

## **Exhibit 4**

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

## AFFIDAVIT OF GERMIN SIMS

I, Germin Sims, state as follows:

1. My name is Germin Sims. I am 38 years of age, and I live in Chicago, Illinois.
2. Some official records spell my first name as Germain.
3. In October of 2009 I was staying with my then-fiancé near 61st and Cottage Grove.
4. On October 15, 2009, in the morning, Robert Lindsey drove me to the office of Powers & Sons, a construction company. I needed to show them my identification documents to keep working for them.
5. After we left Powers & Sons, we got something to eat at the truck stop at Pershing and Normal.
6. Then we drove on South Prairie and saw a man I know as “Bug.” I do not know his name. We talked to him about fixing Robert’s car.

7. As we were talking to "Bug," several police cars surrounded us and the officers ordered us to exit the vehicle.

8. I got out of the car. Some officers searched the car and some officers searched me.

9. The officers did not find anything illegal.

10. Officers then told me that they were going to take us to the station to be strip searched.

11. At the station, Robert and I were handcuffed to a bench.

12. While handcuffed to the bench, I saw some of the officers who had stopped us bring Willie Martin into the station.

13. The officers took Martin to another room.

14. About 20 minutes later, one of the officers, who I now know was Ronald Watts, came out of the room.

15. He showed me bags of drugs. He said to Robert and me words to the effect of, "this is y'all's."

16. I understood this to mean that the officers would falsely charge us with drug possession.

17. I learned later that police officers claimed that they saw me make several hand-to-hand drug transactions before arresting me and that they found drugs in the car.

18. These claim are absolutely false. I did not make any hand-to-hand drug transactions on October 15, 2009, I did not do anything that would look like a hand-to-hand transaction on October 15, 2009, and I did not have any drugs in my possession or control on October 15, 2009.

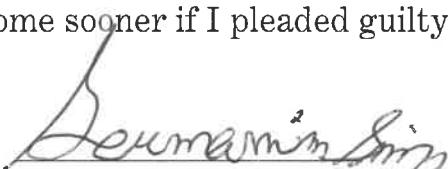
19. I told my lawyer Dennis Sherman that I was framed.

20. I pleaded guilty to the charges even though I was innocent.

21. I knew that I could get a substantial sentence if I was found guilty at trial and that I would get home sooner if I pleaded guilty.

Dated:

9/14/18

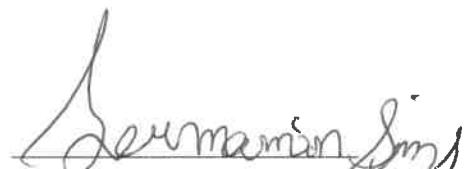
  
Germin Sims

## 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:

9/14/18

  
Germin Sims