

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

AARON PATTERSON, et al.,	)	
	)	
Plaintiffs,	)	No. 03 C 4433
	)	
vs.	)	The Honorable Joan
	)	B. Gottschall
FORMER CHICAGO POLICE	)	
LIEUTENANT JON BURGE, et al.,	)	Magistrate Judge
	)	Geraldine Soat
Defendants.	)	Brown

The sworn statement of MR. SAMMY W. LACEY,  
JUNIOR, taken before Carmella T. Fagan, C.S.R.,  
R.P.R., Notary Public within and for the County of  
Cook and State of Illinois, at 10540 South Western  
Avenue, in the City of Evergreen Park, Cook County,  
Illinois, commencing at 8:15 p.m. on the 12th day of  
October, 2004.

PRESENT:

MR. G. FLINT TAYLOR,  
Attorney for Aaron Patterson;

MR. MORT SMITH,  
Investigator.

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

AARON PATTERSON, et al.,	)	
	)	
Plaintiffs,	)	No. 03 C 4433
	)	
vs.	)	The Honorable Joan
	)	B. Gottschall
	)	
FORMER CHICAGO POLICE	)	Magistrate Judge
LIEUTENANT JON BURGE, et al.,	)	Geraldine Soat
	)	Brown
Defendants.	)	

The sworn statement of MR. SAMMY W. LACEY,  
JUNIOR, taken before Carmella T. Fagan, C.S.R.,  
R.P.R., Notary Public within and for the County of  
Cook and State of Illinois, at 10540 South Western  
Avenue, in the City of Evergreen Park, Cook County,  
Illinois, commencing at 8:15 p.m. on the 12th day of  
October, 2004.

PRESENT:

MR. G. FLINT TAYLOR,  
Attorney for Aaron Patterson;

MR. MORT SMITH,  
Investigator.

(WHEREUPON, the Witness was  
sworn.)

SAMMY W. LACEY, JUNIOR,  
called as a witness herein, having been first  
duly sworn, was examined and testified as follows:

EXAMINATION

BY MR. TAYLOR:

Q Mr. Lacey, could you give us your full  
name and spell it for the record.

A My name is Sammy, S-a-m-m-y, middle  
initial W., last name L-a-c-e-y, and I'm a Junior.

Q And your present age?

A Forty -- I was going to give my  
birthday. July the 5th, 1948. I'm 56 years old.

Q What is your present occupation?

A Retired police sergeant and I'm an  
attorney.

Q And how long have you been an  
attorney?

A Approximately three and a half years.

Q And calling your attention to sometime  
in the mid-'70s, did you have an occasion to become a  
Chicago police officer?

A Yes, I did.

1 Q What year did you actually become a  
2 police officer?

3 A Uh, 1975, but they gave me my  
4 seniority back to February of, uh, 1973.

5 Q And that had to do with a lawsuit  
6 having to do --

7 A Yes.

8 Q -- with discrimination --

9 A Yes.

10 Q -- in front of Judge Marshall; is that  
11 right?

12 A Judge Prentice Marshall. Right.

13 Q And just so the record reflects, you  
14 are African-American?

15 A Yes, I am.

16 Q Okay. And when you first came on the  
17 job in '75, where did you go to work?

18 A I worked in the 3rd District, rank  
19 officer.

20 Q And you were a beat patrolman at that  
21 time?

22 A Beat patrolman.

23 Q And how long did you stay in the 3rd  
24 District?

1 A Approximately five years.

2 Q So that would make it about 1980,  
3 1981?

4 A Yes.

5 Q Did you make detective at that time?

6 A Well, I was a Tactical officer in the  
7 5th District, and then I made detective a couple of  
8 months later.

9 Q Was that in 1981?

10 A It was 1981.

11 Q Were you then assigned to Area 2?

12 A Yes, I was.

13 Q When you got to Area 2, was Jon Burge  
14 the head of the Violent Crimes unit at that time?

15 A Yes, he was.

16 Q And when you came to Area 2 in 1981,  
17 did you work in the Violent Crimes unit?

18 A Yes, I did.

19 Q Did you have a partner in 1981?

20 A Yes, I did.

21 Q Who was that?

22 A I worked with Jack Hines and Doris  
23 Byrd and Walter Young.

24 Q Were those all African-American --

1 A Yes, they were.

2 Q -- detectives?

3 A Yes.

4 Q Did they all precede you at Area 1 or  
5 did they come there -- excuse me -- Area 2, or were  
6 they there before you or did they come after you?

7 A They came before me, somewhat before  
8 me.

9 Q Okay. Did you work a particular  
10 watch?

11 A Third watch.

12 Q What time was that?

13 A We worked from 4:00 to 12:00 o'clock.

14 Q After the third watch, was there a  
15 watch that followed that?

16 A Yes. It was the first watch, from  
17 12:00 to 8:00 o'clock in the morning.

18 Q Was it sometimes called midnights?

19 A Midnights. That's what we called it.

20 Q And did you stay at Area 2 for  
21 approximately seven years, until 1988?

22 A Approximately seven years.

23 Q And at some point did you make  
24 sergeant?

1 A Yes, I did.

2 Q While you were at Area 2 or later?

3 A While I was at Area 2.

4 Q What year did you make sergeant?

5 A December 1988.

6 Q Okay. Then how long after December of  
7 '88 did you leave Area 2?

8 A Well, in December.

9 Q Oh. So you were never a sergeant at  
10 Area 2?

11 A No.

12 Q Where were you assigned once you  
13 became a sergeant?

14 A Uh, the 7th District, Englewood.

15 Q Then you stayed in the force for how  
16 long after that? What year did you --

17 A Until 2003.

18 Q Okay. You retired in 2003?

19 A 2003. So 15 years later.

20 Q Did you remain in the 7th District all  
21 that time?

22 A No.

23 Q Where else did you go?

24 A I went to, uh, headquarters. I worked

1 in headquarters and I wound up finally working at the  
2 15th District.

3 Q Okay. Now, calling your attention  
4 back to when you first got to Area 2, did you have an  
5 occasion to be involved in the investigation that  
6 arose from the killing of two police officers in  
7 February of 1982 by the names of Fahey and O'Brien?

8 A Yes, I did.

9 Q And during that period of time, that  
10 being the 9th or -- or a day or two after the  
11 killings, did you have an occasion to go to police  
12 headquarters as part of that investigation?

13 A Yes, I did. They, uh, said they had  
14 captured the guys that killed the two police officers  
15 and all the detectives went to, um, headquarters at  
16 11th and State.

17 Q Did they take the persons who they at  
18 that time said had committed the crimes to somewhere  
19 in 11th and State?

