within  
and for the County of Cook and State of Illinois,  
at Suite 1600, 55 West Monroe Street, Chicago,  
Illinois, on the 8th day of April, 2025, at the  
hour of 10:19 a.m.

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On behalf of City of Chicago.

6

7 ALSO PRESENT:

8 Michael Howard,  
Videographer, Video Instanter.

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<p style="text-align: right;">Page 5</p> <p>1       THE VIDEOGRAPHER: Recording. For the 2 record, my name is Michael Howard of Video 3 Instanter. I am the video recording device 4 operator for this deposition. Our business 5 address is 134 North LaSalle Street, Suite 1400, 6 Chicago, Illinois, 60602. This deposition is 7 being video recorded pursuant to the Federal 8 Rules of Civil Procedure. We are at 55 West 9 Monroe to take the video deposition of 10 Robert Lindsey in the matter of Robert Lindsey 11 versus City of Chicago, et al., case number 12 19 CV 2347. Today's date is April 8th, 2025, and 13 time is 10:19 a.m.  14       Will the witness please identify 15 himself for the record?  16       THE WITNESS: My name is Robert Lindsey. 17       THE VIDEOGRAPHER: Thank you. Could the 18 attorneys present please introduce themselves for 19 the record by stating their name and whom they 20 represent?  21       MR. FLAXMAN: Joel Flaxman for Mr. Lindsey. 22       MR. PALLE: Eric Palles and with me is 23 Rachel Johnson for Kallatt Mohammed. 24       MR. GAINER: Jack Gainer for Ronald Watts.</p>	<p style="text-align: right;">Page 7</p> <p>1       <b>your lawsuit and the arrest that took place in 2 October of 2009. If at any time you don't 3 understand my questions, let me know, and I'll 4 rephrase them. We want to reach some sort of 5 understanding. A lot of times you'll probably 6 know the question that I'm asking you before I 7 finish, but please make sure that you let me 8 finish so that we don't talk over each other. 9 That will help the court reporter.</b>  10       <b>In addition to that, try to avoid 11 things like uh-huh, uh-uh. Those are tough to -- 12 please answer yes or no to those types of 13 questions. Can you do that?</b>  14       A. Yes. 15       <b>Q. And if at any time you need to take a 16 break, let me know.</b> 17       A. Mm-hmm. 18       <b>Q. We will be happy to stop. Okay? 19 Where do you currently live?</b> 20       A. I stay in Chicago. I stay on 21 6959 South Eberhart, Chicago, Illinois. 22       <b>Q. 69 Tomahawk?</b> 23       A. No. Eberhart Street. 24       <b>Q. Okay. And are you currently working?</b></p>
<p style="text-align: right;">Page 6</p> <p>1       THE VIDEOGRAPHER: Could the attorneys 2 present on Zoom introduce themselves for the 3 record and whom they represent?  4       MS. BESWICK-HALE: Hanna Beswick on behalf of 5 individual officers via Zoom.  6       MS. HARRIS: Dhavi Harris on behalf of the 7 City of Chicago and supervisory officers.  8       THE VIDEOGRAPHER: Thank you, Counsel. Could 9 the court reporter please introduce themselves 10 and swear in the witness.  11       THE COURT REPORTER: My name is Maureen 12 Woodman from Royal Reporting Service.  13       (Witness was duly sworn.)  14       <b>ROBERT LINDSEY,</b> 15 called as a witness herein, after having been 16 first duly sworn, was examined and testified as 17 follows:  18       <b>EXAMINATION</b> 19       <b>BY MR. PALLE:</b> 20       <b>Q. For the record, your name is Robert 21 Lindsey?</b> 22       A. Yes. Yes, sir. 23       <b>Q. Now, as I said, my name is Eric Palles. 24 I'm going to ask you a series of questions about</b></p>	<p style="text-align: right;">Page 8</p> <p>1       A. No. 2       <b>Q. What is your current means of support?</b> 3       A. I get SSI. I get my father -- well, he 4 died, so I get his benefit, too. 5       <b>Q. So you get social --</b> 6       A. Social Security and my -- 7       THE VIDEOGRAPHER: Would you be able to move 8 your microphone to the string? It's muffled 9 where it's at right now. 10       MR. FLAXMAN: Is that better? 11       THE VIDEOGRAPHER: Thank you. 12       <b>BY MR. PALLE:</b> 13       <b>Q. So as I understand it, you receive 14 Social Security benefits from your -- as a result 15 of your father's death?</b> 16       A. Mm-hmm. 17       <b>Q. Yes or no?</b> 18       A. Yes, sir. And my benefits for myself as 19 part of -- 20       <b>Q. SSI?</b> 21       A. SSI. 22       <b>Q. And those are disability?</b> 23       A. Yeah. 24       <b>Q. Okay. And how long have you been</b></p>

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<p>1     <b>receiving disability payments?</b></p> <p>2     A. Ever since I was about like 12, 13 years</p> <p>3     old.</p> <p>4     <b>Q. And you're in your 40s now?</b></p> <p>5     A. I'm 46.</p> <p>6     <b>Q. You don't look it.</b></p> <p>7     Now -- well, before we get into the</p> <p>8     <b>disability, I'm going to ask you a few questions</b></p> <p>9     <b>about that. You understand, of course, that</b></p> <p>10    <b>we're here because of an incident that took place</b></p> <p>11    <b>in October of 2009?</b></p> <p>12    A. 2009, yeah.</p> <p>13    <b>Q. As we sit here today, do you remember</b></p> <p>14    <b>that incident?</b></p> <p>15    A. Yeah.</p> <p>16    <b>Q. We sometimes ask, you know, whether or</b></p> <p>17    <b>not you have any independent recollection,</b></p> <p>18    <b>meaning aside from anything you could read or</b></p> <p>19    <b>look at. Right now as we're sitting here, you</b></p> <p>20    <b>have a memory of this incident?</b></p> <p>21    A. No. Yeah, yeah, in my mind, yeah. I</p> <p>22    can never -- I never could forget this.</p> <p>23    <b>Q. Okay. Now -- but to prepare for today,</b></p> <p>24    <b>you met with Mr. Flaxman, right?</b></p>	<p>1     of certain polices. Not everybody, but the ones</p> <p>2     I got to watch.</p> <p>3     <b>Q. I understand that, but what I'm asking</b></p> <p>4     <b>is, do you ever -- do you have trouble</b></p> <p>5     <b>remembering things generally?</b></p> <p>6     A. Yeah.</p> <p>7     <b>Q. You do?</b></p> <p>8     A. Yeah.</p> <p>9     <b>Q. Is that a problem that's been -- that</b></p> <p>10    <b>has -- that you've had over your lifetime?</b></p> <p>11    A. Yes, sir. Years and years. Now I'm</p> <p>12    grown now.</p> <p>13    <b>Q. Grown?</b></p> <p>14    A. Yes. That changed now.</p> <p>15    <b>Q. Well --</b></p> <p>16    MR. FLAXMAN: I'm not sure he understood your</p> <p>17    question.</p> <p>18    BY MR. PALLE:</p> <p>19    <b>Q. When you said you got it changed now,</b></p> <p>20    <b>what did you mean?</b></p> <p>21    A. When I was 14, 13, that's when I had my</p> <p>22    bad time, selling drugs and all that, but now I'm</p> <p>23    46. I don't do that.</p> <p>24    <b>Q. I got you.</b></p>
<p style="text-align: center;">Page 10</p> <p>1     A. That's my lawyer.</p> <p>2     <b>Q. Right. Okay. And I'm not going to ask</b></p> <p>3     <b>you about that, but did you have an opportunity</b></p> <p>4     <b>to review any paper with him at that time?</b></p> <p>5     A. No. I don't need to review. He can</p> <p>6     review it. We can go over it if he want, but I</p> <p>7     still remember.</p> <p>8     MR. FLAXMAN: Don't tell him what we went</p> <p>9     over. Just answer -- he is saying did you review</p> <p>10    any paper, yes or no?</p> <p>11    BY THE WITNESS:</p> <p>12    A. We sat down.</p> <p>13    <b>Q. Okay. But anything that he showed you,</b></p> <p>14    <b>did it trigger a new memory that you had</b></p> <p>15    <b>forgotten about?</b></p> <p>16    A. No, sir. It's the same thing he doing</p> <p>17    right now.</p> <p>18    <b>Q. All right. Let me ask you a question.</b></p> <p>19    <b>Have you had any problems with your memory over</b></p> <p>20    <b>your lifetime?</b></p> <p>21    A. Always, always. I got a lot of -- I got</p> <p>22    people dead. People dying every day, so I got a</p> <p>23    lot of stuff on my mind. I always keep the</p> <p>24    police on my mind because I'm kind of like afraid</p>	<p style="text-align: center;">Page 12</p> <p>1     A. I got a mind now.</p> <p>2     MR. FLAXMAN: He is asking you about your</p> <p>3     ability to remember --</p> <p>4     BY MR. PALLE:</p> <p>5     <b>Q. To remember those things.</b></p> <p>6     A. Yeah, sometimes I can remember things</p> <p>7     and sometimes I can't remember things.</p> <p>8     <b>Q. Got you. Good. Tell me -- can you tell</b></p> <p>9     <b>me briefly -- I want to go over what you actually</b></p> <p>10    <b>remember about October of 2009. So tell me,</b></p> <p>11    <b>first of all, do you recall where you were living</b></p> <p>12    <b>on that day?</b></p> <p>13    A. Let me see. That was 72nd -- that</p> <p>14    was -- no. Was that Loomis I stayed? I was</p> <p>15    staying on 79th and Loomis.</p> <p>16    <b>Q. Okay. And this arrest, where did it</b></p> <p>17    <b>take place?</b></p> <p>18    A. This took place on 42nd and Prairie.</p> <p>19    <b>Q. What time of day was it?</b></p> <p>20    A. About -- the time it is right now.</p> <p>21    <b>Q. Morning?</b></p> <p>22    A. Morning. So about like 11:00, going on</p> <p>23    12:00.</p> <p>24    <b>Q. Okay.</b></p>

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<p>1       A. So that's where it took place, at about 2       12:00 or 1:00 o'clock, like that.</p> <p>3       <b>Q. Okay. Now, whom were you with at the 4       time of your arrest?</b></p> <p>5       A. I had a buddy with me named Germin. I 6       had picked him up from the L on like 55th. 7       MR. FLAXMAN: Just answer his question. 8       BY MR. PALLE: 9       <b>Q. We'll get to that.</b> 10      A. That's my rapper, Germin. 11      <b>Q. Were you with anybody else?</b> 12      A. No, no, just me and him. 13      <b>Q. And when did you first see Germin that 14       morning?</b> 15      A. When I picked him up from the L. 16      <b>Q. Picked him up at the L. Where is this 17       now?</b> 18      A. 55th and Garfield. 19      <b>Q. What line is it?</b> 20      A. Green Line. 21      <b>Q. And had you spoken with him before you 22       went to pick him up?</b> 23      A. Oh, yeah, yeah. He had called me when I 24      was leaving out the house, and at the time I was</p>	<p>1       <b>Q. You didn't do it that day?</b> 2       A. I didn't do it that way. 3       <b>Q. That's the reason you went there?</b> 4       A. Always got to check in. Every day. 5       <b>Q. After you got out, you heard from 6       Germin?</b> 7       A. No. As I'm leaving. 8       <b>Q. And he asked you to pick him up?</b> 9       A. Yep. 10      <b>Q. And did he tell you why he needed you to 11       pick him up?</b> 12      A. He said -- saying he need to go down the 13      street right there, so 51st and State. It's not 14      too far from 55th, the Boulevard. 15      <b>Q. So you are saying you really didn't 16       drive him very far from the train station to 17       where he wanted to go?</b> 18      A. No, because it was just like that. 19      <b>Q. Okay. And where did -- where was the 20       place you guys went?</b> 21      A. It was on the corner. After the corner 22      of State on 51st where the projects used to be at 23      but no projects there. Just like a parking lot. 24      <b>Q. Was there some sort of business there?</b></p>
<p style="text-align: center;">Page 14</p> <p>1       leaving out the house, I told him give me about 2       like 20 or 30 minutes. I need to go to 57th and 3       Wood right there, which that's like -- I was 4       already on parole, so I'm not allowed to be 5       around no drugs, no guns, none of that. I go to 6       my parole spot. 7       <b>Q. You go to your what spot?</b> 8       A. Parole spot. 9       <b>Q. Okay.</b> 10      A. So when I come through the door, they 11      got colors on the door that you supposed to 12      understand that's your color, that's your drop 13      date, but my color wasn't on the wall. So that's 14      how I end up leaving back up. Then I picked 15      Germin off 55th at the Garfield station right 16      there. 17      <b>Q. I'm going to try to repeat that so I'm 18       sure that I understand it -- you know, that I 19       understand you.</b> 20      <b>So that morning, you went to adult 21       probation. You were on parole. You had to do a 22       urine drop to make sure that you were clean from 23       drugs?</b> 24      A. Sometimes. I hadn't do it.</p>	<p style="text-align: center;">Page 16</p> <p>1       A. There's business. 2       <b>Q. What type of business?</b> 3       A. They do -- you know, when you got kids 4       and stuff, it got -- they got doctors. Some of 5       these doctors got their own office, and they have 6       you bring their kids to they own office instead 7       of the hospital. 8       <b>Q. Like a clinic?</b> 9       A. Yeah. It's a clinic in there. Some 10      more things in there. He was working for like 11      some like -- where you help people build stuff. 12      He's a bricklayer or something. 13      <b>Q. Construction?</b> 14      A. Yeah. So he just helped him do that. 15      So I found out a man owed him a check, so I took 16      him to get him a check. 17      <b>Q. He was going to a place of work to pick 18       up a check?</b> 19      A. That's all I was doing. 20      <b>Q. All right. So then once you left there, 21       where did you go? You went to eat?</b> 22      A. Yes. We went to the truck stop. 23      <b>Q. And where was that again?</b> 24      A. That's in Bronzeville. It's like on --</p>

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<p>1 you go to 39th. You going to stay by one. 2 There's two truck stops off the -- like train 3 track right here. Warehouse buildings and stuff, 4 car wash and all that. Two truck stops. 5 Anywhere you go, they got nice food.</p> <p>6 <b>Q. All right. I'm not going to ask you</b> 7 <b>what you ate for breakfast. When you left there,</b> 8 <b>then what happened?</b></p> <p>9 A. Oh, it was time to go to see -- I had a 10 guy that was going to fix my car, but he couldn't 11 fix it last night because I didn't trust him 12 because it was too dark, so I said I'll bring it 13 back to you in the morning. His name is Bug. He 14 stays on 42nd and Prairie. Right off the corner. 15 Stop sign right here. You ain't got to do 16 nothing but pull your car over and just walk. 17 His house right off the corner.</p> <p>18 <b>Q. So he works out of his house?</b> 19 A. Yeah. That's all he do.</p> <p>20 <b>Q. So the building you went to see Bug at</b> 21 <b>was a residence, a private home?</b> 22 A. Yeah, yeah.</p> <p>23 <b>Q. Well, let's talk about the car. It was</b> 24 <b>a Mercury Mystique?</b></p>	<p>1 <b>know?</b> 2 A. Oh, he work like on the construction. 3 <b>Q. On --</b> 4 A. Construction. Like he work on the 5 street.</p> <p>6 <b>Q. Construction.</b> 7 A. He lay stuff down in the drains and 8 stuff. Break up the walk, the streets.</p> <p>9 <b>Q. Let me just say, you've got a deep tone.</b> 10 <b>Your voice is down in the lower registers, and I</b> 11 <b>have some hearing issues, so I'm going to --</b> 12 A. Okay.</p> <p>13 <b>Q. We'll try to work through it. Okay?</b> 14 MR. FLAXMAN: We can translate for you. 15 MR. PALLE: You know they have these AI 16 translators now.</p> <p>17 BY MR. PALLE: 18 <b>Q. Okay. So your guy Chandler, do you know</b> 19 <b>whether or not Mr. Chandler was involved in the</b> 20 <b>sale of illegal drugs?</b> 21 A. Who is Chandler? 22 <b>Q. Mo Chandler.</b> 23 A. No. Why would he be involved in 24 something?</p>
<p>1 A. Yeah.</p> <p>2 <b>Q. What year was it?</b> 3 A. Like -- I think 2009.</p> <p>4 <b>Q. So brand new at the time?</b> 5 A. Almost. Yeah, yeah. My friend gave me 6 that car for a gift.</p> <p>7 <b>Q. Your friend gave you the car for a gift.</b> 8 <b>Who is your friend?</b> 9 A. His name is Mo.</p> <p>10 <b>Q. Do you know his government name?</b> 11 A. Maurice.</p> <p>12 <b>Q. Maurice what?</b> 13 A. Chandler.</p> <p>14 <b>Q. Maurice Chandler?</b> 15 A. Yeah.</p> <p>16 <b>Q. So he gave you the car?</b> 17 A. Yeah.</p> <p>18 <b>Q. Why?</b> 19 A. Because I'm like a brother to him. If I 20 had so many cars or -- I'm like, since I met you, 21 I really trust you, so you're my brother now.</p> <p>22 <b>Q. Got you. I understand.</b> 23 <b>But it sounds like he was pretty</b> 24 <b>well off. What did he do for a living, if you</b></p>	<p>1 <b>Q. I just asked the questions.</b> 2 A. No, no, no, no. 3 <b>Q. Okay. So by the way, I think I've seen</b> 4 <b>some stuff in the materials that sometimes Bug</b> 5 <b>was called White Boy Bug?</b> 6 A. He's a white boy. 7 <b>Q. He was actually a white boy?</b> 8 A. Yeah. 9 <b>Q. And you don't know his real name, right?</b> 10 A. No. 11 <b>Q. Do you know whether or not he still</b> 12 <b>operates business over by 42nd and Prairie?</b> 13 A. Yeah, he does real people. That's what 14 he does for a living sometimes. Sometimes he 15 just don't. He's a drug head. He just like to 16 get high. 17 <b>Q. What was his drug of choice? What did</b> 18 <b>he like to get high on, coke, heroin, Ecstasy?</b> 19 A. I think he like that white stuff. 20 <b>Q. Heroin?</b> 21 A. Mm-hmm. 22 <b>Q. So now did you see Bug?</b> 23 A. Where? 24 <b>Q. When you got to the place, did you have</b></p>

