

Exhibit 17

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

)
) No. 19-cv-1717
In re: Watts Coordinated Pretrial)
Proceedings) (*Judge Valderrama*)
)
) (*Magistrate Judge Finnegan*)

**PLAINTIFF ROBERT LINDSEY'S
ANSWERS TO INTERROGATORIES**

The undersigned, under penalties of perjury, certifies that the following interrogatory answers are true:

1. Identify by name and address all health care professionals and/or facilities where you sought and/or received medical treatment for any physical and/or emotional injuries you claim in this case. Include dates for all visits.

ANSWER: I received some mental health treatment in the Jail and in IDOC. Those records have been produced.

2. Prior and /or subsequent to October 15, 2009, have you been treated and/or visited any healthcare professional for any emotional and/or mental health condition? If so, identify by name and address all health care professionals and/or facilities where you sought, visited and/or received treatment for your condition and dates of treatment.

ANSWER: To the best of my recollection, the only times I have seen healthcare professional for any emotional and/or mental health condition as an adult are in the Jail and in IDOC.

3. Describe the amount of heroin or any other controlled substance in weight (measured in grams) and by packaging (zip lock bag, cigarette-pack cellophane, aluminum foil, glass or plastic vials, etc.) that constituted your usage of heroin or any other controlled substance during 2009 and any other time during the past ten years.

ANSWER: I have used marijuana all of my adult life. I smoke almost every day.

4. Identify all individuals by name and last known address from who you have obtained heroin and/or any other controlled substance-relative during your adult life.

ANSWER: I do not know the names or addresses of anyone I bought drugs from.

5. Describe all narcotics activity, if any, you participated in or observed at Ida B Wells Apartment complex during 2009.

ANSWER: None.

6. Have you ever traded personal services in exchange for narcotics? If yes, please describe each instance in which you performed a service in exchange for narcotics, by stating what services you provided, when you provided such services, to whom did you provide such services, and how much narcotics you received as part of the exchange.

ANSWER: No.

7. Have you ever sold narcotics in return for monetary compensation? If yes, please describe each instance in which you sold narcotics by describing when you sold the narcotics, where you sold the narcotics, who did you sell the narcotics for, and how much monetary compensation you received in exchange for selling narcotics.

ANSWER: Yes. I have sold drugs over the years. I cannot describe each time.

8. Have you ever sold heroin or received heroin or any other controlled substance in return as compensation? If yes, please describe each instance in which you sold heroin by describing when you sold the heroin, where you sold the heroin, who did you sell the heroin for, and the amount of heroin or other controlled substance that you received in exchange for selling heroin or another controlled substance.

ANSWER: Yes. I have sold heroin over the years. I cannot describe each time.

9. With the exception of your October 15, 2009 arrest and subsequent conviction, please identify and describe all other criminal conduct that led to your other arrests and felony convictions

ANSWER: Objection relevance and not proportional to the needs of the case to review the circumstances of more than 40 arrests. Without waiving these objections, Plaintiff states that Defendants have produced his criminal history report.

10. Have you been arrested or convicted of any crimes outside of Chicago and/or Illinois? If yes, identify with specificity.

ANSWER: No.

11. Did you ever have contact, communicate with, or have contact with any of the plaintiffs in the coordinated cases while you were at Ida B. Wells? If yes, please identify and describe your interactions with those plaintiffs and whether or not you ever provided or received heroin or any other controlled substance from those plaintiffs.

ANSWER: Objective vague, relevance, and not proportional to the needs of the case. Without waiving this objection, plaintiff answers: I have reviewed a list of the names of the plaintiffs in the coordinated proceedings other than me. The only name I recognize is Germain Sims. We've been friends since we were kids.

12. Did you experience emotional distress or emotional suffering following your other arrests and convictions not related to your October 15, 2009 arrest and subsequent July 12, 2010 conviction? If so, please describe all emotional distress or emotional suffering.

ANSWER: Yes. Every arrest is emotionally stressful and painful.

13. Did you receive and/or use heroin or cocaine the day of your arrest? If so, please state where you received and/or used the heroin, the identity of any person that you received the heroin from or the identity of any person who was present when you used the heroin, and the amount of heroin that you used.

