

Dennis Jackson
September 1, 2023

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

DENNIS JACKSON,)	No. 22-cv-4337
Plaintiff,)	District Judge
vs.)	Alonso
CITY OF CHICAGO, et al.,)	Magistrate
Defendants.)	Judge Weisman

The videotaped deposition of Dennis Jackson in the above-entitled cause, taken before Izetta White-McGee, a Certified Shorthand Reporter, Certified Legal Video Specialist and Notary Public in and for the State of Illinois, located at 2 North LaSalle Street, Suite 420, Chicago, Illinois, held on the 1st day of September, 2023, A.D. at the hour of 10:00 a.m.

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2	<p>1 APPEARANCES</p> <p>2 REPRESENTING THE PLAINTIFF:</p> <p>3 Mr. Joel Flaxman</p> <p>4 Kenneth N. Flaxman, PC</p> <p>5 200 South Michigan Avenue</p> <p>6 Suite 201</p> <p>7 Chicago, Illinois 60604</p> <p>8 312.427.3200</p> <p>9 Jaf@kenlaw.com</p> <p>10 REPRESENTING THE DEFENDANTS:</p> <p>11 Mr. Alexander Michelini</p> <p>12 Mr. Jordan Yurchich</p> <p>13 City of Chicago, Department of Law</p> <p>14 2 North LaSalle Street</p> <p>15 Suite 420</p> <p>16 Chicago, Illinois 60602</p> <p>17 Alexander.Michelini2</p> <p>18 @cityofchicago.org</p> <p>19 jordan.yurchich2@cityofchicago.org</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>	4	<p>1 THE VIDEOGRAPHER: Today's date is</p> <p>2 September 1, 2023. We are going on the video</p> <p>3 record at 10:18 a.m. We are here for the</p> <p>4 purpose of taking the videotaped deposition of</p> <p>5 Dennis Jackson. We are located at 2 North</p> <p>6 LaSalle, Suite 420, Chicago, Illinois.</p> <p>7 The party on whose behalf the</p> <p>8 deposition is being taken is the defendant, and</p> <p>9 the party at whose instance the deposition is</p> <p>10 being recorded on an audiovisual device is the</p> <p>11 defendant.</p> <p>12 This case is instituted in the</p> <p>13 United States District Court for the Northern</p> <p>14 District of Illinois, Eastern Division. The</p> <p>15 case number is 22-cv-4337. The case is titled</p> <p>16 Dennis Jackson versus the City of Chicago, et</p> <p>17 al.</p> <p>18 I will now ask counsel to introduce</p> <p>19 themselves stating your name and your address,</p> <p>20 who you represent, starting with the Plaintiff's</p> <p>21 counsel first.</p> <p>22 MR. FLAXMAN: Joel Flaxman on behalf of</p> <p>23 the plaintiff, Dennis Jackson.</p> <p>24 MR. MICHELINI: Alex Michelini on</p>
3	<p>1 INDEX</p> <p>2 WITNESS PAGE</p> <p>3 Dennis Jackson:</p> <p>4 Examination by Mr. Michelini 6</p> <p>5 Examination by Mr. Flaxman 183</p> <p>6 Further Examination by Mr. Michelini 185</p> <p>7 EXHIBITS:</p> <p>8 Deposition Exhibit No. 1 117</p> <p>9 Deposition Exhibit No. 2 177</p> <p>10 Court Reporter/Videographer's Certificate 188</p> <p>11 Witness' Certificate 191</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>	5	<p>1 behalf of defendants.</p> <p>2 MR. YURCHICH: Jordan Yurchich on</p> <p>3 behalf of the defendants.</p> <p>4 THE VIDEOGRAPHER: Thank you.</p> <p>5 Did you guys want to make a record</p> <p>6 before we swear in.</p> <p>7 MR. MICHELINI: Yes. Just before we</p> <p>8 got started, there was an issue with the notice</p> <p>9 of dep, and I will let counsel voice his</p> <p>10 objection to it.</p> <p>11 MR. FLAXMAN: We were served a notice</p> <p>12 that did not include video, and we objected to</p> <p>13 proceeding with the video deposition. Rather</p> <p>14 than delay proceedings in the case, we are</p> <p>15 willing to proceed with the video-recorded</p> <p>16 deposition today.</p> <p>17 MR. MICHELINI: Okay. Can we swear in</p> <p>18 the witness?</p> <p>19 (Witness sworn.)</p> <p>20 Thank you.</p> <p>21 Please proceed, Counsel.</p> <p>22 DENNIS JACKSON,</p> <p>23 called as a witness herein, having been duly</p> <p>24 sworn on oath, was examined and testified as</p>

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6	<p>1 follows:</p> <p>2 EXAMINATION</p> <p>3 BY MR. MICHELINI:</p> <p>4 Q Good morning, Mr. Jackson, how are you</p> <p>5 doing?</p> <p>6 A I'm all right. How you feel?</p> <p>7 Q Good. Could you just please state</p> <p>8 your name and spell it for the record?</p> <p>9 A Dennis Jackson, D-e-n-n-i-s,</p> <p>10 J-a-c-k-s-o-n.</p> <p>11 Q Okay. What is your date of birth?</p> <p>12 A 4/30/73.</p> <p>13 Q Four -- August 30 -- I'm sorry, April</p> <p>14 30, 1973?</p> <p>15 A Yes, sir.</p> <p>16 Q Okay. And have you ever given a</p> <p>17 deposition before?</p> <p>18 A No.</p> <p>19 Q Okay. So I'm going to go over some</p> <p>20 ground rules before we get started. So you</p> <p>21 understand that you are under oath, right?</p> <p>22 A Yes.</p> <p>23 Q Okay. And that means you have to tell</p> <p>24 the truth?</p>	8
7	<p>1 A Nothing but.</p> <p>2 Q Nothing but the truth, right. There</p> <p>3 is no reason you couldn't be able to tell the</p> <p>4 truth today; is that right?</p> <p>5 A True.</p> <p>6 Q Okay. You are not under the influence</p> <p>7 of any drugs or alcohol?</p> <p>8 A No.</p> <p>9 Q Okay. You don't suffer any medical</p> <p>10 conditions that preclude you from telling the</p> <p>11 truth?</p> <p>12 A No.</p> <p>13 Q Okay. Just got to ask.</p> <p>14 One of the aspects of this is it's</p> <p>15 all being recorded, right. So answers like</p> <p>16 yeah, huh or yeah, sure or uh-huh don't pick up</p> <p>17 well on the record. So I would just ask that</p> <p>18 you answer in the affirmative and negative when</p> <p>19 I ask a question; yes or no, things of that</p> <p>20 nature. Sound good?</p> <p>21 A Correct, I got you.</p> <p>22 Q Okay. In addition, if you don't</p> <p>23 understand a question, just let me know. I can</p> <p>24 rephrase it, okay?</p>	9
	<p>1 A Okay.</p> <p>2 Q And the flip side of that coin is that</p> <p>3 if I ask you a question and you answer it, I</p> <p>4 will assume that you understand the question; is</p> <p>5 that fair?</p> <p>6 A That's fair.</p> <p>7 Q Okay. Do you know why you're here</p> <p>8 today?</p> <p>9 A Yes.</p> <p>10 Q Okay. And why is that?</p> <p>11 A To prove -- prove what I'm saying is</p> <p>12 true.</p> <p>13 Q Okay. So you understand that you are</p> <p>14 a plaintiff in a civil suit, right?</p> <p>15 A Yes.</p> <p>16 Q That you are suing the City, right?</p> <p>17 A Yes.</p> <p>18 Q And myself and my partner, we</p> <p>19 represent the defendant -- the officers and the</p> <p>20 City as a whole, correct?</p> <p>21 A Yes.</p> <p>22 Q Okay. This all stems from an incident</p> <p>23 that happened back in 2017, correct?</p> <p>24 A Yes.</p>	

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<p style="text-align: right;">10</p> <p>1 attorney, Mr. Flaxman, prior to this deposition?</p> <p>2 A Yes, today.</p> <p>3 Q Okay. And that was specifically for</p> <p>4 preparation for this deposition?</p> <p>5 A I mean, I don't really understand. So</p> <p>6 I came --</p> <p>7 MR. FLAXMAN: And before you answer too</p> <p>8 much let me just instruct you. You can tell him</p> <p>9 why we met and how long we met, but you can't</p> <p>10 tell him what we talked about.</p> <p>11 BY MR. MICHELINI:</p> <p>12 Q And to be clear, I'm not asking about</p> <p>13 the substantive nature. I'm just asking about</p> <p>14 if you had conversations?</p> <p>15 A Yes.</p> <p>16 Q Okay. And so you had --</p> <p>17 You met with your attorney today?</p> <p>18 A Yes.</p> <p>19 Q Okay. And that was about this</p> <p>20 deposition?</p> <p>21 A Yes.</p> <p>22 Q Okay. How long --</p> <p>23 And that was prior to you guys</p> <p>24 coming over here today?</p>	<p style="text-align: right;">12</p> <p>1 A Yesterday.</p> <p>2 Q Okay. And when was that?</p> <p>3 A About 2:00 o'clock.</p> <p>4 Q Okay. So was that after his</p> <p>5 deposition?</p> <p>6 A Yes.</p> <p>7 Q Okay. Did you talk about his</p> <p>8 deposition?</p> <p>9 A No.</p> <p>10 Q Okay. What did you guys talk about?</p> <p>11 A Normal things. He got to go to work.</p> <p>12 He was tired.</p> <p>13 Q Okay. So the deposition for this case</p> <p>14 didn't come up at all?</p> <p>15 A No.</p> <p>16 Q Okay. Other than Mr. McIntyre, have</p> <p>17 you discussed this case with anybody else?</p> <p>18 A No.</p> <p>19 Q Okay. No spouse or girlfriend or</p> <p>20 anything like that you talked about it with?</p> <p>21 A No.</p> <p>22 Q Okay. So fair to say other than your</p> <p>23 attorney, you haven't discussed this case or the</p> <p>24 nature of this -- the events of this case,</p>
<p style="text-align: right;">11</p> <p>1 A Yes.</p> <p>2 Q Okay. And how long did you guys talk</p> <p>3 for?</p> <p>4 A 20, 30 minutes.</p> <p>5 Q Okay. Other than your attorney, have</p> <p>6 you discussed this case with anybody else?</p> <p>7 A No.</p> <p>8 Q Okay. What about James McIntyre?</p> <p>9 A Well, we been talking about it since</p> <p>10 it happened, so --</p> <p>11 Q Okay. He is your friend, right?</p> <p>12 A Yes.</p> <p>13 Q Okay. And he was also -- you guys</p> <p>14 were arrested together on that date?</p> <p>15 A Yes.</p> <p>16 Q Okay. And so you have been talking</p> <p>17 about him -- about the case since it happened.</p> <p>18 Is that what you are saying?</p> <p>19 A Yes. So when we first got arrested,</p> <p>20 we talked about it from day one to, like, when</p> <p>21 we do see each other, we probably talk about it,</p> <p>22 stuff like that, the time he did, all that.</p> <p>23 Q Right. When was the last time you</p> <p>24 talked to Mr. McIntyre?</p>	<p style="text-align: right;">13</p> <p>1 correct?</p> <p>2 A No.</p> <p>3 Q Okay. What do you do for work</p> <p>4 currently?</p> <p>5 A I drive trucks, got a CDL.</p> <p>6 Q Okay. You're a CDL license holder?</p> <p>7 A Yes.</p> <p>8 Q Okay. Are you a semi-truck driver?</p> <p>9 A Yes.</p> <p>10 Q Okay. Who do you drive trucks for?</p> <p>11 A Right now, I'm not working.</p> <p>12 Q Okay.</p> <p>13 A Because --</p> <p>14 Q Got ahead.</p> <p>15 A Because it's slow and the money wasn't</p> <p>16 adding up. So right now I'm a -- what you call</p> <p>17 that -- a outreach worker.</p> <p>18 Q What does that mean?</p> <p>19 A So basically they got these programs</p> <p>20 where -- it's a stop the violence program.</p> <p>21 Q Okay. I understand. So you are</p> <p>22 someone that is out on the street that is</p> <p>23 helping with --</p> <p>24 A Stopping the violence.</p>

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<p style="text-align: right;">14</p> <p>1 Q -- gang violence and things of that 2 nature? 3 A Yes. 4 Q Okay. Who -- so that is your current 5 occupation? 6 A Yes. 7 Q Okay. Who employs you? Who -- 8 A I'm employed by Chicago CRED, but I'm 9 a FLIP worker. 10 Q Okay. So there is a couple acronyms. 11 It's Chicago, is it CRED, C-R-E-D? 12 A C-R-E-D. 13 Q What does that stand for? 14 A I don't remember exactly. 15 Q Okay. But it's an anti-violence 16 group, is that what it is? 17 A Yes. 18 Q Okay. And then you said you are a 19 FLIP worker? 20 A Yes. 21 Q Is that an acronym as well? 22 A Yes. 23 Q What does that stand for? 24 A So that's flat -- flat lining -- flat</p>	<p style="text-align: right;">16</p> <p>1 A I make \$400 every week. 2 Q \$400 a week? 3 A (Nonverbal response -- Nodding head.) 4 Q Okay. And -- 5 A Unless they extend the program from 6 different days. So we work Wednesday, Thursday 7 Friday, Saturday. 8 Q Okay. But in some cases they, like, 9 maybe on a holiday weekend -- like coming up on 10 the holiday weekend -- 11 A Yes, on holidays we might work six 12 days. 13 Q Just make sure that we're not talking 14 over each other. I will give you every 15 opportunity to answer your question. So you can 16 go ahead and finish your answer. 17 A So like on holidays, we will work the 18 six days or five days, however it go. 19 Q All right. Is that equivalent to, 20 like, working overtime? 21 A Yes. 22 Q You get paid a little bit more for 23 working the extra days? 24 A So actually we work -- every day we</p>
<p style="text-align: right;">15</p> <p>1 lining violence -- flat lining violence -- I 2 can't remember exactly right now, but it's flat 3 lining violence though. 4 Q Okay. And is that your specific role 5 within CRED? 6 A Yes. 7 Q Okay. And what does that role entail? 8 A So I mediate -- I mediate altercations 9 and stuff like that. 10 Q Okay. So correct me if I'm wrong, 11 but, you know, if there is some sort of gang 12 conflict going on in a certain area, you go and 13 meet with the people and try and mediate it so 14 it doesn't lead to violence? 15 A Yes. 16 Q Okay. 17 A Keep the violence down. 18 Q Okay. How long have you been working 19 in that role? 20 A Four years. 21 Q Okay. So since 2019; is that fair? 22 A Yes. 23 Q Okay. And how much do you make in 24 that role?</p>	<p style="text-align: right;">17</p> <p>1 work is \$100 a day. 2 Q Okay. So it's \$100 a day at average 3 four days a week, about usually \$400 a week? 4 A Yes. 5 Q Okay. And has that been your sole 6 occupation since 2019, since you started? 7 A Yes. 8 Q Okay. When were you last -- 9 You said you were also a truck 10 driver? 11 A Yes. So, well, I was doing both at 12 the time. So like I said, on the road when the 13 gas prices rose, it was like I was doing it for 14 nothing, so -- 15 Q Okay. So the costs were rising is 16 what you are saying? 17 A Yes. 18 Q Okay. When did you -- when did you 19 start working as a CDL truck driver? 20 A I have been doing that since -- I 21 don't remember the year that I got my CDLs. 22 '15, '16, something like that. I had my CDLs 23 like eight years now. 24 Q Okay. Since about 2015 or 2016 is</p>

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<p style="text-align: right;">18</p> <p>1 what you said?</p> <p>2 A Yes.</p> <p>3 Q Okay. And were you working solely as</p> <p>4 a CDL truck driver up until the point you</p> <p>5 started working at CRED?</p> <p>6 A Yes.</p> <p>7 Q Okay. And you said you left that job</p> <p>8 because the costs were rising and it wasn't</p> <p>9 worth the cost of it?</p> <p>10 A Recently, yes.</p> <p>11 Q Okay. So when did you stop working as</p> <p>12 a CDL truck driver?</p> <p>13 A Probably like November or December.</p> <p>14 Q Of this past year, 2022?</p> <p>15 A Yes.</p> <p>16 Q Okay. So you were working as a truck</p> <p>17 driver while you were also working at CRED; is</p> <p>18 that fair?</p> <p>19 A Yes.</p> <p>20 Q Okay. And how much were you making a</p> <p>21 month working as a truck driver?</p> <p>22 A It depends because my job is to go</p> <p>23 from one place to haul something and try to come</p> <p>24 back with something. So like I said, the gas</p>	<p style="text-align: right;">20</p> <p>1 Q Okay. You just don't drive anymore?</p> <p>2 A At this time, no.</p> <p>3 Q Okay. What did you do prior to</p> <p>4 getting your CDL?</p> <p>5 A Prior to my CDL, where was I? I don't</p> <p>6 even remember. I don't even remember. I think</p> <p>7 my mama had got sick or something. I was</p> <p>8 probably helping her out or something like that.</p> <p>9 I can't remember at this time.</p> <p>10 Q Okay. And any other jobs that you can</p> <p>11 recall prior to working as a CDL driver?</p> <p>12 A I was working for my uncle. He had a</p> <p>13 cleaning service. So I helped him out from time</p> <p>14 to time before I got my CDL.</p> <p>15 Q Okay. And when did you work for your</p> <p>16 uncle at the cleaning service?</p> <p>17 A Probably, like, '12, '13, '14.</p> <p>18 Q Okay. And what would you do in that</p> <p>19 role?</p> <p>20 A Clean.</p> <p>21 Q Okay. Was that cleaning houses?</p> <p>22 A Offices.</p> <p>23 Q Okay. Like vacuuming, things like</p> <p>24 that?</p>
<p style="text-align: right;">19</p> <p>1 prices got high and the economy got messed up.</p> <p>2 So it wasn't working out. It was like I was</p> <p>3 going for pennies just for gas money, on the</p> <p>4 road gone.</p> <p>5 Q Right. So could you estimate what you</p> <p>6 were making like -- I know, I understand it was</p> <p>7 like a per job kind of thing, but --</p> <p>8 A So I was making probably like \$4,000,</p> <p>9 \$5,000 a month.</p> <p>10 Q Okay. \$4,000 or \$5,000 a month --</p> <p>11 A Yeah.</p> <p>12 Q -- and then in addition from 2019 on</p> <p>13 you have also been getting the \$400 a week?</p> <p>14 A Yes.</p> <p>15 Q Okay. Prior to becoming a truck</p> <p>16 driver, you say you started -- you got the CDL</p> <p>17 in what year, it was 2015?</p> <p>18 A Or '16.</p> <p>19 Q Or '16.</p> <p>20 A I don't know exactly what year. I</p> <p>21 can't remember, but I know I had it, like,</p> <p>22 seven, eight years now.</p> <p>23 Q Okay. Do you still hold a CDL?</p> <p>24 A Yes.</p>	<p style="text-align: right;">21</p> <p>1 A Yes.</p> <p>2 Q Okay. Got you. A custodian role?</p> <p>3 A Yes.</p> <p>4 Q Got you. Okay. Any other occupations</p> <p>5 you can think of that you have held?</p> <p>6 A At this point in time, no.</p> <p>7 Q Okay. What about education, did you</p> <p>8 attend high school?</p> <p>9 A Yes.</p> <p>10 Q Okay. Where did you go to high</p> <p>11 school?</p> <p>12 A Covert, Michigan.</p> <p>13 Q Sorry. Can you spell that?</p> <p>14 A Covert, C-o-v-e-r-t, High Scholl.</p> <p>15 Q Okay. And you said mission?</p> <p>16 A Michigan.</p> <p>17 Q Michigan. It's in the State of</p> <p>18 Michigan?</p> <p>19 A Covert, Michigan, yes.</p> <p>20 Q Okay, got you. Covert High School in</p> <p>21 Michigan; is that right?</p> <p>22 A Yes, Covert, Michigan.</p> <p>23 Q Got you, okay. And when did you</p> <p>24 attend Covert High School?</p>

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<p style="text-align: right;">22</p> <p>1 A I graduated in '92. So got to be '89, 2 '90, '91, '92. 3 Q Okay. You graduated high school in 4 1992? 5 A Yes. 6 Q Okay. Do you have any other -- did 7 you attend college or community college? 8 A No. 9 Q Okay. So what did you do from the 10 time you graduated high school, from 1992 up 11 until that point you started working for your 12 uncle, or that point in time when you started 13 getting your CDL? 14 A I was a dishwasher. I was a 15 dishwasher for a minute. 16 Q Okay. 17 A Before I came back to Chicago. 18 Q Okay. And that was -- 19 When did you move to Chicago, I 20 guess? 21 A Probably, like, '95 or something. 22 Q Okay. Where do you currently reside? 23 A I stay in Glenwood, Illinois. 24 Q Okay. That's a suburb?</p>	<p style="text-align: right;">24</p> <p>1 A Yes. 2 Q Okay. When did you first move into 3 that address? 4 A In '95. 5 Q Okay. So -- 6 A '94 or '95. 7 Q For a pretty while -- 8 So when you moved into Chicago, was 9 that your first place in Chicago? 10 A Yes. 11 Q Okay. And you stayed there through -- 12 until the time you left? 13 A Yes. 14 Q Okay. So I want to talk about the 15 date of the incident. So on November 6th of 16 2017, what were you doing that day, if you 17 recall? Like prior to everything happening, 18 what were you doing during the day? 19 A I was sitting in my car texting with 20 my girlfriend. 21 Q Okay. And was this -- so the -- 22 When you were arrested eventually, 23 that was at nighttime, right? 24 A Yes.</p>
<p style="text-align: right;">23</p> <p>1 A Yes. 2 Q Okay. Of Chicago? 3 A Yes. 4 Q Okay. Back in 2017, when this 5 happened, where did you live? 6 A 2017, 68th and Sangamon. 7 Q 68th and Sangamon? 8 A Yes. 9 Q Okay. Do you remember the address? 10 A 68 -- 6805 South Sangamon. 11 Q Okay. And when did you move from that 12 -- did you move from that location to your 13 current location? 14 A Yes. 15 Q Okay. When did you do that? 16 A My auntie passed probably like twenty 17 -- what is this, '23? Probably like '20 or '21. 18 Q 2020 or 2021? 19 A Yes. 20 Q Okay. And that is when you moved to 21 the suburbs? 22 A Yes. 23 Q Got you. And prior to that you lived 24 in -- at that same Sangamon address?</p>	<p style="text-align: right;">25</p> <p>1 Q Okay. That was, like, about, like, 2 10:00, 11:00 o'clock at night? 3 A Yes. 4 Q Okay. What were you doing earlier 5 that day, like, you know, in the afternoon or 6 the morning, if you can recall? 7 A I don't remember. 8 Q Okay. What was the first point you 9 can't remember from that day? 10 A I can't remember. 11 Q Okay. I guess, what do you remember 12 from that day? 13 A I remember James getting dropped off. 14 He got in the car with me. I was arguing with 15 my girlfriend through text, and my grandma 16 called me, asked me was I okay? I told her yes; 17 and then, like I said, I was about to pull off 18 and drop him off to his mother's house, and 19 that's when the police pulled up. 20 Q Okay. So I want to walk back a couple 21 things you just said. So the address that you 22 were at was 313 East 20th Place; is that right? 23 A I was at 309 East 120th Place. 24 Q 309, okay. And whose house is that?</p>

