

EXHIBIT A

Jason Enos 09/28/2023

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

CURTIS LAMOND OATS, SR.,)
 Plaintiff,)
 - vs -) No. 3:22-cv-50113
MCHENRY COUNTY, ILLINOIS,) (Judge Johnston)
et al.,)
 Defendants.)

The deposition of JASON ENOS, called for
examination pursuant to the Rules of Civil
Procedure for the United States District Courts
pertaining to the taking of depositions, taken
before ATHANASIA MOURGELAS, a notary public within
and for the County of Cook and State of Illinois,
via Zoom teleconference, Illinois, on the 28th day
of September, 2023, at the hour of 1:25 o'clock
p.m.

Reported by: Athanasia Mourgelas
License No. 084-004329



1 APPEARANCES:
2

3 KENNETH N. FLAXMAN, P.C., by
4 MR. KENNETH N. FLAXMAN,
5 200 South Michigan Avenue, Suite 201,
6 Chicago, Illinois 60604,
7 (312) 427-3200,
8 knf@kenlaw.com

9 Representing the Plaintiff;

10
11 HON. PATRICK D. KENNEALLY,
12 State's Attorney of
13 McHenry County, Illinois, by
14 MR. TROY OWENS,
15 2200 North Seminary Avenue, Suite 150,
16 Woodstock, Illinois 60098,
17 (815) 334-4159,
18 tcowens@mchenrycountyil.gov,
19 Representing the Defendant.
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I N D E X

WITNESS

EXAMINATION

JASON ENOS

By Mr. Flaxman

4

E X H I B I T S

NUMBER

MARKED FOR ID

(None marked.)

(Whereupon, the deposition
commenced at 1:25 p.m.)
(Witness sworn.)

JASON ENOS,
having been first duly sworn, was examined and
testified as follows:

EXAMINATION

BY MR. FLAXMAN:

Q. Good afternoon, sir. Could you state your
name and spell your last name for us?

A. My name is Jason Enos, last named E-N-O-S.

Q. Were you present during the last
deposition of Ms. Carlson?

A. Yes, I was.

Q. And did you hear her say anything that you
thought was inaccurate or incorrect?

A. No.

Q. Did you have occasion to -- did you ever
have occasion to meet Mr. Curtis Oats?

A. We met Mr. Oats.

Q. Did you meet him in the course of your
work from McHenry County?

A. Yes, I did.

Q. Where did you first meet Mr. Oats?



1 A. I met Mr. Oats at 4816 East Lake Shore
2 Drive in Wonder Lake.

3 Q. And did you go there in the course of your
4 duties as an animal patrol officer?

5 A. Yes, I did.

6 Q. And what brought you to Mr. Oats' house?

7 A. There was a nuisance barking call that I
8 responded to.

9 Q. Can you tell us as best you can what the
10 call was?

11 A. I'm sorry, can you repeat that?

12 Q. Can you tell us as best you can what the
13 call was?

14 A. I don't recall. It was a nuisance barking
15 call.

16 Q. And did you have a conversation with
17 Mr. Oats?

18 A. I did.

19 Q. Was that on August 18th of 2021?

20 A. Yes, it was.

21 Q. And when you answered the question, are
22 you looking at what's marked at the bottom
23 right-hand corner MC-000223?

24 A. Yes, I am.



1 Q. And there's an entry there for 8/18/21,
2 did you make that entry?

3 A. Yes, I did.

4 Q. How did you physically go about making
5 that entry?

6 A. On a computer in a work van.

7 Q. And when you made that entry, were you
8 trying to be truthful and accurate?

9 A. Yes, I was.

10 Q. And were you trying to be complete?

11 A. Yes, I was.

12 Q. In your entry for 8/18/21 at 10:44, you
13 wrote that I left an ordinance violation for lack
14 of vaccination and registration and a notice of
15 public complaint for barking; is that right?

16 A. Yes, I did.

17 Q. But did you hear barking?

18 A. I did not.

19 Q. How did you learn that there was a lack of
20 vaccination and registration?

21 A. From the limited information I was given,
22 I called the vet that Mr. Oats provided me with and
23 the name of the dog that he provided me with.