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<p style="text-align: center;">Page 21</p> <p>1    <b>a discussion with Bug about your car?</b>    2    A. I talked to Bug last night. I try to go    3    figure out what's the part to go get. I    4    shouldn't be seeing no polices coming around the    5    corner on me. Never sold no drugs.</p> <p>6    <b>Q. So now are you saying you brought -- you    7    had to bring a particular part with you over to    8    Bug's?</b></p> <p>9    A. No. He got fresh in my memory last    10   night. Tell me what you just said last night. I    11   pulled up on him. He came to the car. He looked    12   up under the car. He's like, "Oh, yeah. I told    13   you it was going to be a ball joint. So it can    14   stop popping every time you turn the corner. He    15   told me go get a ball joint. Before I could get    16   a ball joint, he walks off. He's in the house.    17   I'm about to pull out with the car. I pulled out    18   just -- if I were to hit my gas so fast, whoever    19   the slow person was in front of me -- which is I    20   think it was Brown because the one that jumped    21   out the front car, and all of the Mexicans    22   police, they was in the back of the car. So they    23   ambushed me.</p> <p>24    <b>Q. We're going to go through in a little</b></p>	<p style="text-align: center;">Page 23</p> <p>1    know, I just like looked up, saw some -- like    2    some killers. I just know I was ambushed, and    3    all I saw was guns to Germin's head.</p> <p>4    <b>Q. So, again, just so we're clear, at the    5    time -- your first awareness of the police was    6    when a car sped by you and pulled in front of    7    your car; am I correct?</b></p> <p>8    A. No.</p> <p>9    <b>Q. What was your first awareness that the    10   police were there?</b></p> <p>11   A. The police was somewhere -- sitting    12   somewhere. Not the same -- just told you. Bug    13   is a mechanic. Bug have so many people cars that    14   he fix on, or he don't know what's going on. All    15   he know he going to fix your car. Then some    16   reason, police ride through the neighborhood.    17   You know, homicide, they got to go look for this    18   car. They got the car. But they just got the    19   car. For some reason, I know a lot of -- watch    20   them. Every time they look around, they target    21   Bug. Every drug dealer, car, anything. Like I    22   say they -- he know something, all that. They --    23   they be on -- they be targeting Bug, but Bug    24   don't know what to do because he is so high, he</p>
<p style="text-align: center;">Page 22</p> <p>1    <b>more detail. I'll try to break it down.    2    So Bug had told you you needed to    3    get a ball joint?</b></p> <p>4    A. Yep.</p> <p>5    <b>Q. Right?</b></p> <p>6    A. Yep.</p> <p>7    <b>Q. And then --</b></p> <p>8    A. And he --</p> <p>9    <b>Q. You figured I got to go to Pet Boys or    10   Auto Zone or whatever?</b></p> <p>11   A. Yep.</p> <p>12   <b>Q. In the meantime then, Bug goes into the    13   house?</b></p> <p>14   A. Yeah, yeah, because his girlfriend, you    15   know, she's crazy.</p> <p>16   <b>Q. Who is his girlfriend?</b></p> <p>17   A. Some old black lady.</p> <p>18   <b>Q. Does she still live there, do you know?</b></p> <p>19   A. No. Her and Bug got put out.</p> <p>20   <b>Q. Anyway, so now you are -- you're still    21   on the street or had you gotten back into your    22   car when the police pulled up?</b></p> <p>23   A. When the police pulled up, no, I was    24   sitting, getting ready to pull off, and before I</p>	<p style="text-align: center;">Page 24</p> <p>1    is drunk. He don't care about going to no jail    2    for a bag of blow.</p> <p>3    <b>Q. Again, I need to make sure I understand    4    what you're saying. You're saying that police    5    officers, including members of Watts' team, would    6    get information from Bug concerning other illegal    7    activity, like stolen cars and drugs?</b></p> <p>8    A. Depends on. It's like if someone    9    around, and you fix my car, and I sitting in the    10   car over there, I could ask you a question.</p> <p>11   Ain't nothing wrong with asking a question. You    12   can just tell me, I don't know nothing about that    13   car. So it didn't go like that.</p> <p>14   <b>Q. When you say ask -- who would be asking    15   the questions, the police officers?</b></p> <p>16   A. Of course.</p> <p>17   <b>Q. Or you, would you be --</b></p> <p>18   A. Polices. And when it came down to me,    19   who -- because that might be a car I think I saw    20   somebody might have shot, robbed you, yeah. I    21   don't get a third time robbery.</p> <p>22   <b>Q. Okay. Do you know whether or not Bug    23   provided any information to the police officers    24   about you?</b></p>

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<p style="text-align: center;">Page 25</p> <p>1 A. No. 2 <b>Q. You don't know or he did not?</b> 3 A. No, he did not do no stuff like that. 4 <b>Q. Same question about Germin, did he</b> 5 <b>provide information about Germin, to your</b> 6 <b>knowledge?</b> 7 A. No. Germin ain't do that either, no. 8 He ain't gonna to do that. 9 <b>Q. Now, correct me if I'm wrong, one of the</b> 10 <b>police cars pulled in front of --</b> 11 A. My car. 12 <b>Q. Am I correct?</b> 13 A. Yes. 14 MR. FLAXMAN: Make sure you let him ask the 15 whole question. 16 MR. PALLE: I was close to done. 17 BY MR. PALLE: 18 <b>Q. Okay. And that is -- and where were you</b> 19 <b>when that car pulled in front of you? Were you</b> 20 <b>inside your driver's --</b> 21 A. Sitting right there. 22 <b>Q. In your driver seat?</b> 23 A. Getting ready to pull off. I almost ran 24 into it.</p>	<p style="text-align: center;">Page 27</p> <p>1 got one with -- black one, chubby one, and you 2 got the other one looking like that dude off -- 3 you know, Brother Law. 4 <b>Q. Bronzeville?</b> 5 A. The bald-head dude that playing the one 6 stealing the food. You got to watch the show. 7 But, yeah. That's what I call -- yeah, Brown. 8 The bald head R. Kelly one. 9 <b>Q. Bald hair and chubby?</b> 10 A. Yeah, yeah, and heavyset a little bit. 11 <b>Q. Well, now so am I correct that Brown</b> 12 <b>jumped out of the car?</b> 13 A. Yeah, he the one that searched the car. 14 He the one that got to do the other stuff. I'll 15 tell you when you ask me another question. 16 <b>Q. Brown is the officer that drew a weapon?</b> 17 A. He had his gun out, too. He had -- 18 everybody with they gun out. 19 <b>Q. So then what happened?</b> 20 A. So when Brown jumped out the car, he 21 first told me shut the car off. 22 <b>Q. Okay.</b> 23 A. Because I wasn't going to shut it off if 24 I had my license. I would have sat in that car</p>
<p style="text-align: center;">Page 26</p> <p>1 <b>Q. Got you. I got into an accident last</b> 2 <b>week. I'll show you my car on a break what the</b> 3 <b>guy did when he pulled in front of me.</b> 4 <b>So in any event -- and Germin was in</b> 5 <b>the car with you at the time?</b> 6 A. Yep. 7 <b>Q. In the passenger side?</b> 8 A. Yep. Chilling. 9 <b>Q. Had you guys dealt with anybody else</b> 10 <b>other than Bug while you were there?</b> 11 MR. FLAXMAN: Objection; form. 12 BY THE WITNESS: 13 A. No. 14 <b>Q. You didn't see any people you knew on</b> 15 <b>the street?</b> 16 A. No. We saw some peoples, but we didn't 17 give a damn about them. 18 <b>Q. And then the officer who you called</b> 19 <b>Brown -- but I think at some point you understand</b> 20 <b>that this man's name was Jones; am I correct?</b> 21 A. Brown, Jones, Mohammed. 22 <b>Q. All right.</b> 23 A. And Watts. And really more than that, 24 but these like -- it's like four of them. You</p>	<p style="text-align: center;">Page 28</p> <p>1 and gave them the worse hell in the world. 2 Excuse me. So he walk up to the car. This -- I 3 remember this officer because I saw him before in 4 life, but he's kind of -- he don't hang with them 5 all the time. The one I know hang like this, I 6 already know them. But the ones that they just 7 assign you with or you just -- I'll take you 8 outside today with me. You working on my shift. 9 All right. 10 <b>Q. Okay. So are you saying that Brown was</b> 11 <b>not a guy who you typically saw hanging with the</b> 12 <b>other?</b> 13 A. No, not them -- not them Mexicans, no. 14 Them with Watts, a whole football game that 15 morning. You know how you became a sarge, 16 lieutenant, whatever you want to call it? I go 17 in the station, and I got certain amount of 18 people I can pick. So if I got 12 police 19 officers, I got to be on my -- what they call -- 20 if something happen to you, I got stand up for 21 you. 22 <b>Q. Substitute?</b> 23 A. Whatever. But sometimes I might lie for 24 you. Sometimes I might tell you that's a no-go.</p>

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<p style="text-align: right;">Page 29</p> <p>1     <b>Q. But when you talk about -- now you're</b>    2     <b>talking I, blah, blah, et cetera. But you're</b>    3     <b>putting yourself in the position of a police</b>    4     <b>sergeant of a tactical squad?</b>    5     A. Yeah, because I'm seeing what you're    6     seeing.    7     <b>Q. So I'm just wondering how did you become</b>    8     <b>aware of how those tactical teams are made, you</b>    9     <b>know, in the mornings during roll call? Have you</b>    10     <b>had any experience with that? Or are you just</b>    11     <b>kind of thinking that's normally how things are</b>    12     <b>done?</b>    13     A. No. Basically I watch them every day.    14     If I go to work that day, I ain't got so many    15     complaints -- I do got some complaints that I    16     know I got to watch my back because you going to    17     keep getting these complaints. And then it's    18     going to go to a high power, and they going to    19     have to put you on some type of desk duty. You    20     might get fired. Depends on what it is.    21     <b>Q. Now, it sounds to me like you have</b>    22     <b>gotten some information about the police</b>    23     <b>department procedures from somebody. Somebody</b>    24     <b>told you about this?</b></p>	<p style="text-align: right;">Page 31</p> <p>1     <b>Q. Then what happened?</b>    2     A. See, he said -- they didn't -- they took    3     us out the car, but then again why you put it in    4     the police report? You say -- when y'all did the    5     spin-out and blocked us in, you said all y'all    6     came out with y'all guns. Told me and Germin put    7     our hands up, which we had already saw that. So    8     we don't want you to kill us by no mistake. So    9     we put our hands up. And, you know, my door is    10     not unlocked because once -- oh, yeah, the door    11     was unlocked. He just snatched me out right    12     there. He just want to read me my rights before    13     he snatched me out. So I've been read my rights.    14     So I stepped out the car. You got Brown over    15     there getting my friend out the passenger side.    16     I got some big old tall Scottie Pippen officer    17     here.    18     <b>Q. A big tall what?</b>    19     A. Scottie Pippen. He tall as hell.    20     <b>Q. Now I understand. Okay.</b>    21     A. So I'm looking like what's going on,    22     man. You know what they said in the report?    23     They said Germin had something in his sock or    24     ankle or something, and he goes to dig in his</p>
<p style="text-align: right;">Page 30</p> <p>1     A. No, no. I just told you. You think    2     you're looking at a kid. I'm 46 years old. How    3     old is you? I'm 46 years old.    4     <b>Q. I'm 74 years old.</b>    5     A. I'm almost becoming to be your age    6     because God let me be here. I ain't going with    7     these polices. Meanwhile, I watch all these    8     shows, all this other stuff. But you can't --    9     you just can't get me like that.    10     <b>Q. Well --</b>    11     A. Because I'm a man that tell you if I'm    12     wrong, I'm wrong. If I'm right, then you got to    13     honor that.    14     <b>Q. Number one, you're not nearly as old as</b>    15     <b>me. I've been practicing law longer than you've</b>    16     <b>been born. Let's start there.</b>    17     <b>But now I'm not trying to challenge</b>    18     <b>you. I'm just trying to get some information.</b>    19     A. Come on.    20     <b>Q. So then you were ordered out of the car.</b>    21     <b>You kept the car running. You were told --</b>    22     A. No, no. That car shut off. The key    23     still in the ignition though. He just ordered to    24     step out.</p>	<p style="text-align: right;">Page 32</p> <p>1     ankle, and before you knew it, he had -- he    2     wouldn't have no chance to throw it out the    3     window or nothing. And then, you know, for him    4     to be my friend or anything like that. And, you    5     know, this is not my car like that. This is my    6     mama car. I think a lot of people know me    7     because me and him would not have been friends    8     right now.    9     <b>Q. Okay. Let's --</b>    10     A. Go back to --    11     MR. FLAXMAN: Wait for him to ask another    12     question.    13     BY MR. PALLS:    14     <b>Q. I'm sorry. You're giving me a lot of</b>    15     <b>information. You obviously remember this very</b>    16     <b>well.</b>    17     A. Mm-hmm.    18     <b>Q. You know, I'm, again, a little hard of</b>    19     <b>hearing, and I just want to make sure I'm taking</b>    20     <b>it all in. Okay?</b>    21     So now let me ask you this. I    22     thought you just said about the car that it was    23     your mama's car.    24     A. Yeah. It's been my mama's car.</p>

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<p style="text-align: right;">Page 33</p> <p>1     <b>Q. I thought you said a friend gave it to</b> 2     <b>you?</b> 3     A. I bought -- I got it from my friend. I 4     end up getting another car because I got -- I 5     told you I got a lawsuit -- I ain't got a 6     lawsuit. A settlement from my father's death. 7     <b>Q. Got you.</b> 8     A. So I went and bought me another car. 9     <b>Q. What kind of car?</b> 10    A. It was an Oldsmobile Intrigue, but I 11    didn't get my mama nothing. 12    <b>Q. You gave her the Mercury?</b> 13    A. I gave away the car. So she seemed like 14    she don't like to drive it, or she just let it 15    sit around, so nine times out of ten I be back 16    and forth in both of these cars. This car, that 17    car, you know. 18    <b>Q. Another thing I'm getting from you,</b> 19    <b>though, is that because you're driving your mom's</b> 20    <b>car, because you're on parole, and you got some</b> 21    <b>conditions of parole which includes staying away</b> 22    <b>from certain people --</b> 23    A. Yeah. 24    MR. FLAXMAN: Let him ask the question.</p>	<p style="text-align: right;">Page 35</p> <p>1     <b>So now when you are -- just so I'm</b> 2     <b>clear now, the officer looks like Scottie Pippen,</b> 3     <b>he is -- he's the guy on your side -- no, you</b> 4     <b>got --</b> 5     A. He is the one that pulled -- got me out 6     the car. I know him. I just don't know his -- 7     like his name like I know Watts. 8     <b>Q. He is not as tall as Scottie Pippen, I</b> 9     <b>assume.</b> 10    A. He just acted like that. I saw him a 11    lot of times. He played like -- I ain't going to 12    lie. One day -- he caught me one day, and that 13    was way before Watts even become a sarge. Watts 14    used to be like them. 15    <b>Q. Patrol officer?</b> 16    A. Regular patrol. 17    <b>Q. Blue shirt?</b> 18    A. Yeah. Detectives. Yeah. So I 19    recognize him, but he was cool. But they said 20    Germin stuck his hand in his sock. When I jumped 21    out -- when he told me to get out of the car, I 22    just threw the pack in front of him. 23    <b>Q. That's what you did or -- or that's</b> 24    <b>what --</b></p>
<p style="text-align: right;">Page 34</p> <p>1     BY MR. PALLS: 2     <b>Q. So as a consequence, you're saying had</b> 3     <b>you known that Germin was holding drugs, there's</b> 4     <b>no way you would have let him in your car?</b> 5     MR. FLAXMAN: Objection; form. 6     BY MR. PALLS: 7     <b>Q. Am I correct?</b> 8     A. Yes, sure. 9     <b>Q. Fine. Now let me ask you a question.</b> 10    Was Germin actually -- did he have drugs in his 11    sock? 12    A. No, he didn't have drugs in his socks. 13    <b>Q. He didn't have any drugs on him?</b> 14    A. I don't think Germin would have played 15    me like that. 16    <b>Q. Well, why did Germin reach down to his</b> 17    <b>sock?</b> 18    MR. FLAXMAN: Objection; form, foundation. 19    BY MR. PALLS: 20    <b>Q. You know, here's the thing. Remember --</b> 21    <b>I'm sure he's told you this, though I won't ask</b> 22    <b>you. If he is objecting, let him finish his</b> 23    <b>objection for the record, and then you're going</b> 24    <b>to answer.</b></p>	<p style="text-align: right;">Page 36</p> <p>1     A. No. He said that. 2     <b>Q. Understood. We don't have to deal with</b> 3     <b>what he said right now. You can pick that up if</b> 4     <b>you want; otherwise, we will take care of it.</b> 5     <b>You need more props to throw around.</b> 6     A. I'm just showing you what they said. I 7     remember it now. 8     <b>Q. I read the report, and that's pretty</b> 9     <b>much what they said. I agree with you. Okay.</b> 10    <b>Now -- but, again, I just want to understand. By</b> 11    <b>the time both you guys are out of the car,</b> 12    <b>Officer Brown, the chubby bald one, is over by</b> 13    <b>Germin, and the Scottie Pippen guy --</b> 14    A. By Robert. 15    <b>Q. By you, right.</b> 16    <b>So then what? Did they pat you</b> 17    <b>down?</b> 18    A. No. It's something else that takes 19    place. So the thing was, pull us out of the car. 20    Search the car. 21    <b>Q. Search the car.</b> 22    A. We don't find nothing. Y'all might be 23    lucky. All right. So we didn't -- just 24    laughing. I could tell you in the long run, you</p>