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<p style="text-align: right;">26</p> <p>1 A My grandmother's. 2 Q Okay. And were you staying there at 3 the time? 4 A No. 5 Q Okay. Were you just visiting? 6 A Yes. 7 Q Okay. When did you first get to your 8 grandma's house that day? 9 A Probably like 9:30, 10:00 o'clock; 10 like 20 minutes before that happened; like 20, 11 30 minutes before it happened. 12 Q Okay. So that was the first time you 13 got to the house? 14 A Yes. 15 Q Okay. And you hadn't been there 16 earlier in the day? 17 A I might have. I don't know. 18 Q Okay. But you remember arriving about 19 20, 30 minutes, about, before the police arrived 20 is what you are saying? 21 A Yes. 22 Q Okay. And what was the reason for 23 visiting your grandmother's house? 24 A I always visit my grandma --</p>	<p style="text-align: right;">28</p> <p>1 A My grandma called me on the phone, 2 asked me was I okay? She like, "baby, you 3 okay?" I'm like, "yes." 4 Q Okay. Your buddy is James McIntyre, 5 right? 6 A Yes. 7 Q Okay. How long have you known James 8 McIntyre? 9 A Since he probably was like 17. So I 10 probably was like 22 or something, 21, 23. 11 Q Okay. So since you guys were in your 12 late teens, early 20s, somewhere around there? 13 A Yes. 14 Q Okay. And how old are you today? I 15 forgot to ask. 16 A I'm 50. 17 Q Okay. So this was over 30 years, 18 about that time? 19 A Yes. 20 Q Okay. Would you call James McIntyre a 21 good friend? 22 A Yes. 23 Q Okay. You see him quite often, 24 correct?</p>
<p style="text-align: right;">27</p> <p>1 Q Okay. 2 A -- because that's what we do. She 3 old. She 80-something. So we always check on 4 her, so -- 5 Q Go you. So you were just checking up 6 on her? 7 A Yeah. 8 Q Okay. And so did you talk to your 9 grandma when you came to go visit? 10 A No. She called me on the phone and 11 asked me was I okay because she seen me sitting 12 outside and I never went to the door. 13 Q Okay. So you didn't -- 14 You were going to visit your 15 grandma, but you didn't have an opportunity to 16 go talk to her. Is that what you are saying? 17 A Right, because I -- 18 Q Go ahead. 19 A Because I was -- like I said, I was 20 texting with my girl, arguing with her. That's 21 when my buddy pulled up, asked me to drop him 22 off. My -- I still was sitting there arguing 23 with her. 24 Q Okay.</p>	<p style="text-align: right;">29</p> <p>1 A Well, not now because he works. 2 Q Uh-huh. 3 A So he do a lot of overtime at work. 4 So I see him occasionally though. 5 Q What is occasionally? 6 A Probably twice, three times a week. 7 Q Okay. So on that day back on November 8 6th of 2017, Mr. McIntyre showed up to your 9 grandma's house? 10 A Yes. 11 Q Okay. Did you -- had you talked to 12 him about coming over prior to that? 13 A No. 14 Q Okay. He just showed up? 15 A Yes. 16 Q Okay. And do you know why he showed 17 up to your grandma's house? 18 A No, I don't. 19 Q Okay. How did he know that you would 20 be at your grandma's house? 21 MR. FLAXMAN: Objection; foundation. 22 BY MR. MICHELINI: 23 Q You can answer the question. 24 MR. FLAXMAN: If you know.</p>

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<p style="text-align: right;">30</p> <p>1 THE WITNESS: Could you repeat the 2 question? 3 BY MR. MICHELINI: 4 Q How did Mr. McIntyre know that you 5 would be at your grandma's house? 6 A He wouldn't know. 7 Q Okay. So he was -- 8 A He was getting dropped off by his 9 girl. 10 Q Okay. But he was getting dropped off 11 at your grandma's house? 12 A Well, I ain't going to say just 13 basically at her house, but he was getting 14 dropped off right there. 15 Q Okay. Mr. -- 16 A But he -- 17 Q Sorry, go ahead. 18 A He cool with my other family members 19 too. So that's where we be, at my grandma 20 house. 21 Q Okay, got you. But it wasn't 22 specifically you telling him to come over? 23 A Exactly. 24 Q Okay. And Mr. McIntyre lives a few</p>	<p style="text-align: right;">32</p> <p>1 A He sat there for a second, then he 2 jumped out, came to my car, got in my car. And, 3 like I said, he sat down and I was still arguing 4 with my girl. He asked me to drop him off. And 5 I was still sitting there because I was arguing 6 on the -- through the text and, like I said, the 7 police pulled up. 8 Q Got you. Do you know who dropped off 9 Mr. McIntyre? 10 A His girlfriend. 11 Q Okay. Do you know who that -- what 12 her name is -- or what her name is? 13 A No. 14 Q Okay. You never met her before? 15 A I met her before, but I don't -- you 16 know, I don't be all in her face or nothing. I 17 seen her before. 18 Q Okay. But you haven't spoken to her? 19 A No. I don't really speak to her 20 because she a little mean. 21 Q Okay. I understand. And so Mr. 22 McIntyre is dropped off at your house, and he 23 just -- you were already in the vehicle at that 24 time?</p>
<p style="text-align: right;">31</p> <p>1 blocks away from your grandma's house; is that 2 fair? 3 A Yes. 4 Q Okay. Would -- do you know the 5 address he was staying at the time? 6 A No. 7 Q Okay. Whereabouts was it? Do you 8 know, like, the cross streets? 9 A 119th. 10 Q Okay. That's his mother's house? 11 A Yes. 12 Q Okay. You know his mother, right? 13 A Yes. 14 Q Okay. And you have been over to that 15 house before, correct? 16 A Yes. 17 Q Okay. And so Mr. McIntyre just showed 18 up at your grandma's house; is that correct? 19 A Yes. 20 Q Okay. And you hadn't talked to him 21 before that? 22 A No. 23 Q Okay. And when Mr. McIntyre arrived, 24 what did he do?</p>	<p style="text-align: right;">33</p> <p>1 A Yes. 2 Q Okay. And what kind of vehicle was 3 that? 4 A A Chevy. 5 Q Was it a Chevy Tahoe? 6 A Yes. 7 Q Okay. What color was it? 8 A If I ain't mistaken, white. 9 Q Okay. Was that your vehicle? 10 A No. It was my girl's vehicle. 11 Q Okay. It was your girlfriend's? 12 A (Nonverbal response -- nodding head). 13 Q Yes? 14 A Yes, yes. I'm sorry. 15 Q That is okay. No problem. I do it 16 too sometimes. 17 So it was your girlfriend's 18 vehicle, you said, right? 19 A Yes. 20 Q Okay. What is her name? 21 A Her name was Tonya (phonetic). 22 Q Okay. Tonya what? 23 A Tonya Smith. 24 Q Okay. Are you still dating her?</p>

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<p style="text-align: right;">34</p> <p>1 A No.</p> <p>2 Q Okay. When did that relationship end?</p> <p>3 A Probably like a year later.</p> <p>4 Q Okay.</p> <p>5 A So whatever year it was, '17; probably</p> <p>6 like 2018.</p> <p>7 Q Got you. Where was --</p> <p>8 You said you were arguing with her</p> <p>9 at the time?</p> <p>10 A Yes.</p> <p>11 Q Where was she at the time when you</p> <p>12 were arguing with her?</p> <p>13 A That I don't know.</p> <p>14 Q Okay. But she wasn't at that -- at</p> <p>15 your grandmother's house, right?</p> <p>16 A No.</p> <p>17 Q Okay. Because you said you were</p> <p>18 texting her?</p> <p>19 A Yes.</p> <p>20 Q Okay. You guys were --</p> <p>21 There was some sort of fight going</p> <p>22 on between you two?</p> <p>23 A Yes.</p> <p>24 Q Okay. And so you were in the car in</p>	<p style="text-align: right;">36</p> <p>1 Q There was kind of an open lot to the</p> <p>2 east of that area, right?</p> <p>3 A Open lot to the east of that area.</p> <p>4 East is going towards the train tracks?</p> <p>5 Q Yes, to the train tracks.</p> <p>6 A Right. It's a factory over there or</p> <p>7 something.</p> <p>8 Q Yes. It's like there is an open space</p> <p>9 and then there's the train tracks; is that</p> <p>10 correct?</p> <p>11 A Yes, yes.</p> <p>12 Q Okay. So you were in the driver's</p> <p>13 seat. The car was facing towards the train</p> <p>14 tracks, right?</p> <p>15 A Yes, east.</p> <p>16 Q Okay. And Mr. McIntyre is dropped</p> <p>17 off. Is that what you said?</p> <p>18 A Yes.</p> <p>19 Q Okay. And then would --</p> <p>20 He enters the passenger's seat?</p> <p>21 A Yes.</p> <p>22 Q Okay. Did he say anything to you?</p> <p>23 A "Drop me off."</p> <p>24 Q He said "drop me off?"</p>
<p style="text-align: right;">35</p> <p>1 the driver's seat; is that right?</p> <p>2 A Yes.</p> <p>3 Q Okay. Which way is the --</p> <p>4 Is it parked on the street? Is it</p> <p>5 in the driveway? How is it situated?</p> <p>6 A On the street.</p> <p>7 Q Okay. And that's on 120th?</p> <p>8 A Place.</p> <p>9 Q 120th Place. I'm sorry. Yes?</p> <p>10 A Yes.</p> <p>11 Q Okay. That's and east-west street,</p> <p>12 right?</p> <p>13 A Yes.</p> <p>14 Q Okay. Was the car facing east or</p> <p>15 west?</p> <p>16 A West.</p> <p>17 Q It was facing west?</p> <p>18 A Yes. No, no, no, I'm sorry. East.</p> <p>19 It was facing east.</p> <p>20 Q Facing towards the train tracks over</p> <p>21 there to the east, right?</p> <p>22 A Yes, yes.</p> <p>23 Q Okay.</p> <p>24 A Exactly.</p>	<p style="text-align: right;">37</p> <p>1 A Yes.</p> <p>2 Q Okay. And you took that to mean to</p> <p>3 drop him off at his mother's house?</p> <p>4 A Yes.</p> <p>5 Q And that was down the street, right?</p> <p>6 A Yes.</p> <p>7 Q Did you think that was odd that he was</p> <p>8 asking you to drop him off just only a couple</p> <p>9 blocks away when he had just been dropped off at</p> <p>10 your grandma's house?</p> <p>11 A No, not really, because like I said,</p> <p>12 she's mean. So ain't no telling what was going</p> <p>13 on. So she the type of person to bust windows</p> <p>14 and all that. He not going to take that to his</p> <p>15 parents' house, so --</p> <p>16 Q Got you. So he was arguing with his</p> <p>17 girlfriend at the time?</p> <p>18 A That I don't know. I'm just saying.</p> <p>19 Q Okay.</p> <p>20 A You asked me a question about did I</p> <p>21 think it was odd about him being dropped off</p> <p>22 right there, so --</p> <p>23 Q So the answer is no, it was not odd?</p> <p>24 A No, it's not.</p>

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<p style="text-align: right;">38</p> <p>1 Q And that is based upon what you know 2 about that person he was dating at the time? 3 A Yes. 4 Q Okay. And so he gets into the front 5 passenger's seat, right? 6 A Yes. 7 Q Okay. And about how long was he 8 sitting in the front passenger's seat until 9 police arrived? 10 A Probably like 10, 15, no more than 20 11 minutes. 12 Q Right. And so had you been there -- 13 You said earlier that you were 14 about -- you were at your grandma's house for 15 about, you said, 20 to 30 minutes before the 16 police arrived? 17 A Yes. 18 Q Okay. And so was it 20, 30 minutes 19 and then Mr. McIntyre arrived, and then an 20 additional 15, or was that -- 21 A Yes. 22 Q Okay. So you are sitting about 20, 30 23 minutes, let's say, at your grandma's house by 24 yourself, right?</p>	<p style="text-align: right;">40</p> <p>1 he pulled up, jumped out the car. He sat there 2 for a second with the lady talking to her about 3 five minutes. Then he came to my car, jumped 4 in, asked me could I drop him off. 5 Q Okay. And then how long after that 6 did the police arrive? 7 A Like 15 minutes. 8 Q Okay. 15 minutes. So there was only 9 about 15 minutes when you and Mr. McIntyre were 10 in the car together? 11 A Yes. 12 Q Okay. During that 15 minutes, what 13 did you do? What did you guys talk about? 14 A I was -- only thing he said to me, 15 could I drop him off? I was arguing with my 16 girl. 17 Q Okay. 18 A And I told him, like, this girl, but I 19 used a cuss name. 20 Q Right. 21 A Other than that he like, "tell me 22 about it." 23 Q So you guys were talking about each 24 other's relationship woes; is that fair?</p>
<p style="text-align: right;">39</p> <p>1 A Yes. 2 Q Okay. That is when you were texting 3 your girlfriend, correct? 4 A Yes. 5 Q And your grandma, you said, also 6 called you during that time when it was just 7 you? 8 A Yes. 9 Q Okay. And she was asking about, you 10 know, if you are okay, right? 11 A Yes. 12 Q Okay. And after your grandmother had 13 called, that is when Mr. McIntyre arrived and 14 entered your car? 15 A Actually, he was in the car with me 16 when she -- he had just got in the car when she 17 called me. 18 Q When your grandmother called? 19 A Yes. 20 Q Okay. And then how -- that was about 21 20, 30 minutes; and then your grandma calls? 22 I'm just trying to figure out the time line 23 here, if you understand my question. 24 A So I was sitting there 20, 30 minutes;</p>	<p style="text-align: right;">41</p> <p>1 A Yes. 2 Q Okay. And did you agree to go drop 3 him off? 4 A Yes. 5 Q Okay. And so you guys were just kind 6 of catching up; is that fair to say? 7 A Well, actually, that was the only 8 thing we got a chance to say to each other, 9 because once he told me "tell me about it," the 10 police pulled up. 11 Q Okay. Did -- while you were with Mr. 12 McIntyre in the car, did anyone approach your 13 vehicle? 14 A No. 15 Q Okay. No one came up to your side of 16 the vehicle? 17 A No. 18 Q No one came up to Mr. McIntyre's side 19 of the vehicle? 20 A No. 21 Q Okay. No one even came close? There 22 was no one on the sidewalk? 23 A No. 24 Q Okay. When the police arrived, how</p>

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<p style="text-align: right;">42</p> <p>1 many squad cars were there?</p> <p>2 A If I could think correctly, about</p> <p>3 three or four, five maybe. I don't know.</p> <p>4 Q Okay. Were these marked or unmarked</p> <p>5 squad cars?</p> <p>6 A Unmarked.</p> <p>7 Q Unmarked?</p> <p>8 A Yeah.</p> <p>9 Q Did they activate their lights?</p> <p>10 A I can't even remember. I don't think</p> <p>11 so, but I can't remember exactly.</p> <p>12 Q Okay. But at some point, there was</p> <p>13 several police vehicles that arrived on the</p> <p>14 scene, right?</p> <p>15 A Yes.</p> <p>16 Q Okay. And even though they were</p> <p>17 unmarked, you recognized them as police</p> <p>18 vehicles?</p> <p>19 A Yes.</p> <p>20 Q Okay. And eventually officers got out</p> <p>21 and they had their vests on, right?</p> <p>22 A Yes.</p> <p>23 Q Okay. And they approached the vehicle</p> <p>24 you and Mr. McIntyre were in; is that right?</p>	<p style="text-align: right;">44</p> <p>1 went straight in my pocket.</p> <p>2 Q Okay. They went straight in your</p> <p>3 pockets?</p> <p>4 A Yes.</p> <p>5 Q Did they recover anything from your</p> <p>6 pockets?</p> <p>7 A No. My keys, money, stuff like that;</p> <p>8 took everything out of my pocket and set it on</p> <p>9 top of the car.</p> <p>10 Q Right. So they did --</p> <p>11 They took keys and money out of</p> <p>12 your pockets; is that right?</p> <p>13 A Yes.</p> <p>14 Q Okay. And at some point, they placed</p> <p>15 you in the handcuffs?</p> <p>16 A Yes. They --</p> <p>17 Q Okay. Was that --</p> <p>18 Sorry, go ahead.</p> <p>19 A They did that right off top.</p> <p>20 Q Okay. They put you in handcuffs and</p> <p>21 then searched you?</p> <p>22 A Yes.</p> <p>23 Q Okay. After they searched your</p> <p>24 person, you said they then searched the vehicle</p>
<p style="text-align: right;">43</p> <p>1 A Yes.</p> <p>2 Q Okay. And what happened next?</p> <p>3 A They made us get out the car.</p> <p>4 Q Okay. So what do you mean by that?</p> <p>5 They instructed you to do?</p> <p>6 A Yes.</p> <p>7 Q Okay. So they verbally asked you to</p> <p>8 get out of the car?</p> <p>9 A Yes.</p> <p>10 Q Okay. And what did you do?</p> <p>11 A Got out the car.</p> <p>12 Q Okay. What happened next?</p> <p>13 A Then they got to searching us; and</p> <p>14 then they walked in the back searching my car,</p> <p>15 walking the perimeter, checking I guess; and we</p> <p>16 sat on the curb waiting to see what they was</p> <p>17 going to say.</p> <p>18 Q Okay. So you said a couple things</p> <p>19 there. You -- they ordered you out of the car,</p> <p>20 right?</p> <p>21 A Yes.</p> <p>22 Q Okay. And after that, did they pat</p> <p>23 you down?</p> <p>24 A No. They didn't pat me down. They</p>	<p style="text-align: right;">45</p> <p>1 that you were in?</p> <p>2 A Yes.</p> <p>3 Q Okay. Were you able to see what was</p> <p>4 happening with Mr. McIntyre at this time?</p> <p>5 A Yes.</p> <p>6 Q Okay. What was happening with him?</p> <p>7 A They was searching him the same.</p> <p>8 Q Okay. Did they ask him to get out of</p> <p>9 the car?</p> <p>10 A Yes.</p> <p>11 Q Okay. And did he get out of the car?</p> <p>12 A Yes.</p> <p>13 Q Okay. Did he have any issues getting</p> <p>14 out of the car?</p> <p>15 A Yes. His back was hurting. So the</p> <p>16 officer -- I think it was the lady officer, once</p> <p>17 he told her his back, she was kind of being</p> <p>18 gentle with him.</p> <p>19 Q Okay. Did you know his back was</p> <p>20 hurting at that time?</p> <p>21 A No.</p> <p>22 Q Okay. Did he complain about his back</p> <p>23 to you?</p> <p>24 A Not that I know of.</p>

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<p style="text-align: right;">46</p> <p>1 Q Okay. Was he wearing any type of</p> <p>2 brace or anything like that?</p> <p>3 A Not that I know of.</p> <p>4 Q Okay. And so Mr. McIntyre was</p> <p>5 eventually asked -- he was asked out of the car</p> <p>6 about the same time you were; is that right?</p> <p>7 A The same time.</p> <p>8 Q The same time?</p> <p>9 A (Nonverbal response: Nodding head.)</p> <p>10 Q Okay. And you were able to see this</p> <p>11 from where you were?</p> <p>12 A Yes.</p> <p>13 Q Okay. He was also handcuffed; is that</p> <p>14 right?</p> <p>15 A Yes.</p> <p>16 Q Okay. And did the police also go</p> <p>17 through his pockets?</p> <p>18 A Yes.</p> <p>19 Q Okay. After -- strike that.</p> <p>20 When this was happening, did you</p> <p>21 say anything to the police?</p> <p>22 A Yes.</p> <p>23 Q What did you say?</p> <p>24 A So when the officers -- the officers</p>	<p style="text-align: right;">48</p> <p>1 A The night before.</p> <p>2 Q Okay. What happened the night before?</p> <p>3 A So me and one of my buddies was</p> <p>4 standing outside. I had a water bottle and I</p> <p>5 had a cup. I had a little bit of liquor in the</p> <p>6 cup because I only had this much water. So I</p> <p>7 only had enough to -- so I chased my liquor with</p> <p>8 the water.</p> <p>9 Q Uh-huh.</p> <p>10 A So the police was coming. I hurried</p> <p>11 up and drunk my liquor and walked to my car. He</p> <p>12 told me to come here. I'm like, "you could get</p> <p>13 out and talk to me." He was like, "no, I told</p> <p>14 you to come here."</p> <p>15 So now I'm going in my car. He</p> <p>16 said, "don't go in your car." So one thing led</p> <p>17 to another. I end up cussing him out, telling</p> <p>18 him, "I'm older than you. You can get out the</p> <p>19 car if you want me." And, you know, we got into</p> <p>20 an argument, and the next day, that's when I</p> <p>21 seen him walking up the gangway.</p> <p>22 MR. YURCHICH: Can we take a break?</p> <p>23 MR. MICHELINI: Yes, no problem.</p> <p>24 THE VIDEOGRAPHER: The time is 10:53.</p>
<p style="text-align: right;">47</p> <p>1 that I recognized, I asked them, "is this you?"</p> <p>2 He said -- he said, "don't worry about it." I</p> <p>3 said, no -- once I recognized the officers that</p> <p>4 I knew, I asked him, I'm like, "Man, this you?</p> <p>5 I apologized yesterday." He was like, "don't</p> <p>6 worry about it, I'm just trying to see if I'm</p> <p>7 fixing to tow this truck."</p> <p>8 Q Okay. So you said you saw officers</p> <p>9 that you knew or recognized?</p> <p>10 A Yes.</p> <p>11 Q Okay. Which officers?</p> <p>12 A I don't know they name exactly. I</p> <p>13 just know them by, like, how they testified in</p> <p>14 my case.</p> <p>15 Q From the criminal case from this?</p> <p>16 A Yes.</p> <p>17 Q Okay. But did you recognize them from</p> <p>18 before at that time?</p> <p>19 A What you mean?</p> <p>20 Q So you said that you recognized the</p> <p>21 officers on that date?</p> <p>22 A Oh, yes, yes, yes.</p> <p>23 Q Okay. Did you know them from before</p> <p>24 that date?</p>	<p style="text-align: right;">49</p> <p>1 We are going off the record.</p> <p>2 (Whereupon a recess was</p> <p>3 taken after which the</p> <p>4 proceedings resumed as</p> <p>5 follows:)</p> <p>6 THE VIDEOGRAPHER: The time is 10:56.</p> <p>7 We are going back on the record.</p> <p>8 Please proceed.</p> <p>9 BY MR. MICHELINI:</p> <p>10 Q Okay. Mr. Jackson, before we took the</p> <p>11 break, you were just describing something that</p> <p>12 happened the night before you were arrested for</p> <p>13 this case; is that right?</p> <p>14 A Yes.</p> <p>15 Q Okay. You said that you recognized an</p> <p>16 officer from your arrest on November 6th of</p> <p>17 2017, that you saw the night before; is that</p> <p>18 right?</p> <p>19 A Yes.</p> <p>20 Q Okay. Do you remember that officer's</p> <p>21 name?</p> <p>22 A I don't know his name. All I know is</p> <p>23 how he testified in my case.</p> <p>24 Q Okay. And that's, again, for the</p>