20 A I didn't see the people that they had  
21 taken, but I knew that they had taken them up to an  
22 upper floor. I don't know. Maybe the 8th or 9th  
23 floor. I didn't know exactly. But they, uh -- I was  
24 just stationed with Commander Deas at the



1 superintendent's office.

2 Q Where was that located?

3 A That was on the 5th floor.

4 Q And did you come to any conclusions  
5 about why they put you there?

6 A I believe, uh, not to let me see what  
7 was going on.

8 Q And did you later learn that the  
9 people they had taken up, in fact, had not committed  
10 the crime?

11 A I believe the next day or so I was up,  
12 uh, bodyguarding a witness, and I learned that that  
13 was the wrong people.

14 Q Okay. After you spent the time with  
15 Commander Deas -- by the way, is Commander Deas white  
16 or black?

17 A He's black.

18 Q And after you spent some time with  
19 Commander Deas on the 5th floor in the  
20 superintendent's office, did you happen to see who  
21 was there in terms of brass?

22 A Well, I -- I saw Commander Burge and I  
23 saw, uh, Commander -- well, he was the deputy  
24 chief -- no, he was the chief of detectives, Chief

1 Hanhardt. I don't know his first name.

2 Q Okay. And they went to the upper  
3 areas?

4 A Yeah. They went up and left us  
5 downstairs.

6 Q And that was where the questioning was  
7 going on, to your knowledge?

8 A Yes. To my knowledge, yes.

9 Q And did they ultimately give you an  
10 assignment that took you away from Area 2 and away  
11 from 11th and State?

12 A Yes. They gave me bodyguard duty of a  
13 witness at the Holiday Inn at, I believe, it's on  
14 Washington, somewhere around Halsted.

15 Q Now, if -- if the murders happened on  
16 a Tuesday, the 9th, and your assignment to the -- or  
17 your going to 11th and State was on a Thursday; is  
18 that right?

19 A I believe so. I'm not quite sure.

20 Q So then would it have been, like,  
21 basically Friday and Saturday you were assigned to go  
22 to the Holiday Inn?

23 A Right. Because I, uh -- that  
24 bodyguard detail ended Sunday morning.

1                   Q           Okay. And Sunday morning was the 14th  
2 of February, which was the day that Andrew Wilson and  
3 Jackie Wilson were arrested early in the morning and  
4 taken to Area 2; is that right?

5                   A           Yes. I learned that. Right.  
6 Actually, I learned it from the TV.

7                   Q           Right. But did you then -- did you  
8 have some communication with someone in the command  
9 structure who instructed you to go back to Area 2?

10                  A           Yes.

11                  Q           And who was that? Do you remember?

12                  A           I don't recall. I want to think it  
13 was Sergeant Moran, but I'm not sure.

14                  Q           Okay. Did you go back for a purpose  
15 to go back to Area 2?

16                  A           Actually, I, uh, dropped the witness  
17 off. No, they -- I don't know. I think they picked  
18 the witness up for the lineup and then I went home  
19 and, uh, showered, took -- called and asked could I  
20 have the day off, no compen -- no time, and they told  
21 me, no, I had to put in that slip.

22                               So I went back over to the Area 2. At  
23 that time it was, like, 90th and Cottage. There was  
24 news people out. I walked upstairs into the main

1 office, and I want to believe it was Jackie Wilson  
2 was handcuffed, kind of laid out on the floor, and,  
3 uh, I gave my slip to Sergeant Moran and I walked  
4 out.

5 Q Now, when you came in, did you notice  
6 anything unusual in terms of what kind of cars were  
7 there?

8 A Yeah. A lot of the big brass was  
9 there.

10 Q And you could tell that by the --

11 A All the black cars that they used to  
12 drive.

13 Q Okay. So that would be commanders and  
14 deputy superintendents?

15 A Deputy superintendents, yeah. Maybe  
16 even the superintendent. I can't say that. I didn't  
17 see the superintendent, but maybe even the  
18 superintendent.

19 Q Did you see some of the deputy  
20 superintendents when you went in?

21 A No. I only seen, uh -- they were kind  
22 of, like, in the back because Wilson was, like, by  
23 hisself really in the front.

24 Q Did you see any other black faces up

1       there other than yourself when you went up there?

2               A       Mr. Wilson.

3               Q       And Mr. Wilson.

4               A       That's it.

5               Q       Now, did you then leave?

6               A       Yeah. I gave my slip and left and  
7       went to church.

8               Q       Did you ever come to any conclusions  
9       about why you received the assignments you received  
10       during those five days with regard to the Wilson  
11       case?

12              A       Well, it was Commander Burge's policy  
13       that blacks didn't investigate homicides in that  
14       time, so I guess just to get me -- keep me out of the  
15       way. I guess, and this is only my opinion, he didn't  
16       trust me, and because he didn't like me, I didn't  
17       like him.

18              Q       Was there any -- did you have a  
19       reputation in terms of being an honest police officer  
20       who would speak up if, in fact, you saw any  
21       wrongdoing?

22              A       Totally honest. Yes.

23              Q       Had you had other incidents within the  
24       department where you had spoken up on behalf of the

1 people who had been mistreated and you yourself had  
2 then been, if not disciplined, then --

3 A Well, I disciplined some officers for  
4 cutting black drivers' tires, the little stems, and  
5 they had, uh -- they kept me on midnights in the 7th  
6 District.

7 Q That was your "reward," quote,  
8 unquote, for turning in some fellow officers?

9 A Right. And I spoke up against some  
10 things that was going on at the -- when I was down at  
11 the command -- at the, uh, headquarters, and about  
12 them not promoting black sergeants to lieutenants,  
13 and I was sent to the 15th District.

14 Q Was this before 1981 or after 1981?

15 A This was after. But before '81, I  
16 just always had that reputation. I wasn't going to  
17 let nobody mess with nobody. I didn't believe in it.

18 Q Did you have an occasion to go to  
19 Commander Martin at any time to complain about the  
20 policy that Burge had about not allowing black  
21 detectives to work homicides?

22 A Yes. In 19 -- I believe it was 1983,  
23 me, Doris Byrd, Jack Hines, we kind of got upset that  
24 we were not being assigned to homicides, and we went

1 to then Commander Leroy Martin, who is also  
2 African-American, and, uh, explained that Commander  
3 Burge would not assign us to homicides.

4 And initially he was sympathetic with  
5 us and he said he would investigate it. The next day  
6 we were called into Commander Burge's office and he  
7 gave us the hoopla about going out of the chain of  
8 command and don't we ever do it. And at that time I  
9 said I would never go back through the command  
10 structure again.

11 Q So what you learned was that Martin,  
12 rather than to investigate it, had basically told  
13 Burge that you had informed on him and sent you right  
14 back to Burge to be yelled at?

