

Exhibit 5

1 IN THE UNITED STATES DISTRICT COURT FOR
2 THE NORTHERN DISTRICT OF ILLINOIS
3 EASTERN DIVISION
4 JUDGE LASHONDA HUNT
5 CASE NO.: 22-CV-5787
6 TYRONE FENTON, CITY OF CHICAGO, ET AL.,
7 Plaintiff V. Defendants
8 ~~~~~
9 JUDGE LASHONDA HUNT
10 CASE NO.: 22-CV-6046
11 DARNELL HARRIS, CITY OF CHICAGO, ET AL.,
12 Plaintiff V. Defendants
13 ~~~~~
14 JUDGE VIRGINIA KENDALL
15 CASE NO.: 18-CV-5125
16 FRANK SAUNDERS, CITY OF CHICAGO, ET AL.,
17 Plaintiff V. Defendants
18 ~~~~~
19 JUDGE ELLIS SARA
20 CASE NO.: 20-CV-3228
21 ANTHONY MAYS, CITY OF CHICAGO, ET AL.,
22 Plaintiff V. Defendants
23 ~~~~~
24 JUDGE JEFFREY CUMMINGS
25 CASE NO.: 19-CV-3324
 SYDNEY HARVEY, CITY OF CHICAGO, ET AL.,
 Plaintiff V. Defendants
                  ~~~~~  
                  JUDGE LASHONDA HUNT  
                  CASE NO.: 19-CV-3325  
                  CORDERO PAYNE,                  CITY OF CHICAGO, ET AL.,  
                  Plaintiff                  V.                  Defendants  
                  ~~~~~  
 JUDGE REBECCA PALLMEYER
 CASE NO.: 19-CV-2347
 GERMAIN SIMS, CITY OF CHICAGO, ET AL.,
 Plaintiff V. Defendants
                  ~~~~~  
                  JUDGE REBECCA PALLMEYER  
                  CASE NO.: 19-CV-2347  
                  ROBERT LINDSEY,                  CITY OF CHICAGO, ET AL.,  
                  Plaintiff                  V.                  Defendants  
                  ~~~~~  
 JUDGE MATTHEW KENNELLY
 CASE NO.: 22-CV-5845
 JAMES RANDOLPH, CITY OF CHICAGO, ET AL.,
 Plaintiff V. Defendants

The Deposition of ALVIN JONES, taken on May 07, 2025

2

1 JUDGE VIRGINIA M. KENDALL

2 CASE NO.: 18-CV-3474

3 ROBERT FORNEY, CITY OF CHICAGO, ET AL.,
4 Plaintiff V. Defendants

5 ~~~~~

6 JUDGE LASHONDA HUNT

7 CASE NO.: 18-CV-8182

8 GOLEATHER JEFFERSON, CITY OF CHICAGO, ET AL.,
9 Plaintiff V. Defendants

10 ~~~~~

11 JUDGE LINDSEY JENKINS

12 CASE NO.: 19-CV-127

13 HARVEY BLAIR, CITY OF CHICAGO, ET AL.,
14 Plaintiff V. Defendants

23 DEPONENT: ALVIN JONES

24 DATE: MAY 7, 2025

25 REPORTER: OLIVIA M. SIS

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The Deposition of ALVIN JONES, taken on May 07, 2025

7

INDEX

	Page
EXAMINATION BY MR. FLAXMAN	10
CROSS-EXAMINATION BY MR. PALLES	79
RE-EXAMINATION BY MR. FLAXMAN	81

EXHIBITS

Plaintiff Randolph Exhibit	Page
1 - Arrest Report - July 19th, 2003	10
2 - Vice Case Report - July 19th, 2003	19
3 - Criminal Complaints	22
5 - Arrest Report and Photograph November 14th, 2006	27
Plaintiff Sims Exhibit	
1 - Arrest Report of Germain Sims October 15th, 2009	28
2 - Arrest Report of Robert Lindsey October 15th, 2009	30
3 - Original Case Incident Report October 15th, 2009	33
4 - Photograph of Germain Sims	37
5 - Photograph of Robert Lindsey	38
6 - Criminal Complaint against Germain Sims	38
7 - Criminal Complaint against Robert Lindsey	39

The Deposition of ALVIN JONES, taken on May 07, 2025

8

EXHIBITS (CONTINUED)

Plaintiff Sims Exhibit	Page
8 - Transcript - November 4th, 2009	42
9 - Transcript - April 7th, 2010	50
Plaintiff Blair Exhibit	
1 - Arrest Report - July 10th, 2004	55
2 - Vice Case Report - July 10th, 2004	56
3 - Criminal Complaint	58
4 - Photograph of Harvey Blair	59
5 - Transcript - July 27th, 2004	59
Plaintiff Forney Exhibit	
1 - Arrest Report - January 22nd, 2007	64
2 - Vice Case Report - January 22nd, 2007	65
3 - Photograph of Robert Forney	70
4 - Criminal Complaint - CITY-BG 031409-031413	70
Plaintiff Jefferson Exhibit	
1 - Arrest Report - September 12th, 2006	73
2 - Vice Case Report - September 12th, 2006	74
3 - Photograph of Goleather Jefferson	77
4 - Criminal Complaint	77

STIPULATION

The VIDEO deposition of ALVIN JONES was taken at KENTUCKIANA COURT REPORTERS, 110 NORTH WACKER DRIVE, SUITE 2500, CHICAGO, ILLINOIS 60606, via videoconference in which all participants attended remotely, on WEDNESDAY the 7TH day of MAY 2025 at 10:07 a.m. (CT); said deposition was taken pursuant to the FEDERAL Rules of Civil Procedure. The oath in the matter was administered remotely as permitted by Illinois Supreme Court Order No. 30370 which amended Civil Rule 206(h).

It is agreed that OLIVIA M. SIS, being a Notary Public and Digital Reporter for the State of ILLINOIS, may swear the witness and that the reading and signing of the completed transcript by the witness is not waived.

PROCEEDINGS

EXAMINATION

BY MR. FLAXMAN:

Q. Mr. Jones, my name's Joel Flaxman. I have some additional questions for you. Are you prepared to keep asking questions?

A. Yes --

Q. I'm sorry. Are you prepared to continue answering questions?

A. Yes.

Q. Okay. And I -- we dropped off some paper copies of exhibits to your lawyer. Do you or he have those in front of you?

A. Yes.

Q. Okay. The first case I want to ask you about is a man named James Randolph. Do you have any recollection of James Randolph?

A. No.

Q. Could you look at the exhibit that is marked at the top as Plaintiff Randolph Exhibit 1?

(Plaintiff Randolph Exhibit 1 was marked for identification.)

MR. MARX: Here it is.

THE WITNESS: What would that be?

The Deposition of ALVIN JONES, taken on May 07, 2025

11

1 MR. MARX: Here.

2 THE WITNESS: Okay.

3 MR. MARX: Here it is. It says, "Plaintiff."

4 THE WITNESS: Oh.

5 MR. MARX: Yeah. There's two copies of it --

6 THE WITNESS: Yes.

7 BY MR. FLAXMAN:

8 Q. Okay. And there should be two copies of
9 everything, one for you --

10 MR. MARX: Yeah.

11 BY MR. FLAXMAN:

12 Q. -- and one for your lawyer.

13 MR. MARX: Thank you.

14 THE WITNESS: Yes.

15 BY MR. FLAXMAN:

16 Q. And so, are -- you're looking now at what's
17 marked at the top as Plaintiff Randolph Exhibit 1?

18 A. Yes.

19 Q. Is that an arrest report for the arrest of
20 James Randolph on July 19th, 2003?

21 A. Yes.

22 Q. And do you see under Mr. Randolph's name at
23 the top, it says, "Alias or nickname 'Dooney,'"
24 D-O-O-N-E-Y?

25 A. Yes.

1 Q. Do you recall anyone with that nickname?

2 A. No.

3 Q. And this says that the address of the arrest
4 is "732 East 45th Street." Do you see that?

5 A. Yes.

6 Q. Do you recognize that address?

7 A. No, but I can picture where it is.

8 Q. Okay. And what was at that address?

9 A. I don't remember what was at that address, but
10 I can picture where that area is.

11 Q. Okay. Was that in the Ida B. Wells homes?

12 A. No.

13 Q. Was it in a different project?

14 A. I believe there was some walk-up projects
15 there. They didn't have a specific name. They were,
16 like, scattered sites.

17 Q. And when you say "walk-up," do you mean it
18 wasn't a high-rise?

19 A. No.

20 Q. No, it was not a high-rise?

21 A. I don't believe it was, no.

22 Q. And is that the same thing as scattered site,
23 meaning it was not a high-rise?

24 A. Yes.

25 Q. And you said it didn't have a name; is that

1 right?

2 A. Not that I recall.

3 Q. Earlier in the deposition, Mr. Tepfer asked
4 you about an incident, and you said it was at a project
5 that was off of Roosevelt, near Loomis; was that right?

6 A. Yes.

7 Q. Was that the ABLA Homes, A-B-L-A?

8 A. Yes.

9 Q. Okay. Going back to Mr. Randolph's arrest
10 report, do you see at the bottom the first arresting
11 officer listed is G. Summers?

12 A. Yes.

13 Q. Okay. And then do you see your name, also?

14 A. Yes.

15 Q. And what do you list it as?

16 A. I believe that's second arresting officer.

17 Q. Okay. And do you see Officer Summer's
18 signature above his name?

19 A. Yes.

20 Q. And do you recognize that as Officer Summer's
21 signature?

22 A. No.

23 Q. Do you know who signed his name?

24 A. Yes, I do.

25 Q. Oh, who signed his name?

1 A. I did.

2 Q. Okay. And how do you know that?

3 A. Because that's my handwriting.

4 Q. Okay. And do you know why you signed Officer
5 Summer's name?

6 A. Because we were working together that day, and
7 I actually had to type this report for him.

8 Q. How do you know that?

9 A. Because he couldn't type very well. I typed
10 faster, so he wrote it out and I typed it out.

11 Q. What did he write out?

12 A. Pardon me?

13 Q. What do you mean, he wrote it out --

14 A. The information here for the narrative of this
15 arrest report, and I typed it out.

16 Q. Oh, so you mean he wrote it out by hand, and
17 then --

18 A. Yeah.

19 Q. -- you typed it on a typewriter?

20 A. Yes.

21 Q. And I just want to be clear, you don't
22 remember doing that on July 19th, 2003. You're just
23 telling me the usual practice when you worked with
24 Officer Summers?