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<p style="text-align: right;">50</p> <p>1 criminal case for this matter, correct?</p> <p>2 A Yes.</p> <p>3 Q Okay. And it was a male officer?</p> <p>4 A Yes.</p> <p>5 Q Okay. White? Black? Hispanic?</p> <p>6 A Hispanic.</p> <p>7 Q Okay. Color hair?</p> <p>8 A I don't remember the color of his</p> <p>9 hair.</p> <p>10 Q Okay. But a Hispanic male officer is</p> <p>11 what you are testifying to?</p> <p>12 A Correct.</p> <p>13 Q Okay. And so let's talk about that</p> <p>14 night before. Were you -- where were you when</p> <p>15 this happened?</p> <p>16 A Across the street from my</p> <p>17 grandmother's house. So if that's 317, whatever</p> <p>18 that address is across the street from there.</p> <p>19 Q Okay. So across 120th on the other</p> <p>20 side?</p> <p>21 A No, across street. So I think that</p> <p>22 address is, got to say like 120-something.</p> <p>23 Q Was it on 120th?</p> <p>24 A Yes, on 120th place.</p>	<p style="text-align: right;">52</p> <p>1 Q Okay.</p> <p>2 A -- and just having a conversation.</p> <p>3 Q Got you. And you were having this</p> <p>4 conversation on the sidewalk? In front of the</p> <p>5 house? Where were you?</p> <p>6 A Basically in the street standing by</p> <p>7 her car.</p> <p>8 Q Got you. Okay. So you were in the</p> <p>9 street standing by her car; and you said you had</p> <p>10 some alcohol with you?</p> <p>11 A Yes.</p> <p>12 Q Okay. And the alcohol was in a --</p> <p>13 A Cup.</p> <p>14 Q A cup, okay. And you also had a</p> <p>15 plastic water bottle. Is that what you said?</p> <p>16 A Correct.</p> <p>17 Q Okay. And you were chasing the</p> <p>18 alcohol with the water?</p> <p>19 A Correct.</p> <p>20 Q Okay. And this officer --</p> <p>21 Was it just a single officer?</p> <p>22 A Two officers.</p> <p>23 Q Okay. But one squad car?</p> <p>24 A Yes.</p>
<p style="text-align: right;">51</p> <p>1 Q So further west or further east from</p> <p>2 where your grandmother stayed?</p> <p>3 A Further east.</p> <p>4 Q Okay. And it was on the same side of</p> <p>5 the street or the opposite side of the street?</p> <p>6 A Opposite side.</p> <p>7 Q Okay. So your grandmother's house is</p> <p>8 on the north side; is that correct?</p> <p>9 A That would be the south side; this</p> <p>10 would be the north. If I'm facing east, this</p> <p>11 would be north, right?</p> <p>12 Q Yes, to the left.</p> <p>13 A Yeah. The house that I'm talking</p> <p>14 about is north.</p> <p>15 Q Okay. And where is your grandma's</p> <p>16 house?</p> <p>17 A South.</p> <p>18 Q Okay. And you were --</p> <p>19 Who lives there? Why were you at</p> <p>20 that address?</p> <p>21 A I wasn't at the address exactly. I</p> <p>22 was talking to a friend of mine.</p> <p>23 Q Okay.</p> <p>24 A Me and a female was talking --</p>	<p style="text-align: right;">53</p> <p>1 Q Okay.</p> <p>2 A It could have been three. I don't</p> <p>3 know. I just know the one I was -- had the</p> <p>4 conversation with.</p> <p>5 Q Got you. And so a squad car pulls up;</p> <p>6 is that right?</p> <p>7 A Yes.</p> <p>8 Q Okay. And what did the officer that</p> <p>9 you recognized say to you?</p> <p>10 A When he pulled up?</p> <p>11 Q Yes.</p> <p>12 A "Come here."</p> <p>13 Q Okay. And you didn't want to do that?</p> <p>14 A No.</p> <p>15 Q Okay. And so there is an argument</p> <p>16 that happened back and forth between you two?</p> <p>17 A Yes.</p> <p>18 Q Okay. What eventually happened? Did</p> <p>19 you get arrested that night?</p> <p>20 A No.</p> <p>21 Q Okay. What -- how did it conclude, I</p> <p>22 guess, is my question?</p> <p>23 A So he eventually jumped out because he</p> <p>24 told me not to go in the car. So they end up</p>

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<p style="text-align: right;">54</p> <p>1 jumping out; then they searched around the area 2 and they end up letting me go. 3 Q Okay. And so the -- correct me if I'm 4 wrong, but the officer, he pulls up in a squad 5 car, he says "come here;" is that right? 6 A Yes. 7 Q You refuse, right? 8 A Yes. 9 Q There is an argument that happens 10 between you guys? 11 A Yes. 12 Q Okay. And then eventually the officer 13 gets out of that vehicle, correct? 14 A Yes. 15 Q And then he searches around the area 16 that you are standing in? 17 A Yes. 18 Q Okay. 19 A To see if I threw something on the 20 grass or something like that. 21 Q Okay. And then he just got back in 22 the car and left? 23 A Well, after we finished arguing 24 because we was going back and forth arguing the</p>	<p style="text-align: right;">56</p> <p>1 A Exactly. 2 Q Okay. 3 A So that's how -- 4 Another reason that we got into it 5 because he was like, "I could take you to jail 6 for alcohol." I turned the cup upside down and 7 the water bottle; I'm like, "I don't have no 8 liquor." 9 Q Got you. Okay. And was there 10 anything else that happened during that 11 interaction that you haven't told us? 12 A As far as me and him going back 13 cussing each other out? 14 Q Yes. 15 A No. That was about it. 16 Q Okay. And you said that there were 17 other officers in the squad car, but you just 18 don't know how many? 19 A True, yes. 20 Q Okay. And you didn't recognize any of 21 those other officers the day -- the next day 22 when you were arrested? 23 A No. 24 Q Okay. It was just the one that you</p>
<p style="text-align: right;">55</p> <p>1 whole time while he looking on the ground and 2 the grass and under the car to see if I threw 3 something. 4 Q Okay. 5 A He eventually got back in the car. 6 Q Okay. And he didn't search your 7 person? 8 A I can't remember if he searched me. 9 I'm thinking he didn't because, like I said, we 10 was going back and forth. So I don't think he 11 touched me. 12 Q Okay. So he didn't pat you down 13 either? 14 A No. 15 Q Okay. You admit that you had open 16 alcohol on the street at that time, right? 17 A Yes, kind of because, like I said, 18 when I seen them, I drunk it because it was only 19 this much. (Demonstrating). 20 So, yes, I had -- I was drinking 21 liquor. 22 Q Right, okay. But you are saying he 23 didn't see any liquor because you had drank it 24 before he came?</p>	<p style="text-align: right;">57</p> <p>1 had the conversation with? 2 A Yes. 3 Q Okay. But you said you don't remember 4 that officer's name? 5 A No. 6 Q Okay. But he did testify at your 7 criminal trial? 8 A I remember one of they name. I just 9 don't know -- I know them by who testified in 10 the preliminary, who testified in the trial. 11 Q Got you. Okay. Did that officer 12 testify at the preliminary hearing, as well? 13 A Like I said, I would have to be able 14 to be shown, like I have to call my lawyer to 15 ask him which one is which. 16 Q Okay. I'm just asking if you know? 17 A No. 18 Q Okay. 19 A I just know one of they name. I just 20 don't know which one is which. The two, I know 21 which one testified in the preliminary, which 22 one testified in the trial. 23 Q Okay. You said you do know a name of 24 one of them though?</p>

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1 **A Yes.**
2 Q Okay. What is the name?
3 **A Moreno, Carreno, something like that.**
4 Q Carreno, okay.
5 **A Yeah.**
6 Q Is that the Hispanic officer that you
7 were just telling us about from the night
8 before?
9 **A Yes.**
10 Q Okay. Is it Efrain Carreno, Carreno?
11 **A Something like that.**
12 Q Okay. But he is one of the defendants
13 in this case; is that right?
14 **A Yes.**
15 Q Okay. So there is this incident that
16 happens before -- the night before you were
17 arrested. Had you seen that officer, Officer
18 Carreno or any of the officers that arrested you
19 that night prior -- outside of that incident you
20 said of the night before you were arrested?
21 **A When you say any other officers,**
22 **because it was like four or five cars. So a**
23 **couple of them officers I knew.**
24 Q Okay. Which officers did you know?

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1 **A I don't know his name.**
2 Q Okay. What did that --
3 And this is an officer that's
4 separate from Officer Carreno?
5 **A He was the one that testified in my**
6 **trial. I knew him.**
7 Q Okay. And you recognized him because
8 he was the one that testified at your criminal
9 trial?
10 **A No. I knew him prior to that.**
11 Q Okay. How did you know him?
12 **A Because he tried to get me to give him**
13 **a gun one time and I told him no.**
14 Q Okay. What does that officer look
15 like?
16 **A Kind of short. I want to say chubby,**
17 **kind of probably like a little bigger than you.**
18 Q Okay. Stocky, is that what you are
19 trying to say?
20 **A Yes, yeah. But you would think he --**
21 **you would kind of look at him, like, with all**
22 **his gear on, you would think he kind of chubby,**
23 **but he a little cocky, like, a little bit.**
24 Q Okay. Is he white? Black? Hispanic?

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1 **A I want to say he white.**
2 Q Okay. And you don't know his name?
3 **A No.**
4 Q Color of hair?
5 **A No.**
6 Q Okay. And you said that that officer
7 tried to sell you a gun?
8 **A No.**
9 Q Tried to give you a gun?
10 **A No.**
11 Q Okay. Explain what happened.
12 **A He tried to get me to get him a gun.**
13 Q Oh, okay. All right. Explain how
14 that worked.
15 **A So one day we was all outside; and he**
16 **end up finding some weed; and he told me give**
17 **him -- get him a gun. I told him no.**
18 Q Okay. So when did this happen, this
19 incident?
20 **A I don't remember exactly.**
21 Q Was it the same year? Was it in 2017?
22 Was it the year before?
23 **A I can't even remember. Probably like**
24 **a year before or some months, closer to a year**

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1 **before.**
2 Q Okay. And where did this happen when
3 you had this interaction with this other
4 officer?
5 **A 120th Place.**
6 Q So the same location?
7 **A Yes.**
8 Q Okay. In front of your grandma's
9 house?
10 **A Yes.**
11 Q Okay. And you said that he found some
12 weed?
13 **A Yes.**
14 Q Okay. Where did he find --
15 **A At least that's what he said.**
16 Q Okay.
17 **A He pulled some weed out of his little**
18 **pocket. He had, like, some pants like I got on,**
19 **pulled some weed out of his pocket, like put it**
20 **on -- he never showed none of the other**
21 **officers. He was like, "man, you owe me a favor**
22 **for this."**
23 **So the next -- like the couple of**
24 **days after that, he was like, "man, you gotta**

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<p style="text-align: right;">62</p> <p>1 get me a gun." I said, "I'm not getting you no 2 gun." He turned red, got to talking stuff, 3 searched around where I was, pulled off like, I 4 got you. 5 Q Okay. So who else was there when this 6 happened? 7 A When the incident happened? 8 Q No, no, the -- what you just described 9 with the weed and the gun, who else was there? 10 A So I was the only one on the car. So 11 everybody else was, like, sitting on the 12 porches. 13 Q Okay. You were in a car? 14 A No. I was on the officer's car. 15 Q Oh, on the officer's car? 16 A Yes. 17 Q What do you mean, you were on the 18 officer's car? 19 A You know when they make you walk to 20 they car, put your hands on the car and -- 21 Q Oh, okay. 22 A -- either they handcuff you or they 23 let you be there, search you, stuff like that. 24 Q Got you. And so this officer pulled</p>	<p style="text-align: right;">64</p> <p>1 Q Okay. How old is she? 2 A 80-something. 3 Q Okay. Do you have her phone number? 4 A No, not at this point. No. 5 Q But you have that -- 6 You do talk to her on the phone, 7 right? 8 A No. I go see her. 9 Q Okay. But -- 10 A My grandma don't really mess with 11 phones. She, you know -- 12 Q Right, but you said earlier that she 13 called you on the date of the incident, right? 14 A Yes. Then, yes, she had a house phone 15 then. 16 Q Okay. Does she still have a house 17 phone? 18 A That I don't know because she moved 19 from down there and I ain't been -- like, you 20 know, I have been doing my little outreach work, 21 so -- 22 Q Okay. So she doesn't live at that 23 location anymore? 24 A No.</p>
<p style="text-align: right;">63</p> <p>1 up in front of your grandma's house; is that 2 right? 3 A Not exactly in front of my grandmama's 4 house. 5 Q Okay. But in that -- in the area? 6 A Yes. 7 Q Okay. And you were outside by your 8 grandmother's house at that time? 9 A Yes. 10 Q Okay. And there was other people that 11 were around? 12 A Yes. 13 Q Okay. What -- who were those people? 14 A So my grandmama, couple of -- one of 15 my family members, the people stay next door. 16 The lady that stayed down there, she said they 17 got to talking, but she couldn't understand what 18 they was saying though. 19 Q What is your grandmother's name? 20 A Louise Price. 21 Q How do you spell that? 22 A I don't know. L-o-u-i-s-e. 23 Q Okay. Is she still alive? 24 A Yes.</p>	<p style="text-align: right;">65</p> <p>1 Q Okay. And she doesn't have a cell 2 phone? 3 A No, she don't have a cell phone. It 4 was a house phone she was using then. 5 Q Okay. Did you have that number for 6 the house phone? 7 A Yes. 8 Q Okay. What is that number? 9 A It was 468-5970. 10 Q Sorry, 468 -- 11 A 773 -- 12 Q 773. 13 A 468-5970. 14 Q Okay. And that was the house number 15 for your grandmother at the time, right? 16 A Yes. 17 Q Okay. I want to go back to the 18 incident with the weed. You said your grandma 19 was there. Who else was there? 20 A People that was on they porches, like 21 the neighbors and all that. 22 Q Okay. Can you recall any of their 23 names? 24 A Dang, what is her name? Nakia, Nakia,</p>

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<p style="text-align: right;">66</p> <p>1 N-a-k-i-a. I don't know her last name.</p> <p>2 Q Okay. And is she someone that lives</p> <p>3 in the neighborhood?</p> <p>4 A She did. She moved.</p> <p>5 Q Okay. And so you and this group of</p> <p>6 people were outside your grandmother's house at</p> <p>7 that -- when the officers showed up?</p> <p>8 A Yes.</p> <p>9 Q Okay. And he told you to come over to</p> <p>10 his car?</p> <p>11 A Yes.</p> <p>12 Q Okay. And what happened next?</p> <p>13 A He -- once he told me about the gun,</p> <p>14 he let me go, and just told me he'd catch me</p> <p>15 later.</p> <p>16 Q Okay. So had you met that officer</p> <p>17 before?</p> <p>18 A Probably seen him a couple of times in</p> <p>19 the neighborhood.</p> <p>20 Q Okay. Just, like, on patrol?</p> <p>21 A Yes.</p> <p>22 Q But had you talked to him before?</p> <p>23 A Probably -- probably not actually</p> <p>24 talked to him but, like, we'd -- like, in a</p>	<p style="text-align: right;">68</p> <p>1 And you took that to mean that you</p> <p>2 wanted -- he wanted you to give the name or a</p> <p>3 location of a weapon so he could recover it?</p> <p>4 A Yeah, that's how I took it. Yes.</p> <p>5 Q Okay. And you refused to do that?</p> <p>6 A Yes.</p> <p>7 Q Okay. And was he -- was he offering</p> <p>8 you the weed in exchange for information about a</p> <p>9 gun?</p> <p>10 A No.</p> <p>11 Q Okay. He was saying that he found</p> <p>12 this, and he was going to charge you with the</p> <p>13 weed, possession of the weed?</p> <p>14 A He never said he was going to charge</p> <p>15 me. He just said he not going to charge me. I</p> <p>16 owed him a favor.</p> <p>17 Q Okay. And that --</p> <p>18 And what did you take that to mean;</p> <p>19 that you owed him a favor?</p> <p>20 A Meaning he was going to try to use</p> <p>21 whatever he had to make me try to tell on</p> <p>22 somebody or something like that.</p> <p>23 Q Right. So that is what I'm getting</p> <p>24 at. He was using the weed as leverage; is that</p>
<p style="text-align: right;">67</p> <p>1 group they always come mess with us, have us on</p> <p>2 the car, but not just really have a conversation</p> <p>3 with him.</p> <p>4 Q Right, but you had seen him before</p> <p>5 that incident?</p> <p>6 A Yes.</p> <p>7 Q Okay. And he told you to come over by</p> <p>8 his car?</p> <p>9 A Yes.</p> <p>10 Q Okay. And what happened after that?</p> <p>11 A Like I just said, he showed me the</p> <p>12 weed, and told me I owed him a favor, and let me</p> <p>13 go.</p> <p>14 Q Okay. And so where did he produce the</p> <p>15 weed from?</p> <p>16 A Out of his little pocket.</p> <p>17 Q Okay. He pulled it out of his pants</p> <p>18 pocket?</p> <p>19 A Yeah, out of his pants pocket.</p> <p>20 Q And he said he found it where?</p> <p>21 A He never really said where he found it</p> <p>22 at. He just said, "this what I got, you owe me</p> <p>23 a favor."</p> <p>24 Q Okay. And he was --</p>	<p style="text-align: right;">69</p> <p>1 fair?</p> <p>2 A Yes.</p> <p>3 Q Okay. And you refused to let him know</p> <p>4 about the location of a gun at that time?</p> <p>5 A Yes.</p> <p>6 Q Okay. That officer is one separate</p> <p>7 than Officer Carreno, correct?</p> <p>8 A Yes.</p> <p>9 Q But that other officer is one that was</p> <p>10 there on the date of your arrest on November 6th</p> <p>11 of 2017?</p> <p>12 A Yes.</p> <p>13 Q Okay.</p> <p>14 A Well, all three of them was there.</p> <p>15 You asked me did I know any other officers.</p> <p>16 Q Right, yeah, that's -- yeah. They</p> <p>17 were there?</p> <p>18 A Yes.</p> <p>19 Q Okay. Any other officers that you</p> <p>20 recognize from that date that you had seen</p> <p>21 prior?</p> <p>22 A Not that I know of, no.</p> <p>23 Q Okay. So we're going to circle back</p> <p>24 to the date of the incident. So I think we are</p>

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<p style="text-align: right;">70</p> <p>1 at the point where there's officers at the 2 scene, right, you and Mr. McIntyre are 3 handcuffed? 4 A Yes. 5 Q Okay. And you mentioned you had a 6 conversation with the police at that time, 7 right? 8 A Yes. 9 Q Okay. And what did you say? 10 A I asked him was this -- was this them 11 and they said -- I said, "is this y'all..." 12 He said -- 13 "...I told y'all I was sorry." He 14 said, "don't worry about it, I'm just trying to 15 see if I'm fixing to impound this truck." 16 Q Okay. And so what do you mean by "is 17 this y'all?" 18 A So, like I said before, I got in an 19 argument with the guy. 20 Q Yes, right. 21 A So when they -- so as they had me and 22 James handcuffed and the cars pulled up, them 23 two officers walked from the back. They wasn't 24 in them cars.</p>	<p style="text-align: right;">72</p> <p>1 Mr. McIntyre's car was at your 2 grandmother's place, correct? 3 A What do you mean, at my grandmother's 4 place? 5 Q Mr. McIntyre's Grand Am was parked 6 nearby; is that right? 7 A Nearby? 8 Q Yes. 9 A Yes. 10 Q Okay. Where was it parked? 11 A In the back. 12 Q The back of what? 13 A In the back of the next house. 14 Q Okay. So not your grandmother's 15 house? 16 A No. 17 Q Okay. Was it in a parking garage -- 18 like a garage? Was it in on the -- on the 19 alley? Where was it? 20 A It was, like, in the yard basically 21 because there is no garage there. 22 Q Okay. And so it was open? 23 A Yes. 24 Q Okay. Did you know the neighbor or</p>
<p style="text-align: right;">71</p> <p>1 Q Okay. So -- but I want to go back. 2 You said that you asked the officers, you know, 3 "is this y'all?" By that you meant, like, was 4 this related to the night before? 5 A Yes. 6 Q Okay. That, you know, you felt that 7 he was angry or upset at you, and that is why 8 you were being targeted? 9 A Yes. 10 Q Okay. You said the two officers came 11 from -- not from the squad cars? 12 A No. 13 Q Okay. And where did they come from? 14 A They came, it's like a little field. 15 So it's like my grandma house, a building; then 16 it's a field where houses been tore down. 17 Q Okay. 18 A They came from that way. 19 Q What direction is that? 20 A So it's like they was walking from 21 west and came through the field to come towards 22 us. 23 Q Okay. There was another -- strike 24 that.</p>	<p style="text-align: right;">73</p> <p>1 did you have permission to -- did he have 2 permission to park over there? 3 A That I don't know, but we know the 4 neighbors though. 5 Q Okay. So his car was getting worked 6 on at that time, right? 7 A I think so. Something was wrong with 8 it. 9 Q Okay. Had you seen the car there 10 before that day? 11 A Before that day? 12 Q Yes. 13 A A couple of times, yes. 14 Q Okay. How long was the car -- had 15 been sitting there? 16 A That I couldn't tell you. 17 Q Okay. 18 A You would have to ask him that. 19 Q You knew that was his car, right, the 20 Grand Am? 21 A Yes. 22 Q Okay. You had rode in that car with 23 him before? 24 A Probably. I don't know.</p>

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<p style="text-align: right;">74</p> <p>1 Q Okay.</p> <p>2 A I like to stay in my own car.</p> <p>3 Q Got you. But you knew that he drove</p> <p>4 that Pontiac Grand Am?</p> <p>5 A Yes.</p> <p>6 Q Okay. Did the officers that you were</p> <p>7 just mentioning just now come from the area of</p> <p>8 that car?</p> <p>9 A No, they came from the other side of</p> <p>10 the -- so, like, my grandma house here. This is</p> <p>11 the house where his car was parked at.</p> <p>12 Q Yes.</p> <p>13 A Then there's another building, then</p> <p>14 there's an open field.</p> <p>15 Q Okay. So it was the opposite</p> <p>16 direction of the car?</p> <p>17 A Yes.</p> <p>18 Q Okay. You said the officers came from</p> <p>19 the open field. Is that towards the train</p> <p>20 tracks?</p> <p>21 A Yes, it's train tracks back there.</p> <p>22 Q Okay. And there is -- the open field</p> <p>23 is between the train tracks and the buildings,</p> <p>24 right?</p>	<p style="text-align: right;">76</p> <p>1 because before I let the officer walk away,</p> <p>2 right, I told him, I'm like, "I'm having a bad</p> <p>3 day, like, never mind me."</p> <p>4 So that's why he was like, "no, I'm</p> <p>5 just trying to figure out if I'm fixing to tow</p> <p>6 this car." That's why he said that.</p> <p>7 Q Got you. And when he was asking about</p> <p>8 towing a car, he was referring to your vehicle?</p> <p>9 A My girl's vehicle.</p> <p>10 Q I'm sorry. Your girl's -- the vehicle</p> <p>11 that you were seated in, right?</p> <p>12 A Yes, yes.</p> <p>13 Q And why did you think he was going to</p> <p>14 tow the car?</p> <p>15 A He said it.</p> <p>16 Q Okay. Yeah, but why do you think he</p> <p>17 was going to tow the car?</p> <p>18 MR. FLAXMAN: Objection; foundation.</p> <p>19 BY MR. MICHELINI:</p> <p>20 Q If you know.</p> <p>21 A I don't know.</p> <p>22 Q Okay. But he told you that he was --</p> <p>23 He told you not to worry about --</p> <p>24 A The incident.</p>
<p style="text-align: right;">75</p> <p>1 A No. The open field is in between this</p> <p>2 building and the next building that's --</p> <p>3 Q Okay. It's a vacant lot. Is that</p> <p>4 what you're saying?</p> <p>5 A Yes.</p> <p>6 Q Okay. Got you. That's separate from</p> <p>7 the open area between the street and the train</p> <p>8 tracks?</p> <p>9 A Yes.</p> <p>10 Q Okay. You said these other -- strike</p> <p>11 that.</p> <p>12 You said you saw two other officers</p> <p>13 come from a different direction that didn't get</p> <p>14 out of cars, right?</p> <p>15 A Yes.</p> <p>16 Q Okay. What happened after that?</p> <p>17 A Like I said, they made us get out the</p> <p>18 --</p> <p>19 After we seen the officers?</p> <p>20 Q Yes.</p> <p>21 A So we was on the car; and then, like I</p> <p>22 said, I asked him was that them, why they</p> <p>23 messing with us? And he was like -- I was like,</p> <p>24 "I'm sorry. I told you I was sorry yesterday,"</p>	<p style="text-align: right;">77</p> <p>1 Q The incident that happened prior?</p> <p>2 A Yes.</p> <p>3 Q Okay. And that he was trying to</p> <p>4 figure out if he was going to tow the car that</p> <p>5 you were seated in?</p> <p>6 A Yes.</p> <p>7 Q Got you. Okay. What happened after</p> <p>8 that?</p> <p>9 A They took us to jail.</p> <p>10 Q Okay. They took you and Mr. McIntyre?</p> <p>11 A Yes.</p> <p>12 Q Okay. Did you guys ride in separate</p> <p>13 squad cars?</p> <p>14 A I can't even remember.</p> <p>15 Q Okay. What happened when you --</p> <p>16 A I think so.</p> <p>17 Q What happened when you got to the</p> <p>18 police station?</p> <p>19 A I was asking him, "what we going to</p> <p>20 jail for? Why you tow my car." And they</p> <p>21 wouldn't tell me.</p> <p>22 Q They didn't tell you anything?</p> <p>23 A Nope.</p> <p>24 Q So when did you first learn that you</p>