15 A Yes.

16 Q Is that fair to say?

17 A That's fair to say.

18 Q Okay. Now, you mentioned earlier that  
19 you preceded the midnight shift; is that right?

20 A Yeah.

21 Q And did you guys have a name or a  
22 slang term you used for the midnight shift?

23 A We called them the A-Team.

24 Q Was there a particular reason why you

1 called them the A-Team?

2 A We just called it the A-Team.

3 Q Well, let me ask you this. In your  
4 eight years or seven years of experience at Area 2, I  
5 take it you questioned quite a few suspects and  
6 arrestees, did you not?

7 A Quite a few.

8 Q And you also were aware that  
9 questioning was going on on the midnight shift when  
10 you would leave. The midnight shift would be coming  
11 on and they would be starting their work, right?

12 A Right. Because if there was any  
13 prisoners left over from the days or the afternoons,  
14 the A-Team would interview them.

15 Q Okay. And were you able through your  
16 experience to come to any conclusions with some of  
17 your fellow officers like Doris Byrd and others about  
18 the fact that the A-Team or the midnights seemed to  
19 obtain a lot more signed confessions than the other  
20 watches?

21 A Yeah. It was very -- they had a very  
22 high percentage of clear-ups through written  
23 confessions. Yes.

24 Q And did you also when you worked at



1 the Area, from time to time, talk to or overhear  
2 statements made by people who worked with some of the  
3 detectives on the third watch -- excuse me -- on the  
4 midnight watch who also were police officers who  
5 might have brought suspects up to the third watch  
6 about some of the tactics that were used up there?

7 A Well, every day I then -- you know,  
8 especially if I was going to court, you might run  
9 into officers that worked in the 5th District, the  
10 midnight watch.

11 Q Um-hum.

12 A Some of those guys would work maybe,  
13 like, the wagon that would bring prisoners in or  
14 something, and they would be joking and asking me  
15 questions, like, what's going on on midnights, what  
16 are they doing up there to people on midnights, stuff  
17 like that. And I would tell them I didn't know.

18 Q But there seemed to be some  
19 recognition that --

20 A That something --

21 Q -- something --

22 A -- was not going right on the  
23 midnights.

24 Q And that perhaps physical abuse was

1 going on in order to get this high percentage of --

2 A That's what it seemed like. That's  
3 what they sounded like, right, what they would  
4 indicate.

5 Q Also sometimes did you hear from  
6 lockup keepers, people who would end up with the  
7 suspects after they had confessed, and they would see  
8 their physical and mental condition?

9 A Well, I rarely ever had occasion to  
10 speak to the lockup keepers. But it was just like  
11 the scuttlebutt that was going on from the guys doing  
12 the midnight watch that worked there, you know,  
13 during that time.

14 Q Now --

15 A But --

16 Q Okay. Go ahead.

17 A But I never, you know, had, like, a  
18 lockup keeper or anything tell me that they did or  
19 not. I didn't hear that.

20 Q Okay. Now, during this seven or eight  
21 years, up and until '86 or so, sometime in '86, Burge  
22 was the head of Violent Crimes; is that right?

23 A Yes, he was.

24 Q And when you -- would he often be on

1 your shift? Would he often be working the  
2 afternoons?

3 A Actually, the lieutenant worked 2:00  
4 to 10:00, 2:00 p.m. to 10:00 p.m. But a lot of times  
5 when there were big cases, he would -- I would see  
6 him. He would be working over.

7 Q So what time did you leave?

8 A I left at 12:00.

9 Q So you would leave at 12:00 and you  
10 would often seen Burge still there working and --

11 A Still hanging around. Yes.

12 Q -- hanging around if there was a  
13 suspect being questioned, that kind of thing?

14 A If there was any questioning, yeah, he  
15 was there.

16 Q He was there. And a lot of people,  
17 like detectives and people who worked with him,  
18 described him as both one of the hardest-working,  
19 meaning that he worked almost around-the-clock on big  
20 cases, and also that he was a hands-on type of  
21 supervisor, meaning he liked to be involved in  
22 interrogations and look in on interrogations. Would  
23 you agree with those characterizations?

24 A Well, he was kind of -- from my

1 opinion, he's kind of, like -- oversee, he would  
2 oversee any type of major investigation because, you  
3 know, I guess there was no real reason for him to  
4 stay because they were all seasoned detectives.

5 Q But he would anyway?

6 A He would stay.

7 Q And did it ever -- while Burge was  
8 there, did that policy of blacks only working with  
9 blacks and being pretty much closed out of the  
10 homicide investigations, did that ever change or was  
11 that a policy of his for the entire six or seven  
12 years you were there?

13 A It was there. It didn't change until  
14 Lieutenant Philip Cline took over.

15 Q And Cline took over sometime in '86 --

16 A Yes.

17 Q -- as the head of Violent Crimes?

18 A Yes.

19 Q And did you notice that a lot of the  
20 detectives from midnights all of a sudden were no  
21 longer working at Area 2 but had transferred out?

22 A Yeah. A great deal of them left right  
23 after Burge left, and I believe they went to Area 3.

24 Q Okay. They ultimately -- Burge went

1 to Bomb and Arson, then he went to Area 3, so these  
2 guys ended up at Area 3; is that right?

3 A Yes. Then we later heard that the  
4 same kind of scuttlebutt was going on at Area 3.

5 Q Right.

6 A Yeah.

7 Q And when you say, "scuttlebutt," what  
8 you're talking about is word you heard within the  
9 department of people who were talking kind of off the  
10 record or whatever about what they knew or had heard  
11 about misconduct in the Area; is that right?

12 A Yeah, that strange things was going on  
13 at Area 3 and there was a lot of confessions being  
14 made.

15 Q Did you ever have an occasion to be at  
16 a party with Burge where he said anything disparaging  
17 about you?

18 A Yes. I was at a retirement party and  
19 I was -- I want to believe the commander's name was  
20 Lesniak, I'm not sure, and he was shaking my hand,  
21 and Commander Burge walked up and says, don't shake  
22 his hand, he's a racist.

23 And I was, like, shocked. And then  
24 the commander, who also was white, says, well, we

1 know who the racist is, and laughed and walked away.

2 Q Now, were you at Area 2 when the young  
3 man, whose father was a police sergeant, by the name  
4 of George Jones was arrested and put on trial?  
5 George Jones was the son. Well, the father too.

6 A Oh, I was -- I was there.

7 Q You worked at Area 2 --

8 A Area 2.

9 Q -- when that case was going on?

10 A Well, I got there just a few days  
11 after he was arrested, and that was in '81.

12 Q And did you know Detective Frank  
13 Lavery at that time?

14 A Yeah, I knew Frank Lavery.

15 Q Were you aware that Frank Lavery had  
16 come forward at some point and exposed the fact that  
17 George Jones hadn't committed the crime, but that he  
18 had evidence that someone else did?