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<p>1 going to be prosecuted. Get out of my mama car. 2 That's what I'm saying. Brown over there 3 laughing and stuff, talking about, man, y'all 4 just shut up damn it. We know who you is. Go 5 on, you keep going. This ain't the first time be 6 talking and stuff. They do this stuff all the 7 time. When they get pissed off, they just go 8 through and do anybody wrong, any old way. Yeah, 9 got out of the car. Stand back there. His arm 10 on my arm. They searching the car. Trying to 11 wait until they get through searching the car. I 12 recognize after Brown see that he can't find 13 nothing. Since you say you a lawyer, I'm going 14 to ask you this.</p> <p>15 MR. FLAXMAN: No, no. You can't ask him 16 questions.</p> <p>17 MR. PALLE: Maybe on the break when he is 18 around.</p> <p>19 BY THE WITNESS:</p> <p>20 A. This is what I saw.</p> <p>21 MR. FLAXMAN: Let him ask another question.</p> <p>22 MR. PALLE: Okay. We'll start. We'll 23 reset.</p> <p>24 THE WITNESS: It's going to be the same thing</p>	<p>1 off that phone and come back over here, you know 2 what he do?</p> <p>3 <b>Q. No. Excuse me. Let me ask the</b> <b>question. What did he do?</b></p> <p>4 A. Watts told him look northbound down the 5 street. He said, Man, I think -- I told you I 6 know something about them two niggers, man, in 7 that car right there. He said, Tell the three 8 officers that's in the back to only take two of 9 them. He said, Tell them to jump in the car and 10 tell them when they acting like they finna drive 11 past, tell the heavyset nigger on the north side 12 of the street, grab him. That was his words. 13 Grab him and bring him to where we at.</p> <p>14 <b>Q. Grab another overweight black person</b> <b>from down the block and bring him over to where</b> <b>you are, that's what --</b></p> <p>15 A. Watts said.</p> <p>16 <b>Q. Now, you said that this was a call</b> <b>received by Officer Brown?</b></p> <p>17 A. No.</p> <p>18 <b>Q. Received by officer --</b></p> <p>19 A. Watts.</p> <p>20 <b>Q. Who?</b></p>
<p style="text-align: center;">Page 38</p> <p>1 you're going to ask.</p> <p>2 MR. FLAXMAN: Robert, he doesn't want you to 3 predict his question.</p> <p>4 THE WITNESS: I'm giving him the right 5 question then. Go ahead. Ask the question 6 again.</p> <p>7 BY MR. PALLE:</p> <p>8 <b>Q. What's the right question?</b></p> <p>9 A. The question I'm finna say, we stayed on 10 the back of the car. He already been in the car. 11 Ain't no drugs in the car. So I know my phone 12 ain't ringing. I know his phone ain't ringing, 13 and I sure don't see the other three officer 14 phones ringing. I can say out of six, one of the 15 phones ringing. You know who phone it was?</p> <p>16 <b>Q. No.</b></p> <p>17 A. That was Brown phone.</p> <p>18 <b>Q. Brown's phone rings?</b></p> <p>19 A. Yeah. So when he got that phone call, 20 he backed off the car. Stopped searching the 21 car, period. Go walk on the sidewalk almost like 22 in front of White Boy door, but he on the 23 sidewalk in front of his house. So I could see 24 him talking to somebody, right? When he do get</p>	<p style="text-align: center;">Page 40</p> <p>1 A. Watts.</p> <p>2 <b>Q. Watts is already on-scene?</b></p> <p>3 A. Yeah. See, he's nowhere I can see, but 4 I see these other six officers.</p> <p>5 <b>Q. I'm sorry. We're going to have to take</b> <b>it slower for me.</b></p> <p>6 To begin with, right now, where 7 we're at, I've only dealt with two officers. 8 There's Scottie Pippen and Brown, correct?</p> <p>9 A. Uh-uh.</p> <p>10 <b>Q. Hold on. This is the car that pulled in</b> <b>front of you, right? It was a two-person car?</b></p> <p>11 A. Yeah, but I got Scottie Pippen -- since 12 I can't think of the --</p> <p>13 <b>Q. I understand.</b></p> <p>14 A. His name is not really Scottie Pippen.</p> <p>15 <b>Q. I know. You are absolutely right. And</b> <b>I'm not going to say that. Make it clear.</b></p> <p>16 <b>Scottie Pippen is not involved in this case.</b></p> <p>17 <b>There is a guy, an officer, who you believe looks</b> <b>like Scottie Pippen?</b></p> <p>18 A. Uh-huh.</p> <p>19 <b>Q. Just like -- well -- but at some point</b> <b>after that car pulls in front of you, there's</b></p>

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<p>1      <b>other cars that pull in behind your car, correct?</b></p> <p>2      <b>Other police cars.</b></p> <p>3      A. No, no. No cars come -- I mean right</p> <p>4      there because they had the whole street blocked</p> <p>5      off.</p> <p>6      <b>Q. How many cars in total approached your</b></p> <p>7      <b>car and stopped you and Germin?</b></p> <p>8      A. Oh, yeah, about three, four.</p> <p>9      <b>Q. And I think there was another group</b></p> <p>10     <b>of --</b></p> <p>11     A. Detectives.</p> <p>12     <b>Q. Officers that you -- I think you</b></p> <p>13     <b>referred to them as Mexicans earlier?</b></p> <p>14     A. Yeah, yeah.</p> <p>15     <b>Q. Are those the police officers that came</b></p> <p>16     <b>next?</b></p> <p>17     A. No, no. They always with them. If</p> <p>18     Watts saw us, you, you, you are kicked out. When</p> <p>19     anything go on, Watts got to stand up for them,</p> <p>20     whatever they do. They put drugs on somebody, I</p> <p>21     got to be able to say I don't think -- them my</p> <p>22     boys. I don't think I change on them. But if</p> <p>23     sometimes I know if I finna get caught, I'm going</p> <p>24     to have to tell you step up, take the plate.</p>	<p>1      A. Yep.</p> <p>2      <b>Q. And three Hispanic and not African?</b></p> <p>3      A. Yeah.</p> <p>4      <b>Q. Either Mexican --</b></p> <p>5      A. Mexican -- Puerto Rican.</p> <p>6      <b>Q. Latin, Hispanic?</b></p> <p>7      A. Yeah.</p> <p>8      <b>Q. Who put you in handcuffs?</b></p> <p>9      A. The Scottie Pippen dude.</p> <p>10     <b>Q. You mentioned Mohammed. When did you</b></p> <p>11     <b>first see Mohammed?</b></p> <p>12     A. I always see Mohammed. They will ride</p> <p>13     past me.</p> <p>14     <b>Q. I'm talking about that day.</b></p> <p>15     A. I saw Mohammed -- I saw Mohammed, he</p> <p>16     was -- I saw him in the station. It was Brown</p> <p>17     out acting like he ain't with his boys. So it</p> <p>18     was Mohammed was with Watts.</p> <p>19     <b>Q. Mohammed was with Watts. When was this?</b></p> <p>20     A. When they -- the car tracking us down,</p> <p>21     putting drugs on us. He was with him because</p> <p>22     he's now -- I saw him in the station.</p> <p>23     <b>Q. All right. So I'm trying to understand</b></p> <p>24     <b>who it was you saw after 42nd.</b></p>
<p style="text-align: center;">Page 42</p> <p>1      <b>Q. Got you. Let me ask you this, though.</b></p> <p>2      <b>How many officers are on the scene with you and</b></p> <p>3      <b>Germin at 42nd and Prairie?</b></p> <p>4      A. About four of them.</p> <p>5      <b>Q. Okay. And did you know who any of those</b></p> <p>6      <b>officers were?</b></p> <p>7      A. I know about four of them. I know the</p> <p>8      Mexicans, too. I just don't know them by their</p> <p>9      name. I know them by faces.</p> <p>10     <b>Q. Okay. Anyway, so how many officers in</b></p> <p>11     <b>total then are now on the scene? Would there be</b></p> <p>12     <b>six?</b></p> <p>13     A. No, seven.</p> <p>14     <b>Q. And who is the seventh?</b></p> <p>15     A. Brown, Mohammed, Scottie Pippen, and</p> <p>16     Watts.</p> <p>17     <b>Q. Those are four.</b></p> <p>18     A. And --</p> <p>19     <b>Q. The Mexicans?</b></p> <p>20     A. At least three I don't know. So like</p> <p>21     seven.</p> <p>22     <b>Q. You're talking about now basically four</b></p> <p>23     <b>black officers, including Sergeant Watts and</b></p> <p>24     <b>three --</b></p>	<p style="text-align: center;">Page 44</p> <p>1      A. I told you, Brown.</p> <p>2      <b>Q. You said you also saw Mohammed?</b></p> <p>3      A. No, no, no. I said Brown, the Mexican</p> <p>4      boys, and the one that looks like Scottie Pippen.</p> <p>5      Those are the only four out there on the street.</p> <p>6      Now, if you looking for -- you looking for</p> <p>7      Mohammed, he's with Watts.</p> <p>8      <b>Q. Where's Watts? Is Watts on the scene or</b></p> <p>9      <b>at the station?</b></p> <p>10     A. I can't tell you where he at. I can</p> <p>11     tell you he somewhere in my mind, and he got to</p> <p>12     go close because he seeing something going on.</p> <p>13     <b>Q. Okay. Were there any other citizens --</b></p> <p>14     <b>civilians on the street at the time these</b></p> <p>15     <b>officers came down on you?</b></p> <p>16     A. Uh-uh.</p> <p>17     MR. FLAXMAN: You have to say no.</p> <p>18     BY THE WITNESS:</p> <p>19     A. No.</p> <p>20     <b>Q. Thank you. Let me back up for a few</b></p> <p>21     <b>minutes. I'd like to talk a little bit about</b></p> <p>22     <b>your background.</b></p> <p>23     <b>Now, you're a young man of 46. We</b></p> <p>24     <b>know that.</b></p>

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<p>1 A. Yeah. Half of them cases --</p> <p>2 MR. FLAXMAN: Just let him ask the questions.</p> <p>3 BY MR. PALLE:</p> <p>4 Q. <b>Where did you grow up?</b></p> <p>5 A. Where I grew up?</p> <p>6 Q. <b>Where did you grow up?</b></p> <p>7 A. 4120. In the projects.</p> <p>8 Q. <b>4120 what?</b></p> <p>9 A. South Prairie.</p> <p>10 Q. <b>What project is that?</b></p> <p>11 A. We call our building Lonely Building, but it's part of -- I forgot the name of it.</p> <p>12 Q. <b>Still there?</b></p> <p>13 A. No, no. Ain't no projects in Chicago. They got nice houses though, yeah.</p> <p>14 Q. <b>That's good. And whom did you grow up with?</b></p> <p>15 A. Family and friends.</p> <p>16 Q. <b>Both your parents? Did they live together?</b></p> <p>17 A. Oh, yeah, yeah, yeah. My mom and dad.</p> <p>18 Q. <b>And did you have brothers and sisters?</b></p> <p>19 A. Yeah, two sisters. I got some other brothers and sisters. They running around.</p>	<p>1 A. Yeah.</p> <p>2 Q. <b>And they're close in age to you?</b></p> <p>3 A. Close to my age?</p> <p>4 Q. <b>Yes, close to your age.</b></p> <p>5 A. No. I'm the baby.</p> <p>6 Q. <b>What are their names, your sisters?</b></p> <p>7 A. Kim Jones.</p> <p>8 Q. <b>Is your mom still alive?</b></p> <p>9 A. Yep.</p> <p>10 Q. <b>Where does she live?</b></p> <p>11 A. She stay on 95th right now.</p> <p>12 Q. <b>95th?</b></p> <p>13 A. Mm-hmm.</p> <p>14 Q. <b>What's her name?</b></p> <p>15 A. You say what?</p> <p>16 Q. <b>What's her name?</b></p> <p>17 A. Dorothy.</p> <p>18 Q. <b>Dorothy Coleman or Lindsey?</b></p> <p>19 A. Coleman.</p> <p>20 Q. <b>Let me ask you, first of all, about -- let me go back to the SSI issue.</b></p> <p>21 Now, am I correct -- is it your understanding that you have what's known as a learning disability?</p>
<p style="text-align: center;">Page 46</p> <p>1 Q. <b>And you guys all lived together on Prairie?</b></p> <p>2 A. Well, they all -- about two, and the rest of them stay somewhere with they parents.</p> <p>3 Q. <b>We're talking about, though, now as you are growing up, let's say -- well, let's say you're 12 years old. Who are you living with?</b></p> <p>4 A. At 12 years old? Would you say it again?</p> <p>5 Q. <b>I'm just picking a date. Say you are 12 years old.</b></p> <p>6 A. Right.</p> <p>7 Q. <b>You're living at 4120 Prairie, correct?</b></p> <p>8 A. No. 4120 South Prairie.</p> <p>9 Q. <b>4120 South Prairie. I thought I just said that.</b></p> <p>10 A. No. I heard you say something else. Go ahead.</p> <p>11 Q. <b>And who's in the -- your apartment with you? Your mom and dad?</b></p> <p>12 A. I stay with my mama.</p> <p>13 Q. <b>Just your mama?</b></p> <p>14 A. No. Two sisters.</p> <p>15 Q. <b>So two of your sisters stayed with you?</b></p>	<p style="text-align: center;">Page 48</p> <p>1 A. Sometimes. Not like how it used to be. Not -- as I told you earlier, it's a change.</p> <p>2 Q. <b>We all grow different.</b></p> <p>3 A. When you young, you can play all day, crazy gangs. When you get older, you want it to be like a change.</p> <p>4 Q. <b>Believe me, I understand that. Everybody can grow.</b></p> <p>5 A. Yeah. You got kids.</p> <p>6 Q. <b>You are not the man you were in 2009, correct?</b></p> <p>7 A. Yeah.</p> <p>8 Q. <b>Okay. I got you. But I guess -- let me ask it this way. Have you ever heard of the term "dyslexia"?</b></p> <p>9 A. Dislexa?</p> <p>10 Q. <b>Obviously, you have not heard of it.</b></p> <p>11 A. What is that?</p> <p>12 Q. <b>Let me just say that one of my sons has a learning disability. He had to have special treatment. Dyslexia is simply an inability to read. The letters get all jumbled, you know. Difficulty reading.</b></p> <p>13 A. No, that's not -- no, no. Mine's not</p>

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<p>1 like that. Mine's is similar to that, but it 2 ain't like what you just all just said.</p> <p>3 <b>Q. Could you explain it to me?</b></p> <p>4 A. Mine's like, you know -- I'm trying -- I 5 say right now I'm in a classroom. Certain 6 homework or certain papers, I could do it, but if 7 I don't do it, I know what's going to happen. 8 I'm probably -- probably get -- I can't go to the 9 gym, I can't do nothing. So basic reading -- a 10 reading disability. When I read this word, this 11 word probably be a word I might have saw before, 12 but, see, I have fell out back in like -- let me 13 see, I'm going to say like 2005. I fell out, and 14 I busted my head, and then I got my head busted 15 like two or three times.</p> <p>16 <b>Q. This is -- what year again?</b></p> <p>17 A. 2005.</p> <p>18 <b>Q. Okay. At that time you're what, about</b> 19 <b>20 something?</b></p> <p>20 A. About like -- I'll say 21.</p> <p>21 <b>Q. Go ahead.</b></p> <p>22 A. That damaged. That's why you can't be 23 hit in the brain all the time. It damage -- 24 damage the brain. Your brain has got to freshen</p>	<p>1 <b>it's not your -- you know, well, whatever. I'm</b> 2 <b>not a doctor. I'll go on.</b></p> <p>3 <b>Had you had any major head injuries</b> 4 <b>prior to the time you were 21, if you recall?</b></p> <p>5 A. What you mean by that?</p> <p>6 <b>Q. Well, look, at one point when you were a</b> 7 <b>much younger man, you were involved with the</b> 8 <b>Vice Lords, the street gang, correct?</b></p> <p>9 A. Yep.</p> <p>10 <b>Q. And when you talk about fights, you</b> 11 <b>might have gotten in some mix-ups back in those</b> 12 <b>days when you were a gang member, yes, no?</b></p> <p>13 A. I just fight peoples.</p> <p>14 <b>Q. Just fight people generally?</b></p> <p>15 A. Yes.</p> <p>16 MR. FLAXMAN: Move your hands so we're sure 17 we can hear you.</p> <p>18 BY MR. PALLEs:</p> <p>19 <b>Q. Are you okay? Do you want to keep</b> 20 <b>going?</b></p> <p>21 A. I'm listening to everything you're 22 saying.</p> <p>23 <b>Q. How about a cup of coffee or anything?</b></p> <p>24 A. No, not yet.</p>
<p style="text-align: center;">Page 50</p> <p>1 up and get back to itself.</p> <p>2 <b>Q. Well, so I need to know more about the</b> 3 <b>beating. Was it one beating or were there</b> 4 <b>several meetings?</b></p> <p>5 A. No, just random beatings. Like I was 6 wrestling. I was wrestling, and my sister -- one 7 of -- my older sister, let's say, she -- my 8 cousin and them, they fight. I was trying to be 9 a hero, and she goes and pushed me, and I bust my 10 whole eye open.</p> <p>11 <b>Q. Okay. Is this you're saying around the</b> 12 <b>time you were 21?</b></p> <p>13 A. Yep.</p> <p>14 <b>Q. Now, but let me ask you, did you have</b> 15 <b>trouble with reading really --</b></p> <p>16 A. I just told you that.</p> <p>17 <b>Q. But when you were a young child?</b></p> <p>18 A. Yeah. I only made it to the ninth 19 grade. After the ninth grade, I fell out.</p> <p>20 <b>Q. But even at that time, you were a slow</b> 21 <b>reader, correct?</b></p> <p>22 A. Yeah.</p> <p>23 <b>Q. But, again, as you point out, sometimes</b> 24 <b>it's the brain that affects your ability to read,</b></p>	<p style="text-align: center;">Page 52</p> <p>1 <b>Q. All right.</b></p> <p>2 A. I'm listening to you.</p> <p>3 <b>Q. I got you. I appreciate it.</b></p> <p>4 A. You sound like a lawyer I met before. 5 I'm for real.</p> <p>6 <b>Q. Yeah? Is that good or bad?</b></p> <p>7 A. Bad. I ain't going to lie to you.</p> <p>8 MR. FLAXMAN: Don't tell him anything I told 9 you about Mr. PalleS.</p> <p>10 MR. PALLEs: What can I tell you? We all 11 have our roles.</p> <p>12 THE WITNESS: I'm going to do the right 13 thing.</p> <p>14 BY MR. PALLEs:</p> <p>15 <b>Q. All right. So when you were first --</b> 16 <b>I've got some notes, and I don't necessarily need</b> 17 <b>to pull them up, but they're notes of evaluations</b> 18 <b>that were done for you -- or of you back when you</b> 19 <b>were in the Illinois Department of Corrections</b> 20 <b>back in the fall of 1998. That's a long time</b> 21 <b>ago.</b></p> <p>22 A. Mm-hmm.</p> <p>23 <b>Q. Refresh my memory. You were about 19</b> 24 <b>then, '98?</b></p>