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<p style="text-align: right;">78</p> <p>1 were being charged with manufacturing, delivery 2 or possession with intent of narcotics? 3 A When I got to the County jail. 4 Q Okay. So it wasn't at the station? 5 A Nope. 6 Q Okay. It wasn't at the scene either? 7 A Nope. 8 Q Okay. And you went to -- you went 9 before a judge after you were -- 10 From the jail you went to Cook 11 County, right? 12 A Yes. 13 Q Did that happen that night? 14 A The next morning. 15 Q Okay. And you were before a judge 16 then? 17 A Yes. 18 Q Okay. And that is when you first 19 learned of the charges? 20 A Yes. 21 Q Okay. After you were charged -- 22 And you were charged with a Class 1 23 felony; is that correct? 24 A I don't know the class, but --</p>	<p style="text-align: right;">80</p> <p>1 friend of the family too. 2 Q Okay. Is he a friend of yours? 3 A Not -- we didn't hang together. I 4 wouldn't just say he like a friend that I hang 5 with, but he like family, like it's -- I know 6 him. 7 Q Okay. How often do you see Nate 8 Johnson? 9 A I don't really see Nate. 10 Q Okay. When was the last time you saw 11 Nate? 12 A Last time I seen Nate probably was 13 when we was in the bullpen together. 14 Q At Cook County -- at the jail? 15 A Yes. 16 Q Okay. And that was for this case? 17 A Yes. 18 Q Okay. And so you and Nate were in the 19 bullpen. That is the holding area for Cook 20 County, correct? 21 A Yes. 22 Q That is a term for it? 23 A Yes. 24 Q Okay. And that was when you were</p>
<p style="text-align: right;">79</p> <p>1 Q It was for manufacturing or delivering 2 of crack cocaine; is that correct? 3 A Yes. 4 Q Okay. Did you -- strike that. 5 So you are charged -- you were 6 there for the preliminary hearing; is that 7 right? 8 A Yes. 9 Q Okay. You and Mr. McIntyre were 10 codefendants in that case; is that right? 11 A Yes. 12 Q Okay. And so you guys were both 13 present at the preliminary hearing? 14 A Yes. 15 Q Okay. Do you know a person by the 16 name of Nate Johnson? 17 A Yes. 18 Q Okay. How do you know Nate Johnson? 19 A He been around for years too. 20 Q What do you mean, he has been around? 21 A So like I said, I know James for all 22 these years. 23 Q Okay. 24 A Nate been around for years too. He a</p>	<p style="text-align: right;">81</p> <p>1 awaiting your initial court appearance? 2 A We already went to court. 3 Q Okay. So when was this when you last 4 saw Nate? 5 A The next day after whatever date you 6 have that we was arrested. 7 Q Right. So that's what I'm saying. 8 Yeah, that was, like, when you were first going 9 to court is when you last saw Nate? 10 A So when we was going to bond court -- 11 Q Right. 12 A -- I got a I-bond. I guess he got a 13 I-bond too. He was in the bullpen with me. 14 Q Okay. And that was the last time you 15 saw him? 16 A Yes. 17 Q Okay. Did you talk to him then? 18 A In the bullpen? 19 Q Yes. 20 A Yes. 21 Q Okay. What did you guys talk about? 22 A He was just asking me how -- what I do 23 to get in here. I asked him the same thing. 24 Q And what did he tell you?</p>

21 (Pages 78 to 81)

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<p style="text-align: right;">82</p> <p>1 A He said they caught him with some 2 heroin. 3 Q Okay. And did you tell him why you 4 were arrested? 5 A Yeah, I told him they put cocaine on 6 us. 7 Q Okay. And by "put cocaine on us" you 8 mean that officers planted cocaine? 9 A Yes, because I didn't have no cocaine. 10 Q Right. And so were you suspicious of 11 Nate and him being arrested around the same time 12 you were? 13 A No, not at the time. No. 14 Q Okay. But later were you suspicious 15 of him? 16 A No, not really. I mean, you know how 17 the streets talk and make it seem like one thing 18 got something to do with another; but, I mean, I 19 don't have no black and white to prove it. So 20 some things I don't say out my mouth. 21 Q Okay. So what do you mean about you 22 don't have any black and white to prove it? Are 23 talking about paperwork or something like that? 24 A Yes.</p>	<p style="text-align: right;">84</p> <p>1 -- 2 A Yes. 3 Q -- from Cook County? 4 A Yes. 5 Q Okay. And you guys both received an 6 I-bond that day? 7 A I did. I don't know what -- 8 I don't know if he paid or what he 9 did. I can't remember. 10 Q Right. But he was released also that 11 day? 12 A Yeah, he was released with me. Yeah. 13 Q Got you. Got you. Do you know Nate 14 to be a drug user? 15 A Kind of, yes. 16 Q What do you mean by that? 17 A I mean, I have seen him with heroin 18 before. That's his preference of drugs. 19 Q Okay. And so you have seen him do 20 heroin? 21 A No, I ain't never seen him do heroin. 22 Q Okay. Have you seen him under the 23 influence of heroin? 24 A It's hard to say.</p>
<p style="text-align: right;">83</p> <p>1 Q Okay. And you said something about 2 the streets are talking or something like that. 3 What do you mean by that? 4 A Because they said he -- that he had -- 5 was trying to be forced to try to tell on us or 6 something, something like that. 7 Q Okay. And why do you think that? 8 A I don't know. That is just how the 9 streets is. Anybody go to jail, they try to act 10 like you a snitch. 11 Q Okay. And so do you think Nate 12 Johnson was a snitch? 13 A No, because he rode home with me. 14 Q He rode home that day from Cook County 15 Jail? 16 A Yes. 17 Q And so, again, you have a good 18 relationship with Nate Johnson? 19 A Yeah, we got a fair relationship. I 20 don't hang with him, you know, because he a 21 little older than me, but I know him from being 22 around family members like -- 23 Q Got you. And that was the last time 24 you saw him was back in 2017 after you rode home</p>	<p style="text-align: right;">85</p> <p>1 Q Okay. How do you know him to -- 2 You said the heroin is his 3 preference of drugs. How do you know that? 4 A Because the people that, like I said, 5 that's close to family with me, that is what 6 they do. 7 Q What do you mean by that? 8 A They do heroin. 9 Q Oh, okay. You said -- so you know 10 people -- 11 You're saying that because he's a 12 close family friend, that you know that family 13 or him particularly does heroin? 14 A All of -- all the ones that hang with 15 him, that's what they preference of drugs is. 16 Q Okay. And so is it like he's known in 17 the neighborhood as someone that does heroin? 18 A I ain't going to say the whole 19 neighborhood, but, like, people that I'm close 20 to, yes. 21 Q Right. People that are in your 22 circle, so to speak? 23 A Yes. 24 Q Okay. And he's known to be a heroin</p>

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<p style="text-align: right;">86</p> <p>1 user?</p> <p>2 A Yes.</p> <p>3 Q Okay. Is he known to do any other</p> <p>4 drugs?</p> <p>5 A No.</p> <p>6 Q He just does heroin?</p> <p>7 A Yes.</p> <p>8 Q Okay. He doesn't drink?</p> <p>9 A That I don't know.</p> <p>10 Q Okay. What about marijuana?</p> <p>11 A That I don't know.</p> <p>12 Q What about cocaine?</p> <p>13 A No. Heroin.</p> <p>14 Q You know for sure he doesn't do</p> <p>15 cocaine?</p> <p>16 A Yes.</p> <p>17 Q Okay. How do you know that?</p> <p>18 A Because, like I said, everybody that</p> <p>19 they hang with only do heroin. They don't do --</p> <p>20 they don't do cocaine. They don't mess with</p> <p>21 cocaine.</p> <p>22 Q So the people that he associates with</p> <p>23 are heroin users?</p> <p>24 A Yes, that's they preference, heroin.</p>	<p style="text-align: right;">88</p> <p>1 A Yes.</p> <p>2 Q Okay. When did that happen?</p> <p>3 A Two months -- probably two, three</p> <p>4 months after I caught the case with James.</p> <p>5 Q Okay. And was that the same car that</p> <p>6 you were in or a different car?</p> <p>7 A Yes, same car.</p> <p>8 Q So that was your girlfriend's car,</p> <p>9 the --</p> <p>10 A Yes.</p> <p>11 Q I'm sorry. Was it a Tahoe?</p> <p>12 A Yes.</p> <p>13 Q Okay. Why was it reported stolen if</p> <p>14 it was your girlfriend's car?</p> <p>15 A Because somebody took it from the</p> <p>16 police station.</p> <p>17 Q Okay. So explain that.</p> <p>18 A I guess somebody took it from the</p> <p>19 police station.</p> <p>20 Q Right. Because it was towed on</p> <p>21 November 6th, right, when you were arrested?</p> <p>22 A This a different time. You asked me</p> <p>23 about did I spend any time in the County jail</p> <p>24 after that incident.</p>
<p style="text-align: right;">87</p> <p>1 Q Got you. Okay. And that is just</p> <p>2 known on the street; that is just kind of a --</p> <p>3 he is known to be a heroin user, correct?</p> <p>4 A Yes.</p> <p>5 Q Okay. So after you were I-bonded out,</p> <p>6 you had the criminal case pending against you,</p> <p>7 correct?</p> <p>8 A Yes.</p> <p>9 Q Okay. At any point, did you spend</p> <p>10 time in Cook County custody after you were</p> <p>11 I-bonded out?</p> <p>12 A Yes.</p> <p>13 Q Okay. When?</p> <p>14 A Probably some months later.</p> <p>15 Q Okay. Why was that?</p> <p>16 A Because I was riding in my girl's car,</p> <p>17 and the police pulled it over and said it was</p> <p>18 stolen.</p> <p>19 Q Okay. So you were in a vehicle that</p> <p>20 was reported stolen?</p> <p>21 A Yes.</p> <p>22 Q Okay. And you were arrested for that?</p> <p>23 A Yes.</p> <p>24 Q Okay. Were you driving the vehicle?</p>	<p style="text-align: right;">89</p> <p>1 Q Right. And you said that it was</p> <p>2 because you were in the same vehicle from the</p> <p>3 date of the incident that we have been talking</p> <p>4 about?</p> <p>5 A Yes.</p> <p>6 Q And that was your girlfriend's car?</p> <p>7 A We got the car out on my incident.</p> <p>8 Q Okay. Got you. Okay.</p> <p>9 A So another incident, it was somebody</p> <p>10 took the car out the pound. I was driving it at</p> <p>11 the time and they charged me with the car.</p> <p>12 Q Got you. So I want to -- I just want</p> <p>13 to go back. So to be clear, the car was</p> <p>14 impounded as a result of you being arrested with</p> <p>15 James McIntyre, right?</p> <p>16 A Yes.</p> <p>17 Q After that, you got the car out from</p> <p>18 the impound, or you paid to get it out?</p> <p>19 A Yes.</p> <p>20 Q Okay. After that, that car was then</p> <p>21 again impounded again?</p> <p>22 A Yes.</p> <p>23 Q Okay. And that was why?</p> <p>24 A Because -- I don't even remember why.</p>

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<p style="text-align: right;">90</p> <p>1 But it did get impounded though.</p> <p>2 Q Okay. And then you are saying that</p> <p>3 someone, after it was impound the second time,</p> <p>4 stole it from the impound lot?</p> <p>5 A From the police station.</p> <p>6 Q From the police station. Someone took</p> <p>7 it from the police station while it was still</p> <p>8 impounded?</p> <p>9 A Yes.</p> <p>10 Q Okay. And so it was reported stolen?</p> <p>11 A Yes.</p> <p>12 Q Okay. And did you know that it had</p> <p>13 been reported stolen?</p> <p>14 A No.</p> <p>15 Q Okay. Did your girlfriend know it had</p> <p>16 been reported stolen?</p> <p>17 A No.</p> <p>18 Q Okay. What was the reason it was</p> <p>19 originally -- it was impounded the second time?</p> <p>20 A I can't remember.</p> <p>21 Q Okay. And then you were found to be</p> <p>22 driving this vehicle while it was reported</p> <p>23 stolen; is that right?</p> <p>24 A Yes.</p>	<p style="text-align: right;">92</p> <p>1 County custody during the pendency of this</p> <p>2 criminal case?</p> <p>3 A No.</p> <p>4 Q Okay. How long did the case last?</p> <p>5 A Three years, ten months.</p> <p>6 Q Okay. So the case went to trial in</p> <p>7 September of 2021, right?</p> <p>8 A Was it '21? Yes, I think. I don't</p> <p>9 know exactly what year.</p> <p>10 Q Okay.</p> <p>11 A I thought it was '22, but I could be</p> <p>12 wrong.</p> <p>13 Q I might be wrong on that. Hold on one</p> <p>14 second. I can pull it up. We can come back to</p> <p>15 that.</p> <p>16 But eventually the case went to</p> <p>17 trial, correct?</p> <p>18 A Yes.</p> <p>19 Q Okay. And you said that you</p> <p>20 recognized several officers from the trial that</p> <p>21 were there on the scene; is that right?</p> <p>22 A Yes.</p> <p>23 Q Okay. That Officer Carreno, did he</p> <p>24 testify?</p>
<p style="text-align: right;">91</p> <p>1 Q Okay. And so you were arrested for</p> <p>2 that?</p> <p>3 A Yes.</p> <p>4 Q Okay. Who else was there during that</p> <p>5 arrest?</p> <p>6 A I think I was by myself.</p> <p>7 Q Okay. Because you were arrested and</p> <p>8 you were on bond for this case, you were taken</p> <p>9 into Cook County custody?</p> <p>10 A Yes.</p> <p>11 Q Okay. As a violation of your bond?</p> <p>12 A Yes.</p> <p>13 Q Okay. And how long did you spend in</p> <p>14 Cook County custody?</p> <p>15 A 30 days.</p> <p>16 Q Okay. And eventually you were</p> <p>17 released from Cook County custody?</p> <p>18 A Yes.</p> <p>19 Q Okay. Did the Judge modify your bond</p> <p>20 or how did that work?</p> <p>21 A Yes, she reinstated it.</p> <p>22 Q Got you. After that 30-day period of</p> <p>23 you going into Cook County for the violation of</p> <p>24 the bond, did you spend any other time in Cook</p>	<p style="text-align: right;">93</p> <p>1 A Yes.</p> <p>2 Q Okay. And the other officer, the one</p> <p>3 that you didn't remember the name, but had the</p> <p>4 incident with the weed, did he testify at trial?</p> <p>5 A Yes.</p> <p>6 Q Okay. That was the stocky white guy?</p> <p>7 A Yes.</p> <p>8 Q Okay.</p> <p>9 A He the one that testified in the</p> <p>10 trial.</p> <p>11 Q Okay. He testified at the trial?</p> <p>12 A Yes.</p> <p>13 Q Okay. How many other officers</p> <p>14 testified at the trial?</p> <p>15 A Just them two.</p> <p>16 Q Just two officers?</p> <p>17 A Yes.</p> <p>18 Q Okay. Did you testify at the trial?</p> <p>19 A I can't remember. I don't think so.</p> <p>20 I don't remember, though.</p> <p>21 Q Okay. But for the State, it was just</p> <p>22 those two witnesses, the two officers that you</p> <p>23 mentioned?</p> <p>24 A Yes.</p>

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<p style="text-align: right;">94</p> <p>1 Q Okay. And you were found not guilty</p> <p>2 by the judge, right?</p> <p>3 A Yes.</p> <p>4 Q Okay. Subsequently you filed this</p> <p>5 lawsuit; is that right?</p> <p>6 A Yes.</p> <p>7 Q Okay. During the time -- during the</p> <p>8 pendency of the criminal case, what were you</p> <p>9 doing for work?</p> <p>10 A Say that -- could you repeat that?</p> <p>11 Q We talked about your occupations</p> <p>12 earlier. So this would have been 2017 to</p> <p>13 approximately 2021 during the pendency of the</p> <p>14 case.</p> <p>15 A I think I was hauling RVs at the time</p> <p>16 or something; something with my CDLs.</p> <p>17 Q Right. Again, so you had your CDL --</p> <p>18 you had your CDL at this time in 2017 when you</p> <p>19 got arrested; is that correct?</p> <p>20 A Yes. Whatever it was, it was</p> <p>21 something with my CDL. I don't know exactly</p> <p>22 what job description it was then, but it was</p> <p>23 with my CDL.</p> <p>24 Q Got you. So it's fair to say that</p>	<p style="text-align: right;">96</p> <p>1 A So you just take the test and get the</p> <p>2 endorsements. They fingerprint you and if</p> <p>3 everything cool, you get the endorsement.</p> <p>4 Q Okay. And so you said that you lost</p> <p>5 that -- you had the endorsement at the time</p> <p>6 already?</p> <p>7 A Yes.</p> <p>8 Q When did you get the endorsement</p> <p>9 first?</p> <p>10 A When I first had my CDL. I got all my</p> <p>11 endorsements.</p> <p>12 Q Okay. What other endorsements did you</p> <p>13 hold?</p> <p>14 A All of them except for the passenger.</p> <p>15 Q Okay. How many endorsements are</p> <p>16 there?</p> <p>17 A I don't know exactly. Probably like</p> <p>18 -- you got tankers, I don't know exactly; about</p> <p>19 four or five, something like that.</p> <p>20 Q So correct me if I'm wrong, but a CDL</p> <p>21 allows you to drive a truck, right?</p> <p>22 A Yes.</p> <p>23 Q A class of license, correct?</p> <p>24 A Yes, Class A, yes.</p>
<p style="text-align: right;">95</p> <p>1 this -- the arrest -- the criminal case pending</p> <p>2 didn't affect your ability to drive on the CDL;</p> <p>3 is that right?</p> <p>4 A Kind of, yes.</p> <p>5 Q What do you mean by that?</p> <p>6 A It made me lose an endorsement because</p> <p>7 I couldn't mess with the HAZMAT so they made me</p> <p>8 take it off my license.</p> <p>9 Q So explain what that is. I don't --</p> <p>10 A The HAZMAT?</p> <p>11 Q Yes.</p> <p>12 A So it's a HAZMAT endorsement where you</p> <p>13 can mess with hazardous materials.</p> <p>14 Q So you can transport hazardous</p> <p>15 materials on your CDL?</p> <p>16 A Yes.</p> <p>17 Q Okay. And that's in addition to just</p> <p>18 having a regular CDL?</p> <p>19 A Yes.</p> <p>20 Q That's, like, an additional</p> <p>21 certification?</p> <p>22 A Yes.</p> <p>23 Q Okay. How do you get that</p> <p>24 certification?</p>	<p style="text-align: right;">97</p> <p>1 Q All right. And then the</p> <p>2 certifications or the -- I'm sorry, what was the</p> <p>3 name?</p> <p>4 A Endorsements.</p> <p>5 Q The endorsements, they can determine</p> <p>6 what type of things you can haul; is that right?</p> <p>7 A Yes.</p> <p>8 Q Okay. And so you said you got all of</p> <p>9 them except for a passenger one?</p> <p>10 A Yes.</p> <p>11 Q Okay. And one of those was your</p> <p>12 hazardous materials endorsements?</p> <p>13 A Yes.</p> <p>14 Q Okay. And you got that all when you</p> <p>15 first got your CDL?</p> <p>16 A Yes.</p> <p>17 Q Okay. And because of this arrest you</p> <p>18 lost your hazardous material endorsement?</p> <p>19 A Yes.</p> <p>20 Q Okay. But you didn't lose any of the</p> <p>21 other endorsements you had?</p> <p>22 A No.</p> <p>23 Q Okay. Why is that?</p> <p>24 A Because the HAZMAT, you have to be</p>

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<p style="text-align: right;">98</p> <p>1 fingerprinted for. It's got to go to the 2 Federal thing and by me catching that case, they 3 made me drop it off my license. 4 Q Got you. Okay. And none of the other 5 endorsements require -- have that same 6 requirement where you have to be fingerprinted? 7 A No. 8 Q Okay. So did you -- 9 Are you testifying that you lost 10 out on business because of losing that hazardous 11 material endorsement? 12 A Yes. 13 Q Okay. How much money do you think you 14 lost out on? 15 A I can't even really tell. I have to 16 add it up. 17 Q Okay. 18 A All the time -- you mean from the time 19 that I caught this case until it was over? 20 Q Right. 21 A That's three years. HAZMAT, probably 22 get you about \$2,000 a week. 23 Q Okay. You were still able to drive 24 and haul other materials; is that right?</p>	<p style="text-align: right;">100</p> <p>1 company or is it for a specific job? 2 A Trucking companies. 3 Q Okay. And so were you already 4 employed by a trucking company at the time 5 before you got arrested? 6 A Yes, I was hauling -- 7 I was working for Starfleet -- 8 Q Okay. 9 A -- hauling RVs. 10 Q And were you still able to do that 11 after the arrest? 12 A No. 13 Q Okay. Why is that? 14 A Because somebody told them I had a 15 case and they just parted ways with me. 16 Q Okay. And how do you know that 17 someone told Starfleet that you had a case? 18 A Just other employees. 19 Q Okay. But did Star -- did anyone -- 20 Did any employee of Starfleet ever 21 confront you with that? 22 A They asked about it but, you know, 23 they didn't let me know that was the reason they 24 was terminating me, though, but.</p>
<p style="text-align: right;">99</p> <p>1 A If you can find somebody that will 2 hire you. 3 Q Okay. 4 A So when you fighting a case with the 5 CDL, they don't be -- they be tripping. They 6 don't be wanting to hire you. 7 Q Okay. But you didn't lose your CDL; 8 is that correct? 9 A No. 10 Q Okay. So you were still able to 11 drive? 12 A Yes. 13 Q Okay. But you said you had difficulty 14 finding -- 15 A Jobs. 16 Q -- jobs. And why is that? 17 A Because I didn't want to lie on the 18 application. 19 Q And so what do you mean by the 20 application? 21 A So when I fill out the application, if 22 you lie and they find out, they are going to 23 terminate you. 24 Q Is that an application for a trucking</p>	<p style="text-align: right;">101</p> <p>1 Q Okay. So they never formally informed 2 you that that was the reason? 3 A No. 4 Q Okay. But you suspect that that is 5 what it was? 6 A Yes. 7 Q Okay. Did you find any other jobs 8 during the pendency of this case? Were you able 9 to work? 10 A For Chicago -- CRED gave me an 11 opportunity to get some work. 12 Q Okay. And that is when you first 13 started working for Chicago CRED was during the 14 pendency of this criminal case? 15 A Yes. 16 Q Okay. How much -- I guess how much 17 were you driving per week prior to this arrest? 18 A Prior to the arrest, probably with 19 Starfleet, probably like three times a week. 20 Q Okay. And you said you were making 21 about \$2,000 a week? 22 A No. I told you I can make \$2,000 a 23 week with the HAZMAT because you asked me. 24 Q Okay, yeah. I was asking on average,</p>