25 A. Yes.

1 Q. And where did Officer Summers write it out by
2 hand?

3 A. It would have been in the station where we
4 were.

5 Q. Okay. And would he have done it on a -- or a
6 kind of a full -- sorry. Would he do it on a piece of
7 scratch paper or some kind of police form?

8 A. Piece of scratch paper.

9 Q. All right. And what was your practice to --
10 what would you do with the scratch paper after he wrote
11 it up by hand?

12 A. It would get destroyed.

13 Q. And when -- and do you -- and why is it that
14 Summers would write it out and then you would type it?

15 A. He wasn't a very good typer.

16 Q. Okay. And do you know why he was the one who
17 was assigned to do the writing?

18 A. He made the arrest --

19 Q. Oh, okay. So if --

20 A. He was the first, yes.

21 Q. So if you had been the one to make the arrest,
22 would you have just typed it right on the typewriter
23 yourself?

24 A. Yes.

25 Q. Did you have training for using a typewriter,

1 or is it something you just picked up?

2 A. It's something I just picked up.

3 Q. Okay. And were you also involved in the
4 arrest?

5 A. According to this, yes.

6 Q. Okay. And what do you mean, "According to
7 this"?

8 A. I'm the second arresting officer.

9 Q. Okay. So when you're listed as a second
10 arresting officer, that means that you had some
11 involvement in the arrest, right?

12 A. Yes.

13 Q. And can you tell what it is that you did as
14 part of this arrest?

15 A. No.

16 Q. And so, I understand the report describes
17 officers watching Mr. Randolph make drug transactions,
18 correct?

19 A. Yes.

20 Q. And it says that "Officers broke surveillance,
21 approached the subject," and later it says that they
22 recovered some drugs that were on a porch. Do you see
23 that?

24 A. Yes.

25 Q. But the report doesn't say exactly which

1 officer did what, right?

2 A. No.

3 Q. Okay. And then the next thing it says is
4 "Above placed in custody," meaning Mr. Randolph was
5 arrested, right?

6 A. Yes.

7 Q. Is it your understanding that that "Above
8 placed in custody" is something that Officer Summers
9 did?

10 A. I don't remember.

11 Q. Okay. So what did you mean when you said that
12 Officer Summers was the officer who made the arrest?

13 A. It would have been -- he's the first arresting
14 officer here, so I don't remember.

15 Q. Okay. And so, is it your -- is what you're
16 telling me that the first arresting officer is the one
17 who's responsible for creating the reports?

18 A. Yes.

19 Q. It's not necessarily that that officer put the
20 suspect in handcuffs?

21 A. It could be.

22 Q. Okay. But it doesn't have to be; is that
23 right?

24 A. It doesn't have to be.

25 Q. Okay. Next to Officer Summer's name at the

1 bottom -- or -- is "4512-D." Do you see that?

2 A. Yes.

3 Q. Do you know what that means?

4 A. That was his beat number.

5 Q. Okay. And next to your name is "715-B." Is
6 that another beat number?

7 A. Yes.

8 Q. Do you know why his beat number is different
9 numbers than your beat number?

10 A. Yes.

11 Q. Why is that?

12 A. Because him and his partner, on a regular
13 basis, were the David car, and me and my partner on a
14 regular basis were the boy car.

15 Q. Do you know who your partner was on this day?

16 A. I'm not sure. I don't remember.

17 Q. Okay. And do you know why you were 715, but
18 he was 4512?

19 A. Just a typo there. 715 was actually the unit.

20 Q. Oh, so yours should have also been -- I'm
21 sorry. Which one is the typo?

22 A. The 715.

23 Q. Oh, the 715 is the unit, but 4512 is the beat?

24 A. Yes.

25 Q. Got it. So yours should also be 4512?

1 A. Yes.

2 Q. Okay. All right. Let me ask you to look now
3 at Plaintiff Randolph Exhibit 2. Tell me when you have
4 that in front of you, please.

5 (Plaintiff Randolph Exhibit 2 was marked for
6 identification.)

7 A. Yes.

8 BY MR. FLAXMAN:

9 Q. All right. Is that the vice case report for
10 the arrest of James Randolph on July 19th, 2003?

11 A. Yes.

12 Q. And this report lists Officer Summers as the
13 first reporting and Officer Ridgell as the second
14 reporting. Do you see that?

15 A. Yes.

16 Q. Would you -- well, did you type this report in
17 addition to the arrest report?

18 A. I don't recall.

19 Q. Would it have been your usual practice that if
20 you typed the arrest report, you'd also type the vice
21 case report?

22 A. Sometimes.

23 Q. And if you didn't type it, would you expect
24 that Summers or Ridgell were the ones who typed it?

25 A. I don't know. I don't remember.

1 Q. Was -- you said that Summers was not very good
2 at typing, right?

3 A. No.

4 Q. What about Ridgell? Was he good at using a
5 typewriter?

6 A. He was pretty good.

7 Q. Do you know why the arrest report has you and
8 Summers as the arresting officer, and the vice case
9 report has Summers and Ridgell as the arresting?

10 A. I don't remember, no.

11 Q. Can you remember any other -- any reasons why
12 that might be the case?

13 A. No, I do not.

14 Q. Okay. And I -- and I'm sorry if I'm not -- I
15 think I wasn't clear. I -- you don't remember -- you
16 don't remember this arrest on July 19th, 2003, correct?

17 A. No.

18 Q. Okay. Can you remember reasons during your
19 career that the first and second arresting officers
20 would be different from the arrest report to the vice
21 case report?

22 A. No, but as it appears on this case report, my
23 name is in the second box, also.

24 Q. Okay. What do you mean by that?

25 A. In the case report, my name is listed above

1 Ridgell's.

2 Q. Okay. Are you looking at Box 18?

3 A. No. I'm looking at the case report, Box 46.

4 Q. Oh, yeah. I see your name is written in
5 there. It's a little hard to read. Thank you for
6 pointing that out. So Box 46 reporting officer's names,
7 it has A. Jones and C. Ridgell, correct?

8 A. Yes.

9 Q. Oh, okay. Now that we've -- now that you have
10 helped me out and pointed out your name is there, does
11 that help you to answer whether you typed up the vice
12 case report?

13 A. I don't remember.

14 Q. Okay. If you could see the signatures and you
15 could tell it was your handwriting, would that show you
16 that you were the one who typed it up?

17 A. I don't know. I can't -- I can't see them.

18 Q. I know. I'm just saying if we could see them
19 and you could tell it was your handwriting, would that
20 indicate that you were the one who wrote the -- who
21 typed up the vice case report?

22 A. Possibly.

23 Q. And I wanted -- and let me just go back to the
24 arrest report for a moment. Do you still have that in
25 front of you?

1 A. Yes.

2 Q. And you said that you would have prepared it
3 based on Officer Summers writing out the narrative by
4 hand, correct?

5 A. Yes.

6 Q. Would you also have -- well, I -- sorry. Let
7 me ask it a different way. I mean, the -- Officer
8 Summers wrote out a narrative of this arrest that you
9 also had some involvement in, correct?

10 A. Yes.

11 Q. And then you typed that up, correct?

12 A. Yes.

13 Q. If something that he wrote out by hand was
14 different than what you remembered, would you have
15 talked to him and figured out what the -- how to get it
16 right?

17 A. Yes.

18 Q. Okay. Let me ask you to look at the next
19 exhibit, Plaintiff Exhibit 3 -- Plaintiff Randolph
20 Exhibit 3, and there's two pages of criminal complaints.
21 Do you have that in front of you now?

22 (Plaintiff Randolph Exhibit 3 was marked for
23 identification.)

24 A. Yes.

25 BY MR. FLAXMAN:

1 Q. Okay. And is the first page a criminal
2 complaint charging James Randolph with possession of a
3 controlled substance on July 19th, 2003?

4 A. Yes.

5 Q. Did you write anything on this complaint?

6 A. Doesn't look like it.

7 Q. Meaning you don't recognize your handwriting?

8 A. No.

9 Q. Okay. What about the signature for
10 complainant? Do you recognize that signature?

11 A. No.

12 Q. Okay. And is 19687 -- the star number on the
13 complainant's signature, that's not your star number?

14 A. No.

15 Q. Did you -- have you ever signed a criminal
16 complaint for another officer?

17 A. I don't believe so.

18 Q. And do you -- in your experience, is -- that's
19 different than signing an arrest report for another
20 officer?

21 A. Yes.

22 Q. And can you explain why?

23 A. Usually the officer whose name there, that
24 goes on the complaint, when they look at it and their
25 name is in -- in the -- as complainant, they usually

1 sign it.

2 Q. Okay. The -- underneath the line for -- the
3 second line for complainant's signature, there's a line
4 for judge or clerk. Do you see that?

5 A. Yes.

6 Q. And is that -- do you recognize the signature
7 of Sergeant Watts on that line?

8 A. Yeah, that looks like his signature.

9 Q. Okay. And is that -- his signing there, is
10 that called clerking the complaint?

11 A. Yes.

12 Q. Have you ever clerked a criminal complaint?

13 A. No, not until --

14 Q. No.

15 A. -- I became a sergeant.

16 Q. Oh, okay. When did you become a sergeant?

17 A. 2012.

18 Q. Okay. This first complaint is a possession of
19 controlled substance. You see the estimated weight is
20 115 grams?

21 A. Yes.

22 Q. Okay. If you turn to the next page, do you
23 see another criminal complaint against Mr. Randolph for
24 this July 19th, 2003 date, but this one has an estimated
25 weight of 7.5 grams?

