

## **Exhibit 28**

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, CRIMINAL DIVISION

People of the State of Illinois, )  
 ) Nos. 06 CR 0965102, 08 CR  
 ) 0680201, 09 CR 1454801  
-vs- )  
 ) The Honorable Leroy Martin, Jr.  
 ) Presiding Judge  
Angelo Maurice Shenault. )

**AFFIDAVIT OF ANGELO MAURICE SHENAULT**

I, Angelo Maurice Shenault, state as follows:

1. My name is Angelo Maurice Shenault. I am 30 years of age, and I live in Chicago, Illinois.
2. In April of 2006, I was living at 527 East Browning, Apartment 506 in the Ida B. Wells Homes.
3. I lived there with the mother of my children, Valencia Cline and her family.
4. On April 4, 2006, I was coming down the stairs in 575 East Browning with Ollie Grant and Victor Lyles.
5. As I got to the second-floor landing, I saw Officer Alvin Jones pointing a gun at Christopher Scott and Anthony Woods. David Mayberry was also present.
6. I heard Officer Jones say words to the effect of, "I got you motherfuckers. Don't move."

7. My friends and I then went a different way to get out of the stairs.

8. Sergeant Ronald Watts and Officer Ellsworth Smith came up the stairs that we were going down and told us to go back to the second-floor landing.

9. I went back to the second-floor landing.

10. The officers put me in handcuffs. After about ten minutes, the officers took me to the police station with Grant, Lyles, Scott, Woods, and Mayberry.

11. At the station, I heard Sergeant Watts talking on the phone to someone, telling him who they had arrested.

12. Anthony Woods told me that Watts was talking to a drug dealer named “Shock.”

13. It was common knowledge in the community that “Shock” paid bribes to Watts.

14. After his phone call, Watts told us that three of the arrestees were going home and three were going to 26th and California.

15. Watts told me that I was one of the three going to 26th and California.

16. After I was arrested, I learned that the arresting officers claimed that they saw me standing on the landing holding a bag of drugs.

17. This claim is absolutely false. The officers saw me coming down the stairs and I did not have any drugs in my possession or control when I was arrested.

18. I believe that the officers singled me out because I was not associated with "Shock," the drug dealer who was paying bribes to Watts.

19. I pleaded guilty to these charges even though I was innocent.

20. I knew that a jury would not believe my story over that of the officers.

21. I also feared the stiffer sentence I could get after being convicted at trial.

22. I did not complain the Chicago Police Department because I knew that doing so could lead to further harassment by Watts and his crew.

23. In March 2008, I was living at 511 East Browning, Apartment 506.

24. I lived there with the mother of my children, Valencia Cline and her family.

25. On March 3, 2008, I was at the home of a man I knew as “V House.” He lived at 574 East Browning, Apartment 304.

26. I was talking to “V House” about fixing my car. His wife, a young girl, and a man who I did not know were also present.

27. I heard people outside saying “clean up,” which I knew meant that police officers were coming to make arrests and search the building.

28. A few minutes later, Officers Alvin Jones and Kallatt Mohammed knocked on the door of Apartment 304 and the wife of “V House” let them in.

29. The man in the apartment who I did not know was trying to swallow drugs as the officers came in.

30. Mohammed brought me out to the hallway where I saw Sergeant Watts searching the elevator shaft.

31. Watts directed Mohammed to take me back to the apartment.

32. Watts then came into the apartment and spoke to “V House” and his wife in a separate room.

33. When Watts came out of the room, I saw him holding money and bags of drugs.

34. The officers took me and the man I did not know downstairs before taking us to the station. They did not arrest “V House” and his wife.

35. After I was arrested, I learned that Officers Nichols and Leano claims that they saw me standing in a public portion of the building holding a bag of drugs.

36. This claim is absolutely false. I did not see Nichols and Leano until after Watts, Mohammad, and Jones took me downstairs. None of these officers saw me holding a bag of drugs. None of these officers could have seen me at all before Watts, Mohammad, and Jones came to the apartment of "V House." At the time of my arrest, I did not have any drugs on my person or in my control.

37. I pleaded guilty to these false charges and did not complain to the Chicago Police Department for the same reasons I pleaded guilty and made no complaints before.

38. After I pleaded guilty I was held in the Illinois Department of Corrections until I was released in December 2008.

39. In July 2009, I was living at 4311 South Ellis, Apartment 2.

40. I lived there with my parents, Darlene St. Clair and Angelo Shenault and my brother and sister.

41. On July 16, 2009, I was walking with my friend Carl Rice on 43rd Street near Cottage Grove Avenue.

42. We bought loose cigarettes from someone at the alley on 43rd between Cottage Grove and Evans.

43. We saw police cars pull up as we walked toward Cottage Grove.

44. The police cars stopped, and I saw Alvin Jones and Ellsworth Smith running after us. Jones and Smith put me and Carl in handcuffs and brought us back to the alley on 43rd between Cottage and Evans.

45. Sergeant Watts told me words to the effect of, "tell me where the stuff is and I won't lock you up."

46. I told Watts that I did not know where any drugs where.

47. I saw Watts looking in bushes across the street, and I saw him find a bag of drugs.

48. I heard him tell the other officers to call for a transport van, and I was taken to the station.

49. After I was arrested, I learned that Officers Nichols and Leano claimed that they saw me toss the bag into the bushes.

50. This claim is absolutely false. I did not toss anything into the bushes and I was not on the side of the street where the bush was. At the time of my arrest, I did not have any drugs on my person or in my control.

51. I pleaded guilty to these false charges and did not complain to the Chicago Police Department for the same reasons I pleaded guilty and made no complaints before.

52. After I pleaded guilty I was held in the Illinois Department of Corrections until I was released in January 2011.

53. Around the time of my arrests, it was common knowledge in the community that Watts and members of his team, including the officers discussed above, were crooked officers.

54. Those officers used their authority to protect the drug dealers who paid them and to put false charges on anyone who did not cooperate with them.

Dated: 6-12-17

Angelo Shenault 6-12-17  
Angelo Shenault

## VERIFICATION

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that he has personal knowledge of the facts stated in this instrument and that the same are true and correct.

Dated: 6-12-17

Angelo Shenault  
Angelo Shenault