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<p style="text-align: right;">102</p> <p>1 what were you making a week before the arrest?</p> <p>2 A So when I was hauling RVs, probably,</p> <p>3 like, about the same, depend on what state I</p> <p>4 went to.</p> <p>5 Q Okay. And you were still able to haul</p> <p>6 RVs up until when?</p> <p>7 I guess my question is when did</p> <p>8 Starfleet part ways with you?</p> <p>9 A I can't even remember.</p> <p>10 Q It was some time after your arrest</p> <p>11 though?</p> <p>12 A Yes.</p> <p>13 Q Okay. Was it a year after your</p> <p>14 arrest?</p> <p>15 A If not, like ten months.</p> <p>16 Q Okay. So you were still hauling RVs</p> <p>17 for about ten months after the arrest?</p> <p>18 A Yes.</p> <p>19 Q Okay. After Starfleet parted ways</p> <p>20 with you, did you apply for any other trucking</p> <p>21 companies?</p> <p>22 A Yes. I tried the HAZMAT and then -- a</p> <p>23 HAZMAT job, but like two, three days later, I</p> <p>24 had --</p>	<p style="text-align: right;">104</p> <p>1 A And gave me some type of number to</p> <p>2 call on why they surrendered my license. But</p> <p>3 when I called that place they can't tell you.</p> <p>4 They told me they sent that in the mail too, but</p> <p>5 I never got it.</p> <p>6 Q Okay. So to be clear, the only</p> <p>7 endorsement you lost because of this arrest was</p> <p>8 the hazardous materials, the HAZMAT, right?</p> <p>9 A Yes.</p> <p>10 Q And did you apply to other trucking</p> <p>11 companies after you left Starfleet?</p> <p>12 A Yes.</p> <p>13 Q Okay. Where did you apply?</p> <p>14 A I worked -- I actually had worked for</p> <p>15 OTM Trucking.</p> <p>16 Q OTM?</p> <p>17 A Yes.</p> <p>18 Q Okay. And when did you work for them?</p> <p>19 A Twenty -- let me see when I worked for</p> <p>20 them. That was just, like, '21, when I told you</p> <p>21 I was working for Chicago CRED and them.</p> <p>22 Q Okay. So that's more recently in</p> <p>23 2021?</p> <p>24 A Yes.</p>
<p style="text-align: right;">103</p> <p>1 So I had a letter in the mail that</p> <p>2 I didn't know about, was telling me to surrender</p> <p>3 my license. So when they called me back, they</p> <p>4 was like, "you got a letter to..." -- because</p> <p>5 they see all that. They said, "you got a letter</p> <p>6 to surrender your license." And I'm like "why?"</p> <p>7 So when I went to the Secretary of State --</p> <p>8 Q Secretary of State is who issues the</p> <p>9 CDLs, right?</p> <p>10 A Yes.</p> <p>11 Q Okay. And so you got a letter from</p> <p>12 the Secretary of State. Is that what you're</p> <p>13 saying?</p> <p>14 A Yes.</p> <p>15 Q Okay. Sorry, you can continue.</p> <p>16 A So when I took the letter up there,</p> <p>17 they really couldn't tell me nothing. They just</p> <p>18 was saying, "all we know is you got this letter</p> <p>19 to be surrendering your license. Give us your</p> <p>20 license." They made me take another picture,</p> <p>21 took the endorsement off, sent me the little</p> <p>22 paper -- they gave me the little paper license</p> <p>23 and sent my license in the mail.</p> <p>24 Q Okay.</p>	<p style="text-align: right;">105</p> <p>1 Q Okay.</p> <p>2 A Or '22, one of them. Something like</p> <p>3 that.</p> <p>4 Q Okay. And you said that you recently</p> <p>5 haven't been working as a truck driver, correct?</p> <p>6 A Yes.</p> <p>7 Q In the past, like, ten months you</p> <p>8 said?</p> <p>9 A Yes.</p> <p>10 Q Okay. And why is that?</p> <p>11 A Because they have you too upside down.</p> <p>12 The money is not adding up on where they want</p> <p>13 you to drive to.</p> <p>14 Q Okay. But it didn't have anything to</p> <p>15 do with --</p> <p>16 I mean, you still don't have your</p> <p>17 hazardous materials or did you get that</p> <p>18 reinstated?</p> <p>19 A No, I haven't reinstated it yet.</p> <p>20 Q Okay. Since the case was --</p> <p>21 Since you were found not guilty,</p> <p>22 you could reinstate that hazardous materials</p> <p>23 license, right, because you were found not</p> <p>24 guilty?</p>

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<p style="text-align: right;">106</p> <p>1 A I think so. 2 Q Okay. But you chose not to? 3 A Yeah, you could say that. I'm going 4 to renew it, but I haven't done it at this point 5 yet. 6 Q Okay. And you haven't worked as a 7 truck driver for the past ten months you said, 8 right? 9 A Yes. 10 Q Okay. And that is because the costs 11 are too high? 12 A Yes. 13 Q Okay. Other than Starfleet and -- 14 I'm sorry, what was the other? 15 A OTM. 16 Q -- OTM -- 17 A Yes. 18 Q -- was there any other trucking 19 companies you worked for? 20 A No. That's it. 21 Q Okay. OTM, did they hire you? 22 A Yes. 23 Q Okay. And they hired you, you said, 24 in 2021?</p>	<p style="text-align: right;">108</p> <p>1 A Yes. 2 Q Okay. And the only endorsement you 3 lost was the HAZMAT one? 4 A Yes, the best one. 5 Q And is that the most lucrative? 6 A Yes. 7 Q Okay. How much more money do you get 8 paid, say, for the same -- 9 Is it paid by weight? How are the 10 -- or mileage? 11 A Some people do different. Some go by 12 mileage; some go by the trips; some go by -- 13 Q Okay. And so just in your experience, 14 you know, I know nothing about the trucking 15 industry. 16 So in your experience, how much 17 more would you get per trip for a hazardous 18 materials as opposed to something else? 19 A You will make more money doing HAZMAT 20 because it's more dangerous. 21 Q Right. I understand, but how much 22 more? 23 A Probably maybe \$1,000 more. 24 Q \$1,000 per trip?</p>
<p style="text-align: right;">107</p> <p>1 A Yes. 2 Q Okay. And what were you hauling for 3 OTM? 4 A How do I explain that? Just freight. 5 So we was hauling with a 40-foot trailer, the 6 flatbed. 7 Q Okay. 8 A So we was doing flatbed work. 9 Q Do you need an endorsement for that? 10 A No. 11 Q Okay. 12 A Depending on the weight, you need a 13 CDL, depending on what trailer you have. 14 Q Got you. So there are -- there is 15 freight or things that you can haul that you 16 don't need an endorsement for; is that fair? 17 A Not -- depending with the weight, no. 18 You have to have a CDL for that. 19 Q Right. A CDL, but I'm saying 20 endorsements that are in addition to the CDL? 21 A Oh, no, no. It depend on what you 22 doing. Like if I go to drive tankers or triples 23 and doubles, like that. 24 Q Everything has its own endorsement?</p>	<p style="text-align: right;">109</p> <p>1 A Oh, per trip? 2 Q Yes. 3 A Depends. Probably get like \$400, \$500 4 a trip, \$600 at the most probably. 5 Q \$400 or \$500 total or \$400 or \$500 6 more than what you would doing something else? 7 A So other things, you can probably get 8 \$200, \$300 a trip, \$400. You might get \$600, 9 \$700 with the HAZMAT because you dealing with 10 hazardous materials. 11 Q So there's, like, a multiplier on it 12 because it's dangerous materials? 13 A Yes. 14 Q Okay. Got you. Okay. I think I 15 understand. 16 And, again, the way you are paid, 17 it varies based upon a different company? 18 A Yes. 19 Q It can be by mileage, by trip? 20 A Hour too. 21 Q By hour? 22 A Yeah. 23 Q Is it ever by weight of what you are 24 hauling, or is it more so --</p>

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<p style="text-align: right;">110</p> <p>1 A It could go by weight.</p> <p>2 Q Okay.</p> <p>3 A However they do it, like.</p> <p>4 Q Got you. And it's up to the company?</p> <p>5 A Yes.</p> <p>6 Q Got you.</p> <p>7 MR. MICHELINI: Okay, let's take a</p> <p>8 quick break. Come back in five.</p> <p>9 THE VIDEOGRAPHER: The time is 11:43.</p> <p>10 We are going off the record.</p> <p>11 (Whereupon a recess was</p> <p>12 taken after which the</p> <p>13 proceedings resumed as</p> <p>14 follows:)</p> <p>15 THE VIDEOGRAPHER: The time is 12:03.</p> <p>16 We are going back on the record.</p> <p>17 Please proceed.</p> <p>18 BY MR. MICHELINI:</p> <p>19 Q Okay. Mr. Jackson, when we left off</p> <p>20 we were talking about the criminal case for this</p> <p>21 matter; and then also you said there was another</p> <p>22 case that you were arrested for during the</p> <p>23 pendency of this criminal case; is that right?</p> <p>24 A Yes.</p>	<p style="text-align: right;">112</p> <p>1 case based on that arrest?</p> <p>2 A Yes.</p> <p>3 Q And then there was a finding of no</p> <p>4 probable cause?</p> <p>5 A Yes.</p> <p>6 Q Okay. And then you were held in</p> <p>7 custody after there was a finding of no probable</p> <p>8 cause in that case?</p> <p>9 A Yes. I had to wait for the -- to see</p> <p>10 the judge?</p> <p>11 Q Okay. Because you already had a date</p> <p>12 scheduled; is that why?</p> <p>13 A Yes, she said -- yes, yes, yes.</p> <p>14 Q Okay, right. So there was a finding</p> <p>15 of no probable cause; and at the next hearing,</p> <p>16 or the next date for this case, it was brought</p> <p>17 to light to the judge that that was a finding of</p> <p>18 no probable cause, and then you were released;</p> <p>19 is that correct?</p> <p>20 A No. So she gave me a date. She</p> <p>21 continued that case to wait to see what happened</p> <p>22 with this case.</p> <p>23 Q Got you. And, again, there was the</p> <p>24 finding of no probable cause on the stolen</p>
<p style="text-align: right;">111</p> <p>1 Q Okay. And that was for possession of</p> <p>2 a stolen vehicle?</p> <p>3 A Yes.</p> <p>4 Q You were arrested for that case in</p> <p>5 April of 2018; is that right?</p> <p>6 A Yes.</p> <p>7 Q Okay. And that case, you said, was</p> <p>8 the basis for your violation, the reason that</p> <p>9 you went into Cook County custody?</p> <p>10 A Yes.</p> <p>11 Q Okay. That case, though, the stolen</p> <p>12 vehicle case, was dismissed about eight days</p> <p>13 later though, right?</p> <p>14 A Yes.</p> <p>15 Q Okay. There was a finding of no</p> <p>16 probable cause at the preliminary hearing for</p> <p>17 that matter, right?</p> <p>18 A Yes.</p> <p>19 Q Okay. And your testimony is still</p> <p>20 that that was the basis for why you were held</p> <p>21 for 30 days in Cook County is solely because of</p> <p>22 that case?</p> <p>23 A Yes.</p> <p>24 Q Okay. They violated your bond on this</p>	<p style="text-align: right;">113</p> <p>1 vehicle case a week after you were arrested on</p> <p>2 that; and after that, you came back up on this</p> <p>3 case; at that point you were released; is that</p> <p>4 right?</p> <p>5 A Yes.</p> <p>6 Q Okay. When you were given the I-bond</p> <p>7 initially for this case, you didn't have to pay</p> <p>8 any money; is that right?</p> <p>9 A No.</p> <p>10 Q Okay. You didn't have to wear a</p> <p>11 bracelet, an EM bracelet?</p> <p>12 A No.</p> <p>13 Q Okay. Your only restriction is that</p> <p>14 you couldn't leave the state, right?</p> <p>15 A Yes.</p> <p>16 Q And that you had to show up to court</p> <p>17 whenever the dates were, right?</p> <p>18 A Yes.</p> <p>19 Q Okay. After -- and then there was the</p> <p>20 violation of the bond for that case, right, we</p> <p>21 just talked about that?</p> <p>22 A Yes.</p> <p>23 Q At that point you were in Cook County</p> <p>24 custody?</p>

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<p style="text-align: right;">114</p> <p>1 A Yes.</p> <p>2 Q And then when you were re-released,</p> <p>3 did you have to pay any money when you got</p> <p>4 released the second time?</p> <p>5 A No.</p> <p>6 Q Okay. Did you have to go on an</p> <p>7 electronic monitoring bracelet then?</p> <p>8 A No.</p> <p>9 Q Okay. And, again, the conditions of</p> <p>10 your bond were the same?</p> <p>11 A Yes.</p> <p>12 Q Okay. You couldn't commit any more</p> <p>13 crimes?</p> <p>14 A Yes.</p> <p>15 Q You couldn't leave the state?</p> <p>16 A Yes.</p> <p>17 Q And you had to show up to court,</p> <p>18 right?</p> <p>19 A Yes.</p> <p>20 Q Okay. Other -- you do have some</p> <p>21 criminal convictions in your background; is that</p> <p>22 right?</p> <p>23 A Yes.</p> <p>24 Q Okay. What have you been convicted</p>	<p style="text-align: right;">116</p> <p>1 Q Okay. That was an arrest that</p> <p>2 happened in February of 2005?</p> <p>3 A Yes.</p> <p>4 Q Okay. And that you pled guilty and</p> <p>5 served one day of incarceration?</p> <p>6 A Yes.</p> <p>7 Q Okay. In addition to that, you were</p> <p>8 convicted on driving on a suspended license in</p> <p>9 2013, right?</p> <p>10 A Yes.</p> <p>11 Q Okay. That was a misdemeanor offense?</p> <p>12 A Yes.</p> <p>13 Q Okay. And you served two days jail</p> <p>14 time for that?</p> <p>15 A Yes.</p> <p>16 Q Okay. Other than that, do you have</p> <p>17 any other convictions?</p> <p>18 A No.</p> <p>19 Q Okay. But you do have other arrests;</p> <p>20 is that right?</p> <p>21 A Yes.</p> <p>22 Q Okay. I want to show you what we will</p> <p>23 mark Exhibit 1.</p> <p>24 (Whereupon Deposition</p>
<p style="text-align: right;">115</p> <p>1 of?</p> <p>2 A Cocaine.</p> <p>3 Q Okay. When was that?</p> <p>4 A '94, '96, something like that.</p> <p>5 Q Okay. You were charged with</p> <p>6 possession of cocaine?</p> <p>7 A Yes.</p> <p>8 Q Okay. And that was in the late 90s,</p> <p>9 you said?</p> <p>10 A Yes.</p> <p>11 Q Okay. Would that have been in 1996?</p> <p>12 A Yes.</p> <p>13 Q Okay. You were sentenced to two years</p> <p>14 of probation for that case?</p> <p>15 A Yes.</p> <p>16 Q Okay. Did you complete that probation</p> <p>17 satisfactorily?</p> <p>18 A Yes.</p> <p>19 Q Okay. Any other convictions that you</p> <p>20 can think of?</p> <p>21 A No.</p> <p>22 Q Okay. Were you also convicted for</p> <p>23 possession of cannabis in 2005?</p> <p>24 A Yes, I think so. Yes.</p>	<p style="text-align: right;">117</p> <p>1 Exhibit No. 1 was marked</p> <p>2 for identification; said</p> <p>3 exhibit was tendered to</p> <p>4 the witness.)</p> <p>5 Mr. Jackson, do you recognize this</p> <p>6 document? You can go ahead and flip through it</p> <p>7 if you like.</p> <p>8 (Whereupon the witness</p> <p>9 examines the document.)</p> <p>10 A Hard for me to read it, though; don't</p> <p>11 got some glasses.</p> <p>12 Q Okay. So looking at Exhibit 1, this</p> <p>13 is for this case, right?</p> <p>14 A Yes.</p> <p>15 Q Okay. Your name is at the top of this</p> <p>16 document, Dennis Jackson, Plaintiff, right?</p> <p>17 A Yes.</p> <p>18 Q Okay. And then the case number here</p> <p>19 is the case number for this case, 22-cv-4337?</p> <p>20 A Yes.</p> <p>21 Q Okay. And I want to direct your</p> <p>22 attention to the last page of this document,</p> <p>23 Page 8. Is the signature there for Dennis</p> <p>24 Jackson, is that your signature?</p>

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<p style="text-align: right;">118</p> <p>1 A Yes.</p> <p>2 Q Okay. And it's dated January 24,</p> <p>3 2023?</p> <p>4 A Yes.</p> <p>5 Q Okay. And so you signed this document</p> <p>6 on January 24th of this year?</p> <p>7 A Yes.</p> <p>8 Q Okay. And this is a document that you</p> <p>9 went through with your attorney; is that right?</p> <p>10 A Yes.</p> <p>11 Q Okay. And you signing this document</p> <p>12 is saying that all these answers are true and</p> <p>13 accurate; is that correct?</p> <p>14 A Yes.</p> <p>15 Q Okay. So I want to direct your</p> <p>16 attention to Question No. 15. It's Page No. 6.</p> <p>17 So the questions for No. 15 --</p> <p>18 And you understand that these are</p> <p>19 what is called interrogatories for this case?</p> <p>20 Do you know what that is?</p> <p>21 A No.</p> <p>22 Q Okay. It's part of what is called</p> <p>23 discovery in this case. We ask you questions;</p> <p>24 your attorney asks our clients questions; and</p>	<p style="text-align: right;">120</p> <p>1 went back as the violation, the stolen vehicle</p> <p>2 case?</p> <p>3 A Yes.</p> <p>4 Q Okay. And how long did that --</p> <p>5 How long did you have trouble</p> <p>6 sleeping?</p> <p>7 A I still really have trouble sleeping.</p> <p>8 Q To this day?</p> <p>9 A Yes.</p> <p>10 Q Okay. Have you sought any treatment</p> <p>11 for this issue?</p> <p>12 A No.</p> <p>13 Q Okay. To this day you haven't sought</p> <p>14 treatment?</p> <p>15 A No.</p> <p>16 Q Okay. And so you're saying from 2017</p> <p>17 when you were arrested to today you have had</p> <p>18 trouble sleeping?</p> <p>19 A Yes.</p> <p>20 Q Even after you have been found not</p> <p>21 guilty?</p> <p>22 A Yes.</p> <p>23 Q Okay. And why is that?</p> <p>24 A Because I be feeling like the Chicago</p>
<p style="text-align: right;">119</p> <p>1 you signed off on these questions -- or your</p> <p>2 attorney helped you prepare these questions; is</p> <p>3 that right?</p> <p>4 A Yes.</p> <p>5 Q Okay. And you signed off as these</p> <p>6 answers being true and accurate; is that right?</p> <p>7 A Yes.</p> <p>8 Q So No. 15, we asked if you were</p> <p>9 claiming any mental, psychiatric, psychological</p> <p>10 or emotional injuries as a result of this</p> <p>11 occurrence; and your response is: Yes, the</p> <p>12 false charges caused me stress and I had trouble</p> <p>13 sleeping; no treatment.</p> <p>14 So what do you mean by that, that</p> <p>15 you had trouble sleeping?</p> <p>16 A I couldn't rest.</p> <p>17 Q Okay. How -- when did that start, I</p> <p>18 guess?</p> <p>19 A Once I got out of jail, once I bonded</p> <p>20 out, I got the I-bond, I could no longer sleep;</p> <p>21 and then when I went back, it was like I felt</p> <p>22 like the police was just harassing me; like, so</p> <p>23 it was hard for me to sleep. I couldn't sleep.</p> <p>24 Q Okay. You're talking about when you</p>	<p style="text-align: right;">121</p> <p>1 Police will just do you any type of way. So I</p> <p>2 be -- I can't rest. It just stay on my mind.</p> <p>3 Q Okay. And why haven't you sought any</p> <p>4 treatment for this issue?</p> <p>5 A Because I don't have no medical.</p> <p>6 Q You don't have medical insurance?</p> <p>7 A Yes.</p> <p>8 Q Got you. That is not provided by the</p> <p>9 trucking company?</p> <p>10 A No.</p> <p>11 Q And, again, you are not working right</p> <p>12 now, right?</p> <p>13 A Exactly.</p> <p>14 Q If you had insurance, would you go</p> <p>15 seek treatment for the lack of sleep?</p> <p>16 A Yes.</p> <p>17 Q Okay. You also mentioned in your</p> <p>18 response Question 15 that it has caused you</p> <p>19 stress?</p> <p>20 A Yes.</p> <p>21 Q What do you mean by that?</p> <p>22 A So I wasn't able to take care of my</p> <p>23 family because my job consists of going in and</p> <p>24 out of town. So I had to take little light jobs</p>