19 A I was off the weekend and, uh, it came  
20 out in the paper, and then when I got back, it was,  
21 like, a big thing. I remember he and Burge screaming  
22 and yelling about something, about the fact that he  
23 shouldn't have done that or something. I don't know.

24 But then I found out that, uh, Lavery

1 had found information that George did not do it and  
2 he told them. And that's what he should have done.  
3 It was the right thing. He should have never even  
4 been in jail.

5 Q And you were present when Burge was  
6 reading him the riot act?

7 A Well, he wasn't reading him the riot  
8 act. He was just ranting and raving in the  
9 supervisor's office. And I knew that's what he was  
10 talking about because I heard him say he shouldn't  
11 have done that, that was stupid, or something to that  
12 effect. You know, something to that effect. And I  
13 knew that's what he was talking about because nobody  
14 else had done nothing else.

15 Q Right. So was there -- to your  
16 knowledge, were you aware that there was this  
17 practice that the detectives had, prior to Laverly  
18 coming forward, of keeping what they called street  
19 files or running files, that kind of thing?

20 A Yeah.

21 Q And in some of those files they  
22 kept -- evidence was kept that showed innocence; is  
23 that right?

24 A Well, we know that with -- with George

1 Jones we knew it. You know, I never seen anything  
2 that said anybody was innocent.

3 Q Right.

4 A But we know that on that one because  
5 Frank seen it and he turned it in, and we knew that  
6 George Jones was innocent.

7 Q Do you know what happened to Frank  
8 because he came forward like that?

9 A They sent him downtown.

10 Q Kicked him out?

11 A Yeah.

12 Q Was that done -- did that set an  
13 example in the department and particularly in Area 2  
14 about what would happen to you if you came forward  
15 and told the truth?

16 A I got a feeling that everybody knew  
17 what would happen to you if you stepped on Burge's  
18 toes.

19 Q Um-hum. Was Burge, to your knowledge,  
20 responsible for sending Frank out of Area 2?

21 A I believe he was.

22 Q Did that ever happen to any other  
23 detectives or supervisors there at Area 2 while you  
24 were there?



1           A           Yeah. Sergeant Michael Hoke assigned  
2           us to a -- me and Jack Hines to a homicide when Jon  
3           Burge was on vacation and Jon Burge got very upset.  
4           And a few weeks later, he was, Mike Hoke was, sent  
5           out or transferred out.

6           Q           Do you remember when that was?

7           A           I want to think -- I just remember the  
8           case was Denise Mayberry. I don't remember. But Jon  
9           Burge was very upset with him. But it -- Mike Hoke  
10          landed on his feet. He made lieutenant and captain  
11          and then commander.

12          Q           Any other cases other than that one  
13          where Hoke got sent out for giving you guys a  
14          homicide assignment?

15          A           No. I had heard that, uh, there was  
16          another sergeant that gave Burge a little flack  
17          because he wanted to assign anybody to cases, and I  
18          think his name was Lee and I think he got transferred  
19          out too.

20          Q           Frank Lee?

21          A           I don't know his first name, but I  
22          know he got transferred out too. So you didn't give  
23          him no hard time about his principles. That's the  
24          way -- his orders was his orders.

1           Q           Now, after Leroy Martin, did you ever  
2 have any contact with Leroy Martin other than to try  
3 to get him to be fair with the assignments?

4           A           I mean, you know, other than he was  
5 the boss, you know, the supervisor, you know, we,  
6 uh -- I think, uh, the next real time I had occasion  
7 to be with him was when, uh, I apprehended the Pill  
8 Hill rapist, and then I met him that night.

9                    You know, he spoke that night about  
10 what a good job I had done, and I told him it was the  
11 good Lord that blessed me with the case, you know.

12          Q           Now, did you also have a tip, a  
13 significant tip, having to do with the Wilson case  
14 that you passed on to Burge?

15          A           Oh, in that case, a partner of mine  
16 that I used to work with in the 3rd District, Daniel  
17 Dixon, gave me some information that after the  
18 shooting of Fahey and O'Brien, that he had had the  
19 opportunity to arrest Jackie and Andrew Wilson in a  
20 armed robbery of a, uh, camera store at 115th and  
21 Michigan and that the car was brown, I believe.

22                   And I went to Commander Burge and  
23 explained that to him, and he told me it's burnt  
24 orange, we know what we're doing, and he sent me up

1 north then to interview a Hispanic guy.

2 Q So your impression was not only that  
3 he didn't want you involved in the inner workings of  
4 the investigation, but he wasn't interested in  
5 getting a tip from you?

6 A Yeah!

7 Q And, to your knowledge, did that tip  
8 pan out at all?

9 A It was a great tip. It could have  
10 cleared that case that day.

11 Q Because of the car that the Wilson  
12 brothers were in was --

13 A It was the Wilsons and it was the  
14 brown car.

15 Q And your partner even had the names,  
16 the Wilson brothers' names?

17 A Yeah. I gave him the names.

18 Q And this was on the day of the  
19 killings?

20 A Well, you know, I don't know if I gave  
21 him the names or I was going to get the names from  
22 Danny, but I gave him that information. That was  
23 at -- yeah, because they called us in that day.

24 Q So he sent you on the far north side

1 to do an investigation?

2 A Yeah. He said somebody, a Hispanic  
3 guy, way up north had some information, and I was  
4 trying to figure out how in the world could this guy  
5 have information.

6 Q About the Wilson case?

7 A Yeah. This just happened, you know?

8 Q Did you bother to follow up that lead  
9 that he gave you?

10 A Well, I wasn't going looking for no --  
11 maybe possible killers by myself.

12 Q No, no. I'm sorry.

13 A Oh.

14 Q Did you go on --

15 A Oh, I went up north. Yeah.

16 Q -- the chase he sent you on?

17 A It was way up north somewhere, I  
18 forget, and I couldn't find that person, and so they  
19 kind of -- I think that was it for me for that day.  
20 I had to go home. Some of the people worked, you  
21 know.

22 Q And this was the first day or two  
23 before you ever went to 11th and State?

24 A Yeah. The next time I really got a --

1 I was going to be a bodyguard and sit down with the  
2 commander.

3 Q Okay. Are there any other racist or  
4 race-related incidents you can think of other than  
5 what you've already told us having to do with Burge?

6 A Well, only thing I can say, I -- and  
7 this is why I consider that it was totally racist, is  
8 that every time he would give us our Detective  
9 division evaluations, we would always be rated low.

10 I don't care what we did, how many  
11 arrests we made, he always would throw this in our  
12 faces, that you didn't do any homicides. But you  
13 didn't assign homicides to blacks. He said, well,  
14 that's -- that's your problem, or something like  
15 that.

