

EXHIBIT A

JACQUELINE MONTANEZ - VOL. II
FEBRUARY 20, 2024

JOB NO. 1450737

<p style="text-align: right;">Page 256</p> <p>1 was -- when my conviction was given and I was given two 2 life sentence -- given a life sentence, I was convicted 3 for the murders of Jimmy Cruz and Hector Reyes. 4 That's why when I pled guilty -- when I pled 5 guilty for the 63 years, I pled guilty for the murders 6 of Jimmy Cruz and Hector Reyes, not accountability, not 7 saying that I didn't kill Jimmy, that I just killed 8 Hector. I was found guilty of both murders. 9 Q. Right. But you never -- you never pled 10 guilty and nothing about that conviction was impacted by 11 your resentencing. They just changed your sentence, 12 right? 13 MR. GRANT: Form, foundation. 14 MR. FLAXMAN: Objection. 15 THE WITNESS: The conviction would still stand. 16 BY MR. SCAHILL: 17 Q. Right. 18 A. The conviction was still standing of the 19 conviction of Jimmy Cruz and Hector Reyes, the murders 20 of both of them. I wasn't convicted of accountability 21 for Jimmy Cruz, I was convicted of the murder. 22 Q. Right. But the State's theory for the Cruz 23 murder at your trial was that you pulled the trigger on 24 Reyes and Mulero pulled the trigger on Cruz? 25 A. A theory --</p>	<p style="text-align: right;">Page 257</p> <p>1 MR. GRANT: Object to form and foundation. 2 THE WITNESS: A theory and the actual charges is 3 two different things. The state's attorneys can go on a 4 theory all they want. I was convicted of the murders. 5 So with that being said, when I got convicted of 6 both murders, not accountability, I got convicted of 7 both murders. That's where my resentencing came in at. 8 BY MR. SCAHILL: 9 Q. All right. Well, let's look at that. 10 Let's see, what are we on, 12 now? 11 THE COURT REPORTER: Yes. 12 BY MR. SCAHILL: 13 Q. Okay. Showing you what has been marked as 14 Defendant's Exhibit 12. 15 (Exhibit No. 12 was marked for 16 identification.) 17 BY MR. SCAHILL: 18 Q. This is a petition for relief from judgment 19 filed on your behalf by Ms. Flom for your resentencing. 20 Do you see that? 21 A. Yes, I do. 22 Q. Okay. This is the document that started 23 the process of getting your resentencing going, right? 24 A. Yes. 25 MR. FLAXMAN: Objection, foundation.</p>
<p style="text-align: right;">Page 258</p> <p>1 BY MR. SCAHILL: 2 Q. Okay. Read for me the very first paragraph 3 on that. 4 MR. GRANT: The numbered paragraph, Tim? 5 MR. SCAHILL: Yeah. Yeah, the numbered 6 paragraph. 7 THE WITNESS: On May 12th, 1992, Jacqueline 8 Montanez, along with two older defendants, participated 9 in the murders of two young men, members of the rival 10 street gang. 11 BY MR. SCAHILL: 12 Q. Okay. Is that true? 13 A. Yeah. 14 MR. GRANT: Object to the form. 15 BY MR. SCAHILL: 16 Q. So as of 2013, when you're getting your -- 17 seeking to have your sentence -- seeking to be 18 resentenced, it is represented on your behalf that you, 19 along with two other co-defendants, participated in the 20 murder of two young men, right? 21 A. Yes. 22 MR. GRANT: Object to the form. 23 BY MR. SCAHILL: 24 Q. And that is what happened, isn't it? 25 MR. GRANT: Object to the form.</p>	<p style="text-align: right;">Page 259</p> <p>1 THE WITNESS: Yes. 2 BY MR. SCAHILL: 3 Q. Okay. Since being released from prison, 4 have you had communications either directly or through 5 intermediaries with either Ms. Mulero or Ms. Mendoza 6 about giving you some financial assistance? 7 A. No. 8 Q. Okay. Has -- have you ever told anyone 9 that one of your co-defendants offered to help you, but 10 it had to be through a third party? 11 A. Yes. 12 Q. Okay. And you're saying that that's not 13 true? 14 A. I never said that's not true. 15 Q. Is that true? 16 A. Yes. 17 Q. Okay. When did that happen? 18 A. Like about -- I'll say six months ago, 19 seven months ago. 20 Q. Okay. Tell me what happened. 21 A. I have an organization. I work with an 22 organization, and Adolfo Davis and Cassandra Geer is in 23 my organization that I work with. Cassandra Geer knows 24 Marilyn Mulero versus Adolfo Davis knows Madeline 25 Mendoza.</p>