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<p style="text-align: right;">122</p> <p>1 that's, you know; and then it's not enough money 2 for me to do it with the fuel high, so -- 3 Q Right. So what do you mean, you 4 couldn't take care of your family? 5 A Because I can't -- I wasn't supposed 6 to go out of town. 7 Q Right. You are saying that you 8 couldn't leave Illinois as part of your bond 9 requirements? 10 A Yes, yes. 11 Q Okay. But you could still drive 12 trucks within Illinois; is that right? 13 A Yes. 14 Q Your CDL wasn't revoked because of 15 this case? 16 A No. 17 Q Okay. You could also ask -- you could 18 have your defense attorney ask for a special 19 amendment to your bond, right, for work 20 purposes? 21 A Yes. 22 MR. FLAXMAN: Objection; foundation. 23 BY MR. MICHELINI: 24 Q Right, you could have done that?</p>	<p style="text-align: right;">124</p> <p>1 criminal case happened? 2 A Yes. 3 Q Okay. How often were you traveling 4 out of state for your job? 5 A Three times a week. 6 Q Okay. And you no longer can do that 7 because of your bond? 8 A Yes. 9 Q Okay. And you never thought to ask 10 the judge to amend your bond? 11 A No. Actually she was so mean. She 12 shot everything down that I asked for. 13 Q Okay. And that would have been for 14 work purposes, right, to leave the state? 15 A Yes. 16 Q Okay. And that was -- that was the 17 only thing that was causing you stress was being 18 unable to provide for your family? 19 A Yes. 20 Q Okay. Anything else besides that? 21 A That's about it. 22 Q Okay. When you're saying providing 23 for your family, who are you specifically 24 providing for?</p>
<p style="text-align: right;">123</p> <p>1 MR. FLAXMAN: Objection; foundation. 2 BY MR. MICHELINI: 3 Q You can answer. 4 MR. FLAXMAN: Answer if you know. 5 THE WITNESS: No, I don't know. I 6 didn't know that. 7 BY MR. MICHELINI: 8 Q There has been a couple objections. 9 Just to be clear, your attorney can voice 10 objections on the record. He is making it clear 11 for the record what his objections are. Unless 12 he instructs you to do so -- unless he instructs 13 you not to answer, you are obligated to answer 14 the question. Do you understand that? 15 A Yes. 16 Q Okay. 17 A I don't know, though. 18 Q Okay. You don't know? 19 A I didn't know I could do that. 20 Q Got you. You never brought that up to 21 your defense attorney? 22 A No. 23 Q Okay. And were you traveling out of 24 state at the time when your -- when this</p>	<p style="text-align: right;">125</p> <p>1 A My kids. 2 Q Okay. How many kids do you have? 3 A Eight. 4 Q You have eight kids? 5 A Yes. 6 Q Okay. Let's go through them. What 7 are their names? 8 A Da'sha, Darren, Rashaun, Destiny, 9 Zanyia, Toni, Liana and Dajuan. 10 Q Okay. Do they all share the same last 11 name as you? 12 A Some of them. 13 Q Okay. Which ones do? 14 A Da'sha, Darren -- Da'sha, Darren, 15 Dajuan, Destiny. 16 Q Okay. And they're all -- their last 17 name is Jackson? 18 A Yes. 19 Q Okay. 20 (Whereupon the court 21 reporter requested 22 spellings of the names.) 23 MR. FLAXMAN: Let's just do it now. 24 BY MR. MICHELINI:</p>

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<p style="text-align: right;">126</p> <p>1 Q You know, can you just state it for 2 the record? 3 A That end in Jackson? 4 Q All of them, if you could, yeah. 5 A So Rashaun is a Jackson. Destiny is a 6 Jackson. 7 Q Can you spell their names as you're 8 going through it? 9 A How does she spell his name? 10 R-a-s-h-a-u-n, Jackson; Destiny Jackson, 11 D-e-s-t-i-n-y, Jackson; Dajuan Jackson; Da'sha 12 Jackson and Darren Jackson. 13 14 (Whereupon the court 15 reporter requested 16 additional spellings.) 17 THE WITNESS: D-a-j-u-a-n for Dajuan 18 and Da'sha is D-a-'s-h-a. 19 MR. MICHELINI: Is that all? Is that 20 good? 21 THE COURT REPORTER: Is that 8? 22 THE WITNESS: Them the only ones with 23 the Jackson. That's what he asked. 24 MR. FLAXMAN: Those were the five with</p>	<p style="text-align: right;">128</p> <p>1 Q Okay. 2 A Smith. And Tiffany, I don't know. 3 She changed her last name. Tiffany is a 4 Johnson. That is for Dajuan. Then for Liana, 5 that's -- she's Tiffany too. I forgot her mama 6 last name. Toni, her mama's name Ebony 7 (phonetic), what is her last name? Her last 8 name Crawford, Ebony Crawford. And Destiny is 9 Lajenae (phonetic), what is her last name? 10 Lenore. So L-a -- I don't know how she really 11 spell her name. I can't remember. 12 Q Okay. Appreciate that. 13 A Rashaun, he's -- his mama name is 14 Shamal (phonetic). 15 Q Okay. And so earlier you were just 16 describing that you were stressed because you 17 weren't able to provide for your family. And 18 you just mentioned now that you have eight kids. 19 So were you providing for all eight kids at the 20 time? 21 A Yes. 22 Q Okay. How much -- and this was -- the 23 kids are with -- 24 All eight kids were alive at the</p>
<p style="text-align: right;">127</p> <p>1 the Jackson. 2 BY MR. MICHELINI: 3 Q Okay. And then the other three, what 4 are their names? 5 A Toni, Zanyia and Liana. 6 Q And can you spell those? 7 A Liana is L-i-a-n-a; and Zanyia, 8 Z-a-n-y-i-a, she a Jones; and what else did I 9 say? 10 THE VIDEOGRAPHER: Toni. 11 THE WITNESS: Toni, she's a Crawford. 12 So she spell her T-o-n-i Crawford. 13 BY MR. MICHELINI: 14 Q Are all those children with the same 15 person? 16 A Different. 17 Q Okay. Could you list which kids -- 18 name of the mother for each kid? 19 A Darren and Da'sha, they mama's name 20 Tawannah. 21 Q Okay. What is her last name? 22 A Smith. 23 Q Could you spell Tawannah? 24 A T-a-w-a-n-a-h.</p>	<p style="text-align: right;">129</p> <p>1 time in 2017; is that right? 2 A Yes. 3 Q Okay. And how much were you providing 4 -- and some of the kids have different mothers; 5 is that right? 6 A Yes. 7 Q Were any of the kids living with you 8 at the time? 9 A Zanyia was living with me and Rashaun 10 and Dajuan was back and forth. 11 Q Okay. And they were living with you 12 at -- 13 A The time -- 14 Q -- the place at Sangamon? 15 A Yes. 16 Q Okay. And so one was staying -- one 17 was staying with you full time, and two other 18 ones were on and off? 19 A Yes. 20 Q Okay. And so supporting the kids, are 21 you referring to those three that were staying 22 with you or all eight? 23 A Well, actually, my stepson too. I had 24 to provide for him too. So I had Derrick and</p>

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<p style="text-align: right;">130</p> <p>1 Zanyia, Rashaun and Dajuan.</p> <p>2 Q Okay. How old are all those kids that</p> <p>3 you just mentioned, or how old were they at the</p> <p>4 time?</p> <p>5 A Now they like 20 -- let me see.</p> <p>6 Darren, he probably 28; Da'sha like 27; Rashaun</p> <p>7 like 26 or vice versa with Da'sha and Darren --</p> <p>8 I mean, Da'sha and Rashaun.</p> <p>9 Q Okay. So all these -- all the</p> <p>10 children that were staying with you at the time</p> <p>11 in 2017, they were all adult children?</p> <p>12 A Basically. You could --</p> <p>13 Q They were over 18?</p> <p>14 A At that time, they was like -- Zanyia,</p> <p>15 so she 22 now; Rashaun -- Da-Da, he like 24 now;</p> <p>16 Derrick, he is 23; and Rashaun, he is, what, 25</p> <p>17 too.</p> <p>18 Q Okay. You mentioned that you were</p> <p>19 still providing for the ones, even the ones that</p> <p>20 weren't living with you; is that right?</p> <p>21 A Yes.</p> <p>22 Q Okay. How were you doing that?</p> <p>23 A Work.</p> <p>24 Q Okay. Sorry, I will rephrase that.</p>	<p style="text-align: right;">132</p> <p>1 around me the most got the most.</p> <p>2 Q Got you. Okay. I understand. But</p> <p>3 the ones that were living with you, you would</p> <p>4 also provide food, correct?</p> <p>5 A Yes.</p> <p>6 Q Okay. You were also providing</p> <p>7 shelter, paying for the house?</p> <p>8 A Yes.</p> <p>9 Q Okay. Anything else that you were</p> <p>10 paying for at the time?</p> <p>11 A Besides the bills?</p> <p>12 Q Yes.</p> <p>13 A Besides the bills and money to get</p> <p>14 them back and forth to school.</p> <p>15 Q Okay. And so you would just pay them</p> <p>16 directly? You would give them cash?</p> <p>17 A Or buy them things like they shoes,</p> <p>18 uniforms, pants, whatever they needed.</p> <p>19 Q Got you. Okay. And it was about, you</p> <p>20 said, \$200 to \$300 a kid and that is outside of</p> <p>21 what you would spend providing shelter,</p> <p>22 providing food for the ones that live with you?</p> <p>23 A Yes.</p> <p>24 Q Okay. Would you provide food for the</p>
<p style="text-align: right;">131</p> <p>1 Were you providing money to their mother or</p> <p>2 providing to them directly?</p> <p>3 A At first I started off with they</p> <p>4 mothers, then once they got old enough, I had my</p> <p>5 own relationship with them.</p> <p>6 Q So would you pay them on a weekly</p> <p>7 basis, on a monthly basis?</p> <p>8 A Kids beg every day.</p> <p>9 Q Okay. Yeah, I get that. So -- but</p> <p>10 how often --</p> <p>11 I understand they might ask every</p> <p>12 day, but how often would you give them money?</p> <p>13 A So just say weekly because they --</p> <p>14 every day I have to give them something.</p> <p>15 There's something they need every day.</p> <p>16 Q And so how much would you, I guess,</p> <p>17 pay weekly or monthly for all the children?</p> <p>18 A Monthly, I probably be out \$200, \$300</p> <p>19 for each one of them.</p> <p>20 Q Okay. And that includes the ones that</p> <p>21 weren't living with you at the time?</p> <p>22 A Yes.</p> <p>23 Q Okay. The ones that you were --</p> <p>24 A Well, basically the ones that was</p>	<p style="text-align: right;">133</p> <p>1 ones that did not live with you?</p> <p>2 A Somewhat. Like I said, the ones that</p> <p>3 live with me got more because they was around,</p> <p>4 so --</p> <p>5 Q Okay.</p> <p>6 A So when I give it to they mothers, I</p> <p>7 don't know if they will buy food, clothes.</p> <p>8 Whatever they needed, they had it if I had it.</p> <p>9 Q Okay. I want to go back to the</p> <p>10 interrogatories. That's Exhibit 1. I want to</p> <p>11 go to -- it's Page 3 for your response. The</p> <p>12 question is No. 5, though. So the question is</p> <p>13 asking --</p> <p>14 A It's Page 5?</p> <p>15 Q No. I'm sorry. Question 5 --</p> <p>16 A Page 3?</p> <p>17 Q -- which goes -- yeah.</p> <p>18 The question is on Page 2 and the</p> <p>19 answer is on Page 3. So the question is:</p> <p>20 State, list and itemize each item of expense,</p> <p>21 monetary loss or any damage claimed by you in</p> <p>22 this action, but not limited to any and all</p> <p>23 attorneys' fees incurred to date.</p> <p>24 And so in response to that, you</p>

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<p style="text-align: right;">134</p> <p>1 said that: You paid your lawyer, David 2 Gaeger -- 3 MR. FLAXMAN: Let's let him get onto 4 the next page. 5 MR. MICHELINI: Sorry. 6 BY MR. MICHELINI: 7 Q Yeah, the response is on Page 3 and 8 your response was: I paid my lawyer -- 9 MR. FLAXMAN: Just a second -- 10 MR. MICHELINI: Sorry. 11 MR. FLAXMAN: -- while he gets to the 12 right -- 13 See now: I paid my lawyer. 14 THE WITNESS: Yes. 15 BY MR. MICHELINI: 16 Q And your response was: I paid my 17 lawyer, David Gaeger, \$7,000; is that right? 18 A Yes. 19 Q And that's for this criminal case? 20 A Yes. 21 Q Okay. And that was the entirety of 22 his fee? 23 A Yes. 24 Q Okay. Were there any other expenses</p>	<p style="text-align: right;">136</p> <p>1 A Yes, I think so. 2 Q So \$7,000 all in? 3 A Yes. 4 Q Got you. Okay. Any other expenses 5 that you incurred as a result of this criminal 6 case? 7 A Other expenses that I -- other 8 expenses. I had to get back and forth to court 9 when I had to be inside the building. 10 Q Okay. And that was part of your bond 11 is you had to go -- show up to court, right? 12 A Yeah, sometimes. Yes, sometimes it 13 was Zoom. 14 Q Yes, and sometimes it was on Zoom 15 right? 16 A Mm-hmm. 17 Q During the pandemic a lot of court 18 proceedings were on Zoom, right? 19 A Yes. 20 Q Okay. So it didn't cost you anything 21 to show up on Zoom, right? 22 A No. 23 Q Okay. You didn't have to show up to a 24 9:00 to 5:00 job where you would be taking time</p>
<p style="text-align: right;">135</p> <p>1 that you incurred as a result of this criminal 2 case? 3 A The \$1,000 I had to give up for 4 retainer fee for the stolen car. 5 Q For the -- a separate attorney? 6 A I used the same attorney. 7 Q You used David Gaeger again? 8 A (Nonverbal response: Nodding head.) 9 Excuse me. 10 Q And he required a separate \$1,000? 11 A Retainer fee, yes. 12 Q To represent you in the stolen vehicle 13 case? 14 A Yes. 15 Q But that was not for this case, 16 correct? 17 A Well, no, not exactly for this case. 18 No. 19 Q Right. The \$1,000 was to retain him 20 for defending you in the other case, right? 21 A Yes. 22 Q Okay. And that \$7,000 that you 23 mentioned in your response, that includes his 24 retainer for this case?</p>	<p style="text-align: right;">137</p> <p>1 off, right? 2 A Was I working then? Yes. Yeah, I had 3 to take off a couple of times when I was 4 working. 5 Q Okay. You had to take off work from 6 your trucking job? 7 A Yes. 8 Q Okay. So then how would you show up 9 on the Zoom while you were working? 10 A So -- no, I'm saying when I had to go 11 in the building. When I was on Zoom, it was 12 okay. 13 Q Okay. Got you. 14 A I'm fine. It only took like -- 15 Q If you were working, you're driving, 16 you just pull over and go on Zoom? 17 A Yeah, give me a continuance and I 18 would go on about my business. 19 Q Okay. It was only the dates that you 20 were going into court? 21 A Yes. 22 Q Okay. Any other expenses that you can 23 think of that resulted from this criminal case? 24 A Not that I can think of.</p>

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<p style="text-align: right;">138</p> <p>1 Q Okay.</p> <p>2 A Besides -- oh, matter fact, I'm sorry.</p> <p>3 My -- the bonding out my car.</p> <p>4 Q I'm sorry?</p> <p>5 A Bonding my car out the pound.</p> <p>6 Q Okay.</p> <p>7 A Get it out the pound.</p> <p>8 Q How much did you have to pay to get it</p> <p>9 out of the pound?</p> <p>10 A \$2,500.</p> <p>11 Q Okay. And that was the first time it</p> <p>12 was removed from the pound?</p> <p>13 A Or the second time. Probably both, I</p> <p>14 think, if I ain't mistaken.</p> <p>15 Q Okay. And you paid that?</p> <p>16 A Yes, I had to pay that back.</p> <p>17 Q Okay. And that would have been on the</p> <p>18 receipt for the tow?</p> <p>19 A Yes.</p> <p>20 Q Okay. The second time the car --</p> <p>21 A The first time.</p> <p>22 Q I'm sorry, yeah. But I'm saying --</p> <p>23 you said that was for the first time?</p> <p>24 A The second time I know for sure. I'm</p>	<p style="text-align: right;">140</p> <p>1 to change the media file?</p> <p>2 MR. MICHELINI: Yes, that's fine, we</p> <p>3 can take a short break.</p> <p>4 THE VIDEOGRAPHER: The time is 12:29.</p> <p>5 We have reached the conclusion of Media File No.</p> <p>6 1. We are going off the record.</p> <p>7 (Whereupon a recess was</p> <p>8 taken after which the</p> <p>9 proceedings resumed as</p> <p>10 follows:)</p> <p>11 THE VIDEOGRAPHER: The time is 12:29.</p> <p>12 This is Media File No. 2. We are continuing the</p> <p>13 deposition of Dennis Jackson.</p> <p>14 Please proceed.</p> <p>15 BY MR. MICHELINI:</p> <p>16 Q Okay. So I'm just going to go back</p> <p>17 over some of the things I previously asked you.</p> <p>18 So if I'm a little bit haphazard. I apologize</p> <p>19 in terms of jumping around.</p> <p>20 A It's okay.</p> <p>21 Q So you mentioned you graduated high</p> <p>22 school in 1990-what?</p> <p>23 A Two.</p> <p>24 Q Two, okay. And you kind of did odd</p>
<p style="text-align: right;">139</p> <p>1 trying to remember what happened with the first</p> <p>2 one.</p> <p>3 Q Right. But I'm saying the second tow</p> <p>4 didn't have to do with this case, right?</p> <p>5 A Okay, okay.</p> <p>6 Q Is that right?</p> <p>7 A Yes.</p> <p>8 Q You said that it was towed initially</p> <p>9 when you got arrested, and then there's a second</p> <p>10 time that somehow it got -- there was something</p> <p>11 else that went on, right?</p> <p>12 A Yeah, yes.</p> <p>13 Q Okay. So it was just for the first --</p> <p>14 A First time.</p> <p>15 Q -- the first time it was towed?</p> <p>16 A Yes, yes.</p> <p>17 Q Okay. Whatever that amount was that</p> <p>18 you paid?</p> <p>19 A Yes.</p> <p>20 Q Got you. Okay. Any other expenses</p> <p>21 besides these that we have just talked about?</p> <p>22 A No, none that I can think of.</p> <p>23 Q Okay.</p> <p>24 THE VIDEOGRAPHER: Is this a good time</p>	<p style="text-align: right;">141</p> <p>1 jobs for a while there afterwards, right?</p> <p>2 A Yes, with my uncle.</p> <p>3 Q Okay. And is that how --</p> <p>4 Is that the sole way that you</p> <p>5 supported yourself at that time?</p> <p>6 A Yes.</p> <p>7 Q Okay. When was your first child born?</p> <p>8 A My first child was born in --</p> <p>9 I don't even remember the year for</p> <p>10 real, honestly.</p> <p>11 Q Okay. Was it in the 90s?</p> <p>12 A Yes.</p> <p>13 Q Okay. And so it's fair to say that</p> <p>14 you were initially supporting at least one kid,</p> <p>15 maybe others, just on the jobs that you were</p> <p>16 working, the odd jobs you were working at the</p> <p>17 time; is that right?</p> <p>18 A Yes.</p> <p>19 Q Okay. You had no other source of</p> <p>20 income?</p> <p>21 A Not that I really worked. My mother</p> <p>22 took care of me to help her with her father too,</p> <p>23 so.</p> <p>24 Q Okay.</p>

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<p style="text-align: right;">142</p> <p>1 A At that time.</p> <p>2 Q So you mentioned the Sangamon address</p> <p>3 that you lived at in Chicago, right?</p> <p>4 A Yes.</p> <p>5 Q And that was the only address that you</p> <p>6 had ever lived in Chicago, right?</p> <p>7 A Yes, basically, yes.</p> <p>8 Q What do you mean basically?</p> <p>9 A Yes, that's the address I lived at.</p> <p>10 Q Okay. But you would frequent your</p> <p>11 grandmother's house?</p> <p>12 A Yes.</p> <p>13 Q Okay. Was there any else -- any other</p> <p>14 places in Chicago, like family members or</p> <p>15 friends, that you would hang out at?</p> <p>16 A Yes.</p> <p>17 Q Where is that?</p> <p>18 A 87th, Euclid, all over. You know, I</p> <p>19 was young. I was hanging out.</p> <p>20 Q Okay. You mentioned your grandma.</p> <p>21 What is your grandma's name again?</p> <p>22 A Louise Price.</p> <p>23 Q Okay. It's L-o-u-i-s-e?</p> <p>24 A Yes.</p>	<p style="text-align: right;">144</p> <p>1 A Not exactly.</p> <p>2 Q Okay. That was the intersection,</p> <p>3 118th and Stewart?</p> <p>4 A Yes.</p> <p>5 Q Okay. I want to go back to that area</p> <p>6 that you were arrested in near your</p> <p>7 grandmother's house. Were you directly outside</p> <p>8 of your grandmother's house when the police</p> <p>9 arrived?</p> <p>10 A I was in the street.</p> <p>11 Q Right. But was it directly outside of</p> <p>12 your grandmother's house or was it a little bit</p> <p>13 further down the street one way or the other?</p> <p>14 A No, it was in front of her house.</p> <p>15 Q Directly in front?</p> <p>16 A Yes.</p> <p>17 Q Okay. And what was the address of</p> <p>18 that?</p> <p>19 A 309.</p> <p>20 Q 309 120th?</p> <p>21 A Yes.</p> <p>22 Q And from there you can see the train</p> <p>23 tracks, right, from that position or that</p> <p>24 location?</p>
<p style="text-align: right;">143</p> <p>1 Q Okay. And Price, P-r-i-c-e?</p> <p>2 A Yes.</p> <p>3 Q Okay. You mentioned earlier that</p> <p>4 Tonya Smith was the person you were dating at</p> <p>5 the time of this incident; is that right?</p> <p>6 A Yes.</p> <p>7 Q Okay. Do you have her phone number?</p> <p>8 A No, we no longer together.</p> <p>9 Q Okay. Did you have her phone number</p> <p>10 at the time?</p> <p>11 A Yes.</p> <p>12 Q Okay. And you don't have that number</p> <p>13 anymore?</p> <p>14 A I don't think so.</p> <p>15 Q Okay. When did you date her?</p> <p>16 A I was dating her in '17. I think we</p> <p>17 finished messing with each other around '18.</p> <p>18 Q Okay. She is not one of the mother of</p> <p>19 your children; is that correct?</p> <p>20 A No.</p> <p>21 Q Okay. Do you know where she lived at</p> <p>22 that time?</p> <p>23 A 118th and Stewart.</p> <p>24 Q Do you know the address?</p>	<p style="text-align: right;">145</p> <p>1 A The one that's in front where you was</p> <p>2 asking about the open space?</p> <p>3 Q Yes.</p> <p>4 A Yes.</p> <p>5 Q Okay. It was nighttime when the</p> <p>6 officers arrived, correct?</p> <p>7 A Yes.</p> <p>8 Q Okay. But there are streetlights in</p> <p>9 that area; is that correct?</p> <p>10 A Yes.</p> <p>11 Q Okay. Did you have your lights of</p> <p>12 your car on as well?</p> <p>13 A I can't remember.</p> <p>14 Q Okay. But there is artificial</p> <p>15 lighting in that area?</p> <p>16 A Yes.</p> <p>17 Q Okay. You mentioned there was the two</p> <p>18 other officers, you said, that came not from</p> <p>19 squad cars, they came from a different area,</p> <p>20 right?</p> <p>21 A Yes.</p> <p>22 Q Okay. And you said it was a vacant</p> <p>23 lot?</p> <p>24 A Yes.</p>

