

EXHIBIT 1

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

People of the State of Illinois,)
) No. 92-CR-13088-03
)
-vs-) (Room 305)
)
)
 Madeline Mendoza.)

**MOTION TO VACATE CONVICTION
PURSUANT TO 735 ILCS 5/2-1401**

Petitioner MADELINE MENDOZA, by counsel, respectfully requests
that this Court enter an order vacating her conviction.

On August 9, 2022, the Court vacated the conviction of Petitioner's co-defendant, Marilyn Mulero, without objection by the State, based on newly available evidence that she is one of the many victims of false convictions manufactured by disgraced Chicago police detectives Reynaldo Guevara and Ernest Halvorsen.

Petitioner, like Mulero, is a victim of the wrongdoing of Guevara and Halvorsen. The Court should grant Petitioner the same relief it recently provided to Mulero.

I. Introduction

1. On May 12, 1992, Jacqueline Montanez killed Jimmy Cruz and Hector Reyes in Humboldt Park on the West Side of Chicago. Montanez acted alone in committing the murders. (Exhibit 1, Transcript of Video Interview

with Jacqueline Montanez, February 22, 2017, Nancy Stone, *Woman Convicted of Murder as a Teen Given New Hope for Freedom*, CHI. TRIB. (Feb. 22, 2017), available at <https://www.chicagotribune.com/visuals/92544958-132.html>.)

2. Chicago Police Detectives Reynaldo Guevara and Ernest Halvorsen were assigned to investigate the murders. These detectives made up the false story that Petitioner and the recently exonerated Marilyn Mulero had participated in the murders with Montanez. As a result, all three women were convicted of the murders.

3. Detective Guevara has been aptly labeled “a malignant blight on the Chicago Police Department and the judicial system,” *People v. Martinez*, 2021 IL App (1st) 190490, ¶64, who committed “profoundly alarming acts of misconduct.” *People v. Montanez*, 2016 IL App (1st) 133726, ¶ 1. And his partner, Halvorsen, aided and abetted Guevara in framing innocent people. *People v. Montanez*, 2016 IL App (1st) 133726, ¶ 37.

4. The State’s Attorney of Cook County recently completed a comprehensive review of several convictions engineered by Guevara and concluded that each was invalid because of Guevara’s misconduct. (Exhibit 2, Cook County State’s Attorney Kimberly Foxx Announces Dismissal of Murder Cases Tied to Former Chicago Police Detective Reynoldo Guevara, August 9, 2022.)

5. Following the State's review, seven murder convictions, including that of Mulero, were vacated on August 9, 2022. *People v. Andino*, 94-CR-21462; *People v. Colon*, 91-CR-23750; *People v. Flores*, 90-CR-10007; *People v. Alfredo Gonzalez*, 90-CR-21787-02; *People v. Nelson Gonzalez*, 93-CR-18247-01; *People v. Mulero*, 92-CR-13088-02; *People v. Jaime Rios*, 89-CR-16525.

6. Detective Guevara invoked his Fifth Amendment right against self-incrimination when asked about Petitioner's case at a deposition in a civil case. Guevara was specifically asked whether he knew that Montanez was responsible for both murders, whether he fabricated police reports, and whether he had manipulated and threatened witness to give false testimony. (Exhibit 3, Deposition of Reynaldo Guevara in *Sierra v. Guevara*, 18-cv-3029 (N.D. Ill.), August 20, 2019, at 182-83.) Guevara responded to each question by declining to answer because the answer would incriminate him. (*Id.*)

7. Guevara has also invoked his Fifth Amendment right against self-incrimination in other collateral challenges to false criminal convictions that he had engineered. *E.g.*, *People v. Martinez*, 2021 IL App (1st) 190490, ¶ 47; *People v. Gonzalez*, 2016 IL App (1st) 141660, ¶ 57; *People v. Montanez*, 2016 IL App (1st) 133726, ¶¶ 13, 31; *People v. Serrano*, 2016 IL App (1st) 133493, ¶ 14.

II. Petitioner's False Conviction

8. Less than twenty-four hours after Cruz and Reyes were killed on May 12, 1992, a woman named Yvette Rodriguez was arrested by Chicago

Police Officers for drug possession. Rodriguez was then on parole for a drug offense.