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<p>1       A. 1998, let me see.</p> <p>2       <b>Q. 18, 19.</b></p> <p>3       A. Oh, yeah, I was -- yeah, I was about 4       that age.</p> <p>5       <b>Q. And you were in prison?</b></p> <p>6       A. Yeah, because I caught possession.</p> <p>7       <b>Q. So you were -- and do you recall -- I 8       can maybe look, but do you remember what 9       institutions were you housed at back in 19 --</b></p> <p>10      A. I've been -- I was in Logan. They first 11     gave me see -- I took the plea. The plea. I 12     guess some reason they said the State or somebody 13     that sign off on the paperwork, but then again 14     they just messed the paperwork up because so many 15     people that you got to look over the files and 16     stuff. See there's boot camp. It was boot camp. 17     So I took a plea there to be back home like this. 18     I took the four months in boot camp.</p> <p>19      <b>Q. This is back in 1998?</b></p> <p>20      A. 1998.</p> <p>21      <b>Q. So now that arrest was for possession?</b></p> <p>22      A. Possession. Rocks and some blow.</p> <p>23      <b>Q. Okay. Now, are you telling me here 24     today that you were not guilty of that offense?</b></p>	<p>1       it out the window.</p> <p>2       <b>Q. I see. So you had some drugs. You 3       tossed it out the window?</b></p> <p>4       A. Yeah.</p> <p>5       <b>Q. They ultimately caught you and -- okay.</b></p> <p>6       A. They picked them up, and they brought 7       them all back upstairs, and they just gave me the 8       case. So I -- I could have -- down the line, 9       sitting in that booking room in the County Jail, 10      no, I'm not staying here no two years fighting 11      that.</p> <p>12      <b>Q. Were you aware at the time or did you 13     talk to your lawyer about the fact that you could 14     have moved to suppress the evidence? Do you know 15     what that is?</b></p> <p>16      MR. FLAXMAN: I'm instructing him not to tell 17      you what he talked to his lawyer about regarding 18      this case. That's an attorney-client privileged 19      communication. I'm instructing you not to tell 20      him.</p> <p>21      THE WITNESS: Okay.</p> <p>22      MR. PALLES: Let me ask you a question. Is 23      that going to be the position that you take with 24      respect to the underlying --</p>
<p style="text-align: center;">Page 54</p> <p>1       A. I wasn't given -- not that, because they 2       did some other stuff, too. Like I stay in the 3       projects. It's called -- what's it called back 4       in the day? Not CTA. But whoever used to own 5       all the projects.</p> <p>6       <b>Q. CHA?</b></p> <p>7       A. Yeah, yeah, Housing Authority. So -- 8       neighborhood -- it's a lot of peoples that rules 9       and act. But one day I was coming down the 10      stairs, and I got all the way to the first floor. 11      It was me and a couple more guys. We were out 12      there kicking, and I'm looking like -- I see 13      somebody run off the wall so fast like, but guess 14      who it is? It's a police officer. So he's 15      chasing us up the stairs. I think I made it to 16      like the fourth floor. I got caught. And when I 17      got caught, I was in somebody's house though. 18      They couldn't get in unless they opened the door 19      for them, and they didn't open the door for them. 20      So they start saying like -- now more police 21      coming now. But, see, that's what I'm trying to 22      tell you all what I did, though. So I went and 23      threw the drugs. I tried to throw it down the 24      toilet, but the toilet was stopped up, so I threw</p>	<p style="text-align: center;">Page 56</p> <p>1       MR. FLAXMAN: No, we're waiving it for that.</p> <p>2       MR. PALLES: All right.</p> <p>3       MR. FLAXMAN: I'm protecting the privilege 4       for any other communication.</p> <p>5       MR. PALLES: All right. I got to get a 6       little bit of water.</p> <p>7       BY MR. PALLES:</p> <p>8       <b>Q. I think there's some notes at the time 9       in 1998 you told the people in IDOC that the 10      police officers had put drugs on you in that 11      case. Is that just something you told them back 12      then?</b></p> <p>13      A. They didn't put it on me, but I still 14      had to go to prison. It's no case to me, though.</p> <p>15      <b>Q. Okay. Now, you talked about dropping 16      out. Let's see, you finished school, am I 17      correct, for elementary?</b></p> <p>18      A. Yeah.</p> <p>19      <b>Q. And the notes again from the -- your 20      IDOC file say that you picked up a weapons charge 21      when you were 13 years old; is that right?</b></p> <p>22      A. Yeah.</p> <p>23      <b>Q. Was that your first run-in with the law?</b></p> <p>24      A. Yeah. That's about -- 13, yeah, yeah.</p>

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MSJ-SL EXHIBIT 14

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<p style="text-align: center;">Page 57</p> <p>1 That's when I start kicking up my dust.      2 <b>Q. Tell me what happened there. How did</b>      3 <b>you get a weapon?</b>      4 A. I found it in the garbage can.      5 <b>Q. Found it in the garbage can?</b>      6 A. Mm-hmm.      7 <b>Q. And then what happened? Where was the</b>      8 <b>garbage can, if you recall, or whereabouts?</b>      9 A. Incinerator.      10 <b>Q. And then what happened? What did you do</b>      11 <b>with the gun once you found it?</b>      12 A. I was running around like. I wasn't      13 running around, but I was like just like there in      14 the -- still right there trying to figure out      15 what I'm going to do with it. So I figured      16 out -- and then I did figure it out. I      17 recognized going out -- going toward the hallway      18 I saw an undercover cop, and his name was -- his      19 name was Texas Ranger.      20 <b>Q. Texas Ranger?</b>      21 A. Yeah, that's his name. Just like I said      22 Watts. He got names. So you never met Texas      23 Ranger.      24 <b>Q. Let me ask you, though. So you're</b></p>	<p style="text-align: center;">Page 59</p> <p>1 <b>attention -- keeping -- you know, attention</b>      2 <b>deficit disorder it's called. Sometimes</b>      3 <b>hyperactive.</b>      4 A. What type of drugs?      5 <b>Q. It's called Ritalin. It's to help you</b>      6 <b>focus your attention. No?</b>      7 A. No.      8 <b>Q. Are you on any drugs now?</b>      9 A. No.      10 <b>Q. By prescription or anything?</b>      11 A. No.      12 <b>Q. Do you regularly see a doctor?</b>      13 A. I take drugs.      14 <b>Q. What? I beg your pardon?</b>      15 A. I take drugs.      16 <b>Q. What?</b>      17 A. All type of medicine.      18 <b>Q. What kind of medicine?</b>      19 A. Seizure medicine, Dilantin, blood      20 pressure. What else? Just like medicine.      21 <b>Q. You make a good point. Rather than talk</b>      22 <b>about them as drugs, which they are, medications</b>      23 <b>would be better, yeah. So now you're saying you</b>      24 <b>take a pill for seizures?</b></p>
<p style="text-align: center;">Page 58</p> <p>1 <b>basically saying you found a gun. You're 13</b>      2 <b>years old. You figure it makes you look big.</b>      3 <b>You're carrying it around like a cowboy?</b>      4 A. Yeah. I found it. Like I had some more      5 friends. We were looking, but I'm the one that      6 found it. So when I found it, I told the one      7 standing right here with me, and we ran from the      8 other friends. They got mad. By the time we      9 were trying to run, I told you it's an undercover      10 police officer snuck in the building, and he was      11 standing right there.      12 <b>Q. Texas Ranger.</b>      13 A. Texas Ranger didn't catch me until -- it      14 just got -- his friend -- his friend was like let      15 me go back and see my partner. So they walked      16 up. It was in the hallway. They got a gun off      17 me. But I was in Audy Home, so I didn't go to      18 the penitentiary.      19 <b>Q. Now, there's also a note that you were</b>      20 <b>using a drug called Ritalin.</b>      21 A. I don't know what that is.      22 <b>Q. Huh?</b>      23 A. What's that?      24 <b>Q. I think it's for people who suffer from</b></p>	<p style="text-align: center;">Page 60</p> <p>1 A. Yeah, Dilantin.      2 <b>Q. And diabetes?</b>      3 A. Dilantin.      4 <b>Q. Dilantin for seizures. And -- okay.</b>      5 <b>And I take it you've had seizures most of your</b>      6 <b>life since you were young?</b>      7 A. Yes. Yes, I guess, because it comes      8 from my father. I never saw my mom, I saw dad.      9 It's in the blood.      10 <b>Q. So other than for seizures, are you</b>      11 <b>taking any other medicines?</b>      12 A. No.      13 <b>Q. Just that. Okay.</b>      14 <b>Now, the guy who saw you back in</b>      15 <b>1998 when you were in prison, mental health</b>      16 <b>professional --</b>      17 A. I saw a lot of them.      18 <b>Q. Yeah. Well, in any event, I believe he</b>      19 <b>said that you had been beaten at age 13, and that</b>      20 <b>resulted in a concussion.</b>      21 A. No, we got beat up at 13. I think a lot      22 of kids beating up a lot of kids. I just told      23 you my sister bust my head at 13.      24 <b>Q. Okay. And at the time you had that</b></p>

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<p>1      <b>thing with your sister, that resulted in a</b>  2      <b>concussion?</b>  3      A. Yeah.  4      Q. <b>And after that, you had -- you had some</b>  5      <b>memory loss after that incident?</b>  6      A. Yes.  7      Q. <b>And he said that you had changes in how</b>  8      <b>your brain worked after that incident.</b>  9      A. It's like a brain is like -- I ain't get  10     my focus back until like about at least 13. I  11     ain't get my focus back until at least about I  12     was about 21.  13     Q. <b>All right.</b>  14     A. Because I started to take all type of  15     medicine. And then some of the medicine that I  16     took used to get me hyper. When I get hyper --  17     you tell the kids stop jumping around and stuff,  18     that was me. I still do it.  19     Q. <b>You were hyper?</b>  20     A. Yeah, hyper.  21     Q. <b>Well, that would be why you would take a</b>  22     <b>drug like Ritalin. They give it to a lot of</b>  23     <b>children.</b>  24     <b>Do you recall whether or not you</b></p>	<p>1      A. Yep. Mm-hmm.  2      Q. <b>And I guess my question is, are you</b>  3      <b>still smoking pot now that it's legal?</b>  4      A. Yeah. Everybody smoke.  5      Q. <b>I assume you drink?</b>  6      A. I drink.  7      Q. <b>Have you ever had a problem with abusing</b>  8      <b>alcohol?</b>  9      A. Yeah.  10     Q. <b>When was that?</b>  11     A. Right now.  12     Q. <b>Right now?</b>  13     A. I got to -- me and my lady, right,  14     like -- I don't like to feel depressed. All  15     right? If I start feeling depressed, I start  16     feeling like I want to go out and hurt somebody  17     or somebody hurt you, but that's what I got  18     stopped -- I'm not depressed. I need to slow  19     down what they call alcohol. And I mean I'm  20     going to get into a -- what they call a class --  21     drug class. I did it before.  22     Q. <b>Substance abuse?</b>  23     A. I did it before. But I let my trigger  24     pull me to go get that bottle. And it did, and</p>
<p style="text-align: center;">Page 62</p> <p>1      <b>were taking medication for that during the period</b>  2      <b>of time --</b>  3      A. Probably so because I -- I tell you, I  4      was getting better at 20 years old.  5      Q. <b>That gets into another issue, I guess,</b>  6      <b>which is, of course, the use of illegal drugs.</b>  7      <b>And -- well, you know, a lot of people say the</b>  8      <b>drugs are -- illegal drugs are a form of</b>  9      <b>self-medication, you know. So if you're hyper,</b>  10     <b>maybe you want to take a certain drug to help</b>  11     <b>those symptoms. Did you begin using drugs when</b>  12     <b>you were in your teen years?</b>  13     A. No, uh-uh.  14     Q. <b>Now, at one point you admitted that you</b>  15     <b>were a pot smoker, correct?</b>  16     A. Everybody smoke weed.  17     Q. <b>Certainly everybody does now, so that's</b>  18     <b>true.</b>  19     A. Smoking back then.  20     Q. <b>It was true back then?</b>  21     A. More than cigarettes.  22     Q. <b>Absolutely. But my point is -- well,</b>  23     <b>you used to smoke pot daily before it was legal,</b>  24     <b>correct?</b></p>	<p style="text-align: center;">Page 64</p> <p>1      that's why I always -- I drink -- I ain't going  2      to say I drink -- like in one day I drink like  3      about two fifths.  4      Q. <b>Two fifths of alcohol a day?</b>  5      A. Mm-hmm.  6      Q. <b>What alcohol do you drink?</b>  7      A. I'm old school. I drink Bacardi.  8      Q. <b>Bacardi?</b>  9      A. Mm-hmm. I drink Bacardi.  10     Q. <b>Well, look, over the years, you've</b>  11     <b>enrolled in many substance abuse programs; am I</b>  12     <b>correct?</b>  13     A. Yep.  14     Q. <b>And some of those have been part of the</b>  15     <b>conditions of any particular sentence that you</b>  16     <b>were dealing with at the time, correct?</b>  17     A. Mm-hmm.  18     Q. <b>As part of parole?</b>  19     A. Yeah, yeah, yeah, I always did. It  20     wasn't --  21     Q. <b>And in prison, you took some substance</b>  22     <b>abuse classes in prison?</b>  23     A. Yep. It was all right. You got to make  24     it look better for yourself. Once they let your</p>

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<p>1 hands go, they let you go. If you have it in 2 your body all this time, going to put it back in. 3       <b>Q. Yeah.</b> 4       A. That's where a lot of people start. 5 Lose their mind and go crazy. And I ain't crazy, 6 though. I think a lot of people be thinking 7 that, but I'm not crazy. I got more sense than 8 two dollars. 9       MR. FLAXMAN: You answered the question. 10 BY MR. PALLE: 11       <b>Q. I don't think you're crazy. In fact,</b> 12 <b>one -- the guy who evaluated you, the</b> 13 <b>psychologist -- by the way, I see it was at</b> 14 <b>Graham Correctional. Did you put this in or do</b> 15 <b>you care?</b> 16       MR. FLAXMAN: That's fine. 17       MR. PALLE: I will. 18       MR. FLAXMAN: Are you going to show it to 19 him? 20       MR. PALLE: No, probably not. 21       MR. FLAXMAN: Then you don't need to. 22 BY MR. PALLE: 23       <b>Q. For the record, I'm kind of -- it</b> 24 <b>doesn't matter, but the gentleman who saw you was</b></p>	<p>1       A. I would agree with it, but that's not 2 true. 3       <b>Q. I think what you're starting to say --</b> 4 <b>and you can tell me if I'm wrong. I'm going to</b> 5 <b>let you talk about it. Believe me, I'm going to</b> 6 <b>let you talk about it -- is that there are</b> 7 <b>certain things that have happened to you over</b> 8 <b>your lifetime that have been pared -- taken away</b> 9 <b>from some of your ability to function on an</b> 10 <b>intellectual level.</b> 11       A. Mm-hmm. 12       <b>Q. Is that what you're saying?</b> 13       A. Yeah. When it come to him, he just 14 trying to push me to get out of there. 15       <b>Q. Okay. I understand he saw a ton of</b> 16 <b>people, correct?</b> 17       A. Yeah. 18       <b>Q. He doesn't know you?</b> 19       A. Yeah. But he is a nice cat, though. 20       <b>Q. Probably. Did you get to know this guy</b> 21 <b>over time?</b> 22       A. All the time I go to his classroom. 23       MR. FLAXMAN: He is not talking about the 24 person at Graham Correctional.</p>
<p style="text-align: center;">Page 66</p> <p>1       <b>a Mr. Nawaji, a psychologist at Graham</b> 2 <b>Correctional, and he said that you were of</b> 3 <b>average intelligence with no thought disorders.</b> 4 <b>In other words, you are not crazy. You'd agree</b> 5 <b>with that?</b> 6       A. I agree with it, but I don't agree with 7 it. 8       <b>Q. What don't you agree with? Would you</b> 9 <b>say you're of average intelligence?</b> 10       A. He probably told you in a way I'm -- 11 like if I can follow just -- like when I was 12 in -- I say his -- his -- and I would have kept 13 on pushing instead of just -- see, I did some 14 dangerous stuff back in the -- 15       MR. FLAXMAN: His question was just -- try 16 just asking the question. 17 BY MR. PALLE: 18       <b>Q. Let me ask you --</b> 19       MR. FLAXMAN: Robert, let him start over with 20 the question. 21 BY MR. PALLE: 22       <b>Q. Robert, I think I'm asking -- I mean he</b> 23 <b>felt that you were of average intelligence.</b> 24 <b>Would you agree with that?</b></p>	<p style="text-align: center;">Page 68</p> <p>1       <b>THE WITNESS: Yeah.</b> 2       MR. PALLE: The psychologist at Graham. 3       <b>THE WITNESS: Yeah. You got to see psych,</b> 4 and they put you in school. But most time you 5 got to have a couple of days with the psych. 6 They are the ones that like put so much work in 7 for you. Even if like I go to school, and I 8 couldn't do this in school, the teacher would 9 already know he is not -- to do what everybody 10 else do. So we got some other books. And I 11 think I saw them books when I was a little baby, 12 too. But ain't nothing wrong with trying to 13 start from the bottom to the top. 14 BY MR. PALLE: 15       <b>Q. Well, now we discussed the fact that you</b> 16 <b>were a slow learner, correct? You'd agree with</b> 17 <b>that?</b> 18       A. Yes. Yeah. 19       <b>Q. In fact, now you told one of the guys,</b> 20 <b>Jamie House, in fact, on --</b> 21       A. When -- Jamie House, where he from? 22       <b>Q. He is a mental health professional at</b> 23 <b>one of the places. I can't -- oh -- I'm just</b> 24 <b>looking. It's in your master file. But in any</b></p>