1 A. Yes.

2 Q. Okay. And is any of the writing on this page
3 your handwriting?

4 A. No.

5 Q. Okay. And are -- is that your signature on
6 either one of the complainant's signatures lines?

7 A. No.

8 Q. All right. Let me -- I just have -- can I ask
9 you to go back one more time to that arrest report,
10 Plaintiff Randolph Exhibit 1?

11 A. Yes.

12 Q. All right. And the -- at the bottom of the
13 narrative, there's a list of officers. Do you see that?

14 A. Yes.

15 Q. The first one is Gonzalez, Star number 12152?
16 Do you see that?

17 A. Yes.

18 Q. And then Officer Spaargaren? Do you see that?

19 A. Yes.

20 Q. And then Officer Young?

21 A. Yes.

22 Q. Okay. And it looks like Officer Young's star
23 number is not listed there, or is that his star number
24 underneath --

25 A. No, it's not listed there.

1 Q. Not listed. Okay. And then the next line
2 starts with Officer Cadman?

3 A. Yes.

4 Q. And then it goes through -- the last one is
5 Officer Ridgell, correct?

6 A. Yes.

7 Q. Okay. And are those officers the ones who are
8 listed in this report as also A/Os?

9 A. Yes.

10 Q. And does that mean arresting officers?

11 A. That mean they took part in some of the -- the
12 arrest somewhere, yes.

13 Q. Okay. Could it also mean assisting officers?

14 A. It could be.

15 Q. Okay. And it -- but it means -- okay. And
16 the -- if you look at the vice case report, Exhibit
17 number 2 -- are you looking at that?

18 A. Yes.

19 Q. Okay. And then narrative section starts with
20 Event number 12764 --

21 A. Yes.

22 Q. And then it says, "Assisting arrest," correct?

23 A. Yes.

24 Q. And then it lists several officers?

25 A. Yes.

1 Q. And does that also mean that those officers
2 assisted the arrest in some way?

3 A. In some way.

4 Q. Okay. But if it doesn't say in the report
5 what they did, then we're not able to tell, correct?

6 A. Correct.

7 Q. Okay. Now that you've looked at these reports
8 about Mr. Randolph, are you still unable to remember the
9 arrest of Mr. Randolph on July 19th, 2003?

10 A. No, I do not.

11 Q. Okay. And are you aware of anything that
12 would help you remember the arrest of James Randolph on
13 July 19th, 2003?

14 A. No.

15 Q. Okay. You can put those exhibits to the side.
16 We have other -- I think I may have delivered other
17 exhibits about Mr. Randolph, but I'm not going to ask
18 you about those. Oh, you know what? I -- one of them
19 has a picture, so we are going to. I'm sorry. Let me
20 ask you, please, to just look at the first page of
21 Plaintiff Randolph Exhibit 5.

22 (Plaintiff Randolph Exhibit 5 was marked for
23 identification.)

24 A. Yes.

25 BY MR. FLAXMAN:

1 Q. And is that the arrest report of James
2 Randolph on November 14th, 2006?

3 A. Yes.

4 Q. And do you see a picture of a -- the person
5 who was arrested in the top right?

6 A. Yes.

7 Q. Okay. Does the person in that picture look
8 familiar to you?

9 A. No.

10 Q. And so, looking at this -- the first page of
11 this arrest report doesn't refresh your recollection of
12 Mr. Randolph?

13 A. No.

14 Q. Okay. All right. Now you can put aside the
15 Randolph exhibits. Thank you. Next, I want to ask you
16 about Germain Sims and Robert Lindsey. Do you remember
17 either of those men?

18 A. No.

19 Q. Okay. And you don't remember the arrest of
20 Germain Sims and Robert Lindsey on October 15th, 2009?

21 A. No.

22 Q. Okay. Can I ask you to look, please, at what
23 I marked as Plaintiff Sims Exhibit 1?

24 (Plaintiff Sims Exhibit 1 was marked for
25 identification.)

1 A. Yes.

2 BY MR. FLAXMAN:

3 Q. Is that the arrest report of Germain Sims on
4 October 15th, 2009?

5 A. Yes.

6 Q. And have you looked at that report before
7 today's deposition?

8 A. Yes.

9 Q. And did it refresh your recollection about
10 that arrest?

11 A. No.

12 Q. Did you write this arrest report?

13 A. Yes.

14 Q. And how can you -- tell me how you can tell
15 that.

16 A. I'm listed as the first arresting officer.

17 Q. And so, based on the report, did you arrest
18 Germain Sims on October 15th, 2009?

19 A. According to this report.

20 Q. Okay. And the report says the location of the
21 arrest was 4210 South Prairie Avenue. Do you see that?

22 A. Yes.

23 Q. Okay. Are you familiar with that address?

24 A. I can picture the location.

25 Q. Was that a Chicago Housing Authority building?

1 A. I don't believe so.

2 Q. Do you know what building was that -- at that
3 address?

4 A. No.

5 Q. Okay. Can you recall making any other arrests
6 at that location?

7 A. No.

8 Q. Okay. And I should have said that better.
9 You can't recall making any arrests at that location,
10 correct?

11 A. No.

12 Q. No, you can't; is that right?

13 A. No, I cannot.

14 Q. Okay. Let me ask you, please, to look at
15 Plaintiff Sims Exhibit 2. Are you looking at that now?

16 (Plaintiff Sims Exhibit 2 was marked for
17 identification.)

18 A. Yes.

19 BY MR. FLAXMAN:

20 Q. Okay. Is that the arrest report of Robert
21 Lindsey on October 15th, 2009?

22 A. Yes.

23 Q. And is this your report, also?

24 A. Yes.

25 Q. And Mr. Lindsey was arrested with Mr. Sims,

1 correct?

2 A. Yes.

3 Q. On the third page of the arrest report, that's
4 where it lists you as the first arresting officer; is
5 that right?

6 A. Yes.

7 Q. And it also lists Officer Mohammed as the
8 second arresting officer?

9 A. Yes.

10 Q. What does it mean to be the second arresting
11 officer?

12 A. That means he was part of the arrest, and he
13 was the second arresting officer. He had something to
14 do with the arrest.

15 Q. Okay. And then if you go to the fourth page
16 of the arrest report, it says, "Arrest processing
17 report" at the top. Do you see that?

18 A. Yes.

19 Q. Okay. In the box on the right at the top,
20 first it says, "Time last fed." Do you see that?

21 A. Yes.

22 Q. Okay. And then underneath that, it says,
23 "Time called," and underneath that, it says, "Cell
24 number." Do you see those?

25 A. Yes.

1 Q. Okay. I want to ask you about the next part
2 of this, that says, "Transport details." Do you see
3 that?

4 A. Yes.

5 Q. And it says, "Other 0214, 15th, October 2009,
6 10:25 hours." Do you see that?

7 A. Yes.

8 Q. Do you know what that means?

9 A. I believe that's the time he was transported
10 by Beat 214, that would look like to me.

11 Q. Okay. Transported from the arrest to the
12 police station?

13 A. I would guess. I'm not sure.

14 Q. Was -- when you were the -- as the officer
15 writing the arrest report, would you have put that
16 information into the report?

17 A. What? The -- the transport time?

18 Q. Correct.

19 A. I'm not sure.

20 Q. Okay. And do you know what Beat 214 was on
21 this day?

22 A. No.

23 Q. It wasn't one of the officers on your team;
24 is that right?

25 A. No.

1 Q. Do you know if it was the -- do you know if it
2 was a wagon, or if it was a blue and white car?

3 A. It probably was a blue and white car. I don't
4 know if it was a wagon or not.

5 Q. Okay. And why do you say that?

6 A. Because it's a beat car on the second
7 district, 214.

8 Q. Oh, okay.

9 A. Beat car.

10 Q. Do you know what the number would be for a
11 wagon?

12 A. I don't remember.

13 Q. Would you -- would it have been your practice
14 to list the officers who drove that beat car as
15 assisting/arresting officers?

16 A. Sometimes

17 Q. Sometimes yes, sometimes no?

18 A. Yes.

19 Q. Okay. All right. Let me ask you to go to
20 Plaintiff Sims Exhibit 3, please.

21 (Plaintiff Sims Exhibit 3 was marked for
22 identification.)

23 A. Yes.

24 BY MR. FLAXMAN:

25 Q. All right. Is that an original case incident

1 report for the arrest of Mr. Sims and Mr. Lindsey on
2 October 15th, 2009?

3 A. Yes.

4 Q. And is this another report that you authored?

5 A. Looks like it. Yes.

6 Q. And tell me how you are able to say that it
7 looks like a report that you authored?

8 A. On the last page, where it says, "Reporting
9 officer."

10 Q. Okay. And it has your name, correct?

11 A. Yes.

12 Q. All right. The -- above that is the narrative
13 section, correct?

14 A. Yes.

15 Q. And it begins with Event number 04997,
16 correct?

17 A. Yes.

18 Q. Then it says, "In summary, R/O's were
19 conducting a narcotic surveillance at the above
20 location." Did I read that right?

21 A. Yes.

22 Q. Okay. What does "R/O's" mean? "R/O's"?

23 A. That means the officers that were involved in
24 this arrest.

25 Q. And is the list of officers at the bottom the

1 officers who were involved in this arrest?

2 A. Yes.

3 Q. Okay. And the -- that list has you as the
4 first arresting officer, correct?

5 A. Yes.

6 Q. It has Mohammed as the second arresting
7 officer, correct?

8 A. Yes.

9 Q. And then it has Officer Smith, Leano, Nichols,
10 Bolton, and Gonzalez as assisting arresting officers,
11 correct?

12 A. Yes.

13 Q. Okay. And then it also has Watts as
14 supervisor on scene. Did I read that right?

15 A. Yes.

16 Q. And what does that mean, "Supervisor on
17 scene"?

18 A. That means he was there at the location at the
19 time.

20 Q. At the time of the arrest?

21 A. Yes.

22 Q. Okay. Or at the time of the events discussed
23 before the arrest?

24 A. Possibly.

25 Q. So at some time, he was on the scene, is what

1 we're saying, right --

2 A. Yes.

3 Q. Okay. When you -- so this report, it was done
4 on a computer? This -- the case report that we're
5 looking at, right?

