

# **EXHIBIT 2**

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

MARILYN MULERO, )  
Plaintiff, )  
v. )  
REYNALDO GUEVARA, *et al.* )  
Defendants. )  
Case No. 23-L-4795

## DECLARATION OF JAQUELINE MONTANEZ

I, Jacqueline Montanez, am over the age of 18, am of sound mind, have personal knowledge of the below and, if called as a witness, would testify as follows:

1. On the morning of May 10, 1992, I was with Ismael Mudo Torres, who was my best friend, when he was shot and murdered by members of the Latin Kings. I knew that Hector Reyes was involved with his murder.

2. I spent the rest of that day with Ismael Mudo Torres' mother at the hospital and promised her that I would avenge his shooting.

3. That night, I went to Cortez and Washtenaw and was given a gun by a man named Manny, a member of the Latin Maniac Disciples. I planned to use the gun to avenge Ismael's murder.

4. Neither Marilyn Mulero nor Madeline Mendoza were present when I was given the gun.

5. To my knowledge, neither Marilyn Mulero nor Madeline Mendoza knew that I had a gun.

6. Marilyn Mulero then arrived at Cortez and Washtenaw, and me, Marilyn Mulero, and Madeline za got in Marilyn Mulero's brother's car.

7. Marilyn Mulero was driving and I told her to drive over to Beach and Spaulding. As we pulled up, Hector Reyes and Jimmy Cruz randomly pulled up next to our car and asked us to follow them to Humboldt

Park. At that point, I knew that I was going to kill Hector Reyes but I did not tell Marilyn Mulero and Madeline Mendoza that and they did not know that.

8. We followed Hector Reyes and Jimmy Cruz to Humboldt Park and parked behind them.
9. We all got out of the cars and Hector Reyes invited me into the bathroom.
10. When we got into the bathroom, Hector Reyes made sexual advances towards me which I denied. Hector Reyes then asked if I was denying him because he shot Ismael Mudo Torres.
11. Hector Reyes then turned towards a urinal in the bathroom, and I shot him in the back of the head.
12. I then walked out of the bathroom and Jimmy Cruz looked at me. He then turned back around and looked like he was reaching for his gun.
13. I then ran towards Jimmy Cruz and shot him in the back of the head.
14. Me, Marilyn Mulero, and Madeline Mendoza then ran back to Marilyn Mulero's brother's car and drove back to Cortez and Washtenaw.
15. All three of us then went our separate ways.
16. I alone shot and killed Hector Reyes and Jimmy Cruz.
17. I never told Marilyn Mulero or Madeline Mendoza that I planned to shoot or kill either Hector Reyes or Jimmy Cruz.
18. Neither Marilyn Mulero nor Madeline Mendoza had any knowledge that I planned to shoot or kill either Hector Reyes or Jimmy Cruz.
19. Neither Marilyn Mulero nor Madeline Mendoza knew that I planned to commit any crime that led up to these shootings.
20. Two days later me, Marilyn Mulero, and Madeline Mendoza were all at Ismael Mudo Torres' funeral.
21. After the funeral, Detectives Guevara and Halvorsen arrested me and Marilyn Mulero.
22. We were not read our *Miranda* rights.

23. Guevara and Halvorsen then drove us to Humboldt Park and then to Beach and Spaulding. They parked the car and a large group of Latin King members came over to the car. They opened the door and Halvorsen told them I was the one who killed Hector Reyes and Jimmy Cruz.

24. At that point, Guevara and Halvorsen told us that if we did not cooperate, they were going to let us out right then and there with these Latin King members.

25. Knowing that we would be killed if we got out of the car, we agreed to cooperate and were taken to the police station.

26. Marilyn and I were separated into different rooms.

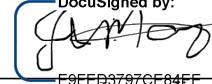
27. I was not read my *Miranda* rights. I requested an attorney, a youth officer, and to talk to my mother. They ignored me. I was not provided a lawyer, youth officer, or my mother throughout my interrogation.

28. Guevara and Halvorsen interrogated me and said if I agreed to take responsibility for one murder, and say Marilyn Mulero did the other, I would be tried as a juvenile and get out of jail by the time I was 21.

29. Because they told me I would get out by the time I was 21, which turned out to be a lie, I agreed to give a statement that I committed one murder and that Marilyn Mulero committed the other.

#### **VERIFICATION PURSUANT TO 28 U.S.C § 1746**

Pursuant 28 U.S.C § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Date: 10/10/2024 | 9:21 AM PDT /s/   
Jacqueline Montanez