9. Rodriguez sought and obtained leniency by telling police that she could help them with the Cruz and Reyes murders. (Exhibit 4, Police Report, May 13, 1992, at 2.)

10. Detective Poli recorded the first statement that Rodriguez made to police on May 12, 1992. Rodriguez said that she heard Jacqueline Montanez boasting that she had just shot two members of the Latin Kings street gang. (Exhibit 4.)

11. Rodriguez also told police that she had heard Montanez say that Mulero was with her when she shot the two men and that Petitioner was not involved because she had been in a parked car with her boyfriend. (Exhibit 4.)

12. Detectives Guevara and Halvorsen arrested Montanez and Mulero in the afternoon of May 13, 1992. (Exhibit 5, Police Report, May 14, 1992.)

13. At about 10:00 p.m., detectives Guevara and Halvorsen succeeded in coercing Montanez into confessing and falsely implicating Mulero and Petitioner in the murders. The story concocted by Guevara and Halvorsen is that Montanez shot Reyes and then gave the gun to Mulero who shot Cruz when Petitioner signaled Mulero to shoot. (Exhibit 5 at 5.)

14. The truth is that Montanez shot Reyes and Cruz, Petitioner did not know that Montanez was going to shoot the two men, and Petitioner did not do anything to encourage anyone to shoot Cruz. (Exhibit 6, Affidavit of Madeline Mendoza, September 23, 2022, ¶¶ 7, 8, 12, 14.)

15. After extracting the false confession from Montanez, Detectives Guevara and Halvorsen coerced Mulero to make the false confession that she had shot Cruz after Montanez gave her the gun. (Exhibit 5 at 5-6.)

16. Mulero made this false confession because Halvorsen threatened that if she did not confess to one of the shootings, Montanez would testify for the prosecution against Mulero and cause Mulero to be sentenced to death. (Exhibit 7, Testimony of Marilyn Mulero, June 21, 1993, at 43.) Halvorsen also threatened Mulero that, unless she went along with the false story, she would never see her children again. (Exhibit 8, Affidavit of Marilyn Mulero, ¶ 6.)

17. After the detectives had extracted these false confessions, they persuaded Yvette Rodriguez to change her story to match the one concocted by the detectives. In her second recorded statement, Rodriguez claimed for the first time that Petitioner, Montanez, and Mulero had each bragged about the shooting. (Exhibit 9, Statement of Yvette Rodriguez, May 14, 1992, at 2.) Rodriguez initially claimed that only Montanez had bragged about the shootings. (Exhibit 4 at 2.)

18. Rodriguez also changed her statement from recounting that Montanez bragged about doing both shootings (Exhibit 4 at 2) to claiming that Montanez bragged only about killing Cruz. (Exhibit 9 at 2.)

19. Detectives Guevara and Halvorsen later concocted a third statement for Rodriguez that included the false claim that the three co-defendants had asked her to join with them in the shooting. (Exhibit 10, Police Report, May 21, 1992, at 2.) This made-up claim was not in either of the two earlier statements. (Exhibits 4, 9.)

20. As Guevara and Halvorsen promised, Rodriguez received favorable treatment on her pending drug charges. (Exhibit 11, Testimony of Ivette Rodriguez, November 18, 1998, at 56.)

21. Petitioner Madeline Mendoza was arrested on May 14, 1992. (Exhibit 10.) She did not give a statement to the police. (*Id.*)

22. To secure Petitioner's conviction, Detectives Guevara and Halverson claimed that Jackie Serrano had heard the first gunshot and had witnessed the second gunshot from her apartment. (Exhibit 5 at 6-7.) Serrano could not have made the observations attributed to her by detectives Guevara and Halvorsen. (Exhibit 12, Affidavit of Michael L. Deppe, June 30, 1999; Exhibit 13, Affidavit of Joseph T. Kirk, June 30, 1999.)

23. Also to secure Petitioner's false conviction, detectives Guevara and Halvorsen enlisted the assistance of Joan Roberts, a jailhouse informant.