6 A. Yes.

7 Q. And that's different than the vice case report
8 we looked for mister -- looked at for Mr. Randolph,
9 right?

10 A. Excuse me?

11 Q. I -- earlier in the deposition, I showed you
12 the vice case report for Mr. Randolph, and that one was
13 done on a typewriter, right?

14 A. Yes.

15 Q. Do you remember when CPD switched from doing
16 case reports on typewriters to doing them on computers?

17 A. No.

18 Q. Okay. But it was sometime before 2009, right?

19 A. Sometime before when?

20 Q. It was sometime before this report on
21 October 15th, 2009 --

22 A. Yes.

23 Q. When you would do the -- a case report on a
24 computer -- and sorry. Let me -- let -- will you go
25 back to the narrative section? I just want to make sure

1 you're looking at the same thing I'm looking at. Are
2 you on Page 3 of this case report from Mr. Sims and
3 Lindsey?

4 A. Yes.

5 Q. All right. The -- what I was wanting to ask
6 was about those listing of officers at the bottom.
7 First arresting officer, second arresting officer. Do
8 you see those?

9 A. Yes.

10 Q. Would you type that all out, or was there a
11 box on the computer that you'd fill in for the first
12 arresting officer?

13 A. I believe you typed that all out.

14 Q. Okay. And you say, "believe." Am I right
15 that you don't have --

16 A. Yes. I'm not. I'm not sure.

17 Q. -- a perfect recollection of the computer
18 system? Sorry --

19 A. I'm not sure.

20 Q. Okay. You can put the Exhibit 3 to the side,
21 and I want you to look at exhibits -- Plaintiff Sims
22 Exhibit 4 and Exhibit 5 are mugshots, so let me know
23 when you're looking at those.

24 (Plaintiff Sims Exhibit 4 was marked for
25 identification.)

1 (Plaintiff Sims Exhibit 5 was marked for
2 identification.)

3 A. Yes.

4 BY MR. FLAXMAN:

5 Q. All right. Do you see the picture of Germain
6 Sims on Plaintiff Sims Exhibit 4?

7 A. Yes.

8 Q. Okay. And does that picture look familiar?
9 Does that person in that picture look familiar to you?

10 A. No.

11 Q. Okay. What about Plaintiff Sims Exhibit 5?
12 Do you see the picture of Robert Lindsey?

13 A. Yes.

14 Q. And does the man depicted in that picture look
15 familiar to you?

16 A. No.

17 Q. All right. You can put those to the side.
18 Can you please look at Plaintiff Sims Exhibit 6? And is
19 that first page the criminal complaint against Germain
20 Sims for October 15th, 2009, for possession of a
21 controlled substance, heroin?

22 (Plaintiff Sims Exhibit 6 was marked for
23 identification.)

24 A. Yes.

25 BY MR. FLAXMAN:

1 Q. And is that your signature on the complainant
2 signature lines?

3 A. Yes.

4 Q. And did you type the information that's above
5 your signature?

6 A. I don't remember.

7 Q. Was it your practice that if you were the one
8 signing the complaint, you'd type the information above
9 your signature?

10 A. Not necessarily.

11 Q. Okay. But no matter who typed it, you were
12 the one who was swearing that it was true, correct?

13 A. Yes.

14 Q. And once you swore that it was true, that
15 began the prosecution of Mr. Sims, right?

16 A. Yes.

17 Q. All right. The -- there are two pages of
18 this, but the second one is just a copy, so I'm not
19 going to ask you about that. Can you go to Plaintiff
20 Sims Exhibit 7, please?

21 (Plaintiff Sims Exhibit 7 was marked for
22 identification.)

23 A. Yes.

24 BY MR. FLAXMAN:

25 Q. Okay. And that's the complaint against

1 Robert Lindsey for possession of a controlled substance,
2 heroin, on October 15th, 2009, correct?

3 A. Yes.

4 Q. And again, you signed on the complainant's
5 signature lines?

6 A. Yes.

7 Q. And you're also listed on that line at the top
8 for the complainant's name, correct?

9 A. Yes.

10 Q. Okay. And it -- the same answer? You're not
11 sure who typed out the information on this one, correct?

12 A. No.

13 Q. But whoever typed it out, you were the one who
14 was swearing that it was true?

15 A. Yes.

16 Q. And you were signing your name to charge
17 Mr. Lindsey with possession of a controlled substance?

18 A. Yes.

19 Q. All right. And do you see that Brian Bolton
20 is the signature on the judge or court line?

21 A. Yes.

22 Q. Do you remember Officer Bolton signing that?

23 A. No.

24 Q. Okay. Do you know -- do you recognize his
25 signature?

1 A. No.

2 Q. Okay. Do you know why he signed this one and
3 not a sergeant?

4 A. A sergeant didn't necessarily have to clerk
5 the complaint --

6 Q. Oh, okay.

7 A. An officer could -- could clerk the complaint.

8 Q. Okay. I think you told me before that you
9 never clerked a complaint until you were a sergeant?

10 A. No. Some, yeah. Well, see, when you put
11 Dorothy Brown name there -- we, as police officers, you
12 sign Dorothy Brown's name there, and another officer
13 could.

14 Q. And is that something that you did before you
15 were a sergeant?

16 A. Yes.

17 Q. Oh, okay. Do you remember that you told me
18 that you hadn't done it before you were a sergeant --

19 A. Yes. I did tell you that, yes.

20 Q. Okay. And why'd you tell me that before?

21 A. Because I -- usually, a sergeant does that.
22 You know, usually, the sergeant looks that over, but
23 it's a complaint. Once we sign it, it still has to go
24 by the desk sergeant. It wasn't just -- a supervisor
25 always looked at it.

1 Q. Okay. But it didn't have to be the
2 sergeant --

3 A. No.

4 Q. -- who was the one who signed it? And I --
5 and I'm sorry. Did you say that you -- we can read that
6 this says, "Police Officer B. Bolton," correct?

7 A. Yes.

8 Q. Did you say -- do you recognize that to be his
9 signature, or do you not know what his signature looks
10 like?

11 A. No, I don't know what his signature look
12 like --

13 Q. Okay. All right. Do you remember that you
14 gave testimony in court about Mr. Lindsey and Mr. Sims?

15 A. I don't recall.

16 Q. Okay. Have you looked at any transcripts of
17 that?

18 A. Yes.

19 Q. Okay. Well, let me ask you to look at one of
20 them that we marked as Plaintiff Sims Exhibit 8.

21 (Plaintiff Sims Exhibit 8 was marked for
22 identification.)

23 A. Yes.

24 BY MR. FLAXMAN:

25 Q. And is that -- you're looking at that now?

1 A. Yes.

2 Q. Okay. It says, "People v. Robert Lindsey,
3 Germain Sims," and it's a preliminary hearing. And it's
4 dated 4th day of November 2009; is that right?

5 A. Yes.

6 Q. Okay. And if you go to the second page, do
7 you see that you're listed as the witness and you're
8 giving testimony?

9 A. Yes.

10 Q. And I'm sorry. Did you say you did? Is this
11 one of the transcripts that you reviewed?

12 A. Yes.

13 Q. And reviewing the transcript didn't help you
14 remember anything about this arrest?

15 A. No.

16 Q. And did you see anything in your testimony
17 that was inaccurate or untrue?

18 A. I don't know.

19 Q. Okay. Well, did you ever give -- I'll break
20 it down. I'll -- sorry. Was it your practice when you
21 were a Chicago police officer to always testify
22 truthfully in court?

23 A. Yes.

24 Q. Was there ever a time that you did not testify
25 truthfully in court?

1 A. No.

2 Q. When was the last time that you did testify in
3 court?

4 A. I don't remember.

5 Q. Okay. Since you've been retired, have you
6 been asked to testify at any cases?

7 A. Yes.

8 Q. And when was that?

9 A. Last month.

10 Q. Okay. Did you go to court and testify?

11 A. No.

12 Q. And why not?

13 A. To my understanding, there was a mistrial in
14 the case.

15 Q. Do you know who the -- was that a criminal
16 case?

17 A. No.

18 Q. Was it a civil case?

19 A. Yes.

20 Q. Okay. And what -- who's case was it?

21 A. Lieutenant Paz.

22 Q. Do you know how to spell that?

23 A. P-A-Z.

24 Q. Were you a defendant in that case?

25 A. No.

1 Q. Why -- do you know why they wanted you to
2 testify?

3 A. They wanted me to testify as a witness.

4 Q. What did you witness?

5 A. To my understanding, that I was given orders
6 to falsely do sergeant's logs by Lieutenant Paz.

7 Q. And if called, you would have testified that
8 Lieutenant Paz gave you instructions to falsify
9 something?

10 A. No.

11 Q. Okay. What -- tell me what I'm
12 misunderstanding.

13 A. I was ordered to do logs for my team from the
14 desk that I was sitting at, working at. I was told I
15 still had to do a log, though I could not go to the
16 streets. I was not given that order by Lieutenant Paz.
17 I was given that order prior to Lieutenant Paz coming to
18 the unit.

19 Q. And so, it was Lieutenant Paz --

20 MR. MARX: Joel, I'm sorry. This is Jason.
21 You know, I object to this line of questioning. The
22 relevance of it is non-existent, and also, we
23 weren't advised we were being asked questions about
24 a civil matter in which he has yet to give testimony
25 in. To be clear, he has not given testimony in the

1 case. It's an open case, and I would like him not
2 to be asked questions about what his prospective
3 testimony would be in a matter that has nothing to
4 do with the Watts matter whatsoever.

5 MR. FLAXMAN: Yeah. I mean, I've made similar
6 objections with my clients, and the questioning has
7 continued. So I don't really see that as a valid
8 objection to not asking questions. I mean, is it --
9 is this something you want to talk to me about
10 offline?