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<p style="text-align: center;">Page 69</p> <p>1 event, you used to get Cs in school. You had a C 2 average when you were in grade school? 3 A. Not all the time. It will be sometimes 4 I get lucky. Might find good work and get an A. 5 Sometimes it jump from B, C, D. 6 Q. Okay. 7 A. Just -- 8 Q. But he is saying the way it averages 9 out -- 10 A. I called it ups and downs. 11 Q. Okay. Okay. What would affect that, do 12 you know? Was it the way you were feeling at the 13 time? 14 A. Well, that was just the way. Yep, you 15 could say that. 16 Q. Okay. Also -- now before you were in 17 prison, so when you were 18, 19, you had some 18 work as a detailer? 19 A. What's that? 20 Q. I don't know. That's what I'm asking. 21 And a janitor it says. A detailer, is that like 22 car wash maybe? 23 MR. FLAXMAN: Objection; form, foundation. 24</p>	<p style="text-align: center;">Page 71</p> <p>1 where were you shot from the drive-by? 2 A. In my leg. 3 Q. Okay. Right leg or left leg? 4 A. Right. 5 Q. And when was the second time you were 6 shot? 7 A. Man, like three months ago. 8 Q. My goodness. Where was that? 9 A. In my shoulder. 10 Q. I can understand why you're -- 11 A. My shoulder. That's a drive-by. 12 Q. That was also a drive-by? Where was 13 that? 14 A. Huh? 15 Q. Where was that? 16 A. 41st and Prairie. 17 Q. Right at the same location? 18 A. Across the street. Yeah, across the 19 street. 20 Q. Hey, listen. I'm sorry. As far as 21 the -- that injury we were talking about when you 22 were 13 years old, do you remember telling the 23 mental health professional at IDOC that you had 24 suffered that while you were kicked when you were</p>
<p style="text-align: center;">Page 70</p> <p>1 BY THE WITNESS: 2 A. No. I did one work. I worked at Waste 3 Management. 4 Q. What did you do there? 5 THE VIDEOGRAPHER: Counsel, someone joined 6 the waiting room. 7 (Brief Pause.) 8 BY MR. PALLS: 9 Q. You know what else, one of the things 10 reported is you -- that you received a gunshot 11 wound when you were very young, yes? 12 A. I was shot twice. 13 Q. Tell me about the first time. 14 A. Drive-bys. 15 Q. Somebody drove by and shot you? 16 A. Mm-hmm. 17 Q. Where was that? 18 A. Outside my projects. 19 Q. So 4120 South Prairie? 20 A. Uh-huh. 21 Q. Do you need to take a break? I can tell 22 you're a little uncomfortable. 23 A. No. My neck popping. 24 Q. And then the -- and so where was --</p>	<p style="text-align: center;">Page 72</p> <p>1 jumped? That there was an occasion where you 2 were jumped by somebody and kicked in the head? 3 A. No. That never happened like that. 4 Q. Okay. 5 A. I got stole though. 6 Q. Now, you mentioned earlier that at the 7 time of the arrest in this case, you were on 8 parole, correct? 9 A. Yeah. 10 Q. And what were you on parole for? 11 A. Same thing. 12 Q. What does that mean? 13 A. Drugs. That's not the first -- that's 14 why I'm trying to tell him. That's not the first 15 time I had a run-in with Watts. That same case 16 you're talking about now, I got that case from 17 him, too. 18 Q. Okay. Let's talk about that. Correct 19 me if I'm wrong, that was a case that took place 20 in June of 2007? 21 A. Yeah. 22 Q. And it was an arrest for possession of 23 cocaine? 24 A. Yep.</p>

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<p style="text-align: center;">Page 73</p> <p>1     <b>Q. And it took place at 5926 South Parnell?</b>    2     A. That's where I stay at. No, no. As a    3     matter of fact -- yeah, yeah.    4     <b>Q. It was actually down the block from</b>    5     <b>where you were staying, correct?</b>    6     A. Yeah.    7     <b>Q. You were staying at 5943 South Parnell,</b>    8     <b>and the arrest was at 5926, so across the street?</b>    9     A. Yeah.    10    <b>Q. And the officer -- arresting officer was</b>    11    <b>an officer Jarocki?</b>    12    MR. FLAXMAN: Objection; foundation.    13    BY MR. PALLES:    14    <b>Q. If you know.</b>    15    MR. FLAXMAN: Do you know the name of the    16    officer who arrested you?    17    BY THE WITNESS:    18    A. No. I don't know them over there.    19    <b>Q. Black or white officer?</b>    20    A. Puerto Ricans.    21    <b>Q. Officer -- arresting officer was?</b>    22    <b>Puerto Rican?</b>    23    A. Yeah.    24    <b>Q. And -- okay. Let me ask you, are you</b></p>	<p style="text-align: center;">Page 75</p> <p>1     A. Mm-hmm.    2     <b>Q. The answer is yes?</b>    3     A. Yeah.    4     <b>Q. And do you know an officer Brian Bolton?</b>    5     A. That sounds like that Brown Bolton.    6     <b>Q. So if Brian Bolton is a bald-headed</b>    7     <b>black guy, we might be talking about the same</b>    8     <b>guy?</b>    9     A. Uh-huh.    10    <b>Q. Robert Gonzalez?</b>    11    MR. FLAXMAN: He doesn't want you to guess.    12    Just say yes or no.    13    BY MR. PALLES:    14    <b>Q. If you know, you know.</b>    15    A. That's Scottie Pippen.    16    <b>Q. Robert Gonzalez?</b>    17    A. Yeah, yeah. It's the funny dude.    18    <b>Q. Alvin Jones, do you know him?</b>    19    A. That's -- no, I don't know Alvin.    20    <b>Q. Manuel Leano?</b>    21    A. I think I do know him, but I'm just    22    after Watts and Brown and Mohammed. I don't want    23    nobody else.    24    <b>Q. Okay. So, for example, Douglas Nichols,</b></p>
<p style="text-align: center;">Page 74</p> <p>1     <b>saying that you were not in possession of cocaine</b>    2     <b>at the time of that arrest in 2007?</b>    3     A. No.    4     <b>Q. I'm sorry. My bad question. Were you</b>    5     <b>in possession of cocaine in June 2007?</b>    6     A. No.    7     <b>Q. That was a case that the Chicago Police</b>    8     <b>Department put on you?</b>    9     A. Yep.    10    <b>Q. Okay. And this was a false arrest that</b>    11    <b>was engineered by Ronald Watts; is that what</b>    12    <b>you're saying?</b>    13    A. Yep.    14    <b>Q. Any other officers from his tactical</b>    15    <b>team involved in this arrest as far as you know?</b>    16    A. I told you Watts around, Mohammed,    17    Scottie Pippen name. I saw him. He probably --    18    all on desk duty, but I still see the Chinese    19    man, though.    20    <b>Q. You know what? I'll tell you what --</b>    21    <b>perhaps bear with me a second. Okay. I'll tell</b>    22    <b>you what. Let's talk about officers that you may</b>    23    <b>know from Watts' crew. You say you know</b>    24    <b>Ronald Watts?</b></p>	<p style="text-align: center;">Page 76</p> <p>1     <b>a white officer, as far as you are concerned,</b>    2     <b>he's got nothing to do with this case?</b>    3     MR. FLAXMAN: Objection; form, foundation.    4     THE WITNESS: I ain't got nothing to talk    5     about about that one.    6     BY MR. PALLES:    7     <b>Q. And, finally, Officer Elsworth Smith.</b>    8     A. No, I ain't got nothing to talk about    9     that one.    10    <b>Q. Let's get back to Watts and Mohammed</b>    11    <b>then for a moment. When is the first time that</b>    12    <b>you dealt with Ronald Watts?</b>    13    A. So many times I dealt with him, I can't    14    even count them up. All I know, he just was an    15    ass. Excuse me. He is a bully cop. Sometimes    16    he give me a break, but I guess that break    17    stuff -- and then I told you, I was a bad little    18    child at a certain age, and him and me starting    19    to know each other, and I used to always run --    20    every time I see him, I run from him. It's like    21    he scare me all the time. Sometimes I run from    22    him because you know why?    23     <b>Q. Why?</b>    24     A. I ain't supposed to tell nobody.</p>

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<p>1       <b>Q. You what?</b></p> <p>2       A. I ain't supposed to tell nobody what me</p> <p>3       and him do.</p> <p>4       <b>Q. What do you and him do?</b></p> <p>5       A. I get caught with them drugs, he'll tell</p> <p>6       me, In three days or two days, if you have me a</p> <p>7       gun -- I ain't got no money for you right now,</p> <p>8       because I didn't even blew up yet, but I know how</p> <p>9       to find a gun. It's easy to find a gun. Put it</p> <p>10      in the garbage can. Don't go to jail.</p> <p>11      <b>Q. So now maybe I ought to defer a little</b></p> <p>12      <b>bit more to counsel for Ronald Watts here, but</b></p> <p>13      <b>let me ask you, did you have any interactions</b></p> <p>14      <b>dealing with Ronald Watts before he became a</b></p> <p>15      <b>tactical sergeant?</b></p> <p>16      MR. FLAXMAN: Objection; foundation.</p> <p>17      BY THE WITNESS:</p> <p>18      A. No, I just -- I just told you what I do.</p> <p>19      I sell drugs, but I would not let him catch me.</p> <p>20      So if he ever -- sometimes he gets lucky and just</p> <p>21      catch me in the crowd like this, and then when</p> <p>22      I -- I'm getting arrested and all that, I got to</p> <p>23      be the last one to be let go. I already know</p> <p>24      something ain't right. All the other people</p>	<p>1       A. 2006, '5, all that.</p> <p>2       <b>Q. 2005 is --</b></p> <p>3       A. 2005, he was just like really starting</p> <p>4       his soldier. And then 2007, he really became a</p> <p>5       sergeant. He is not detective no more. He's a</p> <p>6       real boy now.</p> <p>7       <b>Q. So during that period of time, you were</b></p> <p>8       <b>dealing drugs, but you were careful not to have</b></p> <p>9       <b>Watts catch you; is that your testimony?</b></p> <p>10      A. Yeah. Not let him catch you. If he</p> <p>11      catch you, then just go to jail.</p> <p>12      <b>Q. But are you saying there were occasions</b></p> <p>13      <b>when you were holding drugs that you made a deal</b></p> <p>14      <b>with him and either he asked you for money or</b></p> <p>15      <b>guns; is that correct?</b></p> <p>16      A. He always ask for something. I think --</p> <p>17      I keep telling you the bad thing -- I would never</p> <p>18      play nobody down for. Look, when you do stuff</p> <p>19      like that -- like I could have got the drugs</p> <p>20      back, but then again, he know that's destroying</p> <p>21      the community. So he going to make me go find</p> <p>22      another one of them. But this right here, you</p> <p>23      see the gun, these little guns, you know why?</p> <p>24      <b>Q. Why?</b></p>
<p style="text-align: center;">Page 78</p> <p>1       looking like, What about him? No. I just told</p> <p>2       you, he don't play -- he don't play fair. You</p> <p>3       owe him something to clear your name up.</p> <p>4       <b>Q. All right. So let me understand again</b></p> <p>5       <b>what you're saying. Well, let me ask you this</b></p> <p>6       <b>first. The time period that we're talking about,</b></p> <p>7       <b>your dealings with Watts through the time you got</b></p> <p>8       <b>out of prison for this case and went to the OPS</b></p> <p>9       <b>department of the Chicago Police Department, how</b></p> <p>10      <b>long of a period was that from like the first</b></p> <p>11      <b>time? You went to OPS in 2011, so --</b></p> <p>12      MR. FLAXMAN: Hold up. Objection; form. I</p> <p>13      don't understand what your question is.</p> <p>14      MR. PALLE: I'm sorry. Okay.</p> <p>15      BY MR. PALLE:</p> <p>16      <b>Q. I think we've established that you were</b></p> <p>17      <b>arrested in 2007 for coke, and you believe Watts</b></p> <p>18      <b>was behind that incident, correct?</b></p> <p>19      A. Mm-hmm.</p> <p>20      <b>Q. Now, at any time before that, had you</b></p> <p>21      <b>been -- how long was it before then that you</b></p> <p>22      <b>first had a run-in with Watts?</b></p> <p>23      A. Back at that time 2007.</p> <p>24      <b>Q. Okay.</b></p>	<p style="text-align: center;">Page 80</p> <p>1       A. If I found a gun, I get an extra -- I</p> <p>2       get some days off, and I get -- when my check</p> <p>3       come, I have a nice decent check.</p> <p>4       <b>Q. You are talking about if you're a police</b></p> <p>5       <b>officer?</b></p> <p>6       A. If you are a police officer.</p> <p>7       <b>Q. So you are saying there was a financial</b></p> <p>8       <b>gain --</b></p> <p>9       A. Yeah.</p> <p>10      <b>Q. -- to take guns off the street?</b></p> <p>11      A. Yeah. And that's what he was doing.</p> <p>12      <b>Q. Got you.</b></p> <p>13      A. Look at his rap sheet. He took so many</p> <p>14      people off the street. But I tell you this, some</p> <p>15      of us never went off the street. That's what I'm</p> <p>16      trying to tell you.</p> <p>17      <b>Q. And some of them should have gone off</b></p> <p>18      <b>the street?</b></p> <p>19      A. Some should go.</p> <p>20      <b>Q. And some people who should have gone off</b></p> <p>21      <b>the street, in your view, made a deal, and they</b></p> <p>22      <b>stayed on the street?</b></p> <p>23      A. Uh-huh.</p> <p>24      MR. FLAXMAN: Objection; foundation.</p>

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MSJ-SL EXHIBIT 14

Robert Lindsey, et al. v. City of Chicago, et al.  
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Page 81	Page 83
<p>1       MR. PALLE: I agree. 2       BY MR. PALLE: 3       <b>Q. What would you base that on?</b> 4       A. Huh? 5       <b>Q. If that's true, do you know anybody that</b> 6       <b>was dealt with in that way?</b> 7       MR. FLAXMAN: Objection; form. 8       BY THE WITNESS: 9       A. You know, you do -- I can't judge nobody 10       else. I can only judge myself. 11       <b>Q. I got you. People talk.</b> 12       A. The last time I could have ever gave 13       Watts some money, that was the last time me and 14       him had this run-in, but it turned out -- he kept 15       on targeting me. I ain't going to lie. I think 16       I was as worse as like young boys or whatever you 17       call me, yeah, because I have been getting away 18       from him, but he caught me coming out the stairs. 19       <b>Q. Let me move back really into my lane</b> 20       <b>here. Let's talk about Kallatt Mohammed. When</b> 21       <b>is the first time you ran into Mohammed?</b> 22       A. Mohammed and me, all the time. They run 23       in the building. And both of them, when they 24       come out the building, they both trap me in</p>	<p>1       <b>the day of the incident we're talking about was</b> 2       <b>at the police station, right? The conviction</b> 3       <b>we're talking about.</b> 4       A. No. Mohammed came in -- he came in 5       about the same time Watts came in. And you 6       talking about Brown? He came in similar to like 7       that time, too, because I didn't see nothing but 8       Mexicans. Like this is the front desk. This is 9       the desk in the back room back there. 10       <b>Q. At the station?</b> 11       A. Yeah, yeah. So I'm always looking at 12       the ones that I told you. I told them I won't 13       get them, but if they -- if I ever see them on 14       the streets again, and they do anything stupid, 15       they going to already know not to try me because 16       you know why? 17       <b>Q. Why?</b> 18       A. I just got washed. And Mohammed and the 19       other Scottie Pippen -- yeah, yeah. I ain't 20       going to lie on them. I told them they know what 21       they did. 22       <b>Q. All right. So you went to OPS and filed</b> 23       <b>a citizen's complaint back in May of 2011?</b> 24       A. Yeah.</p>
<p>1       there or -- you know. 2       <b>Q. Did you ever talk to Mohammed?</b> 3       A. Nah. I talked to Mohammed -- Mohammed, 4       he ain't doing nothing that crossed -- this is my 5       friend. I can't cross him. If he said 6       something, I just be like, man -- no, no. See, 7       I'm already knowing it ain't going to work out. 8       <b>Q. So, again, I'm trying to understand.</b> 9       <b>You're saying that if you complained to Mohammed</b> 10       <b>about Watts --</b> 11       A. He is not going to listen. 12       <b>Q. He is not going to listen?</b> 13       A. Yeah. Just throw that away. 14       <b>Q. Did Mohammed ever hit you up for money?</b> 15       A. No. Mohammed just got a -- just 16       followed the program. So whatever Watts said, it 17       goes. That's why nobody -- like his partners -- 18       I think he have a couple of arguments with some 19       of them. Everybody go through something every 20       day. 21       <b>Q. Did Mohammed ever threaten you, harass</b> 22       <b>you?</b> 23       A. No. 24       <b>Q. And the first time you saw Mohammed on</b></p>	<p>1       <b>Q. You were outside prison, right?</b> 2       A. Mm-hmm. 3       <b>Q. By the way, when was your out date, do</b> 4       <b>you recall from this?</b> 5       A. I got out sometime -- 6       <b>Q. I got it someplace. It was from -- you</b> 7       <b>got out of IDOC November 12th of 2010. Does that</b> 8       <b>sound right?</b> 9       A. Probably is if it's on paper. 10       <b>Q. All right. So then about six months</b> 11       <b>later, you go, and you file this complaint with</b> 12       <b>OPS, right?</b> 13       A. Yep. 14       <b>Q. What took you so long?</b> 15       MR. FLAXMAN: Objection; form. 16       BY THE WITNESS: 17       A. Say that one more time. 18       <b>Q. Why did you wait so long?</b> 19       MR. FLAXMAN: Objection; form. 20       BY THE WITNESS: 21       A. No. Go over the whole thing. You said 22       why did I wait so long? I never waited. See, I 23       had already -- this is the thing I did. I ran 24       into them -- this is what I really know some</p>