24 Q. And you wrote I left an ordinance



1 violation, where did you leave it?

2 A. At the front door.

3 Q. Did you see Mr. Oats' mailbox that day?

4 A. I don't recall.

5 Q. Was there another time when you went out
6 to Mr. Oats' residence at that address you told us
7 before at 4816 East Lake Shore Drive in Wonder
8 Lake?

9 A. No, I went out there the one time.

10 Q. Have you ever looked inside of a
11 resident's mailbox in the course of your work for
12 McHenry County?

13 A. No, I have not.

14 Q. Was anybody with you on August 18th of
15 2021 when you went to Mr. Oats' home?

16 A. No.

17 Q. Now, there's an entry on that Page
18 MC-000223, 8/18/21 at 15:04. Did you make that
19 entry? It starts a gentleman came in with a camera
20 around his neck.

21 A. I did not make that entry.

22 Q. Do you know who did?

23 A. A woman by the name of Dana Coone.

24 Q. And then at the last entry for -- well,



1 there's several paragraphs down it starts out, I
2 called the vet and the only dog they stated is that
3 they did not have a Monica Crosby. Did you write
4 that?

5 A. I'm sorry, could you direct me to what
6 you're looking at?

7 Q. Well, okay. The first paragraph is a
8 gentleman came in. The next paragraph I explained
9 to him the form and that -- you didn't write that;
10 is that correct?

11 A. I did not, no.

12 Q. Okay. The next paragraph, he brought up
13 the officer had a Monica Crosby. Am I correct that
14 you didn't write that one either?

15 A. I did not write that.

16 Q. And then the next paragraph he stated now
17 he's recording. Did you write that?

18 A. I did not write that.

19 Q. And the paragraph after that, I called the
20 vet. Is that something -- did you write that?

21 A. I did not.

22 Q. Do you recall calling the vet on
23 August 18th of 2021?

24 A. I did call the vet on August 18th, 2021.



1 Q. Now, there's a continued note for 8/18/21,
2 the vet stated they have a dog named Goose Oats.
3 Did you write that?

4 A. I did not.

5 Q. And then the next paragraph was that --
6 that appears to be written by Coone; is that
7 correct?

8 A. That's correct.

9 Q. And that's not you?

10 A. That is not me.

11 Q. Did you ever speak with Ms. Carlson about
12 issuing a ticket to Mr. Oats?

13 A. I don't recall.

14 Q. Did you issue a ticket to Mr. Oats?

15 A. I did issue a ticket to Mr. Oats.

16 Q. Does that correspond to the entry on
17 8/18/21 at 16:28?

18 A. That's correct.

19 Q. And it says there I issued a ticket for
20 impeding. Could you tell us what impeding is?

21 A. Impeding is when a patron is not complying
22 with -- it's just when a patron is not giving us
23 information that we require through our ordinance,
24 specifically name, phone number, animal name, and



1 previous vaccination registration status.

2 Q. Now, was that ticket for impeding in
3 addition to the ordinance violation for lack of
4 vaccination and registration and a notice of public
5 complaint for barking?

6 A. That's correct.

7 Q. It appears that you issued the ticket for
8 impeding at 4:28 p.m., and you issued the other
9 tickets at 3:00 -- no, at 10:44 a.m.; is that
10 correct?

11 A. I would have to look at the --

12 Q. Well, let's go to the top. You see the
13 entry for August 18th, '21, 10:44?

14 A. Yes.

15 Q. And 10:44, does that mean 10:44 a.m.?

16 A. Yes.

17 Q. And then you ended that paragraph or that
18 entry by writing, I left an ordinance violation for
19 lack of vaccination and registration and a notice
20 of public complaint for barking. Is that what you
21 wrote?

22 A. Yes.

23 Q. So did you leave that ordinance violation
24 for lack of vaccination and registration and a



1 notice of public complaint for barking before you
2 made the entry on August 18th, 2021, at 10:44 a.m.?