11 MR. MARX: Well, I fail to see how -- well,
12 respectfully, the question of your clients has to do
13 with the -- the -- the criminal conduct that they're
14 involved in, and we're talking about something
15 that's completely unrelated Watts and completely
16 unrelated to the subject matter of Watts. So I'm
17 objecting that you asked questions regarding
18 prospective testimony he might give in a civil case
19 that's completely unrelated to Watts, as we've
20 already established through the couple of answers
21 he's given you.

22 MR. FLAXMAN: Yeah. I don't think that it has
23 to be related to Watts for me to ask about it, so I
24 don't -- I also don't think relevance is a valid
25 objection to a deposition.

1 MR. MARX: Well, at this time, I'm going to
2 instruct him not to answer. You and I can talk
3 about this on a break. And I'd like to talk with
4 you on a break about what, if anything, he can
5 answer about this, but at this time, I'm going to
6 instruct him not to answer.

7 BY MR. FLAXMAN:

8 Q. Are you going to follow your lawyer's
9 instruction?

10 A. Yes.

11 Q. Okay. And you're going to refuse to answer
12 more questions about this case with Lieutenant Paz,
13 P-A-Z?

14 A. Yes.

15 Q. What's the last criminal matter that you gave
16 testimony at?

17 A. I don't remember.

18 Q. Was it before you retired?

19 A. Yes.

20 Q. Have you given a -- an -- all right. Going
21 back to the transcript that's marked as Exhibit 8. Do
22 you still have that in front of you?

23 A. Yes.

24 Q. And when you gave this testimony on November
25 4th, 2009, were you following your usual practice of

1 testifying truthfully in court?

2 A. Yes.

3 Q. If you look at Page 3, on Line 10, there's a
4 question to you. "Question: Were you the enforcement
5 officer? Answer: Yes, I was." Do you see that?

6 A. Yes.

7 Q. What's an "enforcement officer"?

8 A. One that moves in, makes an arrest.

9 Q. Okay. And that's part of a -- during a
10 surveillance operation; is that right?

11 A. Yes.

12 Q. Okay. The next -- Line number 12 says, "Do
13 you recall who the surveillance officer was? Answer:
14 Yes, I do. Question: Who was that? Answer: Officer
15 Mohammed." Did I read that right?

16 A. Yes.

17 Q. Okay. And what's a "surveillance officer"?

18 A. Surveillance officer is one who's looking at
19 whatever target that we are looking at to make the
20 possible arrest.

21 Q. Okay. Let me ask you to go to Page 4, please.
22 And at Line number 13, you testified, "As I approached
23 the passenger side of the vehicle where Mr. Sims was, I
24 observed him trying to place suspect narcotics under the
25 front seat." Do you see that?

1 A. Yes.

2 Q. Okay. And you wouldn't have testified to that
3 if it was another officer who made that observation,
4 right?

5 A. No.

6 Q. Okay. The next question. "Question: Did you
7 have him exit the vehicle, and did you recover those
8 items? Answer: Yes, I did." Do you see that?

9 A. Yes.

10 Q. And that means that you were the one who
11 recovered those items, correct?

12 A. I believe so, yes.

13 Q. Okay. Is it possible that someone else
14 recovered them?

15 A. No. It says I did.

16 Q. Okay. Let me ask you to go to Page number 8
17 of this transcript.

18 A. Yes.

19 Q. And Line number 17 says, "Do you recall if
20 Officer Mohammed told you how many alleged transactions
21 he observed Mr. Sims engage in? Answer: No, he did
22 not." Do you see that?

23 A. Yes.

24 Q. The next line says, "Question: Did he tell you
25 that he could see how much money was allegedly

1 exchanged? Answer: No, he did not." Do you see that?

2 A. Yes.

3 Q. The next line says, "Question: Did you stop
4 anybody that was allegedly involved in these
5 transactions?" And you gave the answer, "No, I did
6 not." Do you see that?

7 A. Yes.

8 Q. And was it typical during a surveillance
9 operation that the officers would not stop the buyers?

10 A. Sometimes, yes.

11 Q. Sometimes they would, sometimes they wouldn't?

12 A. Sometimes they would, sometimes they wouldn't.

13 Q. Okay. All right. You can put that transcript
14 to the side. I'm going to ask you to look at what's
15 marked as Plaintiff Sims Exhibit 9 next.

16 (Pleading Sims Exhibit 9 was marked for
17 identification.)

18 MR. TEPFER: Joel, sorry to interrupt. I got
19 to hop off. Someone else from my firm may or may
20 not hop on, but -- just so you know. This is Josh.

21 UNIDENTIFIED FEMALE SPEAKER: All right. I'm
22 just wondering if our call should wait, because we
23 really don't want to miss this call.

24 BY MR. FLAXMAN:

25 Q. All right. Are you looking at Exhibit 9 now?

1 A. Yes.

2 Q. Okay. And that's another transcript from
3 People v. Lindsey and Sims, correct?

4 A. Yes.

5 Q. It's dated the 7th day of April 2010, correct?

6 A. Yes.

7 Q. Okay. Did you review that transcript before
8 the deposition?

9 A. Yes.

10 Q. And did you see anything in it that was
11 inaccurate or untrue?

12 A. Not that I can recall.

13 Q. Okay. But it -- when you gave the testimony
14 on April 7th, 2010, did you follow your usual practice
15 of testifying truthfully?

16 A. Yes.

17 Q. All right. Let me ask you to go to Page
18 number 15 of this transcript.

19 A. Yes.

20 Q. And you understand that this is still
21 questioning of you at this hearing, right?

22 A. Yes.

23 Q. Okay. And Line number 18 says, "Question: And
24 what you approached this vehicle, did you approach by
25 yourself? Answer: No, I did not." Do you see that?

1 A. Yes.

2 Q. And the next line says, "Who else did you
3 approach with?" And you answered, "Officer Gonzalez and
4 Officer Bolton"; is that right?

5 A. Yes. Was --

6 Q. And -- sorry?

7 A. Yes.

8 Q. Oh, okay. And does that indicate that
9 Gonzalez and Bolton were also enforcement officers with
10 you?

11 A. Yes.

12 THE VIDEOGRAPHER: Sorry to interrupt. This is
13 the videographer. I have a Drew Wycoff joining the
14 Zoom right now, so I'm going to let them in.

15 MR. FLAXMAN: Okay.

16 MS. WILKIE: And actually, that's -- he's from
17 my firm. I'm going to have to hop off really quick,
18 but he's going to cover for me. Thank you.

19 BY MR. FLAXMAN:

20 Q. Let me ask you to go to Page 20 next, please.

21 A. Yes.

22 Q. At the -- near the bottom, on Line 19, you
23 were asked, "Approximately, how many narcotics arrests
24 have you made?" And you gave the answer, "I've made
25 over a hundred narcotics arrests." Do you see that?

1 A. Yes.

2 Q. And that was true in 2010, correct? That
3 you'd made over 100 narcotics arrests?

4 A. I believe so, yes.

5 Q. Okay. The next line, "Question: And you made"
6 -- "and approximately how many surveillance missions
7 have you taken part in? Answer: More than a hundred";
8 was that true? In 2010, you'd been a part of more than
9 100 surveillance missions?

10 A. Yes.

11 Q. Let me ask you to turn to Page 24, please.

12 A. Yes.

13 Q. The -- well, you -- there's some objections.
14 Why don't you just go to Line number 18? Do you see the
15 question there is: "Were you the only vehicle that came"
16 -- "that responded to Officer Mohammad's call?" and the
17 answer was: "No, sir." Do you see that?

18 A. Yes.

19 Q. And then the question was: "How many other
20 vehicles came? Answer: One other vehicle" -- "unmarked
21 vehicle showed up, and transport vehicles showed up
22 eventually." Do you see that?

23 A. Yes.

24 Q. Meaning that a -- an unmarked vehicle in
25 addition to yours also came to the scene and a transport

1 vehicle or transport vehicles?

2 A. Another vehicle and -- and an unmarked
3 vehicle.

4 Q. Okay. Would you have been in an unmarked
5 vehicle, too?

6 A. Yes.

7 Q. And would you have been in the same car as
8 Mohammed, or would he have been in another car?

9 A. I don't think Mohammed was in the vehicle. I
10 think Mohammed was somewhere else observing.

11 Q. Okay.

12 A. Different -- from a different view.

13 Q. You said from a different?

14 A. View.

15 Q. View, meaning he wasn't in a vehicle, he was
16 hiding somewhere?

17 A. Probably, yes.

18 Q. As we sit here today, do you remember -- or do
19 you know where he was hiding?

20 A. No.

21 Q. Okay. I don't have anything else based on
22 that. Now that you've looked at the transcripts and
23 reports of Mr. Sims and Lindsey, do you have any memory
24 of their arrest on October 15th, 2009?

25 A. No.

1 Q. And are you aware of anything else that would
2 help you remember those arrests?

3 A. No.

4 Q. Okay. You can put that -- those exhibits to
5 the side. I next want to ask you about Harvey Blair.
6 Do you remember Harvey Blair?

7 A. No.

8 Q. Okay. Could you look at -- well, do you
9 remember the arrest of Harvey Blair on July 10th, 2004?

10 A. No.

11 Q. Okay. Could you look at the exhibit we marked
12 as Plaintiff Blair Exhibit 1?

13 (Plaintiff Blair Exhibit 1 was marked for
14 identification.)

15 A. Yes.

16 BY MR. FLAXMAN:

17 Q. All right. Is that the arrest report of
18 Harvey Blair on July 10th, 2004?

19 A. Yes.

20 Q. Do you see your name on this report?

21 A. Yes.

22 Q. And where is your name?

23 A. Second arresting officer.

24 Q. Okay. And who's the first arresting officer?

25 A. Kenny Young.

1 Q. And do you recognize Kenny Young's signature
2 above his name?

3 A. Yes.

4 Q. Meaning you didn't sign this one for him,
5 right?

6 A. Correct.

7 Q. Do you know who wrote the narrative on this
8 arrest report?

9 A. He would have.

10 Q. And how can you -- how can you tell that?

11 A. He signed it.

12 Q. How were Kenny Young skills on a typewriter?

13 A. He was pretty good.

14 Q. All right. I'm going to ask you to look at
15 Plaintiff Blair Exhibit 2, please. And is -- are you
16 looking at the vice case report for the arrest of Harvey
17 Blair on July 10th, 2004?