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<p style="text-align: right;">146</p> <p>1 Q Okay. And that vacant lot was in 2 which direction relevant to your grandmother's 3 house? 4 A So if you facing her door like this, 5 to the west of her. 6 Q Okay. If you are facing towards her 7 -- 8 A Like if you going to ring her bell -- 9 Q Yeah. 10 A -- to the right. 11 Q Okay. Got you. 12 A So the vacant lot, the building, her 13 house, neighbor, neighbor, neighbor, neighbor. 14 Q Got it, okay. And two officers came 15 from that area? 16 A Yes. 17 Q Okay. And you saw them come when you 18 were handcuffed outside the vehicle? 19 A Yes. 20 Q Okay. And what did you think of that? 21 Why did you think that was significant? 22 A I mean, when I first seen them I'm 23 thinking, like, they just came to, you know, 24 jack us, mess with us.</p>	<p style="text-align: right;">148</p> <p>1 testify at the preliminary hearing? 2 A No. Just one. 3 Q Just one, okay. Do you know which 4 one? 5 A No, because I don't know them apart. 6 I don't -- 7 Q Okay. But you just recognize one of 8 them? 9 A Yes. 10 Q Okay. Did the officer that you 11 mentioned, you said the second officer is -- 12 strike that. 13 There was the officer with the 14 incident before where you were drinking on the 15 street, right? 16 A Yes. 17 Q And then there was a separate officer 18 that was the one that showed you the marijuana? 19 A Yes. 20 Q Okay. And both of those officers are 21 the ones that you saw walking from the other -- 22 the vacant lot? 23 A No. 24 Q No, just one of them?</p>
<p style="text-align: right;">147</p> <p>1 Q Okay. Would they -- did they arrive 2 before the other officers arrived? 3 A No, we was handcuffed when they came 4 out the back, on the car already. 5 Q Got you. Okay. And you thought that 6 those officers were just there to mess with you? 7 A Yes. 8 Q Why did you think that? 9 A Because I got into it with them the 10 night before. 11 Q Okay. So one of -- one of those 12 officers that walked through that other area 13 that wasn't in the squad car, was that Officer 14 Carreno? 15 A Like I said, I don't know them from 16 apart. All I know is -- 17 Q Right, but he was one of the ones that 18 testified at trial? 19 A Yes, yes, yes. 20 Q Okay. He was one of the ones that you 21 recognized from the night before? 22 A Yes. 23 Q Got you. Okay. Did both those 24 officers that testified at your trial also</p>	<p style="text-align: right;">149</p> <p>1 A Just one of them. 2 Q Okay. 3 A So the whatever officer that -- from 4 the preliminary, and one of the officers that 5 testified in my trial, them two was partners. 6 Q Got you. They were partners. 7 A The guy with the marijuana, he wasn't 8 one of the ones that came from the field. 9 Q Okay, right. And he wasn't one of the 10 ones that testified at your trial? 11 A The one with the marijuana is one that 12 testified. 13 Q Oh, he is one. Okay. Got you. But 14 he didn't come from the field? 15 A So the two partners didn't testify at 16 the trial. 17 Q Got you. 18 A One of them testified at preliminary. 19 The other one testified at the trial. 20 Q Okay. I understand. Got you. 21 And the marijuana one -- 22 A Testified at the trial. 23 Q -- testified at the trial. Got you. 24 Okay. You eventually found out that you were</p>

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<p style="text-align: right;">150</p> <p>1 being charged with delivery or possession with 2 intent of crack cocaine, right? 3 A Yes. 4 Q Okay. And, I mean, that -- your 5 testimony is that you don't -- you were just 6 sitting in the car. So why did you think the 7 officers were charging you with that crime? 8 A Repeat that. 9 Q So you were just sitting in the car 10 with Mr. McIntyre that night, right? 11 A Correct. 12 Q All of a sudden the officers arrest 13 you, right? 14 A Correct. 15 Q They don't really explain what is 16 going on? 17 A Correct. 18 Q But eventually you find out that you 19 are being charged with delivery of narcotics, 20 right? 21 A Correct. 22 Q Okay. So what did you think about 23 that? 24 A At the time that I was being arrested?</p>	<p style="text-align: right;">152</p> <p>1 A No, she -- it was wintertime. She 2 never got out her car. 3 Q Okay. And so when you found out about 4 the criminal charges against you, you thought 5 that the officers must have planted cocaine 6 either on you or in your vehicle. Is that what 7 you are testifying to? 8 A Yes. 9 Q Okay. But you didn't have any cocaine 10 in your car, right? 11 A No. 12 Q Okay. So did you ever see cocaine 13 that was produced in this trial? 14 A No. 15 Q Okay. Were the -- 16 A At the station, in the trial, none of 17 that. 18 Q At the trial, though, they introduced 19 inventory reports; is that right? 20 A I don't know. If they did -- I don't 21 know. I'm not equipped to really even be 22 knowing what they be talking about, for real, 23 for real. 24 Q But you were present at your trial,</p>
<p style="text-align: right;">151</p> <p>1 Q No, just what did you learn about the 2 charges? 3 A Oh, once I learned about the charges, 4 I just felt like he -- because we got into it 5 the day before, he put cocaine on us. 6 Q Okay. 7 A Because I didn't have no cocaine. I 8 didn't see James with no cocaine, so -- 9 Q Okay. And you didn't see Mr. McIntyre 10 with any cocaine? 11 A No. 12 Q Okay. And Mr. McIntyre, you said, 13 didn't leave your vehicle from the time that you 14 saw him that night, right? 15 A No. 16 Q Okay. When he got dropped off by his 17 girlfriend, did she stick around at all or she 18 just -- it was quick? 19 A When he got -- when she -- 20 When they pulled up, he sat there 21 for about five minutes, exit her car, got in the 22 car with me. 23 Q Okay. And you didn't say anything to 24 her?</p>	<p style="text-align: right;">153</p> <p>1 right? 2 A Yes. 3 Q Okay. You were there for all the 4 testimony? 5 A Yes. 6 Q Okay. So how do you think that the 7 officers just were able to place cocaine or put 8 cocaine on you and Mr. McIntyre? 9 MR. FLAXMAN: Objection; form and 10 foundation. 11 THE WITNESS: I don't know. 12 BY MR. MICHELINI: 13 Q Okay. Did you eventually learn 14 through the course of the trial that the 15 officers had set up surveillance near the train 16 tracks? 17 MR. FLAXMAN: Objection; form. 18 THE WITNESS: I don't know. 19 BY MR. MICHELINI: 20 Q Okay. That -- you didn't hear that 21 testimony during the trial? 22 A At preliminary, yes. 23 Q Okay. That they were surveilling from 24 the train tracks towards where you</p>

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<p style="text-align: right;">154</p> <p>1 grandmother's house was?</p> <p>2 A No.</p> <p>3 MR. FLAXMAN: Objection; form.</p> <p>4 THE WITNESS: They never said that.</p> <p>5 BY MR. FLAXMAN:</p> <p>6 Q They never said that they were in a</p> <p>7 surveillance position?</p> <p>8 A No.</p> <p>9 Q Okay. Did you learn from the</p> <p>10 preliminary in the criminal case and the trial</p> <p>11 that the officers -- their version of the</p> <p>12 events, what they are alleging, is that they</p> <p>13 observed several people come up to your vehicle</p> <p>14 and then follow Mr. McIntyre to a second</p> <p>15 vehicle?</p> <p>16 A No. Repeat the question again.</p> <p>17 Q So during -- you know, you sat -- you</p> <p>18 heard -- you were there for the preliminary</p> <p>19 hearing, right?</p> <p>20 A Right.</p> <p>21 Q You were there for the criminal trial,</p> <p>22 right?</p> <p>23 A Right.</p> <p>24 Q You learned about the evidence that</p>	<p style="text-align: right;">156</p> <p>1 hands the drug to the customer?</p> <p>2 A No.</p> <p>3 Q Okay. You never even heard of that,</p> <p>4 like, in TV or movies?</p> <p>5 A No.</p> <p>6 Q Okay.</p> <p>7 A Well, yeah, I seen it in TV, but yeah.</p> <p>8 Q Okay. Where, you know, someone</p> <p>9 hands --</p> <p>10 A But that didn't happen, though.</p> <p>11 Q Okay, right. But you are familiar</p> <p>12 with that kind of system?</p> <p>13 A Yes, yes, yes.</p> <p>14 Q That kind of system makes it harder</p> <p>15 for police and prosecutors to connect the dots,</p> <p>16 so to speak, of the evidence; is that right?</p> <p>17 MR. FLAXMAN: Objection; foundation.</p> <p>18 THE WITNESS: I don't know.</p> <p>19 BY MR. MICHELINI:</p> <p>20 Q Okay. But you would agree there is a</p> <p>21 disconnect if someone hands one person money and</p> <p>22 then a different person hands that person --</p> <p>23 that same -- the customer a drug?</p> <p>24 MR. FLAXMAN: Objection; form and</p>
<p style="text-align: right;">155</p> <p>1 the State and the police had built against you,</p> <p>2 right?</p> <p>3 A Correct.</p> <p>4 Q Okay. And part of that evidence was</p> <p>5 that the police observed several people</p> <p>6 approaching your vehicle that evening; is that</p> <p>7 right?</p> <p>8 A Yes.</p> <p>9 Q Okay. And the police also said that</p> <p>10 they observed -- after that -- after they</p> <p>11 approached your side of the vehicle, they would</p> <p>12 follow Mr. McIntyre to a second vehicle and</p> <p>13 receive drugs from that from that -- from that</p> <p>14 vehicle. Did you learn that?</p> <p>15 A Yes, I heard that.</p> <p>16 Q Okay. And that is all false, correct?</p> <p>17 A Correct.</p> <p>18 Q Okay. That never happened?</p> <p>19 A No. See, why would he take somebody</p> <p>20 to where he was going to get drugs? That don't</p> <p>21 even sound right.</p> <p>22 Q Okay. So you're not familiar with,</p> <p>23 like, a system of dealing drugs where cash is</p> <p>24 handed to one person and then another person</p>	<p style="text-align: right;">157</p> <p>1 foundation.</p> <p>2 THE WITNESS: I don't know.</p> <p>3 BY MR. MICHELINI:</p> <p>4 Q Okay. Was there anything else that</p> <p>5 happened on the day of your arrest that you</p> <p>6 haven't told us about?</p> <p>7 MR. FLAXMAN: Objection; form.</p> <p>8 THE WITNESS: Not that I know of.</p> <p>9 BY MR. MICHELINI:</p> <p>10 Q Okay. Nothing you can think of?</p> <p>11 A No.</p> <p>12 Q Okay. Did anything happen to you</p> <p>13 during transport to the police station?</p> <p>14 MR. FLAXMAN: Objection; form.</p> <p>15 THE WITNESS: Not that I could</p> <p>16 remember.</p> <p>17 BY MR. MICHELINI:</p> <p>18 Q Okay. You are not alleging any</p> <p>19 physical damages in this case; is that right?</p> <p>20 MR. FLAXMAN: Objection; foundation.</p> <p>21 THE WITNESS: Not that I can remember.</p> <p>22 BY MR. MICHELINI:</p> <p>23 Q Okay. Well, you are not --</p> <p>24 To be clear, you are not alleging</p>

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<p style="text-align: right;">158</p> <p>1 that you were physically harmed by the police, 2 right? 3 A I mean, it depend on if you -- like, 4 my handcuffs, my wrists, they had the handcuffs 5 tight, jerking on me, stuff like that; like, you 6 know. 7 Q Okay. So were you sore from the -- 8 A Did I go to the hospital? No, but, 9 yes, I was sore. 10 Q You were sore from the handcuffs being 11 too tight? 12 A Yes. 13 Q Okay. Did you tell the officers that 14 the handcuffs were too tight? 15 A Yes. 16 Q When did you do that? 17 A When they first put them on. 18 Q Okay. So at the scene? 19 A Yes. 20 Q Okay. When you were outside the 21 vehicle? 22 A Yes. 23 Q Okay. Did you tell them at any other 24 point?</p>	<p style="text-align: right;">160</p> <p>1 get it out of the impound lot; is that right? 2 A Yes, I had to give her her money back. 3 Q Okay. Why were you the one that paid 4 for the -- to get it out of the impound if it 5 was her car? 6 A Because I was in it. 7 Q Okay. Did you feel responsible for it 8 being impounded? 9 A Yes, I did. 10 Q Okay. The second time -- because it 11 got impounded after that. You got it out and 12 then it got impounded a second time during the 13 pendency of this case is what you're saying, 14 right? 15 A Yes. 16 Q Okay. Do you know why that car was 17 impounded again? 18 A I can't even remember. It's been so 19 long ago. 20 Q Okay. Were you present for whatever 21 happened for that second impoundment? 22 A I can't even remember. I just 23 remember it was in the pound, and I was driving 24 it; and then they said it was stolen or</p>
<p style="text-align: right;">159</p> <p>1 A Once we got to the station, I told 2 them again. 3 Q Okay. And then did they keep the 4 handcuffs on you behind your back the entire 5 time? 6 A For a second. They eventually took 7 them off. 8 Q Okay. So eventually they -- 9 A Put me to the wall. 10 Q Okay. And when you were attached to 11 the wall, were the handcuffs too tight? 12 A I think they loosened them up by then. 13 Q Okay. So it was just during your 14 transport that the handcuffs were too tight? 15 A Yes. 16 Q Okay. Any other physical damages that 17 you are alleging in this case? 18 A No. 19 Q Okay. We talked a little bit about 20 the car that you were in that day. You said 21 that was your girlfriend's car, right? 22 A Yes. 23 Q Okay. And even though it was your 24 girlfriend's car, you were the one that paid to</p>	<p style="text-align: right;">161</p> <p>1 something. 2 Q Okay. But I'm saying, do you know the 3 reason it was impounded the second time before 4 you -- 5 A I don't. I can't remember. 6 Q Okay. I'm just asking. Who else -- 7 You had keys to that vehicle, 8 right? 9 A At the time when they stopped me? 10 Q Yes, on November 6th of 2017. 11 A To which vehicle? 12 Q The vehicle you were in. 13 A Yes. 14 Q Okay. Did anyone else have keys to 15 the vehicle? 16 A No. 17 Q Okay. There was just one single set 18 of keys? 19 A No. I'm saying as far as me and 20 James, I had possession of that car. 21 Q Right. But my question is -- 22 A But if she got extra keys, I wouldn't 23 know. 24 Q Okay. Your girlfriend, you're talking</p>

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<p style="text-align: right;">162</p> <p>1 about?</p> <p>2 A Yes.</p> <p>3 Q You don't know if she had extra keys?</p> <p>4 A No, I don't know.</p> <p>5 Q But there was no one else besides you</p> <p>6 or your girlfriend that would have keys to that</p> <p>7 vehicle?</p> <p>8 A That's it. One of us two.</p> <p>9 Q Okay.</p> <p>10 A That I know of. I don't know.</p> <p>11 Q Okay. You said -- sorry. Go ahead.</p> <p>12 A What she got -- I don't know what she</p> <p>13 got going on with extra keys. I'm just saying,</p> <p>14 what I have --</p> <p>15 Q Right. But you know that you had a</p> <p>16 set of keys?</p> <p>17 A Yes.</p> <p>18 Q Okay. And you said you had been</p> <p>19 fighting with her that evening. You hadn't seen</p> <p>20 her, correct?</p> <p>21 A Depending on what you mean fighting.</p> <p>22 I was arguing with her back and forth on text.</p> <p>23 Q Yes, that's what I meant.</p> <p>24 A Yeah.</p>	<p style="text-align: right;">164</p> <p>1 but your I-bond after this new case, the stolen</p> <p>2 vehicle case, was dismissed, your I-bond was</p> <p>3 reinstated; that's correct?</p> <p>4 A Yes.</p> <p>5 Q Okay. Are there any other damages,</p> <p>6 either emotional, pain and suffering, physical,</p> <p>7 any expenses you have incurred that we haven't</p> <p>8 talked about today?</p> <p>9 MR. FLAXMAN: Objection; form.</p> <p>10 THE WITNESS: At this point in time, I</p> <p>11 can't even remember everything, but so far.</p> <p>12 BY MR. MICHELINI:</p> <p>13 Q Okay. So the answer is, no, not at</p> <p>14 this time?</p> <p>15 A Yes.</p> <p>16 Q Okay. That area that you were</p> <p>17 arrested in outside your grandmother's house,</p> <p>18 how would you describe that area?</p> <p>19 A Kind of messed up.</p> <p>20 Q Okay. What do you mean by that?</p> <p>21 A Like gangs, stuff like that.</p> <p>22 Q Okay. Are there certain gangs that</p> <p>23 operate in that neighborhood?</p> <p>24 A Down there it's different type of</p>
<p style="text-align: right;">163</p> <p>1 Q Okay. You said you were the one that</p> <p>2 got that car from the impound lot, right?</p> <p>3 A No.</p> <p>4 Q Who did?</p> <p>5 A What time are you talking about? The</p> <p>6 first time?</p> <p>7 Q The first time, yes.</p> <p>8 A Yes, yes, yes. I paid to get it out.</p> <p>9 Q You were the one that went, physically</p> <p>10 went and paid?</p> <p>11 A No, she went.</p> <p>12 Q Okay. So she was the one that got the</p> <p>13 car from the lot?</p> <p>14 A Yes.</p> <p>15 Q But you fronted the money?</p> <p>16 A Yes, I gave her the money.</p> <p>17 Q Okay. I understand. How did you find</p> <p>18 out that that car was impounded?</p> <p>19 A I went to jail and they took the car</p> <p>20 with us.</p> <p>21 Q Okay. So you saw the officers drive</p> <p>22 the car?</p> <p>23 A Yes.</p> <p>24 Q Okay. We mentioned it briefly before,</p>	<p style="text-align: right;">165</p> <p>1 gangs. It's like all mixed up.</p> <p>2 Q Okay. What do you mean by that?</p> <p>3 A I means, it's whatever gangs, this</p> <p>4 gang here, this gang here, this gang here, this</p> <p>5 gang here. It's just all mixed up. They all in</p> <p>6 the same --</p> <p>7 Q And so part of your work at CRED is</p> <p>8 you understand where the gangs are operating,</p> <p>9 right?</p> <p>10 A Yes.</p> <p>11 Q Okay. You have a pretty intimate</p> <p>12 knowledge of that in the City of Chicago; is</p> <p>13 that correct?</p> <p>14 A Yes.</p> <p>15 Q Okay. What gangs operate in that area</p> <p>16 that you were arrested in?</p> <p>17 A GDs, BDs and Four Corner Hustlers.</p> <p>18 Q Okay. GDs is short for Gangster</p> <p>19 Disciples?</p> <p>20 A Yes.</p> <p>21 Q And BDs is short for Black Disciples?</p> <p>22 A Yes.</p> <p>23 Q Is BDs an offset of Gangster</p> <p>24 Disciples?</p>

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<p style="text-align: right;">166</p> <p>1 A Yes.</p> <p>2 Q Okay. Were you ever associated with a</p> <p>3 gang?</p> <p>4 A No.</p> <p>5 Q Okay. Was Mr. McIntyre ever</p> <p>6 associated with a gang?</p> <p>7 A Yes.</p> <p>8 Q Which one?</p> <p>9 A He a Black Disciple.</p> <p>10 Q Okay. Is he still associated with</p> <p>11 that gang?</p> <p>12 A No, he was young, you know. He was</p> <p>13 young then.</p> <p>14 Q Okay.</p> <p>15 A He was trying to take care of his</p> <p>16 kids.</p> <p>17 Q Right. When did he associate with the</p> <p>18 Black Disciples?</p> <p>19 A Probably he was like '19,</p> <p>20 20-something. No more than 24, like, you know.</p> <p>21 Q You said 1924?</p> <p>22 A No, no.</p> <p>23 Q I was going to say, I don't think</p> <p>24 that's --</p>	<p style="text-align: right;">168</p> <p>1 got going on now.</p> <p>2 Q Okay. And that's what you have seen</p> <p>3 from your work in CRED?</p> <p>4 A Yes.</p> <p>5 Q Okay. Do you know that area that you</p> <p>6 were arrested in to be a narcotics area?</p> <p>7 A What I was told, everywhere a certain</p> <p>8 color pole; I forgot what color the poles is,</p> <p>9 green, black, whatever it is, is all a bad area.</p> <p>10 Q What does that mean?</p> <p>11 A Meaning wherever these color poles at,</p> <p>12 whatever color that they use -- I can't remember</p> <p>13 exactly what it was, but it's, like, a drug</p> <p>14 infested area.</p> <p>15 Q Okay. You are talking about, like,</p> <p>16 with the material of what the street poles are?</p> <p>17 A Yes.</p> <p>18 Q Okay. But do you know that area to</p> <p>19 have narcotics sales happening on the street in</p> <p>20 that area?</p> <p>21 A Yes.</p> <p>22 Q Okay. Mr. McIntyre used to sell</p> <p>23 drugs, right?</p> <p>24 A Yes.</p>
<p style="text-align: right;">167</p> <p>1 A Between like 17 and 24.</p> <p>2 THE COURT REPORTER: No more than 24?</p> <p>3 THE WITNESS: Yeah.</p> <p>4 BY MR. MICHELINI:</p> <p>5 Q He was 24 years old?</p> <p>6 A Yeah.</p> <p>7 Q Okay. Got you.</p> <p>8 A Between the ages of 17 and 24.</p> <p>9 Q 24. Okay, I understand. Thank you.</p> <p>10 So you said that there were gangs</p> <p>11 that were operating in that area; is that right?</p> <p>12 A Yes.</p> <p>13 Q Okay. And they still do to this day?</p> <p>14 A That I don't know. I mean -- I mean</p> <p>15 -- I mean, I know, but it's like -- it's not</p> <p>16 really about gangs no more. It's about clicks.</p> <p>17 It's like you don't have to be a GD or a BD or a</p> <p>18 Four, they all might be together.</p> <p>19 Q Got you.</p> <p>20 A If it makes sense.</p> <p>21 Q Yeah, yeah. It's a little bit</p> <p>22 fractured. Is that a good word for it?</p> <p>23 A Yeah. So it's like your hood versus</p> <p>24 every other hood. It's like that's what they</p>	<p style="text-align: right;">169</p> <p>1 Q Okay. Did he used to sell drugs in</p> <p>2 that area where you were arrested?</p> <p>3 A I don't know exactly where he sold</p> <p>4 drugs. He ain't never sold drugs around me,</p> <p>5 but, you know, I know he sold drugs before.</p> <p>6 Q Okay. Did you ever know him to use</p> <p>7 drugs?</p> <p>8 A No.</p> <p>9 Q Have you ever used drugs?</p> <p>10 A I smoke weed.</p> <p>11 Q Okay. Anything else?</p> <p>12 A No. That's it.</p> <p>13 Q Alcohol?</p> <p>14 A Yeah, I drink.</p> <p>15 Q Okay. Technically coffee is a drug,</p> <p>16 technically, right, you know, cigarettes, sure.</p> <p>17 A Yeah.</p> <p>18 Q Okay. Have you ever bought or sold</p> <p>19 drugs?</p> <p>20 A Have I bought or sold drugs?</p> <p>21 Q Yes.</p> <p>22 A I bought. Yeah, I bought drugs</p> <p>23 before.</p> <p>24 Q Have you bought cocaine before?</p>