3 A. Yes, I completed the note after I issued
4 it.

5 Q. And then later at 4:28 p.m. you issued the
6 ticket for impeding for \$100; is that correct?

7 A. That's correct.

8 Q. Why did you wait almost five and a half
9 hours before issuing the ticket for impeding?

10 A. I believe I had the right name of Monica
11 Crosby from True People Search.

12 Q. Do you know who Monica Crosby is?

13 A. No.

14 Q. Did you ever meet Monica Crosby?

15 A. No.

16 Q. Did you ever learn the name, if any, of
17 the person who made the original complaint that
18 brought you to Mr. Oats' house on August 18th,
19 2021?

20 A. I do not recall that information.

21 Q. Is there anything you could look at that
22 would refresh your recollection?

23 A. Nothing in front of me.

24 Q. Is there anything in the world that you



1 could look at that could refresh your recollection
2 about the identity of the person who made that
3 complaint?

4 A. Yes, I could.

5 Q. Could you tell us what it is?

6 A. It would be Chameleon.

7 Q. And what is Chameleon?

8 A. Our internal database and operating
9 system.

10 Q. Okay. I have nothing further. Is there
11 anything else you want to tell me about Mr. Oats?

12 A. Sorry, can you say that again?

13 MR. FLAXMAN: I have no further questions.

14 Counsel?

15 MR. OWENS: We'll reserve signature. We have
16 no questions. And thank you. Have a good day.

17 MR. FLAXMAN: I'd like to write these.

18 MR. OWENS: We'll take PDF copies. Ideally I
19 rather have a mini.

20 (Whereupon, the deposition
21 concluded at 1:37 p.m.)
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23
24



1
2 IN THE UNITED STATES DISTRICT COURT
3 FOR THE NORTHERN DISTRICT OF ILLINOIS
4 WESTERN DIVISION

5 CURTIS LAMOND OATS, SR.,)
6 Plaintiff,)
7 -vs-) No. 3:22-cv-50113
8 MCHENRY COUNTY, ILLINOIS,) (Judge Johnston)
9 et al.,)
10 Defendants.)

11
12 I, JASON ENOS, being first duly sworn, on
13 oath say that I am the deponent in the aforesaid
14 deposition taken on September 28, 2023; that I have
15 read the foregoing transcript of my deposition,
16 consisting of Pages 4 through 12 inclusive, and
17 affix my signature to same.

18 _____
19 JASON ENOS

20 Subscribed and sworn to
21 before me this _____ day
22 of _____, 2023.

23
24 _____



1 STATE OF ILLINOIS)

2) SS:

3 COUNTY OF MCHENRY)

4 I, ATHANASIA MOURGELAS, a notary public
5 within and for the County of Cook and State of
6 Illinois, do hereby certify that heretofore,
7 to-wit, on the 28th day of September, 2023,
8 personally appeared before me, via Zoom
9 teleconference, Chicago, Illinois, JASON ENOS, in a
10 cause now pending and undetermined in the United
11 States District Court of Illinois, wherein CURTIS
12 LAMOND OATS, SR., is the Plaintiff, and MCHENRY
13 COUNTY, ILLINOIS, et al., are the Defendants.

14 I further certify that the said JASON ENOS
15 was first duly sworn to testify the truth, the
16 whole truth, and nothing but the truth in the cause
17 aforesaid; that the testimony then given by said
18 witness was reported stenographically by me in the
19 presence of the said witness, and afterwards
20 reduced to typewriting by Computer-Aided
21 Transcription, and the foregoing is a true and
22 correct transcript of the testimony so given by
23 said witness as aforesaid.

24 I further certify that the signature to



1 the foregoing deposition was reserved by counsel
2 for the respective parties.

3 I further certify that the taking of this
4 deposition was pursuant to notice and that there
5 were present at the deposition the attorneys
6 hereinbefore mentioned.

7 I further certify that I am not counsel
8 for nor in any way related to the parties to this
9 suit, nor am I in any way interested in the outcome
10 thereof.

11 IN TESTIMONY WHEREOF: I have hereunto set
12 my hand and affixed my notarial seal this 29th day
13 of September, 2023.