ANSWER: No.

14. Did you use or possess heroin, cannabis or any other controlled substance at any time during 2009? If so, please identify all dates when the heroin, cannabis or other controlled substance was possessed or used, identity of any person that was present when you used or possessed heroin, cannabis or any other controlled substance, and the amount of heroin, cannabis or controlled substance that you possessed or used.

ANSWER: See answer to interrogatory 3.

15. Please account for your whereabouts, including who you were with and where you were in the 24 hours before your October 15, 2009 arrest.

ANSWER: I cannot remember what I did on October 14, 2009. The first thing I did on October 15, 2009 was leave my house at 7324 S Cameron to pick up Germain Sims. I said what happened after that in my affidavit. PL JOINT F 02651-02654. My affidavit talks about "Willie Martin," but it should say "Willie Brownlee."

16. Have you ever been a part of a street gang? If so, please provide the following information:

- A. Which gang did you belong to?
- B. When did you join?
- C. List all of the ranks that you held and when you held each such rank?
- D. Did you ever participate in selling narcotics or narcotics trafficking as part of gang activity? If yes, please describe your role in the selling of narcotics or narcotics trafficking.

ANSWER: I was affiliated with the Vice Lords starting as a teenager until about age 29. I never had a rank. I did not sell drugs as part of my gang activity.

17. With respect to Defendants Jones, Bolton, Gonzalez, Leano, Nichols, Jr. and Smith, Jr., please state with specificity what wrongful action each defendant took in relation to your October 15, 2009 arrest and the facts upon which you assert the wrongful actions.

ANSWER: Those officers are on the reports of my arrest. They helped write the reports or they knew the reports were false and didn't do anything about it.

18. Identify by CB number any of your arrests by Chicago Police officers that you assert were false and unlawful.

ANSWER: Objective relevance and not proportional to the needs of the case.

19. Describe with specificity, if any, any emotional pain or suffering you have experienced that is unrelated to your October 15, 2009 arrest and subsequent conviction.

ANSWER: My other arrests and imprisonments.

20. How many total days were you in custody following your October 15, 2009 arrest and subsequent conviction?

ANSWER: 393.

21. Were you truthful when you pled guilty to drug possession on September 22, 2010?

ANSWER: I was truthful that I wanted to plead guilty.

22. Have you committed any unlawful acts prior and/or subsequent to October 15, 2009 that did not result in arrest? If so, identify the date, location and provide a general description of the unlawful acts.

ANSWER: Objection relevance, vague, overbroad, not proportional to the needs of the case, and violative of rights secured by the Fifth Amendment.

23. Please identify any and all statements you have made about the events giving rise to your complaint by providing the date of such statement, the purpose of the statement, the identity of all individuals present for the statement, the location where the statement was made, and whether the statement was in any way recorded.

ANSWER: Objection vague as to meaning of “statements.” Without waiving this objection, plaintiff answers: I made statements to IPRA (CITY-BG-021294-021404), to the FBI (FBI0000277-FBI0000280), and I submitted an affidavit to the Cook County State’s Attorney (PL JOINT F 02651-02654). My affidavit talks about “Willie Martin,” but it should say “Willie Brownlee.”

24. Have you ever communicated with (either directly, a third party or through a legal representative) any federal investigator or prosecutor regarding alleged corruption and/or alleged misconduct by Chicago Police Officers? If so, please state the approximate date(s) of the communication; the subject of the communication; provide a substantive summary of the statements made in connection with the communication; identify all persons present and/or privy to the communication; and whether the communication was recorded in any way, and, if so, how.

ANSWER: I talked to the FBI. FBI0000277-FBI0000280.

25. Identify with specificity all damages you are claiming in your lawsuit.

ANSWER: I was locked up for 393 days and served time on parole because of what the defendants did. I seek compensation for that loss in an amount to be set by the jury. These damages cannot be calculated exactly. I also lost my car when I was falsely arrested. I seek punitive damages against the individual defendants in amounts to be set by the jury.

Dated: 6-23-2022

Robert Lindsey
Robert Lindsey

Joel Flaxman
Joel Flaxman
An attorney for plaintiff
For objections only