16 And he dumped -- and every time he --  
17 at that time, before the FOP was the union, they  
18 could dump you if your performance was subpar. And  
19 for some reason, it was always us four black  
20 detectives -- well, then it became three because he  
21 dumped Walter Young -- who was always on the chopping  
22 block.

23 Q So he dumped Walter Young at some  
24 point?

1 A Yeah.

2 Q Do you know where Walter Young is now?

3 A Yeah. I think he's retired.

4 Q Um-hum. He's not the one who's  
5 working at the sheriff's office, is he?

6 A I haven't seen Walter in about ten or  
7 12 years.

8 Q Did you know a sergeant by the name of  
9 Walter Jones who worked at Property Crimes?

10 A Yeah, I knew Walter Jones.

11 Q Do you know where he is?

12 A No. I just recall that his wife died  
13 some years ago.

14 Q Okay. You know, there's been actually  
15 some of these guys who -- Peter Dignan, did you know  
16 Peter Dignan?

17 A I knew Pete Dignan.

18 Q Did he work midnights as well?

19 A He was kind of a special guy. I think  
20 he worked when he wanted to work.

21 Q Now, guys like Dignan and Byrne and  
22 some of the others have admitted to using the word  
23 "nigger."

24 A I wouldn't put it past them.

1 Q Did you happen to hear them using it  
2 or were they careful not to use it in front of you?

3 A No, they wouldn't use it in front of  
4 me.

5 Q Okay.

6 A But I wouldn't put it past them.

7 MR. TAYLOR: Let's go off the record for a  
8 second and make sure I didn't forget anything.

9 (WHEREUPON, the Parties agreed to  
10 go off the record.)

11 BY MR. TAYLOR:

12 Q I'm going to show you an exhibit  
13 that's been marked in various depositions. It's a  
14 series of pictures.

15 (WHEREUPON, document was tendered  
16 to Witness.)

17 I want to ask you specifically about  
18 the first picture up here in the left-hand corner of  
19 the first page. Could you tell us who that looks to  
20 be to you.

21 A Jimmy Lotito.

22 Q Okay. And you're pretty sure that  
23 that's him?

24 A Yeah, that looks like him to me.

1 Q Okay. On the second page in the  
2 middle of the top line, do you see -- I'm going to  
3 ask you who that particular person is.

4 A Michael McDermott.

5 Q And you're pretty clear that that's  
6 McDermott?

7 A That's Michael. I know him.

8 Q Oh, let me ask you one thing. Have  
9 you had an occasion to talk to the special  
10 prosecutor?

11 A Yes. Today.

12 Q And have you basically told him the  
13 same things you've told me?

14 A Basically the same thing I told you.  
15 Oh, he had a -- there was case that I worked on that  
16 I can't recall -- the deceased was named Ward. But  
17 basically it's the same thing. And I'm going to talk  
18 to Mr. Boyle sometime next week.

19 Q Do you remember a case where a guy by  
20 the name of Shaded Mumin was being questioned on the  
21 second floor in '85 by Burge?

22 A No, I don't know that name.

23 Q Okay. Did you know whether Burge  
24 happened to have a rather long-barreled, silver gun



1       that he kept either in his drawer or that he carried  
2       around the Area?

3               A           I don't know. I -- you know, I never  
4       paid no attention to his gun, but I think he had  
5       his -- it was a chrome-plated .357, I think, you  
6       know. I don't remember him carrying no snub, but I  
7       don't know.

8               Q           Right. But you do remember him having  
9       a gun?

10              A           He had a brown handle, yeah --

11              Q           A silver-type gun?

12              A           -- chrome-plated gun. I believe so.  
13       I don't know how big it was.

14              Q           A .357 is, what, a four-inch barrel,  
15       something like that?

16              A           But you could carry a second one up to  
17       a six-inch barrel back in those days. That's before  
18       we went automatic, you know.

19              Q           So he could have?

20              A           He could have. I don't know.

21              Q           Okay.

22              A           I can't truthfully say that. I just  
23       know it was nickel-plated or chrome-plated or  
24       something like that.

ORIGINAL

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24

Q Okay. So basically -- well, that's silver, right? Nickel-plated would be silver.

A Yes.

MR. TAYLOR: Okay. I have no further questions.

(Which concluded the sworn statement of Mr. Sammy W. Lacey, Junior, October 12th, 2004.)

ORIGINAL 34

1 STATE OF ILLINOIS )  
2 ) ss:  
3 COUNTY OF C O O K )  
4

5 I, CARMELLA T. FAGAN, a Certified  
6 Shorthand Reporter and Registered Professional  
7 Reporter doing business in the City of Chicago,  
8 County of Cook, and State of Illinois, do hereby  
9 certify that I reported in computerized shorthand the  
10 foregoing proceedings of said sworn statement as  
11 appears from my stenographic notes so taken.

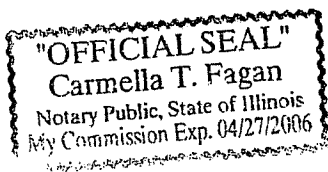
12 I further certify that the foregoing  
13 is a true and correct transcription of my shorthand  
14 notes, and contains all of the proceedings had at  
15 said sworn statement.

16 In testimony whereof, I have hereunto  
17 set my hand and affixed my notarial seal this 15th  
18 day of October, 2004.