18 (Plaintiff Blair Exhibit 2 was marked for
19 identification.)

20 A. Yes.

21 BY MR. FLAXMAN:

22 Q. All right. Do you see your name listed on
23 this report?

24 A. Yes.

25 Q. Where's your name?

1 A. Reporting officer, Box 46.

2 Q. Okay. Is that the second reporting officer?

3 A. Yes.

4 Q. All right. Is that your signature under your
5 name?

6 A. No.

7 Q. Okay. Who signed your name?

8 A. Kenny Young.

9 Q. Do you know why?

10 A. I gave him permission to.

11 Q. Would you have read the report before giving
12 him permission?

13 A. Yes.

14 Q. And why couldn't you sign it?

15 A. Because we were partners.

16 Q. So when he signed it --

17 A. We were partners on the case, and we were
18 there, I guess, assumingly at the same time.

19 Q. Oh, okay. Well, so why didn't you sign it
20 after you reviewed it?

21 A. Because I knew what was in there. He was
22 signing. I was doing something else.

23 Q. Oh. Was it always the practice that if Young
24 prepared the report, he would sign his name and your
25 name?

1 A. Yes.

2 Q. And do you know what you did as part of the
3 arrest of Mr. Blair?

4 A. I don't remember.

5 Q. But because you were the second reporting
6 officer, you can say you had some involvement in the
7 arrest, right?

8 A. Yes.

9 Q. Okay. Can you look at the next exhibit,
10 Plaintiff Blair Exhibit 3, please?

11 (Plaintiff Blair Exhibit 3 was marked for
12 identification.)

13 A. Yes.

14 BY MR. FLAXMAN:

15 Q. And is that the complaint charging Mr. Blair
16 with unlawful possession of a controlled substance on
17 July 10th, 2004?

18 A. Yes.

19 Q. Did you prepare this complaint?

20 A. I don't know.

21 Q. Okay. You see the -- Officer Young's name is
22 on the lines for complainant's signature?

23 A. Yes.

24 Q. Did you sign his name; do you know?

25 A. No.

1 Q. And you can tell because that's not your
2 handwriting?

3 A. Correct.

4 Q. Okay. Could you look at Plaintiff Blair
5 Exhibit 4, please?

6 (Plaintiff Blair Exhibit 4 was marked for
7 identification.)

8 A. Yes.

9 BY MR. FLAXMAN:

10 Q. And do you see that the -- that's a mugshot of
11 Harvey Blair?

12 A. Yes.

13 Q. Okay. Does that picture look familiar to you?

14 A. No.

15 Q. Okay. Looking at that doesn't help you recall
16 Harvey Blair?

17 A. No.

18 Q. All right. Could you please look at Plaintiff
19 Blair Exhibit 5 next?

20 (Plaintiff Blair Exhibit 5 was marked for
21 identification.)

22 A. Yes.

23 BY MR. FLAXMAN:

24 Q. And is that a transcript from People v. Harvey
25 Blair, dated July 27th, 2004?

1 A. Yes.

2 Q. Okay. Did you look at this transcript before
3 the deposition?

4 A. Yes.

5 Q. Okay. And did you see that you gave testimony
6 in Mr. Blair's case?

7 A. Yes.

8 Q. And did looking over your testimony help you
9 remember anything about the case?

10 A. No.

11 Q. And did you see anything in your testimony
12 that was untrue or inaccurate?

13 A. Not that I recognize.

14 Q. Okay. Did you -- would you have followed your
15 practice on this date of giving truthful testimony when
16 you testified in court?

17 A. Yes.

18 Q. Okay. Let me ask you to go to Page 2, and you
19 see that this is your testimony, correct?

20 A. Yes.

21 Q. And it says, "Officer Alvin Jones called as a
22 witness, having been first duly sworn." Do you see
23 that?

24 A. Yes.

25 Q. Do you recall every time you testified in

1 court, you would swear to tell the truth?

2 A. Yes.

3 Q. All right. Line 20, "Question: What did you
4 see the defendant doing on that date, time, and
5 location? Answer: I saw him conduct three hand-to-hand
6 narcotics transactions." Do you see that?

7 A. Yes.

8 Q. And you would not have testified to that if
9 you had not made that observation, correct?

10 A. Correct.

11 Q. The next question says, "What did you see him
12 do specifically?" And if you go to the next page, it's
13 "Answer: He exchanged items he had in a plastic bag for
14 United States currency from unknown male Blacks."

15 A. Yes --

16 Q. Correct? Okay. Next one, "Question: And
17 after you saw those three transactions, what happened
18 next? Answer: My partner and I approached." Do you see
19 that?

20 A. Yes.

21 Q. Based on the arrest report, can you tell that
22 Officer Young was the partner you were talking about?

23 A. Yes.

24 Q. And so, when it says that lower down, that
25 your partner detained him --

1 A. Yes.

2 Q. -- and recovered that clear plastic bag,
3 that's -- you're talking about Officer Young there,
4 right?

5 A. Yes.

6 Q. And let me just ask a similar question, if you
7 go to Page number 5. Are you -- let me know when you're
8 there.

9 A. Yes.

10 Q. And Line number 18 says, "And when he fled
11 from you, how far away were you from him prior to him
12 actually leaving the location? Answer: Roughly about
13 ten feet;" do you see that?

14 A. Yes.

15 Q. "Question: Were you in uniform? Answer: No.
16 Question: And was your partner ahead of you when he was
17 pursuing my client? Answer: Yes. When he fled, my
18 partner took off in front of me." And that's about
19 Officer Young, correct?

20 A. Yes.

21 Q. Okay. And the next question says, "Question:
22 So you lost sight of him." There's an objection that's
23 overruled, and then you answered, "No," correct?

24 A. Correct.

25 Q. Meaning that you -- Officer Young was chasing

1 Mr. Blair, and you were right behind Officer Young,
2 correct?

3 A. Yes.

4 Q. And then lower down, it says you didn't lose
5 sight of him. I think that means you followed behind
6 Mr. Blair the whole time, right?

7 A. I followed behind Mr. Blair -- behind my
8 partner, Officer Young chasing Mr. Blair, yes --

9 Q. Right. Okay. Okay. And just the -- okay.
10 The next -- or Page number 7, Line number 5, "And" --
11 says, "And were you present when your partner recovered
12 the narcotics?" And the answer is: "Yes." Do you see
13 that?

14 A. Yes.

15 Q. Meaning you were there when Officer Young
16 recovered the narcotics?

17 A. Yes.

18 Q. Okay. All right. You can put the -- well,
19 having looked at all of this material about Mr. Blair,
20 has it refreshed your recollection about that arrest?

21 A. No.

22 Q. And are you aware of anything that would help
23 you remember the arrest of Mr. Blair?

24 A. No.

25 Q. Okay. Let me go to the next case. Are you --

1 you're okay to keep going, or do you want a break?

2 A. I'll keep going.

3 Q. Okay. All right. I want you to look at the
4 Plaintiff Forney Exhibit 1, please.

5 (Plaintiff Forney Exhibit 1 was marked for
6 identification.)

7 A. Yes.

8 BY MR. FLAXMAN:

9 Q. And do you have any memory of Robert Forney?

10 A. No.

11 Q. All right. And this arrest report is for an
12 arrest on January 22nd, 2007 of Mr. Forney. Do you see
13 that?

14 A. Yes.

15 Q. And it was in 575 East Browning Avenue. Do
16 you see that?

17 A. Yes.

18 Q. Was that a building at the Ida B. Wells home?

19 A. Yes.

20 Q. Was it a high-rise; do you recall?

21 A. Yes.

22 Q. Do you recall how many floors the high-rises
23 had?

24 A. Seven.

25 Q. Okay. Do you see where you are listed on this

1 arrest report?

2 A. Second arresting.

3 Q. And Officer Elsworth Smith is listed as the
4 first arresting?

5 A. Yes.

6 Q. Can you tell from that who wrote the narrative
7 section of the report?

8 A. Excuse me?

9 Q. Do you know who wrote the narrative section of
10 this report?

11 A. No, I don't.

12 Q. Would you expect it would be either you or
13 Officer Smith?

14 A. Yes.

15 Q. All right. Could you please look at Plaintiff
16 Forney Exhibit 2?

17 (Plaintiff Forney Exhibit 2 was marked for
18 identification.)

19 A. Yes.

20 BY MR. FLAXMAN:

21 Q. Okay. And is that the vice case report for
22 the arrest of Robert Forney and two other individuals on
23 January 22nd, 2007?

24 A. Yes.

25 Q. And the second offender listed is Calvin

1 Robinson. Do you see that?

2 A. Yes.

3 Q. Do you have any recollection of that name?

4 A. No.

5 Q. And the third one is Deborah Jones. Do you
6 have any recollection of that name?

7 A. No.

8 Q. Okay. Do you see your name listed here as the
9 second arresting officer?

10 A. Yes --

11 Q. I'm sorry. The -- it's the -- you're the
12 second reporting officer on this one, right?

13 A. Yes.

14 Q. Okay. Is that your signature under your name?

15 A. Yes.

16 Q. And did you also sign under Smith's name?

17 A. Yes.

18 Q. And based on that, can you tell that you're
19 the one who wrote the narrative on the vice case report?

20 A. Probably.

21 Q. And I said, "wrote." I mean -- do you mean
22 that you were the one who typed it up?

23 A. Yes, I'm probably the one who typed that up.

24 Q. Okay. Is it possible that you copied it from
25 something handwritten?

1 A. Nope.

2 Q. And why do you say that?

3 A. Because it probably conferred with Officer
4 Smith as to what was going on, what we both saw. He
5 probably was one working on the arrest report, while I
6 was doing the case report.