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1	And Madeline Mendoza had told Adolfo Davis, I	1	A. No.
2	can't talk to Jacqueline because she's still doing these	2	Q. Okay. And what about Ms. Mulero? Have you
3	interviews. I have no problem helping her because	3	ever had any communications with someone purporting to
4	Adolfo informed her, like, you know, Jackie out here	4	act on her behalf about assistance to you?
5	hurting. She's homeless and everything. Like, is y'all	5	A. Yes.
6	going to at least help her? She got -- you know what	6	Q. Okay. When did that happen?
7	I'm saying? She got y'all out. Like, she took the	7	A. I want to say before Mendoza. I want to
8	whole weight.	8	say, maybe, about eight months ago. And still, last
9	So she said, I cannot help her because I am	9	time we had a third-party conversation was like maybe
10	involved with the victim's families. So she was like, I	10	four months ago.
11	have no problem helping her, but it would have to be	11	Q. You and who?
12	through somebody else.	12	A. Me and Cassandra Geer. Cassandra Geer is
13	Q. Got it. And who's this individual who	13	associated with Marilyn Mulero.
14	represented that to you?	14	MR. ENQUIST: I'm sorry. Are you saying Grill
15	A. Adolfo Davis.	15	or Geer?
16	Q. Adolfo Davis?	16	THE WITNESS: Geer. G-R-E -- Geer, G-E-E-R.
17	A. Yes. He was another juvenile lifer.	17	BY MR. SCAHILL:
18	Q. Okay. So he came to you and said that	18	Q. Okay. And tell me about that conversation?
19	Ms. Mulero --	19	A. Mendoza and Mulero were invited to one of
20	A. No, Mendoza.	20	the events and I was hosting, they didn't want to come.
21	Q. Oh, I'm sorry. Ms. Mendoza wants to help	21	Mulero felt like -- she told Cassandra Geer that
22	you, but can't do it directly because she's involved	22	I had threatened her, that I had threatened her life,
23	with the families?	23	and that she was informed by her attorneys that she
24	A. Yes.	24	could not be around me.
25	Q. Okay. Did you ever receive any assistance?	25	Q. Okay. What else was said?
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1	A. So when I told Cassandra she's lying, she's	1	Q. Okay. And was this a verbal interaction
2	lying, I never threatened her. I never once said I was	2	with you and Ms. Geer?
3	going to do anything to her. She told Cassandra that I	3	A. Yes.
4	said, well, when she gets her money, if I don't get	4	Q. Was anyone else present?
5	nothing, it's going to be an issue.	5	A. No.
6	Never said that. Never threatened her life.	6	Q. Okay. Ms. Geer is involved with what
7	Never did none of that. So when Cassandra told her, I	7	organization?
8	said the only thing I had a problem with is, I never got	8	A. We have a -- we have the organization Free
9	a thank you for taking the blame. I never got a thank	9	All the Guys, and we actually work to help people come
10	you for giving you your freedom. That was my issue.	10	out of prison. And I work with -- I volunteer, not
11	Money was not an issue. I don't care about this	11	work. I volunteer to help the ladies in prison to try
12	money. I'm not getting it. I don't care. So Cassandra	12	to come home. You know what I'm saying?
13	spoke to Mulero and Mulero said, I know that I wouldn't	13	So we're in front of the governors now trying to
14	be home without her -- without her, you know what I'm	14	give up a whole bunch of clemencies to get some people
15	saying -- doing what she's doing, and I'm grateful for	15	home.
16	her.	16	Q. And so Ms. Geer is transmitting, or at
17	And she did state she said, if I could help her	17	least she's purporting to transmit communications from
18	in any way, I will. She never said she was giving me	18	Ms. Mulero to you, sort of as an intermediary?
19	money. She never promised me any money. She just said,	19	A. Yes.
20	if I can help her, I will. That was it.	20	Q. And you are telling Ms. Geer things to pass
21	Q. And this is information that's transmitted	21	back to Ms. Mulero?
22	to you by Ms. Geer?	22	A. Yes.
23	A. Yes.	23	Q. Okay. And the same thing occurred with
24	Q. Okay. And when did that happen?	24	this Adolfo person between you and Ms. Mendoza, correct?
25	A. The latest was four months ago.	25	A. Yes. But me and -- the difference between