19 Carmella T. Fagan  
20

21 Carmella T. Fagan, CSR, RPR

22 My notary expires:



April 27, 2006

----- ----- ----- '75 3:17 '81 13:15; 21:11 '85 31:21 '86 17:21; 19:15 '88 6:7 ----- 0 ----- 03 1:8 ----- 1 ----- 1 5:4 10540 1:17 10:00 18:4 115th 25:20 11th 7:16,19; 9:11,17; 27:23 12 29:7 12:00 5:13,17; 18:8,9 12th 1:19; 33:10 14th 10:1 15 6:19 15th 7:2; 13:13 19 13:22 1948 2:14 1973 3:4 1975 3:3 1980 4:2 1981 4:3,9,10, 16,19; 13:14 1982 7:7 1983 13:22 1988 5:21; 6:5 ----- 2 ----- 2 4:11,13,16; 5:5,20; 6:2, 3,7,10; 7:4; 9:10; 10:4,9, 15,22; 15:4; 19:21; 21:2, 7,8; 23:13, 20,23 2003 6:17,18, 19 2004 1:20; 33:10	2:00 18:3,4 ----- 3 ----- 3 19:23; 20:1, 2,4,13 357 32:5,14 3rd 3:18,23; 25:16 ----- 4 ----- 4433 1:8 4:00 5:13 ----- 5 ----- 56 2:14 5th 2:14; 4:7; 8:3,19; 16:9 ----- 7 ----- 7th 6:14,20; 13:5 ----- 8 ----- 8:00 5:17 8:15 1:19 8th 7:22 ----- 9 ----- 90th 10:23 9th 7:10,22; 9:16 ----- A ----- A-Team 14:23; 15:1,2,14,18 AARON 1:7,22.5 able 15:15 abuse 16:24 act 22:6,8 actually 3:1; 10:6,16; 18:3; 29:14 admitted 29:22 affixed 34:17 African-Ameri- can 3:14; 4:24; 14:2 afternoons 15:13; 18:2 age 2:12 ago 29:13	agree 18:23 agreed 30:9 ahead 17:16 al. 1:7,10.5 allowing 13:20 almost 18:19 already 28:5 Andrew 10:2; 25:19 another 24:16 anybody 23:2; 24:17 anyway 19:5 appears 34:11 apprehended 25:7 approximately 2:20; 4:1; 5:21,22 Area 4:11,13, 16; 5:4,5,20; 6:2,3,7,10; 7:4; 9:10; 10:4,9,15,22; 15:4; 16:1; 19:21,23; 20:1,2,4,11, 13; 21:2,7,8; 23:13,20,23; 32:2 areas 9:3 armed 25:20 arose 7:6 around 9:14; 18:11,12; 32:2 around-the-cl- ock 18:19 arrest 25:19 arrested 10:3; 21:4,11 arrestees 15:6 arrests 28:11 Arson 20:1 assign 14:3; 24:17; 28:13 assigned 4:11; 6:12; 9:21; 13:24; 24:1 assignment 9:10,16; 24:14 assignments 12:9; 25:3 attention 2:21; 7:3; 32:4 automatic	32:18 Avenue 1:18 aware 15:8; 21:15; 22:16 away 9:10; 21:1 ----- B ----- back 3:4; 7:4; 10:9,14,15, 22; 11:22; 14:9,14; 21:20; 32:17 barrel 32:14, 17 basically 9:21; 14:12; 31:12,14,17; 33:1 beat 3:20,22 became 6:13; 28:20 become 2:22; 3:1 behalf 12:24 believe 8:6, 11; 9:13,19; 11:1; 13:17, 22; 19:23; 20:19; 23:21; 25:21; 32:12 big 11:8; 18:5,19; 21:21; 32:13 birthday 2:14 black 8:16,17; 11:11,24; 13:4,12,20; 28:19 blacks 12:13; 19:8,9; 28:13 blessed 25:11 block 28:22 bodyguard 9:12,24; 28:1 bodyguarding 8:12 Bomb 20:1 boss 25:5 both 18:18 bother 27:8 Boyle 31:18 brass 8:21; 11:8 bring 16:13 brothers 26:12 brothers'
---	--	--	--

<p>26:16 brought 16:5 brown 1:11.5; 25:21; 26:14; 32:10 BURGE 1:10.5; 4:13; 8:22; 13:20; 14:3, 13,14; 17:21; 18:10; 19:7, 23,24; 20:16, 21; 21:21; 22:5; 23:19; 24:3,9,16; 25:14,22; 28:5; 31:21, 23 Burge's 12:12; 14:6; 23:17 burnt 25:23 business 34:7 Byrd 4:23; 13:23; 15:17 Byrne 29:21 ----- C ----- C.S.R. 1:15 called 2:4; 5:18,19; 10:19; 14:6, 23; 15:1,2; 22:18; 26:23 calling 2:21; 7:3 came 3:16; 4:16; 5:7; 11:5; 21:19; 23:8,14 camera 25:20 captain 24:10 captured 7:14 car 25:21; 26:11,14 care 28:10 careful 30:2 Carmella 1:15; 34:5,21 carried 32:1 carry 32:16 carrying 32:6 cars 11:6,11 case 12:11; 21:9; 24:8; 25:11,13,15; 26:10; 27:6; 31:15,19 cases 18:5,20;</p>	<p>24:12,17 Certified 34:5 certify 34:9, 12 chain 14:7 change 19:10, 13 characterizat- ions 18:23 chase 27:16 CHICAGO 1:10; 2:23; 34:7 chief 8:24 chopping 28:21 chrome-plated 32:5,12,23 church 12:7 City 1:18; 34:7 clear 31:5 clear-ups 15:22 cleared 26:10 Cline 19:14,15 closed 19:9 come 5:5,6; 8:4; 12:8; 15:16; 21:16 coming 15:10; 22:18 command 10:8; 13:11; 14:8,9 commander 7:24; 8:15, 19,22,23; 12:12; 13:19; 14:1,2,6; 20:21,24; 24:11; 25:22; 28:2 commander's 20:19 commanders 11:13 commencing 1:19 committed 7:18; 8:9; 21:17 communication 10:8 compen 10:20 complain 13:19 computerized 34:9 concluded 33:8 conclusions 8:4; 12:8;</p>	<p>15:16 condition 17:8 confessed 17:7 confessions 15:19,23; 20:13 consider 28:7 contact 25:2 contains 34:14 Cook 1:17,18; 34:8 corner 30:18 correct 34:13 Cottage 10:23 couldn't 27:18 County 1:16, 18; 34:2,8 couple 4:7 crime 8:10; 21:17 crimes 4:14, 17; 7:18; 17:22; 19:17; 29:9 CSR 34:21 cutting 13:4 ----- D ----- Daniel 25:16 Danny 26:22 day 1:19; 7:10; 8:11; 10:2,20; 14:5; 16:7; 26:10,18,23; 27:19,22; 34:18 days 12:10; 15:13; 21:10; 32:17 deal 19:22 Deas 7:24; 8:15,19 deceased 31:16 December 6:5, 6,8 Defendants 1:11.5 Denise 24:8 department 12:24; 20:9; 23:13 depositions 30:13 deputy 8:23; 11:14,15,19 described</p>	<p>18:18 detail 9:24 detective 4:5, 7; 21:12; 28:8 detectives 5:2; 7:15; 8:24; 13:21; 16:3; 18:17; 19:4,20; 22:17; 23:23; 28:20 died 29:12 Dignan 29:15, 16,17,21 disciplined 13:2,3 discrimination 3:8 disparaging 20:16 DISTRICT 1:2.5,3; 3:18,24; 4:7; 6:14,20; 7:2; 13:6,13; 16:9; 25:16 division 1:3.5; 28:9 Dixon 25:17 document 30:15 doing 16:16; 17:11; 25:24; 34:7 done 21:23; 22:2,11,14; 23:12; 25:10 Doris 4:22; 13:23; 15:17 down 13:10; 28:1 downstairs 9:5 downtown 23:9 drawer 32:1 drive 11:12 drivers' 13:4 dropped 10:16 duly 2:5 dump 28:18 dumped 28:16, 21,23 during 7:9; 12:10; 17:13, 20 duty 9:12</p>
---	---	--	---