14
15
16
17
18


19 NOTARY PUBLIC, COOK COUNTY, ILLINOIS
20 LIC. NO. 84-4329
21
22
23
24



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September 29th, 2023

HON. PATRICK D. KENNEALLY,
State's Attorney of
McHenry County, Illinois, by
Mr. Troy Owens,
2200 North Seminary Avenue, Suite 150,
Woodstock, Illinois 60098

IN RE: Oats v. McHenry County, et al.
COURT NUMBER: 3:22-cv-50113
DATE TAKEN: September 28th, 2023
DEPONENT: Jason Enos

Dear Mr. Owens:

Enclosed is the deposition transcript for the
aforementioned deponent in the above-entitled
cause. Also enclosed are additional signature
pages, if applicable, and errata sheets.

Per your agreement to secure signature, please
submit the transcript to the deponent for review
and signature. All changes or corrections must be
made on the errata sheets, not on the transcript
itself. All errata sheets should be signed and all
signature pages need to be signed and notarized.

After the deponent has completed the above, please
return all signature pages and errata sheets to me
at the above address, and I will handle
distribution to the respective parties.

If you have any questions, please call me at the
phone number below.

Sincerely,
Cindy Alicea
Signature Department

Athanasia Mourgelas
Court Reporter
(312) 263-0052

cc: Mr. Flaxman.