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<p style="text-align: right;">170</p> <p>1 A No.</p> <p>2 Q Okay. What about heroin?</p> <p>3 A No.</p> <p>4 Q Okay. Have you ever sold either of</p> <p>5 those drugs?</p> <p>6 A No.</p> <p>7 Q Okay. So you never sold cocaine?</p> <p>8 A No.</p> <p>9 Q Never sold heroin?</p> <p>10 A No.</p> <p>11 Q Okay. And I'm saying ever in your</p> <p>12 lifetime.</p> <p>13 A No.</p> <p>14 Q Okay.</p> <p>15 A And I been charged with cocaine back</p> <p>16 in '96. Somebody else served them, but, I mean,</p> <p>17 it's like that's hard to prove, but like I said.</p> <p>18 Q Right. So back in '96, when you were</p> <p>19 convicted of the possession of the cocaine --</p> <p>20 A Exactly.</p> <p>21 Q -- you weren't -- you weren't using it</p> <p>22 then?</p> <p>23 A Or buying it or selling it.</p> <p>24 Q Okay. You just had it on your person?</p>	<p style="text-align: right;">172</p> <p>1 A Yes.</p> <p>2 Q Okay. Do you know what constructive</p> <p>3 possession is?</p> <p>4 A No. What is it?</p> <p>5 Q Okay. I was just asking if you know</p> <p>6 what that is.</p> <p>7 A No, I don't. I would like to know</p> <p>8 though.</p> <p>9 Q I'll tell you some other time.</p> <p>10 You would agree that the -- in the</p> <p>11 criminal case the State -- the prosecutors have</p> <p>12 to prove the case beyond a reasonable doubt; is</p> <p>13 that right?</p> <p>14 A Yes.</p> <p>15 Q Okay. You would agree that probable</p> <p>16 cause is a lower standard than beyond a</p> <p>17 reasonable doubt, right?</p> <p>18 A Yeah.</p> <p>19 Q Okay.</p> <p>20 A I don't know.</p> <p>21 Q You don't know, okay.</p> <p>22 You said that there was a</p> <p>23 preliminary hearing in this case, right, for</p> <p>24 this one?</p>
<p style="text-align: right;">171</p> <p>1 A I didn't have it period. Somebody</p> <p>2 else sold the police something. I was just with</p> <p>3 -- in the crowd.</p> <p>4 Q Okay.</p> <p>5 A They said something to me first. He</p> <p>6 spoke up and said something, and they took both</p> <p>7 of us to jail for it.</p> <p>8 Q Okay. But you pled guilty on that</p> <p>9 case; is that right?</p> <p>10 A Yes.</p> <p>11 Q Okay. And why is that?</p> <p>12 A Because I got tired of going to court.</p> <p>13 I was scared; I was young; and I wasn't getting</p> <p>14 in no trouble anyway. So I caught that for</p> <p>15 probation.</p> <p>16 Q Okay. And so you --</p> <p>17 In that case, you pled guilty, even</p> <p>18 though you weren't guilty; is that right?</p> <p>19 A Yes.</p> <p>20 Q Okay. Do you understand what actual</p> <p>21 possession is?</p> <p>22 A Meaning being caught with it.</p> <p>23 Q Right, that you have it on your</p> <p>24 person, right?</p>	<p style="text-align: right;">173</p> <p>1 A Yes.</p> <p>2 Q Okay. And you mentioned earlier that</p> <p>3 you recognized one of the officers at the</p> <p>4 prelim?</p> <p>5 A Yes.</p> <p>6 Q Okay. And the judge at the</p> <p>7 preliminary hearing found that there was</p> <p>8 probable cause to move the case forward; is that</p> <p>9 right?</p> <p>10 A Yes.</p> <p>11 Q Okay. Unlike the other case, the</p> <p>12 stolen vehicle case, that was dismissed at</p> <p>13 preliminary hearing, right?</p> <p>14 A Yes.</p> <p>15 Q Okay. Because the judge found that</p> <p>16 there was no probable cause?</p> <p>17 A Yes.</p> <p>18 MR. MICHELINI: Let's take a quick</p> <p>19 break. I think we're almost done here.</p> <p>20 THE VIDEOGRAPHER: The time is 12:55.</p> <p>21 We are going off the record.</p> <p>22 (Whereupon a recess was</p> <p>23 taken after which the</p> <p>24 proceedings resumed as</p>

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<p style="text-align: right;">174</p> <p>1 follows:)</p> <p>2 THE VIDEOGRAPHER: The time is 1:01.</p> <p>3 We are going back on the record.</p> <p>4 Please proceed.</p> <p>5 BY MR. MICHELINI:</p> <p>6 Q Okay. Mr. Jackson, you had a cell</p> <p>7 phone at the time in November of 2017, right?</p> <p>8 A Yes.</p> <p>9 Q Okay. Do you have the same phone</p> <p>10 number now as you did then?</p> <p>11 A No.</p> <p>12 Q Okay. What was your phone number</p> <p>13 then?</p> <p>14 A I don't remember.</p> <p>15 Q Okay. What is your phone number now?</p> <p>16 A 773-939-7277.</p> <p>17 Q What service provider is it?</p> <p>18 A Verizon.</p> <p>19 Q Okay. And what service provider did</p> <p>20 you have back in 2017?</p> <p>21 A T-Mobile, I think. Boost or</p> <p>22 something. I don't even remember.</p> <p>23 Q Okay.</p> <p>24 A It wasn't Verizon. I know that.</p>	<p style="text-align: right;">176</p> <p>1 of the officers.</p> <p>2 BY MR. MICHELINI:</p> <p>3 Q Right. How -- well, you have named</p> <p>4 actual officers in this complaint, you would</p> <p>5 agree, right?</p> <p>6 MR. FLAXMAN: Objection; foundation;</p> <p>7 form.</p> <p>8 BY MR. MICHELINI:</p> <p>9 Q You can answer.</p> <p>10 A I don't know.</p> <p>11 Q You don't know how you would know the</p> <p>12 names?</p> <p>13 A I wouldn't know.</p> <p>14 Q Okay. But you wouldn't know, you</p> <p>15 said, correct?</p> <p>16 A Yes.</p> <p>17 Q Okay. And yet you have named nine</p> <p>18 individual officers, correct?</p> <p>19 MR. FLAXMAN: Objection; form and</p> <p>20 foundation.</p> <p>21 BY MR. MICHELINI:</p> <p>22 Q You can answer.</p> <p>23 A I don't know.</p> <p>24 Q Okay.</p>
<p style="text-align: right;">175</p> <p>1 Q Okay. You would agree with me that</p> <p>2 your lawsuit allegations or has named nine</p> <p>3 defendant officers; is that right?</p> <p>4 MR. FLAXMAN: Objection; foundation.</p> <p>5 THE WITNESS: I don't know.</p> <p>6 BY MR. MICHELINI:</p> <p>7 Q Okay. You don't know how many</p> <p>8 officers you named in your complaint?</p> <p>9 A I don't even know officers names,</p> <p>10 so --</p> <p>11 Q Okay. So I guess that is my point is</p> <p>12 how do you know that these officers were</p> <p>13 involved in your arrest?</p> <p>14 MR. FLAXMAN: I'm just going to</p> <p>15 instruct the witness to the extent that his</p> <p>16 answer would reveal a conversation you had with</p> <p>17 your attorney, you should not give him that</p> <p>18 answer.</p> <p>19 BY MR. MICHELINI:</p> <p>20 Q Without talking about any</p> <p>21 conversations you had with your attorney, how do</p> <p>22 you know the names of these officers?</p> <p>23 MR. FLAXMAN: And I just object to the</p> <p>24 form; that he testified he didn't know the names</p>	<p style="text-align: right;">177</p> <p>1 A I don't remember.</p> <p>2 Q Okay. You don't remember --</p> <p>3 A The names. I don't remember no names.</p> <p>4 Q Okay, right. But you agree that you</p> <p>5 have named nine names, correct?</p> <p>6 MR. FLAXMAN: Objection; asked and</p> <p>7 answered. He told you he doesn't know.</p> <p>8 MR. MICHELINI: That's not what I</p> <p>9 asked.</p> <p>10 BY MR. MICHELINI:</p> <p>11 Q But you can answer.</p> <p>12 A I don't know.</p> <p>13 Q Okay.</p> <p>14 (Whereupon a discussion</p> <p>15 was held off the record.)</p> <p>16 So I will mark this --</p> <p>17 MR. FLAXMAN: We're not going to</p> <p>18 dispute what is in the complaint.</p> <p>19 MR. MICHELINI: Right. I'm just going</p> <p>20 to mark an exhibit and show it to him.</p> <p>21 BY MR. MICHELINI:</p> <p>22 Q So I will mark this as Exhibit 2.</p> <p>23 (Whereupon Deposition</p> <p>24 Exhibit No. 2 was marked</p>

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<p style="text-align: right;">178</p> <p>1 for identification; said</p> <p>2 exhibit was tendered to</p> <p>3 the witness.)</p> <p>4 Do you recognize this, Mr. Jackson?</p> <p>5 A I can't remember.</p> <p>6 Q Okay. So I'll direct your attention</p> <p>7 to --</p> <p>8 A I didn't read it all the way though.</p> <p>9 Q Okay. Go ahead. Take your time.</p> <p>10 (Whereupon the witness</p> <p>11 examines the document.)</p> <p>12 A I just can't remember if that is the</p> <p>13 page I seen.</p> <p>14 Q Okay. I just want to direct your</p> <p>15 attention to the -- I guess it's the back side</p> <p>16 of the second page of this document.</p> <p>17 MR. FLAXMAN: Is it okay if I go ahead</p> <p>18 and flip for him?</p> <p>19 MR. MICHELINI: Yes, go ahead.</p> <p>20 (Whereupon counsel</p> <p>21 assists the witness.)</p> <p>22 MR. FLAXMAN: This is the complaint?</p> <p>23 MR. MICHELINI: Title page and</p> <p>24 complaint, yes. Yes.</p>	<p style="text-align: right;">180</p> <p>1 where it is?</p> <p>2 MR. MICHELINI: Yes.</p> <p>3 (Whereupon counsel</p> <p>4 assists the witness.)</p> <p>5 THE WITNESS: Oh, okay. Yeah, I see my</p> <p>6 name. I see a lot of names.</p> <p>7 BY MR. MICHELINI:</p> <p>8 Q Right. And so your name is Dennis</p> <p>9 Jackson, and below, it says plaintiff, right?</p> <p>10 A Yes.</p> <p>11 Q Okay. And below that, it says versus,</p> <p>12 right?</p> <p>13 A Yes.</p> <p>14 Q And then below versus, it says City of</p> <p>15 Chicago, right?</p> <p>16 A Yes.</p> <p>17 Q And then it lists several names,</p> <p>18 right?</p> <p>19 A Correct.</p> <p>20 Q Okay. And you don't know -- strike</p> <p>21 that.</p> <p>22 Earlier you said that you</p> <p>23 recognized only two officers from this case; is</p> <p>24 that right?</p>
<p style="text-align: right;">179</p> <p>1 BY MR. MICHELINI:</p> <p>2 Q So you would agreed this is the</p> <p>3 complaint that you filed in this case; is that</p> <p>4 correct?</p> <p>5 MR. FLAXMAN: Objection; foundation.</p> <p>6 BY MR. MICHELINI:</p> <p>7 Q Do you know what this document is?</p> <p>8 A Not at this point, no.</p> <p>9 Q Okay. You have never seen this</p> <p>10 before?</p> <p>11 A I don't remember.</p> <p>12 Q Okay. You don't know if this is the</p> <p>13 complaint that your attorney filed on your</p> <p>14 behalf?</p> <p>15 MR. FLAXMAN: Objection; asked and</p> <p>16 answered; foundation.</p> <p>17 BY MR. MICHELINI:</p> <p>18 Q You can answer.</p> <p>19 A I don't know.</p> <p>20 Q Okay. It has your name on it, right,</p> <p>21 Dennis Jackson?</p> <p>22 A I don't even see it.</p> <p>23 Q At the top of the left of the page?</p> <p>24 MR. FLAXMAN: Is it okay if I point</p>	<p style="text-align: right;">181</p> <p>1 A Yes, but I said I didn't know they</p> <p>2 names.</p> <p>3 Q Okay. But you don't know --</p> <p>4 A I recognized three officers, but I</p> <p>5 don't know they names.</p> <p>6 Q Okay. But you don't know individually</p> <p>7 what each of any of these officers did in this</p> <p>8 case; is that fair?</p> <p>9 A What you mean?</p> <p>10 Q So if I said, what did Patrick Boyle</p> <p>11 do in this case, you wouldn't know?</p> <p>12 A I wouldn't know.</p> <p>13 Q Okay, right. Or Jennifer Burmistrz?</p> <p>14 A I wouldn't know.</p> <p>15 Q Okay. So any of these names of these</p> <p>16 officers, you wouldn't know what their role was</p> <p>17 in this case; is that fair?</p> <p>18 A That's fair.</p> <p>19 Q Okay. So aside from those three</p> <p>20 officers that you did know, but you don't know</p> <p>21 their names, what did the other officers do in</p> <p>22 this case?</p> <p>23 A I guess they just did what them other</p> <p>24 three officers told them to do.</p>

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<p style="text-align: right;">182</p> <p>1 Q Okay. Do you think that those other 2 officers, again, the ones that you do not 3 recognize, but don't know by name, were the 4 reason that you were falsely arrested? 5 A They was all together. 6 Q Okay. 7 A It's just like if these -- the two, 8 three officers that I recognized and the other 9 officers let them do whatever they do, it's like 10 everybody at fault to me. 11 Q Right. So part of your complaint is 12 that the officers fabricated police reports or 13 planted drugs; is that right? 14 A Yes. 15 Q Okay. So which officers fabricated 16 the police reports? 17 A I don't know who wrote the police 18 report. 19 Q Okay. And which officers planted the 20 drugs? 21 A I don't know what officer planted the 22 drugs. 23 MR. MICHELINI: Okay. All right. I 24 have nothing further.</p>	<p style="text-align: right;">184</p> <p>1 car by yourself, did anybody hand you something 2 through the window of the car? 3 A No. My windows didn't work. No. 4 Q And during the time that you were in 5 the car with Mr. McIntyre, did anybody hand you 6 anything through the window? 7 A No. 8 Q Okay. And did you just tell me that 9 the window on the driver's side of that car was 10 not working that day? 11 A Both of them. Both driver's side 12 windows never worked in the car since she had 13 the car. 14 Q Okay. And when you say both driver's 15 side window, do you mean front and back? 16 A Front and back, yes. So there is no 17 way on that side a window was let down. 18 Q While your case was pending, did you 19 learn that Mr. McIntyre pleaded guilty? 20 A Yes. 21 Q And did you learn what sentence he 22 got? 23 A Yes. I can't remember the time that 24 he took. I think 75 days or something. I can't</p>
<p style="text-align: right;">183</p> <p>1 EXAMINATION 2 BY MR. FLAXMAN: 3 Q Mr. Jackson, when you were questioned 4 about the time you were in the car by yourself, 5 and then there was a separate time after Mr. 6 McIntyre was in the car with you. Do you 7 remember there were two different time periods? 8 A Yes. 9 Q And you gave what you thought were the 10 approximate amount of times that each of those 11 two different time periods lasted? 12 A Yes. 13 Q And I meant to ask this as a separate 14 question. Those were approximate times, right? 15 A Yes. 16 Q Okay. During the time that you were 17 in the car by yourself, did anybody speak to you 18 from outside of the car? 19 A No. 20 Q During time that you were in the car 21 with Mr. McIntyre, did anybody speak to you from 22 outside of the car? 23 A No. 24 Q During the time that you were in the</p>	<p style="text-align: right;">185</p> <p>1 remember exactly what it was. 2 Q Okay. Did you learn that he had to 3 serve time in prison? 4 A Yes. 5 Q Were you ever concerned that you might 6 have to do prison time on this case? 7 A Yes. 8 Q Was it stressful to worry about having 9 to serve prison time on this case? 10 A Yes. 11 Q Have you ever been in prison? 12 A No. 13 MR. FLAXMAN: Okay. I don't have any 14 other questions. 15 MR. MICHELINI: Just briefly. 16 FURTHER EXAMINATION 17 BY MR. MICHELINI: 18 Q You said that the front and back 19 windows of the driver's side of that vehicle did 20 not work? 21 A Yes. 22 Q Okay. And how long did that -- how 23 long did those windows not roll down? 24 A Ever since she bought the truck, they</p>

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<p style="text-align: right;">186</p> <p>1 never worked.</p> <p>2 Q Okay. When did she buy the truck?</p> <p>3 A I don't remember exactly.</p> <p>4 Q Okay. Was it a year before this? Was</p> <p>5 it two years?</p> <p>6 A A couple years probably before this.</p> <p>7 Q Okay. And it was only on the driver's</p> <p>8 side that those two windows did not work?</p> <p>9 A Yes.</p> <p>10 Q Okay. And you were never able to roll</p> <p>11 those windows down?</p> <p>12 A Never.</p> <p>13 Q Okay. But the windows on the</p> <p>14 passenger's side, the front and back, those</p> <p>15 windows did work?</p> <p>16 A Yes.</p> <p>17 Q Okay. Did you ever go and get the car</p> <p>18 repaired?</p> <p>19 A I tried to get it repaired. At the</p> <p>20 time, she didn't have the money. So I got a</p> <p>21 work order from one place; and then I got a work</p> <p>22 order from Chevy on 95th and Cicero.</p> <p>23 Q What about Lester, the local mechanic</p> <p>24 in the neighborhood? Did you ask him for help</p>	<p style="text-align: right;">188</p> <p>1 STATE OF ILLINOIS)</p> <p>2)</p> <p>3 COUNTY OF COOK)</p> <p>4 I, Izetta White-McGee, a Notary</p> <p>5 Public and Certified Shorthand Reporter within</p> <p>6 and for the County of Cook and State of</p> <p>7 Illinois, do hereby certify that heretofore, to</p> <p>8 wit: on September 1, 2023, personally appeared</p> <p>9 before me, DENNIS JACKSON, plaintiff in the</p> <p>10 above-captioned matter, which cause is now</p> <p>11 pending and undetermined in the above-captioned</p> <p>12 court.</p> <p>13 I further certify that the said</p> <p>14 witness was by me first duly sworn to testify to</p> <p>15 the truth, the whole truth and nothing but the</p> <p>16 truth in the cause aforesaid; that the testimony</p> <p>17 then given by the witness was reported</p> <p>18 stenographically by me and afterwards reduced to</p> <p>19 writing and the foregoing deposition is a true</p> <p>20 and correct transcription of my shorthand notes</p> <p>21 so taken as aforesaid.</p> <p>22 The signature of the witness to the</p> <p>23 foregoing deposition was not waived.</p> <p>24 I further certify that this</p>
<p style="text-align: right;">187</p> <p>1 with the car?</p> <p>2 A He don't do windows, no.</p> <p>3 Q Okay. He just does mechanical?</p> <p>4 A Yes.</p> <p>5 MR. MICHELINI: Okay.</p> <p>6 (Whereupon a discussion</p> <p>7 was held off the record.)</p> <p>8 Nothing further.</p> <p>9 MR. FLAXMAN: Reserve signature. Thank</p> <p>10 you.</p> <p>11 THE VIDEOGRAPHER: The time is 1:12.</p> <p>12 We have reached the conclusion of the deposition</p> <p>13 of Dennis Jackson. The deposition took place on</p> <p>14 two media files. We are going off the record.</p> <p>15 MR. FLAXMAN: Not right now.</p> <p>16 MR. MICHELINI: PDF and video.</p> <p>17 AND FURTHER DEPONENT SAYETH NAUGHT</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>	<p style="text-align: right;">189</p> <p>1 deposition was taken pursuant to notice and that</p> <p>2 there were present at the taking of the</p> <p>3 deposition the appearance as heretofore noted.</p> <p>4 I further certify that I am not</p> <p>5 counsel for nor in any way related to any of the</p> <p>6 parties to this lawsuit, nor am I in any way</p> <p>7 interested in the outcome thereof.</p> <p>8 IN WITNESS WHEREOF, I have hereunto</p> <p>9 set my hand this date, September 11, 2023</p> <p>10</p> <p>11 *****</p> <p>12 I, Izetta White-McGee, certified</p> <p>13 legal videographer and Notary Public, do hereby</p> <p>14 certify that the above-captioned deposition was</p> <p>15 videotaped by me. That said video deposition</p> <p>16 took place on September 1, 2023, began at 10:18</p> <p>17 a.m., and concluded at 1:12 p.m., total run time</p> <p>18 was 2 hours and 54 minutes (including breaks).</p> <p>19 Said videotape is a true and</p> <p>20 accurate record of the deposition so taken, and</p> <p>21 the same has not been edited or otherwise</p> <p>22 altered.</p> <p>23 I further certify that I am not</p> <p>24 counsel for nor in any way related to any of the</p>

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<p style="text-align: right;">190</p> <p>1 parties to this lawsuit, nor am I in any way</p> <p>2 interested in the outcome thereof.</p> <p>3 The original audio-visual record</p> <p>4 will remain with DCM Court Reporting, Inc.</p> <p>5 IN WITNESS WHEREOF, I have hereunto</p> <p>6 set my hand this date, September 11, 2023.</p> <p>7</p> <p>8</p> <p>9</p> <p>10 <i>Izetta White-McGee</i></p> <p>11 Izetta White-McGee, CCVS</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>	<p style="text-align: right;">192</p> <p>1 ERRATA SHEET</p> <p>2 Examination of: DENNIS JACKSON</p> <p>3 Date taken: September 1, 2023</p> <p>4 Page Line</p> <p>5 Change: _____</p> <p>6 Reason: _____</p> <p>7 Change: _____</p> <p>8 Reason: _____</p> <p>9 Change: _____</p> <p>10 Reason: _____</p> <p>11 Change: _____</p> <p>12 Reason: _____</p> <p>13 Change: _____</p> <p>14 Reason: _____</p> <p>15 Change: _____</p> <p>16 Reason: _____</p> <p>17 Change: _____</p> <p>18 Reason: _____</p> <p>19 Change: _____</p> <p>20 Reason: _____</p> <p>21 Deponent's</p> <p>22 Signature _____ Date _____</p> <p>23</p> <p>24</p>
<p style="text-align: right;">191</p> <p>1</p> <p>2 IN THE UNITED STATES DISTRICT COURT</p> <p>3 NORTHERN DISTRICT, EASTERN DIVISION</p> <p>4 DENNIS JACKSON,)No. 22-cv-4337</p> <p>5 Plaintiff,)District Judge</p> <p>6 vs.)Alonso</p> <p>7 CITY OF CHICAGO, et al.,)Magistrate</p> <p>8 Defendants.)Judge Weisman</p> <p>9 I hereby certify that I have read</p> <p>10 the foregoing transcript of my deposition given</p> <p>11 on September 1, 2023, consisting of 193 pages;</p> <p>12 and I do again subscribe and make oath that the</p> <p>13 same is a true, correct and complete transcript</p> <p>14 of my deposition given as aforesaid, with</p> <p>15 corrections, if any, appearing on the attached</p> <p>16 correction sheet(s).</p> <p>17 _____</p> <p>18 DENNIS JACKSON</p> <p>19 Subscribed and sworn to</p> <p>20 before me this _____ day</p> <p>21 of _____, 2023.</p> <p>22 _____</p> <p>23 Notary Public</p> <p>24</p>	<p style="text-align: right;">193</p> <p>1 ERRATA SHEET</p> <p>2 Examination of: DENNIS JACKSON</p> <p>3 Date taken: September 1, 2023</p> <p>4 Page Line</p> <p>5 Change: _____</p> <p>6 Reason: _____</p> <p>7 Change: _____</p> <p>8 Reason: _____</p> <p>9 Change: _____</p> <p>10 Reason: _____</p> <p>11 Change: _____</p> <p>12 Reason: _____</p> <p>13 Change: _____</p> <p>14 Reason: _____</p> <p>15 Change: _____</p> <p>16 Reason: _____</p> <p>17 Change: _____</p> <p>18 Reason: _____</p> <p>19 Change: _____</p> <p>20 Reason: _____</p> <p>21 Deponent's</p> <p>22 Signature _____ Date _____</p> <p>23</p> <p>24</p>

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