----- E -----	7:7; 10:2 feeling 23:16 feet 24:10 fellow 13:8; 15:17 few 15:5,7; 21:10; 24:4 figure 27:4 files 22:19,21 finally 7:1 find 27:18 first 2:4; 3:16; 5:16; 7:4; 9:1; 24:21; 27:22; 30:18,19 five 4:1; 12:10 flack 24:16 FLINT 1:22 floor 7:22,23; 8:3,19; 11:2; 31:21 follow 27:8 followed 5:15 follows 2:5 FOP 28:17 force 6:15 foregoing 34:10,12 forget 27:18; 30:8 FORMER 1:10 Forty 2:13 forward 21:16; 22:18; 23:8, 14 found 21:24; 22:1 four 28:19 four-inch 32:14 Frank 21:12, 14,15; 23:5, 7,20; 24:20 Friday 9:21 front 3:10; 11:23; 30:2,3 full 2:8 further 33:4; 34:12 ----- G -----	26:17,20,22; 27:9 George 21:4,5, 17; 22:1,24; 23:6 Geraldine 1:11 getting 26:5 give 2:8,13; 9:9; 24:22; 28:8 giving 24:13 got 4:13; 7:4; 13:23; 21:10, 20; 23:16; 24:3,13,18, 22; 27:24 Gottschall 1:9.5 great 19:22; 26:9 guess 12:14, 15; 19:3 gun 31:24; 32:4,9,11,12 guy 26:1; 27:3,4; 29:19; 31:19 guys 7:14; 14:21; 16:12; 17:11; 20:2; 24:13; 29:15, 21 ----- H -----	6:24; 7:1,12, 15; 13:11 hear 17:5,19; 30:1 heard 20:3,8, 10; 22:10; 24:15 hereby 34:8 herein 2:4 hereunto 34:16 high 15:22; 17:1 Hill 25:8 Hines 4:22; 13:23; 24:2 Hispanic 26:1; 27:2 hissself 11:23 Hoke 24:1,4,9, 13 Holiday 9:13, 22 home 10:18; 27:20 homicide 19:10; 24:2, 14 homicides 12:13; 13:21, 24; 14:3; 28:12,13 honest 12:19, 22 Honorable 1:9 hoopla 14:7 ----- I -----
----- F -----	----- G -----	----- H -----	----- I -----
faces 11:24; 28:12 fact 8:9; 12:20; 15:18; 21:16,22 Fagan 1:15; 34:5,21 Fahey 7:7; 25:18 fair 14:16,17; 25:3 far 26:24 father 21:3,5 February 3:4;	----- G ----- gave 3:3; 9:12; 11:3; 12:6; 14:7; 24:16; 25:17;	half 2:20 Halsted 9:14 hand 20:20,22; 34:17 handcuffed 11:2 handle 32:10 hands-on 18:20 hanging 18:11, 12 Hanhardt 9:1 happen 8:20; 23:14,17,22; 30:1 happened 9:15; 23:7; 27:7; 31:24 hard 24:23 hardest-work- ing 18:18 head 4:14; 17:22; 19:17 headquarters	ILLINOIS 1:3, 17,19; 34:1,8 impression 26:2 incidents 12:23; 28:4 indicate 17:4 information 22:1; 25:17; 26:22; 27:3,5 informed 14:13 initial 2:11 initially 14:4 Inn 9:13,22 inner 26:3 innocence 22:22 innocent 23:2, 6 instructed

10:9  
 interested 26:4  
 interrogations 18:22  
 interview 15:14; 26:1  
 investigate 12:13; 14:5, 12  
 investigation 7:5,12; 19:2; 26:4; 27:1  
 investigations 19:10  
 Investigator 1:24  
 involved 7:5; 18:21; 26:3  
 -----  
 J  
 -----  
 Jack 4:22; 13:23; 24:2  
 Jackie 10:3; 11:1; 25:19  
 jail 22:4  
 Jimmy 30:21  
 Joan 1:9  
 job 3:17; 25:10  
 joking 16:14  
 JON 1:10.5; 4:13; 24:2,3, 8  
 Jones 21:4,5, 17; 23:1,6; 29:9,10  
 Judge 1:10.5; 3:10,12  
 July 2:14  
 JUNIOR 1:15; 2:3,11; 33:10  
 -----  
 K  
 -----  
 keep 12:14  
 keeper 17:18  
 keepers 17:6, 10  
 keeping 22:18  
 kept 13:5; 22:22; 32:1  
 Kicked 23:10  
 killed 7:14  
 killers 27:11  
 killing 7:6  
 killings 7:11;

26:19  
 kind 11:2,6, 21; 13:23; 18:13,24; 19:1; 20:4,9; 22:19; 27:19; 29:19  
 knowledge 9:7, 8; 22:16; 23:19; 26:7  
 -----  
 L  
 -----  
 L-a-c-e-y 2:11  
 LACEY 1:14; 2:3,8; 33:9  
 laid 11:2  
 landed 24:10  
 last 2:11  
 later 4:8; 6:2,19; 8:8; 20:3; 24:4  
 laughed 21:1  
 Lavery 21:13, 14,15,24; 22:17  
 lawsuit 3:5  
 lead 27:8  
 learn 8:8  
 learned 8:12; 10:5,6; 14:11  
 leave 6:7; 12:5; 15:10; 18:7,9  
 Lee 24:18,20  
 left 9:4; 12:6; 15:13; 18:8; 19:22, 23  
 left-hand 30:18  
 Leroy 14:1; 25:1,2  
 Lesniak 20:20  
 lieutenant 1:10.5; 18:3; 19:14; 24:10  
 lieutenants 13:12  
 line 31:2  
 lineup 10:18  
 little 13:4; 24:16  
 located 8:2  
 lockup 17:6, 10,18  
 long 2:18; 3:23; 6:6,16

long-barreled 31:24  
 longer 19:21  
 look 18:22  
 looking 27:10  
 looks 30:19,24  
 Lord 25:11  
 lot 11:8; 15:19; 18:4, 16; 19:19; 20:13  
 Lotito 30:21  
 low 28:9  
 -----  
 M  
 -----  
 made 4:7; 16:2; 20:14; 24:10; 28:11  
 Magistrate 1:10.5  
 main 10:24  
 major 19:2  
 man 21:3  
 many 28:10  
 marked 30:13  
 Marshall 3:10, 12  
 Martin 13:19; 14:1,11; 25:1,2  
 Mayberry 24:8  
 McDermott 31:4,6  
 mean 25:4  
 meaning 18:19, 21  
 mental 17:8  
 mentioned 14:18  
 mess 13:17  
 met 25:8  
 Michael 24:1; 31:4,7  
 Michigan 25:21  
 mid-'70s 2:22  
 middle 2:10; 31:2  
 midnight 14:19,22; 15:9,10; 16:4,10; 17:12  
 midnights 5:18,19; 13:5; 15:18; 16:15,16,23; 19:20; 29:18