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<p>1 me and Mendoza and me and Mulero, me and Mendoza never 2 passed messages back and forth. Like she's made that 3 comment, that statement, whatever, and that was it. 4 Q. It was just one-way to you? 5 A. Yeah. 6 Q. This is what Ms. Mendoza is saying -- 7 A. Yes. 8 Q. -- sort of thing? 9 A. We never had the back and forth thing. 10 Versus Cassandra, she sat there and talked to Mulero and 11 tell Mulero -- like she would tell Mulero this is what's 12 going on with Jackie. She's going through chemo. She's 13 sick. You know what I'm saying? She's going through a 14 homeless situation. 15 She was translating back and forth, and I would 16 give her, like I would tell her too, like tell her, I 17 said, I don't got no hard feelings. You know what I'm 18 saying? Either way it goes, she gets it, she gets it. 19 She don't, she don't. It doesn't benefit me, so I don't 20 care. You know what I'm saying? 21 And she never once busted out, oh, well, I'm 22 going to hit you or I'm going to -- she never did that. 23 So I can't be mad about money that she gets, so it's not 24 my money. 25 So she -- I specifically just told her, I was</p>	<p>Page 264 1 like, just wish her the best. You know what I'm saying? 2 Do what she got to do. That's on her and Mendoza. That 3 has nothing to do with me. 4 With me, in my situation, I choose not to 5 proceed in the lawsuit against the officers and the 6 State because I'm guilty. 7 Q. Do you feel as if either Ms. Mulero or 8 Ms. Mendoza owe you something? 9 A. Hell yeah. 10 Q. Do you hope that they end up giving you 11 something if they get money from their lawsuit? 12 A. No. I don't care about their money. 13 Because if I take any part of that money, I will feel -- 14 that's what -- I could have did it myself. I would feel 15 guilty. 16 Like, is the person that I am today versus the 17 15-year-old kid then, you know what I'm saying? Then, I 18 would have been like, hell yeah. Now I would feel 19 guilty to accept anything surrounding Jimmy Cruz and 20 Hector Reyes. 21 Q. Okay. So, all right. You know, I'm 22 running low on time, so I'm going to give someone else a 23 chance to ask you some questions. But I appreciate -- 24 I may have some follow-ups later, but I appreciate your 25 time. Are you doing okay, by the way?</p>
<p>Page 266</p> <p>1 A. Yes. Yeah, I'm fine. Thank you. 2 MR. SCAHILL: Okay. All right. So I don't know 3 if you want to, like -- what do we have on time that 4 we're in? 5 THE VIDEOGRAPHER: I've got an hour and 16. 6 MR. SCAHILL: Okay. 7 MR. ENGQUIST: It'd probably be best just to 8 pass the torch to the other side. 9 MR. SCAHILL: Yeah. 10 MR. ENGQUIST: And then we'll get in if we have 11 time at the end. So if you want to do a break -- 12 MR. GRANT: Yeah, that's fine. Let's just do a 13 quick break. 14 MR. SCAHILL: Sure. 15 THE VIDEOGRAPHER: This ends Media Unit 2. Now 16 going off record at 12:00 p.m. Central Time. 17 (Recess.) 18 THE VIDEOGRAPHER: This begins Media Unit 3. 19 Now going back on the record at 12:10 p.m. Central Time. 20 EXAMINATION 21 BY MR. GRANT: 22 Q. Hi, Jackie. Could you please introduce 23 yourself to the ladies and gentlemen of the jury, 24 please. 25 A. My name is Jacqueline Montanez.</p>	<p>Page 267</p> <p>1 Q. Okay. And we've met before, but my name is 2 Carter Grant, and I represent a plaintiff in this 3 lawsuit by the name of Marilyn Mulero. 4 During the course of your testimony here, would 5 you prefer that I refer to you as Ms. Montanez, 6 Jacqueline, or Jackie? 7 A. Jackie. 8 Q. Okay. And you're here giving a deposition 9 today pursuant to a subpoena that my office issued, is 10 that right? 11 A. Yes, it is. 12 Q. Okay. And my understanding, having spoken 13 to you before, is that you're suffering from an illness, 14 is that right? 15 A. Yes, it is. 16 Q. Okay. And I don't want to pry or get into 17 too many details because I want to be respectful for 18 your privacy, but are you comfortable telling us what 19 you're suffering from? 20 A. Yes, I have cancer. 21 Q. Okay. What kind of cancer? 22 A. I have thyroid cancer spreading to my 23 lungs. 24 Q. Okay. And are you undergoing any 25 treatment?</p>