Using promises of leniency, Guevara and Halvorsen persuaded Roberts to claim that, while incarcerated at the Cook County Jail, she had heard both Petitioner and Mulero admit to involvement in the murders. (Exhibit 14, Statement of Joan Roberts, June 7, 1993.)

24. After Roberts gave false testimony concocted by Detectives Guevara and Halvorsen, her four armed robbery charges were reduced to robbery and she was released on probation. (Exhibit 15, Testimony of Joan Roberts, November 20, 1998, at 59-60, 89-90, 116-18.)

25. Roberts has recanted her false, coerced statements and stated that Detective Halvorsen coerced her and threatened her. (Exhibit 16, Statements of Joann (Roberts) Santiago.)

26. Montanez was the first of the three co-defendants to be convicted; she was found guilty at trial in August 1993 and sentenced to life imprisonment.

27. Petitioner pleaded guilty to the murder of Cruz and to conspiracy to commit the murder of Reyes on September 22, 1993 (Exhibit 17, Sentencing Transcript, September 22, 1993), and was sentenced to 35 years for murder concurrent to 7 years for conspiracy. (Exhibit 17 at 3, 14.)

28. Mulero later entered a blind plea and was sentenced to death. The Supreme Court overturned the sentence, and Mulero was sentenced to life imprisonment.

29. Petitioner pleaded guilty even though she was innocent. (Exhibit 6 ¶ 15; Exhibit 18, Affidavit of Madeline Mendoza, September 20, 1996, ¶ 3.) Petitioner had been present when Montanez shot Cruz and Reyes, but she did not have prior knowledge of any plan to shoot Cruz or Reyes, she did not give any signal before the shooting of Cruz, and she did not otherwise participate in the shooting (Exhibit 6 ¶¶ 6, 7, 8, 12, 14; Exhibit 18 ¶¶ 5-6.)

30. Petitioner pleaded guilty because her lawyer told her that if she went to trial, she would be found guilty based on the jailhouse informant's false testimony, and she would be sentenced to life in prison. (Exhibit 6 ¶¶ 15-16; Exhibit 18 ¶¶ 10-11.)

31. Even though Petitioner knew that she was innocent, and that the informant's testimony was false, she pleaded guilty to avoid spending the rest of her life in prison. (Exhibit 6 ¶¶ 15-16, 18; Exhibit 18 ¶ 13.)

32. Petitioner served her sentence and was released from prison in 2009. (Exhibit 6 ¶ 19.)

III. New Evidence

33. Petitioner relies on four significant pieces of new evidence.

34. First, Montanez has taken responsibility for both shootings. (Exhibit 1.) Her admission that she shot Cruz and Reyes, which was not available at the time of trial, directly contradicts the false narrative that led to Petitioner's conviction.

35. Second, Guevara has invoked his Fifth Amendment right against self-incrimination when asked about whether he fabricated Petitioner's case. (Exhibit 3, Deposition of Reynaldo Guevara in *Sierra v. Guevara*, 18-cv-3029 (N.D. Ill.), August 20, 2019, at 182-83.) The adverse inference from this testimony, *People v. Gibson*, 2018 IL App (1st) 162177 ¶ 4, was not available to Petitioner at the time of trial.

36. Third, the evidence of the pattern of misconduct by Halvorsen and Guevara was not available to Petitioner at the time of trial. Petitioner relies on the most recent set of allegations that led to vacated convictions and caused the State to conclude: "A comprehensive case-by-case review of these cases revealed police misconduct by Guevara that called the validity of these convictions into question, and we concluded that the totality of the evidence currently available is insufficient to support a retrial of these cases." (Exhibit 2, Cook County State's Attorney Kimberly Foxx Announces Dismissal of Murder Cases Tied to Former Chicago Police Detective Reynoldo Guevara, August 9, 2022.)

37. Petitioner also relies on the evidence of misconduct that has been recognized in other cases. *E.g.*, *People v. Martinez*, 2021 IL App (1st) 190490, ¶64 (referring to Guevara as "a malignant blight on the Chicago Police Department and the judicial system"); *People v. Montanez*, 2016 IL App (1st)

133726, ¶ 1 (examining the evidence presented and concluding that Guevara committed “profoundly alarming acts of misconduct”).