7 Q. Okay. And you would have based it on what he
8 was writing and what he saw and --

9 A. Yes.

10 Q. -- also what you saw, right?

11 A. Yes.

12 Q. Okay. And the -- let me just ask you quickly
13 about some things in the narrative section. The last
14 part of it on the first page starts saying, "In summary,
15 R/O's were conducting a narcotics."

16 A. Yes.

17 Q. Do you see that?

18 A. Yes.

19 Q. Okay. And do you think it should say a
20 narcotics operation or something like that?

21 A. I don't know what it would said there.

22 Q. I guess it would be --

23 A. Narcotics investigation.

24 Q. Yeah. I'll tell you the arrest report says a
25 narcotics surveillance.

1 A. Surveillance, investigation. I don't know.
2 Okay.

3 Q. Sure. One or the other. Okay. And it --
4 what's your understanding of what "R/O's" means in this
5 context?

6 A. The officers listed on this report.

7 Q. Okay. Listed --

8 A. All the --

9 Q. -- in the box --

10 A. -- officers listed on the report.

11 Q. Okay. So including you, Officer Smith, and
12 then also Officer Lewis and Officer Mohammed?

13 A. Yes.

14 Q. Any other officers that I missed?

15 A. I don't see any other listed here.

16 Q. Okay. All right. Let me just go to the
17 second page and five lines from the bottom, it says,
18 "Offender number 2 was detained." Tell me when you are
19 looking at that.

20 A. I see it.

21 Q. Okay. And it says, "Offender number 2 was
22 detained by R/O Jones who recovered from his hand two
23 Ziploc baggies with suspect heroin, and one Ziploc
24 baggie with suspect crack cocaine." Do you see that?

25 A. Yes.

1 Q. So that reports that you were the one who
2 detained Offender number 2, right?

3 A. Yes.

4 Q. And then the next sentence says you also
5 detained Offender number 3 and recovered a baggie from
6 her hand, right?

7 A. "R/O Jones also detained and recovered from
8 the hand of Offender number 3 one Ziploc baggie." Yes.

9 Q. All right. Let me -- if you go back to the
10 first page in Box number 48, where it lists the
11 supervisor. Tell me when you're looking at that,
12 please.

13 A. Yes.

14 Q. And it's -- looks like it says -- "Watts" was
15 typed in there, but it was crossed out. Do you see
16 that?

17 A. Yes.

18 Q. And do you know what is written -- handwritten
19 instead of Watts?

20 A. That looks like "Brown."

21 Q. Okay. Do you remember a Sergeant Brown?

22 A. Yes.

23 Q. Do you know why Sergeant Brown's name was
24 handwritten on here?

25 A. Probably because Sergeant Watts wasn't

1 available.

2 Q. Oh, okay. Do you recognize Sergeant Brown's
3 signature underneath his name?

4 A. I don't know if that's his signature or not.

5 Q. Oh, okay. Could I ask you please to look at
6 Plaintiff Forney Exhibit 3, which is a mugshot? Are you
7 looking at that?

8 (Plaintiff Forney Exhibit 3 was marked for
9 identification.)

10 A. Yes.

11 BY MR. FLAXMAN:

12 Q. Does that person look familiar to you?

13 A. No.

14 Q. Okay. Let me ask you to look now at Plaintiff
15 Forney Exhibit 4.

16 (Plaintiff Forney Exhibit 4 was marked for
17 identification.)

18 A. Yes.

19 BY MR. FLAXMAN:

20 Q. Okay. This is a -- these are five pages of
21 criminal complaints. The first page is a complaint
22 against Robert Forney for unlawful possession of a
23 controlled substance on January 21st, 2007. Do you see
24 that?

25 A. Yes.

1 Q. Did you prepare this complaint?

2 A. I don't recall if I did.

3 Q. Okay. Is that your signature, or is that --
4 did you sign Officer Smith's name on this complaint?

5 A. No.

6 Q. And you can tell because you don't recognize
7 your handwriting?

8 A. I don't recognize my handwriting.

9 Q. Okay. Do you know whose signature that is on
10 the clerk line?

11 A. No.

12 Q. Could you -- so this -- do you see at the
13 bottom of this one, this page -- it's City BG 031409?

14 A. Yes.

15 Q. All right. Could you look at the next page
16 that's -- ends in 031410?

17 A. Yes.

18 Q. Okay. Do you recognize -- did you sign this
19 complaint on the complainant signature line?

20 A. No.

21 Q. Do you know who did?

22 A. No.

23 Q. Can you turn to the next page? That's 031411?

24 A. Okay.

25 Q. Did you sign on the complainant's signature

1 lines on this complaint?

2 A. No.

3 Q. Okay. Do you know who did?

4 A. No.

5 Q. Okay. Could you turn to the next page,
6 031412?

7 A. Okay.

8 Q. And I apologize. I think some of these are
9 copies, but did you sign on the complainant's line on
10 this page?

11 A. No.

12 Q. And do you know who did?

13 A. No.

14 Q. Right. The last page of this is number
15 031413. Are you looking at that?

16 A. Yes.

17 Q. And did you sign on the line -- either of the
18 lines for complainant's signature on this page?

19 A. No.

20 Q. Do you know who did?

21 A. No.

22 Q. Bear with me for just a moment. And the -- I
23 don't -- we don't need to go off the record. You could
24 put aside -- well, sorry. Having looked at the
25 documents about Mr. Forney's arrest, has that refreshed

1 your recollection about the arrest of Mr. Forney or the
2 other two people with him?

3 A. No.

4 Q. And are you aware of anything else that would
5 help you recall the arrest of Robert Forney on
6 January 21st, 2007?

7 A. No.

8 Q. Okay. The last case I want to ask you about
9 is for a man named Goleather Jefferson. Do you recall
10 that name?

11 A. No.

12 Q. Okay. Could you look at the document I marked
13 as Plaintiff Jefferson Exhibit 1?

14 (Plaintiff Jefferson Exhibit 1 was marked for
15 identification.)

16 A. Yes.

17 BY MR. FLAXMAN:

18 Q. Okay. Is that the arrest report of Goleather
19 Jefferson on September 12th, 2006?

20 A. Yes.

21 Q. And did you look at that arrest report before
22 the deposition?

23 A. Yes.

24 Q. Did it help you recall anything about this
25 arrest?

1 A. No.

2 Q. Will you look at Plaintiff Jefferson
3 Exhibit 2, please? Is that the vice case report for the
4 arrest of Goleather Jefferson? Oh, I'm sorry. Is that
5 a vice case report?

6 (Plaintiff Jefferson Exhibit 2 was marked for
7 identification.)

8 A. Yes.

9 BY MR. FLAXMAN:

10 Q. Okay. And the date on the -- of occurrence is
11 September 12th, 2006?

12 A. Yes.

13 Q. And the first offender is Willie D. Martin.
14 Do you see that?

15 A. Yes.

16 Q. Do you have any recollection of Willie Martin?

17 A. No.

18 Q. Okay. What about he -- it -- it's listed here
19 that his nickname was Fatty. Do you see that?

20 A. Yes.

21 Q. Do you recall anyone named Fatty?

22 A. No.

23 Q. Okay. And then the second offender is last
24 name Jefferson. This report lists the first name of
25 Coleathen, C-O-L-E-A-T-H-E-N. Do you have any

1 recollection of that name?

2 A. No.

3 Q. And the nickname is Colors. Do you see that?

4 A. Yes.

5 Q. Do you recall anyone with a nickname of
6 Colors?

7 A. No.

8 Q. Okay. And the first name on this one,
9 Coleathen, is different than the first name on that
10 arrest report we just looked at. Do you see that?

11 A. Yes.

12 Q. The arrest report has the first name
13 Goleather, G-O-L-E-A-T-H-E-R?

14 A. Yes.

15 Q. Can you tell by just matching up the RD
16 numbers on these reports that were -- these are about
17 the same arrest?

18 A. Yes.

19 Q. And just so I have a clear record, can you
20 tell me what an RD number is?

21 A. RD number is the record number for the event,
22 for what happened.

23 Q. Okay. And the record number or the RD number
24 on both of these reports is HM 597724, correct?

25 A. Yes.

1 Q. All right. And do you see your name on the
2 vice case report, Plaintiff Jefferson Exhibit 2?

3 A. Yes.

4 Q. Where is your name listed?

5 A. My name is listed in Box 18.

6 Q. And what's your understanding of what it means
7 to be listed in Box 18?

8 A. Probably the reporting officer or witness.

9 Q. So you had something to do with this arrest,
10 but you can't say what it was, right?

11 A. Yes, that's correct.

12 Q. Do you -- and the reporting officers -- well,
13 the first reporting officer is Officer Mohammed,
14 correct?

15 A. Yes.

16 Q. Do you recognize Officer Mohammed's signature
17 under his name?

18 A. I don't know if that's it.

19 Q. Okay. But you didn't sign that, right?

20 A. No.

21 Q. Okay. The next reporting officer is Officer
22 E. Smith, correct?

23 A. Correct.

24 Q. Do you recognize Officer Smith's signature
25 below his name?

1 A. I don't know if that's it.

2 Q. Okay. But you -- that's not your -- you
3 didn't sign -- sorry. Let me ask --

4 A. I didn't sign it.

5 Q. You did not sign for Officer Smith, right?

6 A. No.

7 Q. No, you did not, right?

8 A. No, I did not sign it.

9 Q. Right. Let me ask you to look at Plaintiff
10 Jefferson Exhibit 3.

11 (Plaintiff Jefferson Exhibit 3 was marked for
12 identification.)

13 A. Okay.

14 BY MR. FLAXMAN:

15 Q. And that's a mugshot of Goleather Jefferson.
16 Do you see that?

17 A. Yes.

18 Q. Okay. Does that picture remind you of
19 Mr. Jefferson?

20 A. No.

21 Q. And that person doesn't look familiar?

22 A. No.

23 Q. Okay. You can go on to the next exhibit,
24 Plaintiff Jefferson Exhibit 4.

25 (Plaintiff Jefferson Exhibit 4 was marked for

1 identification.)