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<p>1 stuff is really changing about them. I went out 2 there, and the first day they put -- gave me a 3 dope pack case. You hear me? I end up getting 4 out the County Jail. They gave me an I-bond. 5 Lucky I got that one. So they gave me the 6 I-bond. I got back out. I got in my car. I 7 went out to COPA. Somewhere like on Western or 8 something. You got to go west -- I mean up 9 north. Like you go that way. So I went out 10 there, talked to them. Same way I am sitting 11 here talking to you. They talking to me just 12 like this. And guess what? You try to scare me. 13 I told you, Why would I come out here -- why 14 would I be sitting here too long with you if you 15 can't do nothing about these damn polices. 16 Excuse me. So you know what they did? They end 17 up just sit there. Him right her, her right 18 here. They put the little tape record thing 19 right there and just sat right there and took all 20 my -- my -- what you call words, yeah. Once they 21 took the words -- you know, I always tell them, 22 Don't move too fast, all right. Just sneak up 23 over there, because they be going in the station, 24 and they be having paperwork, and when they call</p>	<p>1 believe it. 2 <b>Q. Okay. All right. Then what I'm asking</b> 3 <b>you is another question I got a little confused</b> 4 <b>on.</b> 5 <b>Are you saying that when you bonded</b> 6 <b>out, you know, from the -- this -- that you</b> 7 <b>bonded out --</b> 8 A. Yeah, I got my -- I got my bond. I got 9 my bond violated because of them. You don't get 10 no money back when you catch another case. 11 <b>Q. Okay. All right. So you're saying you</b> 12 <b>got violated -- your parole got violated,</b> 13 <b>correct?</b> 14 MR. FLAXMAN: Can you give the time period? 15 I'm mixed up. 16 BY MR. PALLE: 17 <b>Q. Your parole got violated as soon as you</b> 18 <b>got arrested in this 2009, right?</b> 19 A. Yep. 20 <b>Q. And that's because you had the previous</b> 21 <b>coke conviction from 2007?</b> 22 A. Yeah, yeah, but I was on parole for 23 that. 24 <b>Q. Right, but you violated your parole?</b></p>
<p style="text-align: center;">Page 86</p> <p>1 these officers' names and stuff, and they show 2 them my picture, the officer come out there, boy, 3 he be -- can you tell me why is that? 4 <b>Q. Okay. So are you saying that you</b> 5 <b>actually went to the police department earlier</b> 6 <b>or --</b> 7 A. Earlier what? 8 <b>Q. Earlier than 2011. Or -- I'm sorry.</b> 9 A. Yeah, I've been in prison -- let me see. 10 <b>Q. You got out November of 2010.</b> 11 A. I been in prison on my hand -- like I 12 can say about five times. 13 <b>Q. Yeah. Let me try this a different way.</b> 14 <b>Are you saying that if you had reported the</b> 15 <b>incident when you bonded out, that you would be</b> 16 <b>afraid that the records would get back to Watts</b> 17 <b>and his people, and that they would punish you in</b> 18 <b>some way for reporting them? Is that what you're</b> 19 <b>saying?</b> 20 A. Nah. See, you got to understand. You 21 don't get punished like that. You just get 22 punished because you're doing something. And 23 they don't like -- I just -- like I said, I just 24 can't just see what you just said. No, I don't</p>	<p style="text-align: center;">Page 88</p> <p>1 A. Yeah. 2 <b>Q. By getting arrested?</b> 3 A. Getting this case from Watts' scheming 4 shit. 5 <b>Q. Got you.</b> 6 <b>Now, according to the arrest report,</b> 7 <b>at the time of the arrest, Germin had \$280 on</b> 8 <b>him, and you had \$21 on you; is that correct?</b> 9 A. I'm not for sure how much money nobody 10 had on them because it ain't -- it ain't make us 11 no good because it didn't get on our books. 12 <b>Q. How about you, did you have \$21 on you</b> 13 <b>at the time?</b> 14 A. No. I don't even know because I -- I 15 don't remember. We don't have no money that day. 16 We just spent our money at the truck stop. 17 <b>Q. Well, do you remember after Watts and</b> 18 <b>Mohammed were arrested, you had an interview with</b> 19 <b>members of the FBI? Do you remember that?</b> 20 A. Yeah. 21 <b>Q. Do you remember telling the FBI that</b> 22 <b>Officer Brown took \$3500 from you?</b> 23 A. Yeah, Brown, yep. 24 <b>Q. But you had \$3500 on you?</b></p>

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<p>1       A. I had just made that money.</p> <p>2       <b>Q. How did you make that money?</b></p> <p>3       A. I collected from -- see, I'm just not a</p> <p>4       drug seller by myself. I might have somebody --</p> <p>5       if I run out, I can get -- I can go tell him go</p> <p>6       to you. And once the money was already made, I</p> <p>7       hold that money. Lucky -- this sneaky cat Brown</p> <p>8       snuck up and said the same thing, "I've been</p> <p>9       watching you. I've been watching you." And I --</p> <p>10      before I could even go to the house and put the</p> <p>11      money up, I had threw it on the floor, searched</p> <p>12      me.</p> <p>13      <b>Q. Wait, when did --</b></p> <p>14      A. Took the money.</p> <p>15      <b>Q. When did Brown tell you "I've been</b></p> <p>16      <b>watching you"? Is this at the time of the arrest</b></p> <p>17      <b>we're talking about?</b></p> <p>18      A. No.</p> <p>19      <b>Q. When?</b></p> <p>20      A. He been telling me that. He tell me</p> <p>21      that all the time "We watching you."</p> <p>22      <b>Q. For some period of time prior to the</b></p> <p>23      <b>time you got arrested by Brown in 2009, you -- he</b></p> <p>24      <b>had been saying "I'm watching you"?</b></p>	<p>1       Not the day they got me with White Boy. Nah,</p> <p>2       none of that. They been did that.</p> <p>3       <b>Q. Okay. So it's a block down on</b></p> <p>4       <b>42nd Street? 4120 south isn't that far from 42nd</b></p> <p>5       <b>and Prairie.</b></p> <p>6       A. But you got to be specific. If I was on</p> <p>7       42nd, I'm on 42nd. If I was on 43rd, I was on</p> <p>8       43rd. If I was on 47th, I was on 47th. You got</p> <p>9       to -- you got to like -- no, no.</p> <p>10      <b>Q. I'm sorry. You're right.</b></p> <p>11      A. I just told you. All right? Watts,</p> <p>12      Mohammed --</p> <p>13      MR. FLAXMAN: Let him ask the question.</p> <p>14      BY THE WITNESS:</p> <p>15      A. I don't --</p> <p>16      <b>Q. Who took the money out of your pocket?</b></p> <p>17      A. I told you, Mohammed.</p> <p>18      MR. FLAXMAN: Objection; form, foundation.</p> <p>19      BY MR. PALLS:</p> <p>20      <b>Q. \$3500?</b></p> <p>21      A. Mohammed.</p> <p>22      <b>Q. Okay. Fine. I got to --</b></p> <p>23      A. I didn't get my money back.</p> <p>24      <b>Q. Stop. I'm sorry. I'm going to ask you</b></p>
<p style="text-align: center;">Page 90</p> <p>1       A. Yeah, him and Watts.</p> <p>2       <b>Q. Him and Watts. Now --</b></p> <p>3       A. See, Mohammed just a crackhead.</p> <p>4       Mohammed --</p> <p>5       MR. FLAXMAN: He is not asking about Mohammed</p> <p>6       right now.</p> <p>7       BY MR. PALLS:</p> <p>8       <b>Q. No, I'm interested in Mohammed. No, no,</b></p> <p>9       <b>I represent Mohammed. I want to hear what you</b></p> <p>10      <b>have to say about him.</b></p> <p>11      A. They stand together, man. It's not one</p> <p>12      dude better than the other. One don't do better.</p> <p>13      It's all three of them. Never saw them cross</p> <p>14      each other. Whatever went down, it's either we</p> <p>15      did, or we not going to do it, or just take them</p> <p>16      to jail. I don't give a fuck. That's how he</p> <p>17      going to say it.</p> <p>18      <b>Q. In any event, on the day of your arrest</b></p> <p>19      <b>at 4120 South Prairie in October of 2009, you had</b></p> <p>20      <b>on your person -- you had on your person \$3500?</b></p> <p>21      A. Yeah.</p> <p>22      MR. FLAXMAN: Which date did you say?</p> <p>23      BY THE WITNESS:</p> <p>24      A. That's not 4120 either. 42nd? No, no.</p>	<p style="text-align: center;">Page 92</p> <p>1       <b>a question now. We're talking -- I want to make</b></p> <p>2       <b>clear I understand.</b></p> <p>3       <b>The \$3500 that you were holding at</b></p> <p>4       <b>that time were drug proceeds?</b></p> <p>5       MR. FLAXMAN: Objection; form, foundation.</p> <p>6       You are mixing up the dates, and you are not</p> <p>7       listening to his answers.</p> <p>8       BY MR. PALLS:</p> <p>9       <b>Q. Okay. When you went -- when you talked</b></p> <p>10      <b>to the FBI, did you or did you not claim that at</b></p> <p>11      <b>the time of your arrest, Officer Brown took</b></p> <p>12      <b>\$3500?</b></p> <p>13      MR. FLAXMAN: Objection; form. Time of what</p> <p>14      arrest?</p> <p>15      MR. PALLS: At the time of the arrest we're</p> <p>16      talking about in this case.</p> <p>17      MR. FLAXMAN: Put that in your question so he</p> <p>18      knows it.</p> <p>19      MR. PALLS: Fine. I thought I did. I</p> <p>20      thought I mentioned specifically --</p> <p>21      MR. FLAXMAN: I'm yelling at you because you</p> <p>22      didn't.</p> <p>23      MR. PALLS: All right. Well, Joel, I love</p> <p>24      you, though.</p>

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<p style="text-align: right;">Page 93</p> <p>1 BY MR. PALLEs:</p> <p>2 <b>Q. On October 15th, 2009 -- and we went off</b>  <b>3 track because I said 4120 South Prairie, but I'm</b>  <b>4 talking about the arrest at 42nd and Prairie on</b>  <b>5 October 15th, 2009. Did you at some point tell</b>  <b>6 the FBI --</b></p> <p>7 A. No. No money wasn't done at that time.</p> <p>8 <b>Q. Okay. So the \$3500 --</b></p> <p>9 A. This a whole other case you are talking about.</p> <p>10 <b>Q. Okay. When did Brown take \$3500 from</b>  <b>11 you, before or after --</b></p> <p>12 A. The first case I told you. I have been down with Watts. All right? I didn't survive that case. All right? I went to prison on that case.</p> <p>13 <b>Q. Right.</b></p> <p>14 A. So the money that they took, it never came up.</p> <p>15 <b>Q. The case never came up?</b></p> <p>16 A. The money didn't come up. I was already gone.</p> <p>17 <b>Q. Okay. Hold on. This is the case that</b>  <b>18 you were arrested on Parnell?</b></p>	<p style="text-align: right;">Page 95</p> <p>1 saying all that money in my pocket was -- it came 2 from a diving. So that's -- you got to argue 3 that. My lawyer had to argue that. I already 4 know I'm going to jail for some drugs 5 that somebody could have left in the hallway. I 6 just in the place at the wrong time, man.</p> <p>7 MR. PALLEs: Okay. Listen, I can keep going, 8 but I don't know -- first of all, I don't know 9 whether you want to have lunch. We've been going 10 two straight hours. I don't know how people on 11 Zoom feel.</p> <p>12 MR. FLAXMAN: I need a bathroom break for sure.</p> <p>13 MR. PALLEs: Anybody on Zoom have any 14 thoughts? Otherwise, we will take ten minutes 15 here. Are you hungry?</p> <p>16 THE WITNESS: What time is it?</p> <p>17 MR. PALLEs: I'll order you a sandwich from 18 downstairs.</p> <p>19 THE WITNESS: What kind of sandwich?</p> <p>20 MR. PALLEs: Let's make it 1:00 o'clock.</p> <p>21 MR. FLAXMAN: That okay with you, Robert?</p> <p>22 THE WITNESS: All right.</p> <p>23 THE VIDEOGRAPHER: The time is 12:28 p.m.,</p>
<p style="text-align: right;">Page 94</p> <p>1 A. No.</p> <p>2 <b>Q. Wasn't that the case that you were</b>  <b>3 violated on?</b></p> <p>4 A. Uh-uh. Uh-uh. I wasn't violated on -- 5 where did I violate that? Violate that in the 6 projects. That's when the projects was up. So, 7 yeah, coming down the stairway. Then I already 8 had the money already on me. I was really finna 9 to give it to somebody, but they happen to run up 10 in the building and caught me with all that money 11 and asked me, "What you doing with all this 12 money? You the mother fucker out here selling 13 the drugs in the hallway, huh?"</p> <p>14 <b>Q. So what happened? So they took the</b>  <b>15 money and let you go?</b></p> <p>16 A. They took the money and claimed that 17 they got some drugs, too. But I could tell you, 18 I had some money though. And I don't know if 19 they say -- they can say all types. They can say 20 the money was -- what they call --</p> <p>21 <b>Q. Drug proceeds?</b></p> <p>22 A. No, no. What they call -- when you give 23 somebody some money and tell them go buy a bag of 24 weed from him. They call it diving. So he</p>	<p style="text-align: right;">Page 96</p> <p>1 and we are now off the record.</p> <p>2 (Recess.)</p> <p>3 THE VIDEOGRAPHER: The time is 1:03 p.m., and 4 we are back on the record.</p> <p>5 BY MR. PALLEs:</p> <p>6 <b>Q. Robert, thanks for hanging in with us so</b>  <b>7 far.</b></p> <p>8 <b>Let me go back to one thing that we</b>  <b>9 discussed this morning, and that's your alcohol</b>  <b>10 use. You said you drink two fifths of rum a day;</b>  <b>11 am I correct?</b></p> <p>12 A. No.</p> <p>13 <b>Q. Okay. You said that you and your</b>  <b>14 girlfriend --</b></p> <p>15 A. Bacardi.</p> <p>16 <b>Q. Isn't Bacardi rum?</b></p> <p>17 A. No, it ain't rum. Bacardi.</p> <p>18 <b>Q. The two fifths of Ba -- anyway, when you</b>  <b>19 do start drinking Bacardi, do you drink when you</b>  <b>20 wake up?</b></p> <p>21 A. Between 12:00 and 1:00.</p> <p>22 <b>Q. Okay. And between 12 -- so lunchtime?</b></p> <p>23 A. Lunchtime and then, you know, once them 24 hours up, then all afternoon hours now, 5:00,</p>