38. The final piece of new evidence is Mulero’s now-vacated conviction. (Exhibit 19, Transcript of *People v. Mulero*, 92-CR-13088-02, August 9, 2022.) There is no basis to deny Petitioner the relief that her co-defendant Mulero has already received.

IV. ARGUMENT

39. This Court should vacate Petitioner’s conviction pursuant to 735 ILCS 5/2-1401 because of Montanez’s statements that she is guilty of both murders, the adverse inference from Guevara’s invocation of the Fifth Amendment, the new evidence showing the corruption of Guevara and Halvorsen, and the vacatur of Mulero’s conviction,

A. Legal Standard

40. A petition filed pursuant to 735 ILCS 5/2-1401 seeks to bring facts to the attention of the trial court that would have precluded entry of a final judgment had the facts been known at the time of entry of the judgment. *People v. Haynes*, 192 Ill. 2d 437, 463 (2000).

41. Although the petition must be filed in the same proceeding as the original judgment, the petition is a separate action. 735 ILCS 5/2-1401(b).

42. The burden of proof for a section 2-1401 petition is a preponderance of the evidence. *Smith v. Airoom, Inc.*, 114 Ill. 2d 209, 221 (1986).

43. Although section 2-1401 is a civil remedy, its remedial powers extend to criminal matters. *People v. Pinkonsly*, 207 Ill. 2d 555, 562 (2003).

44. Ultimately, “[r]elief should be granted under section 2-1401 when necessary to achieve justice.” *People v. Lawton*, 212 Ill. 2d 285, 298 (2004). It is a “versatile and effective means of pursuing justice” for criminal defendants where the Post-Conviction Hearing Act is unavailable. *Id.* at 299.

45. Illinois law recognizes that a conviction may be vacated under section 2-1401 as a result of a claim of actual innocence based on newly discovered evidence. 730 ILCS 5-5-4(c).

46. Ordinarily, section 2-1401 petitions must be filed within two years of entry of the final order in the original action; however, time in which the grounds for relief were fraudulently concealed from the petitioner tolls the statute of limitations. 735 ILCS 5/2-1401(c); *People v. Pinkonsly*, 207 Ill. 2d 555, 562 (2003); *People v. McLaughlin*, 324 Ill. App. 3d 909, 918-19 (1st Dist. 2001).

47. Applying *Lawton*, the Illinois Appellate Court has held that a section 2-1401 petition is the proper vehicle for a petitioner to seek to vacate an unconstitutional conviction if he has already completed his sentence or the interests of justice demand relief. *People v. Mathis*, 357 Ill. App. 3d 45, 50 (1st Dist. 2005).

48. In practice, and in the context of blatant and systemic issues of police misconduct, Illinois courts have routinely granted section 2-1401

petitions filed more than two years after conviction—both at the request of the petitioner and the State.

49. Section 2-1401 is the vehicle used to vacate more than 200 convictions connected to the misconduct of former Chicago Police Sergeant Ronald Watts and his team. It has also been used to vacate convictions of Guevara's victims. *E.g.*, *People v. Demetrius Johnson*, 91-CR-19833; *People v. Rodriguez*, 91-CR-13938; *People v. Rios*, 89-CR-16525.

B. The Court Should Grant the Petition

50. When Petitioner pleaded guilty in 1993, Halvorsen and Guevara had successfully concealed the evidence of their corruption, making Petitioner eligible for relief under 735 ILCS 5/2-1401(c). *See People v. McLaughlin*, 324 Ill. App. 3d 909, 918-19 (1st Dist. 2001).

51. Similarly, the officers' acts of coercing false statements from Montanez and Mulero made it impossible for Petitioner to fairly present evidence of her innocence.

52. Montanez's recent acceptance of responsibility for both shootings was also unavailable to Petitioner.

53. Any delays in filing, therefore, are tolled. Petitioner cannot be penalized for failing to present these claims in the original action when the facts were withheld from her.

54. Petitioner is also entitled to relief under 2-1401 in the interests of justice. *People v. Lawton*, 212 Ill. 2d 285, 299 (2004). A void judgment can be vacated at any time. *People v. Thompson*, 2015 IL 118151, ¶ 32.