Jason Enos 09/28/2023

\$ \$100 11:6	called 6:22 8:2,19 calling 8:22 camera 7:19 Carlson 4:13 9:11 commenced 4:2 complaint 6:15 10:5,20 11:1,17 complete 6:10 completed 11:3 complying 9:21 computer 6:6 continued 9:1 conversation 5:16 Coone 7:23 9:6 corner 5:23 correct 8:10,13 9:7,8,18 10:6,10 11:6,7 correspond 9:16 County 4:22 7:12 Crosby 8:3,13 11:11,12,14 Curtis 4:19	explained 8:8 F FLAXMAN 4:8 form 8:9 front 7:2 11:23 G gentleman 7:19 8:8 giving 9:22 Good 4:9 Goose 9:2 H half 11:8 hear 4:15 6:17 home 7:15 hours 11:9 house 5:6 11:18 I impeding 9:20,21 10:2,8 11:6,9 inaccurate 4:16 incorrect 4:16 information 6:21 9:23 11:20 inside 7:10 issue 9:14,15 issued 9:19 10:7,8 11:3,5 issuing 9:12 11:9 J Jason 4:4,11 L lack 6:13,19 10:3,19,24 Lake 5:1,2 7:7,8 learn 6:19 11:16 leave 7:1 10:23 left 6:13,24 10:18 limited 6:21 looked 7:10	M made 6:7 11:2,17 mailbox 7:3,11 make 6:2 7:18,21 making 6:4 marked 5:22 MC-000223 5:23 7:18 Mchenry 4:22 7:12 meet 4:19,21,24 11:14 met 4:20 5:1 Monica 8:3,13 11:10,12,14 N named 4:11 9:2 neck 7:20 note 9:1 11:3 notice 6:14 10:4,19 11:1 nuisance 5:7,14 number 9:24 O Oats 4:19,20,24 5:1,17 6:22 9:2,12,14,15 Oats' 5:6 7:3,6,15 11:18 occasion 4:18,19 officer 5:4 8:13 ordinance 6:13,24 9:23 10:3,18,23 original 11:17 P p.m. 4:2 10:8 11:5 paragraph 8:7,8,12,16,19 9:5 10:17 paragraphs 8:1 patrol 5:4 patron 9:21,22 People 11:11 person 11:17 phone 9:24 physically 6:4 present 4:12	previous 10:1 provided 6:22,23 public 6:15 10:4,20 11:1 Q question 5:21 R recall 5:14 7:4 8:22 9:13 11:20 recollection 11:22 recording 8:17 refresh 11:22 registration 6:14,20 10:1,4,19,24 repeat 5:11 require 9:23 residence 7:6 resident's 7:11 responded 5:8 right-hand 5:23 S Search 11:11 Shore 5:1 7:7 slr 4:9 speak 9:11 specifically 9:24 spell 4:10 starts 7:19 8:1 state 4:9 stated 8:2,16 9:2 status 10:1 sworn 4:3,5 T testified 4:6 thought 4:16 ticket 9:12,14,15,19 10:2,7 11:6,9 tickets 10:9 time 7:5,9 told 7:6	top 10:12 True 11:11 truthful 6:8 V vaccination 6:14,20 10:1,4,19,24 van 6:6 vet 6:22 8:2,20,22,24 9:2 violation 6:13 7:1 10:3,18,23 W wait 11:8 woman 7:23 work 4:22 6:6 7:11 world 11:24 write 8:3,9,14,15,17,18,20 9:3 writing 10:18 written 9:6 wrote 6:13,24 10:21
1 10:44 6:12 10:9,13,15 11:2 15:04 7:18 16:28 9:17 18th 5:19 7:14 8:23,24 10:13 11:2,18 1:25 4:2 2 2021 5:19 7:15 8:23,24 11:2,19 21 10:13 3 3:00 10:9 4 4816 5:1 7:7 4:28 10:8 11:5 8 8/18/21 6:1,12 7:18 9:1,17 A a.m. 10:9,15 11:2 accurate 6:8 addition 10:3 address 7:6 afternoon 4:9 animal 5:4 9:24 appears 9:6 10:7 August 5:19 7:14 8:23,24 10:13 11:2,18 B barking 5:7,14 6:15,17 10:5, 20 11:1 bottom 5:22 brought 5:6 8:12 11:18 C call 5:7,10,13,15 8:24	D Dana 7:23 day 7:3 deposition 4:1,13 direct 8:5 dog 6:23 8:2 9:2 door 7:2 Drive 5:2 7:7 duly 4:5 duties 5:4 E E-N-O-S 4:11 East 5:1 7:7 ended 10:17 Enos 4:4,11 entry 6:1,2,5,7,12 7:17,19, 21,24 9:16 10:13,18 11:2 EXAMINATION 4:7 examined 4:5	impeding 9:20,21 10:2,8 11:6,9 inaccurate 4:16 incorrect 4:16 information 6:21 9:23 11:20 inside 7:10 issue 9:14,15 issued 9:19 10:7,8 11:3,5 issuing 9:12 11:9 J Jason 4:4,11 L lack 6:13,19 10:3,19,24 Lake 5:1,2 7:7,8 learn 6:19 11:16 leave 7:1 10:23 left 6:13,24 10:18 limited 6:21 looked 7:10	O Oats 4:19,20,24 5:1,17 6:22 9:2,12,14,15 Oats' 5:6 7:3,6,15 11:18 occasion 4:18,19 officer 5:4 8:13 ordinance 6:13,24 9:23 10:3, 18,23 original 11:17 P p.m. 4:2 10:8 11:5 paragraph 8:7,8,12,16,19 9:5 10:17 paragraphs 8:1 patrol 5:4 patron 9:21,22 People 11:11 person 11:17 phone 9:24 physically 6:4 present 4:12	previous 10:1 provided 6:22,23 public 6:15 10:4,20 11:1 Q question 5:21 R recall 5:14 7:4 8:22 9:13 11:20 recollection 11:22 recording 8:17 refresh 11:22 registration 6:14,20 10:1,4,19,24 repeat 5:11 require 9:23 residence 7:6 resident's 7:11 responded 5:8 right-hand 5:23 S Search 11:11 Shore 5:1 7:7 slr 4:9 speak 9:11 specifically 9:24 spell 4:10 starts 7:19 8:1 state 4:9 stated 8:2,16 9:2 status 10:1 sworn 4:3,5 T testified 4:6 thought 4:16 ticket 9:12,14,15,19 10:2,7 11:6,9 tickets 10:9 time 7:5,9 told 7:6	top 10:12 True 11:11 truthful 6:8 V vaccination 6:14,20 10:1,4,19,24 van 6:6 vet 6:22 8:2,20,22,24 9:2 violation 6:13 7:1 10:3,18,23 W wait 11:8 woman 7:23 work 4:22 6:6 7:11 world 11:24 write 8:3,9,14,15,17,18,20 9:3 writing 10:18 written 9:6 wrote 6:13,24 10:21