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<p>1 4:00, 6:00. I be outside, so that's why I always 2 kind of like get in trouble with these polices 3 and stuff because I knew them, they know me.</p> <p>4 <b>Q. Let me ask you, when is the last time --</b> 5 <b>when did you finish drinking yesterday, what</b> 6 <b>time?</b></p> <p>7 A. I couldn't tell you. Probably about 8 like 10:00 or 8:00, yeah.</p> <p>9 <b>Q. Okay. Yeah, I get sleepy after lunch,</b> 10 <b>too. But let me ask, have you had any alcohol</b> 11 <b>today?</b></p> <p>12 A. No.</p> <p>13 <b>Q. How about cannabis?</b></p> <p>14 A. What's that? Weed?</p> <p>15 <b>Q. Weed.</b></p> <p>16 A. No. Cigarettes.</p> <p>17 <b>Q. Okay. All right. Let me go back a</b> 18 <b>minute to your civilian complaint to OPS back in</b> 19 <b>2011.</b></p> <p>20 <b>Now, according to OPS, you told them</b> 21 <b>that you were driving down the street at</b> 22 <b>approximately 4210 South Prairie. Now, is that</b> 23 <b>true?</b></p> <p>24 A. 42nd.</p>	<p>1 <b>were you when you first got your driver's</b> 2 <b>license?</b></p> <p>3 A. Well, I ain't took -- I ain't take a 4 test. I ain't got no license right now. I got a 5 state ID.</p> <p>6 <b>Q. Did you own a state license at the time</b> 7 <b>of this arrest in 2009?</b></p> <p>8 A. I do own a state ID.</p> <p>9 <b>Q. So you never had a driver's license?</b></p> <p>10 A. No.</p> <p>11 <b>Q. Okay.</b></p> <p>12 A. Nope.</p> <p>13 <b>Q. And you know we talked about dyslexia.</b> 14 <b>Do you know -- I'm sorry. When I say dyslexia,</b> 15 <b>the trouble you have with your reading. Are you</b> 16 <b>able to read street signs? Do you have</b> 17 <b>difficulty driving around?</b></p> <p>18 A. Where?</p> <p>19 <b>Q. Currently, do you now have difficulty</b> 20 <b>driving around without being -- do you have</b> 21 <b>difficulty reading the street signs?</b></p> <p>22 A. Nah, nah. I know the street signs. I 23 tell you, it's something like this. All right. 24 Go back to what I just said. All right. I'm not</p>
<p style="text-align: center;">Page 98</p> <p>1 <b>Q. 42nd and Prairie?</b></p> <p>2 A. Yeah.</p> <p>3 <b>Q. So that sounds a little different.</b></p> <p>4 <b>Sounds like you were driving when you were</b> 5 <b>stopped rather than --</b></p> <p>6 A. No. We said this. Once again, I drove 7 down 42nd. I get to the stop sign. Bug stay 8 nowhere but two houses off this corner right 9 here. So I told y'all I going to his house. Any 10 way I go, I don't give a care if they was back 11 there. Whatever they was looking for, who they 12 was looking for, I didn't give a care.</p> <p>13 <b>Q. But you already stepped out of the car</b> 14 <b>and spoke with Bug, and he'd gone back in the</b> 15 <b>house?</b></p> <p>16 A. I went and knocked on Bug's door. 17 Before I could get myself situated, put my seat 18 belt back on and go up to 47th, I recognized I'm 19 not moving because two cars of polices in front 20 of me.</p> <p>21 <b>Q. Okay. Good.</b></p> <p>22 A. I mean back and front.</p> <p>23 <b>Q. All right. I'm glad you clarified that.</b> 24 <b>Let me ask you, when did you first -- how old</b></p>	<p style="text-align: center;">Page 100</p> <p>1 8, 9, 10, 11, 12, 13, 14, 15. I'm not that age 2 no more. See, in that age, you should have been 3 like somebody smart, somebody intelligent, you 4 know. But now these days, that's why kids always 5 fell off when it was always that age right there 6 than right now.</p> <p>7 <b>Q. One thing, too, we talked about -- we</b> 8 <b>talked before about how when you were younger,</b> 9 <b>you were hyper, right? Is that one of the</b> 10 <b>changes, that you're less hyper now that you're</b> 11 <b>older than you were back when you were a young</b> 12 <b>man?</b></p> <p>13 A. Uh-huh. Yeah, when I was young, yeah. 14 I always been hyper. My mama always -- or 15 somebody that's close to me -- I was supposed to 16 be sitting down right there. Think how long I 17 can sit there. I get right up and do what I want 18 to do.</p> <p>19 <b>Q. Yeah. Are you still hyper, would you</b> 20 <b>say?</b></p> <p>21 A. Nah. I can't let you get to my ego. 22 You get to my ego, then I'm going to be hyper on 23 you.</p> <p>24 <b>Q. Got you. Let me ask you this. Do you</b></p>

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<p>1   <b>know -- would you say that you tend to act on</b>    2   <b>impulses? Do you know what I mean?</b>    3    A. No. Give me that.    4    <b>Q. Let me think. Kind of like you act</b>    5   <b>first and think second. Does that make any</b>    6   <b>sense?</b>    7    A. Uh-uh.    8    <b>Q. If you see something that you want, you</b>    9   <b>kind of grab at it?</b>    10   A. If I want? Depending on -- what am I    11   going to do?    12   <b>Q. I don't know.</b>    13   A. No. I come back and get it.    14   <b>Q. If you feel that you want to do drugs or</b>    15   <b>get drunk or smoke weed, you're going to go ahead</b>    16   <b>and do it, right?</b>    17    MR. FLAXMAN: Objection; form.    18   BY THE WITNESS:    19    A. Nah.    20   <b>Q. You won't give in to the temptation?</b>    21   A. No. That's out of my league. See, if    22   I'm dealing it and grew up off of it, I don't    23   have -- people know I did it, but I thought about    24   doing no stuff like that. Bad enough I smoke</p>	<p>1   A. Go back over. Repeat yourself.    2   <b>Q. Huh?</b>    3   A. Repeat it again.    4   <b>Q. Okay. Yeah, I'm saying that you told</b>    5   <b>the -- you told OPS that the officers took drugs</b>    6   <b>from somebody and gave it to you and planted it</b>    7   <b>on you, right? And then let the other guy go.</b>    8   A. What case are you talking about?    9   <b>Q. The case we're here about, 2009,</b>    10   <b>October.</b>    11   A. No, no, not like that. Similar like    12   that, which it is -- let me just give it to you    13   right. This man is like 400 something feet away    14   from that car. We don't even recognize what's    15   finna take place, how it's going to go down. All    16   we said to ourself, We ain't got no drugs, so...    17   <b>Q. We being you and Germin?</b>    18   A. Germin.    19   <b>Q. Sitting near 42nd and Prairie on October</b>    20   <b>of 2009?</b>    21   A. 42nd Prairie, October 15th.    22   <b>Q. Keep going.</b>    23   A. So we sitting there. I tell him    24   let's -- we will probably get started with a</p>
<p style="text-align: center;">Page 102</p> <p>1   cigarettes and a blunt, but that don't make me go    2   geek geek and all like that stuff, like how you    3   people in the streets now, crackheads. They'll    4   do anything for a bag.    5   <b>Q. Yeah. You know, one thing, when we</b>    6   <b>were -- when I was looking through some of these</b>    7   <b>papers, I didn't see when you went to OPS you</b>    8   <b>mentioned anything about Germin. Do you remember</b>    9   <b>mentioning Germin was with you when you went to</b>    10   <b>OPS, or did you keep him out of it?</b>    11   A. No, I told them that. They threatened    12   me out of there. They told me -- they told me if    13   this don't -- in a couple more weeks supposed to    14   call me and investigate, but they didn't got    15   there.    16   <b>Q. Well, in the course, you did tell them</b>    17   <b>that the officers had taken the drugs from</b>    18   <b>somebody else and let that person go. Okay.</b>    19   <b>Now, who was that?</b>    20   A. I didn't say who it was, but I think I    21   know what you're talking about.    22   <b>Q. You do know what I'm talking about?</b>    23   A. Trying to think.    24   <b>Q. Let me ask you this --</b></p>	<p style="text-align: center;">Page 104</p> <p>1   drink in a minute, but right now our food digest.    2   I have to go knock on that man's door, get Bug,    3   White Boy. He come stick his head out. He check    4   the car tires, and he's like, you going -- in a    5   minute, you going to need two ball joints. I'll    6   change this one because this don't look too good.    7   I said, "All right. Cool." I said, "What you    8   want me to do?" He said, "Well, you got to go up    9   to Mares and price it and get it." I said, "I'll    10   be right back." Before I said "I will be right    11   back" --    12   <b>Q. I remember that part. I guess what I'm</b>    13   <b>saying is, did you -- ultimately you -- the</b>    14   <b>police officers say that they caught you and</b>    15   <b>Germin holding drugs, correct?</b>    16   A. Uh-uh.    17   <b>Q. Our police officers never said that --</b>    18    MR. FLAXMAN: Can you just put your phone    19   down?    20   BY THE WITNESS:    21    A. They said --    22    MR. FLAXMAN: Hold on. Hold on.    23   BY THE WITNESS:    24    A. They saying it, but that don't --</p>

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<p>1       MR. FLAXMAN: Hold on. Is your phone off?  2       THE WITNESS: Okay. No.  3       MR. FLAXMAN: I'm going to put it over here.  4       BY THE WITNESS:  5           A. They said that, but that's not how it  6       happened.  7           <b>Q. I understand that. You say that they</b>  8       <b>took drugs from somebody else and laid it on you,</b>  9       <b>right?</b>  10          A. Yeah.  11          <b>Q. Okay. Who's the somebody else?</b>  12          A. He's dead.  13          <b>Q. Is his name Willie?</b>  14          A. Yes.  15          <b>Q. Okay.</b>  16          A. He dead.  17          <b>Q. Now, when did you -- when did you first</b>  18       <b>see Willie that day?</b>  19          A. We seen Will every day. Will stay on  20       the block. You can't do nothing but see somebody  21       if they stay on the block.  22          <b>Q. Stay on the block of 42nd and Prairie?</b>  23          A. No. He stay on 41st.  24          <b>Q. Okay. All right. That whole area --</b></p>	<p>1       <b>Q. You first saw Willie on the street at</b>  2       <b>the time you were arrested?</b>  3          A. I mean when I say I'm on 4, 5  4       something -- more than 4, 5. I give them like 10  5       or 15 feet away from me.  6          <b>Q. When did you first find out that it was</b>  7       <b>Willie who was holding?</b>  8          MR. FLAXMAN: Objection; form, foundation.  9       BY THE WITNESS:  10          A. I don't -- you said what?  11          <b>Q. Willie was holding a certain amount of</b>  12       <b>drugs.</b>  13          A. Oh, the police in the station. They  14       debone. Put him in a figure-four. They wanted  15       to do that to us, but we were already cool. So  16       we ain't got -- we ain't got to go through all  17       that. They didn't tell us we come here for that.  18          <b>Q. Boy, old boy. I think I'm going to have</b>  19       <b>to ask the reporter to read that back.</b>  20          (Said answer was read back.)  21       BY MR. PALLS:  22          <b>Q. Put him in a figure -- they put somebody</b>  23       <b>in a figure-four?</b>  24          A. Uh-huh.</p>
<p>1       <b>Page 106</b>  2       <b>this is the area you grew up in, right?</b>  3          A. Yep. From Bronzeville all the way back  4       to 63rd.  5          <b>Q. Okay. But particularly from 4120 South</b>  6       <b>Prairie is about a half a block from where we're</b>  7       <b>talking about?</b>  8          A. That's in the middle of the block.  9          <b>Q. Okay.</b>  10       A. See, when you design blocks, it's -- you  11       got to go at least a block. That's the only way  12       you going to see the green sign to tell you -- on  13       that sign and say 41st.  14          <b>Q. Got you.</b>  15       A. And in the middle when you get to 42nd,  16       then you going run into 4120 right there because  17       it's right next-door.  18          <b>Q. And you keep going away from 42nd,</b>  19       <b>you're going to cross over 42nd into -- right.</b>  20          <b>Okay. And so on.</b>  21          <b>So in any event -- so, okay, you</b>  22       <b>always see Willie around. When did you see</b>  23       <b>Willie that day?</b>  24          A. We were over back in the car when they            blocked me in.</p>	<p>1       <b>Q. Who?</b>  2          A. Will.  3          <b>Q. Who?</b>  4          A. Will.  5          <b>Q. All right.</b>  6          A. That's how they got the things. And  7       turned around and say, "You know something." I  8       don't know that.  9          <b>Q. I'm sorry. Let's remember -- you know,</b>  10       <b>I'd love to sit and talk with you about this, but</b>  11       <b>for the sake of the court reporter, we got to</b>  12       <b>make sure it's a little more back and forth.</b>  13          <b>Okay. So am I correct that you saw</b>  14       <b>Willie or Will taken into custody?</b>  15          A. Say what?  16          <b>Q. Did you see him -- was he taken into</b>  17       <b>custody?</b>  18          A. Who, Willie?  19          <b>Q. Yeah, at the same time you were.</b>  20          A. Yeah, of course he going to get -- if he  21       tell the police officer to go back down the  22       street on the north side or right side -- this is  23       what I'm trying to ask you. What make you think  24       that you, the police -- you don't supposed to</p>

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<p style="text-align: center;">Page 109</p> <p>1 answer the phone unless it is your wife or 2 somebody. That's the only way I can see. All 3 right?</p> <p>4 <b>Q. Let me stop you. You're going back to</b> 5 <b>when the phone -- when the phone rang?</b></p> <p>6 A. Yeah. Why the phone ring? Why couldn't 7 you just be on your walkie-talkie. You can't 8 hide nothing from nobody.</p> <p>9 <b>Q. And Brown picked up the phone, correct?</b></p> <p>10 A. No. That wasn't Brown. That was Watts. 11 He called him, Brown. Asked Brown how that car 12 is. I know you my man. I know you're going to 13 tell me something. He is like, Man, it's no-go, 14 man. These niggers' car clean. Smell good, too. 15 He's like, I don't find no drugs. He was like, 16 Man, no, man. He bullshitting me today. They 17 got them drugs. I know them. That's the car we 18 told you. We going to catch that car. So you 19 know what he did?</p> <p>20 <b>Q. No.</b></p> <p>21 A. As soon as I start seeing Brown, he 22 start looking all around and stuff. Looking like 23 something up to fall in his hand just to put it 24 on me or put it on Germin.</p>	<p style="text-align: center;">Page 111</p> <p>1 people, right. They do the most selling drugs, 2 smoke the drugs, whatever you want to call it. 3 But then, again, when they get caught, you know 4 what they do?</p> <p>5 <b>Q. Point the finger. I answered.</b></p> <p>6 A. They point the finger at somebody. Who 7 is them to point the finger at me? And they the 8 black cat, too.</p> <p>9 <b>Q. I got you. Let's move on.</b></p> <p>10 <b>Okay. Move ahead to April of 2012.</b></p> <p>11 <b>Okay? You called the FBI, right?</b></p> <p>12 A. Yep.</p> <p>13 <b>Q. What made you call the FBI?</b></p> <p>14 A. Well, trying to find out how the 15 police -- who the power is.</p> <p>16 <b>Q. By that time, had you learned that</b> <b>Mohammed and Watts had been arrested by the Feds?</b></p> <p>17 A. Not right off top. By the time I found 18 that out, it was like almost a couple -- a few 19 days, because I think I had either got out or -- 20 yeah, I think I just got out. As soon as I 21 looked up -- I was in the house on house arrest 22 because I had to do a few days of house arrest 23 before I could get to move around. I'm always</p>
<p style="text-align: center;">Page 110</p> <p>1 <b>Q. Okay. Did Willie ever -- or Will ever</b> 2 <b>tell you specifically, Yeah, those were my drugs</b> 3 <b>that Watts and his guys laid on you?</b></p> <p>4 A. Yeah -- no, no, he ain't say -- he ain't 5 able to say none of that because he already -- 6 they didn't want to hear nothing like that from 7 him.</p> <p>8 Like if somebody got some drugs -- 9 just say I got a gun. The police catch -- I 10 don't even know you from a new birthday cake. 11 You just somebody in the station with me. But 12 guess what? Police just caught me with the gun. 13 And guess what the police said.</p> <p>14 <b>Q. I can't. Go ahead.</b></p> <p>15 A. Make me mad, I give you the gun case. 16 And guess what? You got the gun case. And all 17 you supposed to have is what? Whatever you came 18 here for. But it don't work like that.</p> <p>19 <b>Q. All right. But somehow or another,</b> 20 <b>you're saying that the police were willing to let</b> 21 <b>Will slide, although he was holding drugs, and</b> 22 <b>instead they wanted to put you and Germin --</b></p> <p>23 A. No. They just -- they just know -- I 24 keep telling you, right. It's a lot of old</p>	<p style="text-align: center;">Page 112</p> <p>1 watching the news. That's my favorite. You hear 2 me? Because that's how they tell me a lot about 3 the world, which I already know the world is 4 cold. But he -- he's out there. All I know, I 5 forgot that these -- these ones going to be 6 around here looking for peoples. Just know -- I 7 just -- I just got out, man, and I just -- I 8 got -- I ain't like COPA. COPA told me if I lie 9 or something, they said you going to get to a 10 minimum of this -- like them telling me in 11 prison. You can get the minimum if you hurt 12 somebody, stab somebody or something like, you 13 get more charges. But COPA just sold me out 14 because you know why? They went back in that 15 station like a couple of days -- I don't know. 16 Did they do the next day? But I know when they 17 went back in there, and I saw Watts all by 18 myself, they gave me that ugly face. And you 19 know what I did? Yeah, I gave them the ugly 20 face. I took off running on them. I got away 21 from them. And when I got in the house, I start 22 thinking somebody was setting me up or -- you 23 know what Watts and them said? They want to talk 24 to me. It wasn't nothing about like what I did</p>