55. Section 2-1401 is a “versatile and effective means of pursuing justice.” *People v. Lawton*, 212 Ill. 2d 285, 299 (2004). It has been repeatedly used to vacate convictions—even those secured by guilty plea—in the interests of justice or when circumstances change long after the time to file has run.

56. As the Illinois Supreme Court holds, “it is well accepted that the decision to plead guilty may be based on factors that have nothing to do with defendant’s guilt.” *People v. Reed*, 2020 IL 124940, ¶ 33.

57. A criminal defendant must “engage in a cost-benefit assessment where, after evaluating the State’s evidence of guilt compared to the evidence available for his defense, a defendant may choose to plead guilty in hopes of a more lenient punishment than that imposed upon a defendant who disputes the overwhelming evidence of guilt at trial.” *Id.*

58. The new evidence about the corruption of Halvorsen and Guevara as well as the new evidence of Montanez’s statements provide a meritorious defense.

59. In addition, the suppression of the evidence violated Petitioner’s right to due process of law pursuant to *Brady v. Maryland*, 373 U.S. 83 (1963). The rule of *Brady* “encompasses evidence known to police investigators, but

not to the prosecutor.” *People v. Beaman*, 229 Ill. 2d 56, 73 (2008) (citing *Kyles v. Whitley*, 514 U.S. 419, 438 (1995)).

60. A *Brady* violation is a constitutional error that is never harmless, *People v. Beaman*, 229 Ill. 2d 56, 74 (2008), and a section 2-1401 petition may “be used to challenge judgments claimed to be defective for legal reasons,” *People v. Lawton*, 212 Ill. 2d 285, 297 (2004),

61. The new evidence is the same type of evidence that the State relied on when it dismissed other cases related to Halvorsen and Guevara, including the conviction of Petitioner’s co-defendant.

V. CONCLUSION

WHEREFORE, Petitioner respectfully requests that this Court vacate her conviction.

Respectfully submitted,



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List of Exhibits

Ex. No.	Description
1	Transcript of Video Interview with Jacqueline Montanez, Feb. 22, 2017
2	Cook County State's Attorney Kimberly Foxx Announces Dismissal of Murder Cases Tied to Former Chicago Police Detective Reynoldo Guevara, August 9, 2022
3	Deposition of Reynaldo Guevara in <i>Sierra v. Guevara</i> , 18-cv-3029 (N.D. Ill.), August 20, 2019
4	Police Report, May 13, 1992
5	Police Report, May 14, 1992
6	Affidavit of Madeline Mendoza, September 23, 2022
7	Testimony of Marilyn Mulero, June 21, 1993
8	Affidavit of Marilyn Mulero
9	Statement of Yevette Rodriguez, May 14, 1992
10	Police Report, May 21, 1992
11	Testimony of Ivette Rodriguez, November 18, 1998
12	Affidavit of Michael L. Deppe, June 30, 1999
13	Affidavit of Joseph T. Kirk, June 30, 1999
14	Statement of Joan Roberts, June 7, 1993
15	Testimony of Joan Roberts, November 20, 1998
16	Statements of Joann (Roberts) Santiago
17	Sentencing Transcript, September 22, 1993
18	Affidavit of Madeline Mendoza, September 20, 1996
19	Transcript of <i>People v. Mulero</i> , 92-CR-13088-02, August 9, 2022

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Exhibit 1

LOUISVILLE LEXINGTON LONDON FLORENCE CINCINNATI INDIANAPOLIS ORLANDO JACKSONVILLE TAMPA



KENTUCKIANA
— COURT REPORTERS —

VIDEO WITH NANCY STONE/ CHICAGO TRIBUNE

DATE:

February 12, 2017



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FEBRUARY 12, 2017 VIDEO WITH NANCY STONE/CHICAGO TRIBUNE

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VIDEO WITH NANCY STONE/ CHICAGO TRIBUNE, taken on February 12, 2017