2 A. Yes --

3 BY MR. FLAXMAN:

4 Q. And is that the -- a criminal complaint
5 charging, well, Mr. Jefferson with unlawful possession
6 of a controlled substance on September 12th, 2006?

7 A. Yes.

8 Q. And the complainant on this one is Officer
9 Mohammed, right?

10 A. Yes.

11 Q. Do you recognize Officer Mohammed's signature
12 on the lines for complainant's signature?

13 A. I don't know if that's his signature.

14 Q. Did you sign for Officer Mohammed on these --
15 this complaint?

16 A. No.

17 MR. FLAXMAN: Okay. Let me take a five-minute
18 break, but then I'll just wrap up. It should not be
19 much longer, okay?

20 THE WITNESS: Okay.

21 MR. FLAXMAN: Thanks.

22 THE VIDEOGRAPHER: We're off record at 1:03.

23 (A recess was taken.)

24 THE VIDEOGRAPHER: We are back on the record
25 for the deposition of Alvin Jones. Today is

1 May 7th, 2025, and it is 1:09 p.m. Counsel may
2 continue.

3 MR. FLAXMAN: All right. Sorry. I need one
4 quick sec. Wasn't -- I -- we don't need to go off
5 the record. Give me one moment, please. Okay. I
6 don't have any other questions, except I want to put
7 on the record that we will follow up on the
8 instruction not to answer questions about the
9 Lieutenant Paz case.

10 MR. MARX: Okay. I don't have any questions.

11 MR. PALLES: Excuse me. I do.

12 CROSS-EXAMINATION

13 BY MR. PALLES:

14 Q. Real briefly, Mr. Jones. I want to talk to
15 you about the Germain Sims and Robert Lindsey case for a
16 moment. Now, although I know you don't remember it, you
17 viewed some documents a few minutes ago. This was an
18 arrest that took place at 42nd and Prairie. Now, again,
19 you have no independent recollection of the case,
20 correct?

21 A. Correct.

22 Q. Okay. Mr. Sims and Mr. Lindsey, however, say
23 that you, Mohammed, and Sergeant Watts planted drugs on
24 them at that time. Notwithstanding the fact you don't
25 remember the specific incident, is that something you

1 would remember had you done it?

2 MR. FLAXMAN: Objection. Foundation.

3 THE WITNESS: I wouldn't have planted drugs on
4 anyone.

5 BY MR. PALLES:

6 Q. Okay. And you didn't plant drugs on Sims or
7 Lindsey, correct?

8 MR. FLAXMAN: Objection --

9 THE WITNESS: I did not --

10 MR. FLAXMAN: Foundation.

11 BY MR. PALLES:

12 Q. Okay. Now, specifically Sims and Lindsey say
13 that the drugs that were planted on them came from a
14 gentleman named Woolley Brownley (phonetic). Do you
15 remember Woolley Brownley?

16 A. No.

17 Q. Okay. And specifically, Mr. Sims and
18 Mr. Lindsey say that the drugs that were obtained by
19 Mr. Lindsey were obtained by pulling a bag of dope out
20 of his rectum. Do you remember that?

21 A. No.

22 Q. Okay. And is -- well, let me ask you, is that
23 something you think you would remember?

24 MR. FLAXMAN: Objection. Foundation --

25 THE WITNESS: No. No. Pulling some dope out

1 of somebody's behind? Yes.

2 BY MR. PALLES:

3 Q. Yeah. Okay. Have you engaged in any cavity
4 searches?

5 A. No.

6 MR. PALLES: Okay. That's all the questions I
7 have.

8 MS. MCELROY: I do not have any questions.
9 Thank you.

10 MR. WYCOFF: None from me, either.

11 MR. SCHALKA: No questions from me.

12 MS. HARRIS: None here.

13 MR. PALLES: Thank you. I think we're done.

14 MR. FLAXMAN: Well, let me -- I need to follow
15 up on Mr. Palles' questions.

16 RE-EXAMINATION

17 BY MR. FLAXMAN:

18 Q. You said you've never engaged in a cavity
19 search; is that right?

20 A. No, I have not.

21 Q. Has anyone who you've been arrested ever been
22 cavity searched by another officer?

23 A. Not that I know of.

24 Q. Is it possible that they were searched after
25 you brought them to the station and you didn't know

1 about it?

2 MR. PALLES: Objection. Lack of foundation.

3 THE WITNESS: I've never witnessed a cavity
4 search.

5 BY MR. FLAXMAN:

6 Q. Okay. Do you know what a cavity search is?

7 A. Yes. That's when you search in someone's body
8 where you shouldn't -- you actually should take them to
9 the hospital. Let a doctor do it.

10 Q. Oh. So it would be -- it wouldn't be proper
11 for a police officer to do that without a doctor at all,
12 right?

13 A. No, not to my understanding.

14 MR. FLAXMAN: Okay. Nothing further from me.

15 MR. PALLES: Thanks for your time today.

16 THE WITNESS: Thank you.

17 THE REPORTER: Great. Perfect. Before we go
18 off the record, Mr. Marx, would you like to advise
19 Mr. Jones on read and sign, or would you like for me
20 to do that?

21 MR. MARX: He understands. We'll reserve
22 signature.

23 THE REPORTER: Reserve signature? All right.
24 Perfect. Would you like for me to send that to you,
25 Mr. Marx?

1 MR. MARX: Yes, please.

2 THE REPORTER: All right. Perfect. And then
3 I'll go ahead and get transcript and video orders.
4 I'll just go down the line of who I can see.
5 Mr. Flaxman, do you plan on ordering a copy of the
6 video or the transcript at this time?

7 MR. FLAXMAN: Is it possible to order -- to --
8 for me to order the transcript from where my
9 questioning starts?

10 THE REPORTER: Yeah, we can do that for you --

11 MR. FLAXMAN: Yes, I would like that delivered
12 electronically. Thank you.

13 THE REPORTER: And then any video for you?

14 MR. FLAXMAN: I don't need video. Thank you --

15 THE REPORTER: No video. All right. And then
16 Mr. Palles, do you plan on ordering a copy of the
17 transcript or video at this time?

18 MR. PALLES: (Inaudible). Thank you.

19 THE REPORTER: Oh, sorry. Your audio cut out
20 there. What was that?

21 MR. PALLES: Oh, you know what? Let me take a
22 copy of Joel's section, as well.

23 THE REPORTER: Okay. Sounds good. Any video
24 for you?

25 MR. PALLES: No.

1 THE REPORTER: No? All right --

2 MR. FLAXMAN: And Olivia, can you give me your
3 e-mail to send you the exhibits that I used?

4 THE REPORTER: Yes. I'll get that in the chat
5 once I'm done. I get --

6 MR. FLAXMAN: Thanks.

7 THE REPORTER: -- off the record. Yeah, of
8 course. Ms. McElroy, do you plan on ordering a copy
9 at this time?

10 MS. MCELROY: No, thank you.

11 THE REPORTER: No. Any video for you?

12 MS. MCELROY: No, thank you.

13 THE REPORTER: All right. And then let's see.
14 Mr. Wycoff, I know you're stepping in for
15 Ms. Wilkie. Do you plan on ordering either video or
16 transcript this time --

17 MR. WYCOFF: Not at this time. Thank you.

18 THE REPORTER: Not at this time. All right.
19 Mr. Marx, same for you. Do you plan on ordering
20 transcript or video?

21 MR. MARX: Yes, a full transcript. No video,
22 as in the entire transcript.

23 THE REPORTER: Right. Yes. I got that. Thank
24 you. Ms. Harris, do you plan on ordering a copy of
25 the transcript or video at this time?

1 MS. HARRIS: No, not at this time. Thank you.

2 THE REPORTER: All right. Perfect --

3 MR. PALLES: Olivia --

4 THE REPORTER: Yes --

5 MR. PALLES: Olivia, may I ask, given the
6 timing of one of the -- Mr. Flaxman's case, is this
7 a - - possible to get a transcript, say, within two
8 weeks?

9 THE REPORTER: Within two weeks? Yeah. Our
10 average turnaround is ten business days, so you'll
11 definitely have it by then.

12 MR. PALLES: Thank you. Appreciate it --

13 THE REPORTER: Yeah. Of course. And then last
14 thing --

15 MR. PALLES: All right.

16 THE REPORTER: -- so -- real quick.
17 Mr. Schalka, do you plan on ordering a copy of the
18 transcript or the video at this time?

19 MR. SCHALKA: No, thank you.

20 THE REPORTER: All right. Perfect. And with
21 that, we're ready to go off the record.

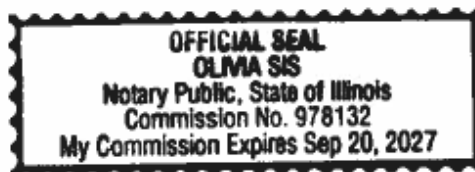
22 THE VIDEOGRAPHER: All right. The time is
23 1:16 p.m. Central, and this concludes the deposition
24 of Alvin Jones.

25 (Deposition concluded at 1:16 p.m. CT)

1 CERTIFICATE OF DIGITAL REPORTER

2 STATE OF ILLINOIS

3
4 I do hereby certify that the witness in the foregoing
5 transcript was taken on the date, and at the time and
6 place set out on the Stipulation page here of by me
7 after first being duly sworn to testify the truth, the
8 whole truth, and nothing but the truth; and that the
9 said matter was recorded digitally by me and then
10 reduced to type written form under my direction, and
11 constitutes a true record of the transcript as taken,
12 all to the best of my skill and ability. I certify that
13 I am not a relative or employee of either counsel, and
14 that I am in no way interested financially, directly or
15 indirectly, in this action.



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OLIVIA M. SIS,
DIGITAL REPORTER / NOTARY
MY COMMISSION EXPIRES ON: 09/20/2027
SUBMITTED ON: 05/22/2025