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<p style="text-align: center;">Page 113</p> <p>1 to them. See, they thought peaches was going to 2 be cream, though, because my last court day -- 3 <b>Q. Who thought peaches were going to be</b> 4 <b>cream?</b> 5 A. Watts and Mohammed and Brown and them. 6 So they come into court. I'm -- I had almost 7 like -- you know what a 402 conference is? 8 <b>Q. A who?</b> 9 A. A 402 conference. 10 <b>Q. Yes, I do. A 402 conference.</b> 11 A. What's that? 12 MR. FLAXMAN: I think we're pretty far afield 13 from the question. I suggest that we go back. 14 MR. PALLE: He wants to tell me. 15 MR. FLAXMAN: We're all going to get out of 16 here -- 17 MR. PALLE: I tell you what -- 18 MR. FLAXMAN: It will be a better time if we 19 ask questions and give answers. 20 BY MR. PALLE: 21 <b>Q. Robert, you hear your lawyer. I'm going</b> 22 <b>to ask you some very specific questions. You try</b> 23 <b>to answer as simply as you can. He will be much</b> 24 <b>happier.</b></p>	<p style="text-align: center;">Page 115</p> <p>1 <b>had dealt drugs in the Ida B. Wells public</b> 2 <b>housing project between 1998 and when the complex</b> 3 <b>closed?</b> 4 MR. FLAXMAN: Objection; form, foundation. 5 BY MR. PALLE: 6 <b>Q. Is that true?</b> 7 A. I been over there. I didn't say I sold 8 it over there. I tell you from the whole -- if I 9 say I'm from State to the lake, that means that 10 goes to State Street to that water. 11 <b>Q. I got you.</b> 12 A. And you see where Mariano's at, all that 13 new stuff? That's the Ida B. Wells. 14 <b>Q. On 35th Street roughly?</b> 15 A. 35th. It's the longest building. The 16 big tall building. I'm talking about right where 17 they built the Mariano's at. All that is 18 Ida B. Wells. 19 <b>Q. I haven't been down there in a long</b> 20 <b>time.</b> 21 A. That's when Watts had a lot of problems. 22 See, that's what I'm looking at. It ain't me. I 23 have a whole lot of kin folks and all that. We 24 didn't deal a lot of stuff, and these like some</p>
<p style="text-align: center;">Page 114</p> <p>1 MR. FLAXMAN: Good advice. 2 BY MR. PALLE: 3 <b>Q. Let me go back to that. Okay. The FBI</b> 4 <b>in April of 2012. Okay. By that time, do I</b> 5 <b>understand that you had found out from the TV</b> 6 <b>that Watts and Mohammed had been arrested by the</b> 7 <b>Feds?</b> 8 A. They had been already arrested about a 9 week ago before that. I was already getting 10 calls from the FBI. 11 <b>Q. So they called you, you didn't call</b> 12 <b>them?</b> 13 A. Nope. As a matter of fact, no, I called 14 them -- 15 <b>Q. Called them back?</b> 16 A. They said they are going to trace my 17 call back, whoever got in contact with me. 18 That's when the show and the ball game went on. 19 I wasn't messing with COPA no more. COPA looked 20 like they told Watts and them, and they did 21 nothing but come out and try to look for me. I 22 told you, I ran from them. 23 <b>Q. In any event, let's talk about it.</b> 24 <b>During your interview, you told the FBI that you</b></p>	<p style="text-align: center;">Page 116</p> <p>1 of the cops that come in. 2 <b>Q. All right. Let's -- that's good, but --</b> 3 <b>so you said until -- you were selling in and</b> 4 <b>around there until the complex closed. Do you</b> 5 <b>remember when Ida B. Wells closed, what year?</b> 6 MR. FLAXMAN: Objection; form. 7 BY THE WITNESS: 8 A. No, no, man. 9 <b>Q. What drugs did you sell?</b> 10 A. Rocks, blow, weed. Weed wasn't pumping. 11 <b>Q. The what?</b> 12 A. The weed wasn't pumping back in the -- 13 <b>Q. Cannabis didn't sell much?</b> 14 A. No, no, no. 15 <b>Q. Not much weed, but cocaine, rock</b> 16 <b>cocaine, crack cocaine, and heroin?</b> 17 A. That's what dope is. 18 <b>Q. Look, you know, I know in part because</b> 19 <b>of the work I do. Somebody listening to this, a</b> 20 <b>judge, a jury, they may not know. So that's why</b> 21 <b>when you say, you know, rocks, I'm going to say</b> 22 <b>cocaine.</b> 23 A. Cocaine. 24 <b>Q. When you say blow, I'm going --</b></p>

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<p style="text-align: right;">Page 117</p> <p>1       A. Dope. 2       <b>Q. You got it.</b> 3       <b>How much did you make a week?</b> 4       A. Huh? 5       <b>Q. How much money were you making?</b> 6       A. I couldn't tell you. 7       <b>Q. A lot of money?</b> 8       A. I can't tell you. 9       <b>Q. I say a week.</b> 10      A. I can't tell you. It was just money. 11      <b>Q. A lot of money? Decent?</b> 12      A. Yep. 13      <b>Q. It will buy nice clothes, cars, things like that?</b> 14      A. Mm-hmm. 15      <b>Q. And, again, were there at least places where you set up or did you set up?</b> 16      A. No. If you known, you could walk around. Nine times out of ten, you will see me somewhere like minding my business. And if something occurred with that, then I know what occurred with that. 17      <b>Q. Let me ask you, I mean that -- you know that some guys are going to set up people to</b></p>	<p style="text-align: right;">Page 119</p> <p>1       A. I remember real polices in that. See, it's not just no one Watts that been in that station. The real, real, real bad boy Watts, he used to be in there, but he -- he was similar to Watts, too. 2       <b>Q. Let me ask you this -- let me go back to my question. Was there a time when you -- I mean like you got some drugs. You want to make some money. Was there a place like you'd set up, you know, and just kind of hang out at the one place?</b> 3       A. No. You don't have to set up. It's America. You can walk past somebody right now, "Hey." 4       <b>Q. Are they going to ask you or are you going to ask them? Either way?</b> 5       A. I ask you and then -- if you ask them, then depends on how people -- you got to know who to serve drugs to. You got to know who to talk to. 6       <b>Q. How long would you have to spend during the day before you'd say, Okay, that's enough, I'm done?</b> 7       A. You go with your first mind. If I said I'm going to start at this time, and I'm going to</p>
<p style="text-align: right;">Page 118</p> <p>1       <b>pitch, and they're going to have -- they may get a few people in the area to -- for security and then there's going to be some guys who are handling the money and the drugs. Did you ever have any organization -- any group of guys like that working for you?</b> 2       A. No. I'm out committing my own crime. 3       <b>Q. So you engaged in basically hand to hand?</b> 4       A. No. I have security, but I don't -- if I'm going to do something, I got to do it myself. It's not worth it me beating you up, messing you up because you mess my money up. 5       <b>Q. Okay. What about now, for example -- aside from Ida B. Wells, there's a lot of drug trafficking, was there not, at that -- the project there on 41st and Prairie, right?</b> 6       A. That's not the only drug spot. 7       <b>Q. But that block.</b> 8       A. That's the whole low end. Everywhere you can get some drugs. We try to see where these police come in at. Where's all the crook stuff come in at. 9       <b>Q. I see. Okay.</b></p>	<p style="text-align: right;">Page 120</p> <p>1       leave at this time, I'm gone. 2       <b>Q. You're your own boss. What time -- were there any times better than others?</b> 3       A. I can't imagine that because it's always something. 4       <b>Q. Now, let's go back to the guns that you gave Watts or you provided to Watts for a minute. Okay? You say that you would drop the guns in the garbage can?</b> 5       A. Yeah. Tell them go get it. 6       <b>Q. And did you ever see anybody take guns out of the garbage can?</b> 7       A. Yeah, me. 8       <b>Q. Okay. What I'm saying, if you dumped them in the garbage can, did you ever go back to check whether or not they were still in the garbage can or whether or not they'd be picked up?</b> 9       A. No. I already know they finna get picked up. 10      <b>Q. Did you ever observe any police officers pick it up?</b> 11      A. Yeah. Watts said stick it in there. Send them Brown, all of them, get the gun. It</p>

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<p>1 ain't going to be there too long. Go and pick it 2 up.</p> <p>3 <b>Q. I know. I'm asking if you saw any of</b> 4 <b>the officers --</b></p> <p>5 A. I got to watch them.</p> <p>6 <b>Q. Huh?</b></p> <p>7 A. I got to watch them go to that garbage 8 can. If they don't go to the garbage can, then 9 what's going to happen then?</p> <p>10 <b>Q. Somebody else will take it like you when</b> 11 <b>you were 13.</b></p> <p>12 A. Yes, sir. It will come to a kid.</p> <p>13 <b>Q. All right. Now, I want to talk about</b> 14 <b>your affidavit. I'm just going to mark it as</b> 15 <b>Exhibit No. 1, but I'm not really going to go</b> 16 <b>through a lot of detail. I don't really think</b> 17 <b>you have to read it, other than to be able to</b> 18 <b>tell me whether or not it's your signature. And</b> 19 <b>for people on Zoom, this will be -- you should</b> 20 <b>have a folder that is -- it says "Affidavit of</b> 21 <b>Robert Lindsey."</b></p> <p>22 Plaintiff -- mine is Plaintiff Joint 23 F, as in Flaxman, 02651 through 54.</p> <p>24 Okay. Robert, let's just turn to</p>	<p>1 BY MR. PALLES:</p> <p>2 <b>Q. Now, I take it that you didn't write the</b> 3 <b>affidavit, right? It was written for you?</b></p> <p>4 A. What?</p> <p>5 <b>Q. The affidavit.</b></p> <p>6 A. This right here?</p> <p>7 <b>Q. Yeah.</b></p> <p>8 A. I could have -- I could have, but I have 9 my lawyer go through it.</p> <p>10 <b>Q. Whose idea was it to draft an affidavit?</b></p> <p>11 MR. FLAXMAN: Hold on.</p> <p>12 BY THE WITNESS:</p> <p>13 A. Me.</p> <p>14 MR. FLAXMAN: Hold on.</p> <p>15 MR. PALLES: Withdrawn. Withdrawn.</p> <p>16 BY THE WITNESS:</p> <p>17 A. This was --</p> <p>18 MR. FLAXMAN: Wait until he asks you a 19 question. He withdrew his question.</p> <p>20 MR. PALLES: I withdrew the question.</p> <p>21 BY MR. PALLES:</p> <p>22 <b>Q. Would you agree that your memory of</b> 23 <b>these events was better in 2009 than it was in</b></p>
<p>1 the last page. And I want to ask you, is that 2 your signature?</p> <p>3 (WHEREUPON, said document 4 was marked as Deposition 5 Exhibit No. 1 for 6 Identification.)</p> <p>7 A. Yeah, that's my signature.</p> <p>8 <b>Q. Okay. And according to this, you signed</b> 9 <b>it on September 8th -- oh, wait. I'm sorry.</b> 10 <b>There's -- actually, if we go back to the fourth</b> 11 <b>page, third page, too, you also signed it, right?</b></p> <p>12 A. Mm-hmm.</p> <p>13 MR. FLAXMAN: Is that a yes?</p> <p>14 MR. PALLES: That's a yes for the record.</p> <p>15 BY MR. PALLES:</p> <p>16 <b>Q. And the -- in both cases, it was -- you</b> 17 <b>remember it was in September of 2018?</b></p> <p>18 A. Mm-hmm.</p> <p>19 <b>Q. Yes?</b></p> <p>20 MR. FLAXMAN: Is that a yes?</p> <p>21 BY THE WITNESS:</p> <p>22 A. Yes.</p> <p>23 MR. FLAXMAN: You got to say yes out loud.</p>	<p>1 2018?</p> <p>2 A. Say that again.</p> <p>3 <b>Q. Yeah. Did you remember these events</b> 4 <b>better in 2009 when they happened, as opposed to</b> 5 <b>2018 when you did the affidavit?</b></p> <p>6 A. Uh-uh. I don't know what you're talking 7 about.</p> <p>8 <b>Q. Do you -- let me ask you whether or not</b> 9 <b>your memory of the events when you prepared this</b> 10 <b>affidavit in 2018 was better than it is today?</b></p> <p>11 <b>Did you remember these things better in 2018 than</b> 12 <b>today?</b></p> <p>13 A. Oh, yeah, yeah.</p> <p>14 <b>Q. Okay.</b></p> <p>15 A. I still got it in my mind.</p> <p>16 <b>Q. Okay. Are you able to stand by the</b> 17 <b>accuracy of your affidavit?</b></p> <p>18 A. Mm-hmm.</p> <p>19 <b>Q. Okay. One of the things that you</b> 20 <b>mentioned in your affidavit was that the officers</b> 21 <b>threatened to take you back to the station and</b> 22 <b>strip search you. Did they ever do that?</b></p> <p>23 A. Yep.</p> <p>24 <b>Q. They did?</b></p>

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<p>1 A. Mm-hmm.</p> <p>2 <b>Q. That was back at the station?</b></p> <p>3 A. Mm-hmm.</p> <p>4 <b>Q. Same officers?</b></p> <p>5 A. Yep, all of them.</p> <p>6 <b>Q. You mentioned in your affidavit that</b></p> <p>7 <b>officers went into like a conference room, their</b></p> <p>8 <b>office, came back out, showed you and Germin bags</b></p> <p>9 <b>of drugs. Do you remember which officers those</b></p> <p>10 <b>were?</b></p> <p>11 A. I don't remember.</p> <p>12 <b>Q. Let me strike that. Let me ask it this</b></p> <p>13 <b>way. Who were the officers that told you and</b></p> <p>14 <b>Germin that you were going to be charged with</b></p> <p>15 <b>possessing those drugs?</b></p> <p>16 A. It was all of them. It was in lockup.</p> <p>17 Just getting -- taking our picture and stuff.</p> <p>18 All we see was us two going to County in the</p> <p>19 morning.</p> <p>20 <b>Q. When you were -- do you remember how you</b></p> <p>21 <b>got transported to the station from 42nd and</b></p> <p>22 <b>Prairie in October of 2009?</b></p> <p>23 A. Yeah. I don't remember that one, if</p> <p>24 I -- somebody sits on a jet -- what that was? A</p>	<p>1 question on behalf of our clients.</p> <p>2 MR. FLAXMAN: Everyone has that right.</p> <p>3 MR. GAINER: I want to, on the record,</p> <p>4 reserve our rights to ask questions for the</p> <p>5 remainder of this deposition.</p> <p>6 MR. FLAXMAN: The defendants collectively</p> <p>7 have a right to finish this deposition.</p> <p>8 MR. PALLES: Thank you.</p> <p>9 THE VIDEOGRAPHER: This is the end of today's</p> <p>10 testimony. The time is 1:50 p.m., and the</p> <p>11 recording length is 2 hours, 56 minutes, and 15</p> <p>12 seconds. We are now off the record.</p> <p>13 THE COURT REPORTER: Do you want this written</p> <p>14 up?</p> <p>15 MR. PALLES: Yeah. Rough or whatever.</p> <p>16 MR. FLAXMAN: Whatever he orders, I will take</p> <p>17 a copy.</p> <p>18 (WHEREUPON, the proceedings</p> <p>19 were adjourned at 1:52 p.m.</p> <p>20 and continued sine die.)</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>
<p>1 jet ski? Yeah, 2009.</p> <p>2 <b>Q. Let me ask you, you look like you're</b></p> <p>3 <b>running out of gas. Do you want to continue this</b></p> <p>4 <b>or would you prefer to put this -- finish it up</b></p> <p>5 <b>on another day?</b></p> <p>6 MR. FLAXMAN: Why don't we go off the record.</p> <p>7 MR. PALLES: Let's go off the record on this.</p> <p>8 THE VIDEOGRAPHER: The time is 1:47 p.m., and</p> <p>9 we are now off the record.</p> <p>10 (Brief pause.)</p> <p>11 THE VIDEOGRAPHER: The time is 1:49 p.m., and</p> <p>12 we are back on the record.</p> <p>13 MR. PALLES: Okay. I'll speak. By</p> <p>14 agreement, we've agreed to recess for the day.</p> <p>15 It's been a long day, and we will resume at a</p> <p>16 mutually agreed time to finish up briefly with</p> <p>17 me, and then to the other defense attorneys</p> <p>18 certainly. Okay?</p> <p>19 MR. FLAXMAN: Okay. We agree, and our intent</p> <p>20 is to reserve signature. We agree that that will</p> <p>21 be just the full transcript. That the clock</p> <p>22 doesn't start ticking on the first one.</p> <p>23 MR. PALLES: Yeah, yeah.</p> <p>24 MR. GAINER: I want to reserve our right to</p>	<p>1 Page 126</p>

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1                   IN THE UNITED STATES DISTRICT COURT  
2                   NORTHERN DISTRICT OF ILLINOIS  
3                   EASTERN DIVISION  
4                   ROBERT LINDSEY and GERMIN      )  
5                   SIMS,                                  )  
6                   Plaintiffs,                          )  
7                   -vs-                                  ) No. 19-cv-2347  
8                   CITY of CHICAGO, et al.,        )  
9                   Defendants.                        )  
10

I, ROBERT LINDSEY, state that I have read  
the foregoing transcript of the testimony given  
by me at my deposition on April 8th, 2025, and  
that said transcript constitutes a true and  
correct record of the testimony given by me at  
said deposition except as I have so indicated on  
the errata sheets provided herein.

12

13

ROBERT LINDSEY

14

No corrections (Please  
initial) \_\_\_\_\_  
Number of errata sheets  
submitted \_\_\_\_\_ (pgs.)

17                   SUBSCRIBED AND SWORN to  
18                   Before me this \_\_\_\_\_ day  
19                   of \_\_\_\_\_, 2025

20

21

22

23

24

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MSJ-SL EXHIBIT 14

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1 State of Illinois )  
2 )  
2 County of C O O K )

3 I, MAUREEN A. WOODMAN, Certified  
4 Shorthand Reporter in the State of Illinois, do  
5 hereby certify that ROBERT LINDSEY was first duly  
6 sworn to testify the whole truth and that the  
7 above deposition was recorded stenographically by  
8 me, and was reduced to typewriting under my  
9 personal direction.

10 I further certify that the said deposition  
11 was taken at the time and place specified.

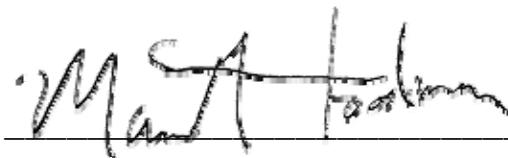
12 I further certify that I am not a relative  
13 nor employee or attorney nor counsel of any of  
14 the parties, nor a relative or employee of such  
15 attorney nor counsel nor financially interested  
16 directly nor indirectly in this action.

17 In witness whereof, I have hereunto set my  
18 hand and affixed my seal of office at Chicago,  
19 Illinois, this 14th day of April, 2025.

20

21

22



23 MAUREEN A. WOODMAN, C.S.R.  
24 License No. 084-002740