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1 PROCEEDINGS

2 JACQUELINE MONTANEZ: I joined the gang
3 because it was the opposite gang of my stepfather,
4 who was a Latin King, who was also my abuser
5 sexually, physically, mentally, and he was training
6 me to be a female hit woman since the age of -- I
7 want to say 6, 7. So it was like that gang was the
8 only gang that I knew that he hated, he despised,
9 and so I definitely joined them so everything he
10 taught me I used with that gang. None of the gang
11 members knew that I was even a child, and so I was
12 arrested and they found out that I was 15 years
13 old. My mother gave me up to DCFS at the age of
14 12, and so I didn't trust DCFS at all. That was
15 one place I didn't trust. So I just felt like I
16 could do this on my own. I knew I had all the
17 training to -- to do what I had to do. I had just
18 came off of shift from selling drugs and I was
19 passing my stuff, my drugs and my guns, and the
20 little boy was -- it was getting ready to be
21 Mother's Day, and he wanted one of us -- we used to
22 take turns taking him to school. So he wanted us
23 to take him to go buy something for his mother for
24 Mother's Day, and he kept --

25 NANCY STONE: And he was just a kid in the

neighborhood?

JACQUELINE MONTANEZ: Just a kid in -- a deaf boy in the neighborhood. And he kept beeping the horn and a car came by and blew his brains out. So it was like his mother felt it. She came running out, you know what I'm saying? It was like she felt it. So I had to watch that, and I -- I vowed to that lady -- I was like, I'm going to get them. I will get them. It -- this is not going to go in vain. He was like, what, you mad because your little boyfriend dead? So he threw Taurus (phonetic) in my face. So I was like, what? He was like, yeah, did you get a piece of his brain? I was like, oh. So I pulled my gun out and I shot him once in the back of the head.

(VIDEO PLAYS)

As he dropped, I came out of the bathroom and ran towards the other one. The other one had a gun and he -- my co-defendant, Mendoza, was scared because you could tell that he was about to do something to her. Because I -- I'm sure he heard the gunshot, so I grabbed the gun and just shot. And when I shot, it hit him, and he hit the floor. I learned to grow up in prison. I have feelings now. I have remorse. I -- I care about people. I

1 don't want to hurt nobody. I don't have the urge
2 to want to beat somebody up or -- or do anything --
3 harm to them. Now, it's just, like, I'm more
4 sensitive towards people and their feelings and
5 their health. To see the victim's family and hear
6 their pain, I -- I wanted to so badly -- for years
7 I have wanted so badly to apologize to the victim's
8 family. I mean, I know it's not going to bring
9 them back. And believe me, if I could trade places
10 with them, I would have. I took two lives. I took
11 somebody's father, brother, son. I don't even like
12 using my childhood as a crutch for what I did, but
13 the difference between me and them is I was trained
14 to be a killer. This is a not life I want, this is
15 the life I was given. I always wanted to be a
16 police officer. That was what I wanted to do as --
17 growing up, but I wasn't able to do that because I
18 became one of the bad boys. That's what I was
19 supposed to do. So it -- it made me really
20 emotional at try -- at sentencing because I wanted
21 everybody to know that the old me, that -- that's
22 not me. I'm not that child, I'm not a monster. I
23 have emotions, I have feelings, and I'm sorry.

24 NANCY STONE: -- admission of the exhibits
25 that were handed to our --

1 JACQUELINE MONTANEZ: The law changed and --
2 and it brought me back. My goal is to try to
3 change some laws to get some of these girls out of
4 here. You have girls that have came in so young
5 and are still here, and you have people that been
6 here for 30, 40, 50 years and nobody is trying to
7 help them and they're just like -- I -- I can't
8 give up on them here. My goal today is to go out
9 there and finally help the kids that couldn't --
10 like, what they couldn't do for me as a child, I
11 want to help somebody else.

12 (END OF VIDEO)
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1 CERTIFICATE OF REPORTER

2 COMMONWEALTH OF KENTUCKY AT LARGE

3
4 I do hereby certify that the the said matter was reduced
5 to type written form under my direction, and constitutes
6 a true record of the recording as taken, all to the best
7 of my skill and ability. I certify that I am not a
8 relative or employee of either counsel, and that I am in
9 no way interested financially, directly or indirectly,
10 in this action.
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19 *Brooke Andrew*
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22 BROOKE ANDREW,

23 COURT REPORTER / NOTARY

24 COMMISSION EXPIRES ON: 11/27/2025

25 SUBMITTED ON: 03/08/2022