might 16:5,8  
 Mike 24:4,9  
 mine 25:15  
 misconduct 20:11  
 mistreated 13:1  
 months 4:8  
 Moran 10:13; 11:3  
 morning 5:17; 9:24; 10:1,3  
 MORT 1:23.5  
 much 19:9  
 Mumin 31:20  
 murders 9:15  
 myself 27:11  
 -----  
 N  
 -----  
 name 2:9,10, 11; 9:1; 14:21; 20:19; 21:3; 24:18, 21; 29:8; 31:20,22  
 named 31:16  
 names 7:7; 26:15,16,17, 21  
 never 6:9; 14:9; 17:17; 22:3; 23:1; 32:3  
 news 10:24  
 next 8:11; 14:5; 25:6; 27:24; 31:18  
 nickel-plated 32:23; 33:2  
 nigger 29:23  
 night 25:8,9  
 No. 1:8  
 nobody 13:17; 22:13  
 north 26:1,24; 27:3,15,17  
 NORTHERN 1:3  
 notarial 34:17  
 notary 1:16; 34:23  
 notes 34:11,14  
 nothing 22:14  
 notice 11:5; 19:19

----- O ----- O'Brien 7:7; 25:18 o'clock 5:13, 17 obtain 15:19 occasion 2:22; 7:5,11; 13:18; 17:9; 20:15; 25:6; 31:9 occupation 2:15 October 1:20; 33:10 office 8:1,20; 11:1; 14:6; 22:9; 29:5 officer 2:23; 3:2,19; 4:6; 12:19 officers 7:6, 14; 13:3,8; 15:17; 16:4,9 often 17:24; 18:1,10 Okay 3:16; 5:9; 6:6,18; 7:3; 8:14; 9:2; 10:1,14; 11:13; 14:18; 15:15; 17:16, 20; 19:24; 28:3; 29:14; 30:5,22; 31:1,23; 32:21; 33:1,4 old 2:14 once 6:12 one 18:18; 23:4; 24:12; 29:4; 31:8; 32:16 only 11:21; 12:15; 19:8; 26:2; 28:6 opinion 12:15; 19:1 opportunity 25:19 orange 25:24 order 17:1 orders 24:24 other 11:24; 12:1,23; 15:19; 23:22;	24:12; 25:2, 4; 28:3,4 others 15:17; 29:22 out 10:24; 11:2,4; 12:14; 14:7; 19:9,21; 21:20,24; 23:10,20; 24:5,13,19, 22; 26:8; 27:4 over 10:22; 15:13; 18:6; 19:14,15 overhear 16:1 oversee 19:1,2 ----- P ----- p.m 18:4 p.m. 1:19; 18:4 page 30:19; 31:1 paid 32:4 pan 26:8 paper 21:20 Park 1:18 part 7:12 particular 5:9; 14:24; 31:3 particularly 23:13 Parties 30:9 partner 4:19; 25:15; 26:15 party 20:16,18 passed 25:14 past 29:24; 30:6 patrolman 3:20,22 PATTERSON 1:7, 22.5 people 7:20; 8:9,13; 10:24; 13:1; 16:2,16; 17:6; 18:16, 17; 20:9; 27:20 percentage 15:22; 17:1 performance 28:18	perhaps 16:24 period 7:9 person 27:18; 31:3 persons 7:17 Pete 29:17 Peter 29:15,16 Philip 19:14 physical 16:24; 17:8 picked 10:17 picture 30:18 pictures 30:14 Pill 25:7 Plaintiffs 1:8 point 5:23; 21:16; 28:24 police 1:10; 2:16,23; 3:2; 7:6,11,14; 12:19; 16:4; 21:3 policy 12:12; 13:20; 19:8, 11 possible 27:11 practice 22:17 precede 5:4 preceded 14:19 Prentice 3:12 present 1:21; 2:12,15; 22:5 pretty 19:9; 30:22; 31:5 principles 24:23 prior 22:17 prisoners 15:13; 16:13 problem 28:14 proceedings 34:10,14 Professional 34:6 promoting 13:12 Property 29:9 prosecutor 31:10 Public 1:16 purpose 10:14 put 8:5; 10:21; 21:4; 29:24; 30:6 ----- Q ----- questioned	15:5; 18:13; 31:20 questioning 9:6; 15:9; 18:14 questions 16:15; 33:5 quite 9:19; 15:5,7 quote 13:7 ----- R ----- R.P.R. 1:16 race-related 28:4 racist 20:22; 21:1; 28:3,7 rank 3:18 ranting 22:8 rapist 25:8 rarely 17:9 rated 28:9 rather 14:12; 31:24 raving 22:8 reading 22:6,7 real 19:3; 25:6 really 11:23; 27:24 reason 14:24; 19:3; 28:19 recall 10:12; 29:12; 31:16 received 12:9 recognition 16:19 record 2:9; 3:13; 20:10; 30:7,10 reflects 3:13 regard 12:10 Registered 34:6 remain 6:20 remember 10:11; 21:21; 24:6,7,8; 31:19; 32:6,8 reported 34:9 Reporter 34:6, 7 reputation 12:19; 13:16 responsible 23:20 retired 2:16;
--	--	--	---



6:18; 29:3 retirement 20:18 reward 13:7 riot 22:6,7 robbery 25:20 RPR 34:21 run 16:8 running 22:19 ----- S ----- S-a-m-m-y 2:10 same 20:4; 31:13,14,17 SAMMY 1:14; 2:3,10; 33:9 Saturday 9:21 saw 8:22,23; 12:20 says 20:21,24 screaming 21:21 scuttlebutt 17:11; 20:4,7 seal 34:17 seasoned 19:4 second 30:8; 31:1,21; 32:16 see 7:20; 8:6, 20; 11:17,19, 24; 17:7; 18:5; 31:2 seemed 15:18; 16:18; 17:2 seen 11:21; 18:10; 23:1, 5; 29:6 sending 23:20 seniority 3:4 sent 13:13; 14:13; 23:9; 24:4,13; 25:24; 26:24; 27:16 sergeant 2:16; 5:24; 6:4,9, 13; 10:13; 11:3; 21:3; 24:1,16; 29:8 sergeants 13:12 series 30:14 set 23:12; 34:17 seven 5:21,22; 15:4; 17:20;	19:11 Shaded 31:20 shake 20:21 shaking 20:20 sheriff's 29:5 shift 14:19, 22; 15:9,10; 18:1 shocked 20:23 shooting 25:18 shorthand 34:6,9,13 shouldn't 21:23; 22:10 show 30:12 showed 22:22 showered 10:19 side 26:24 signed 15:19 significant 25:13 silver 31:24; 33:2 silver-type 32:11 sit 28:1 six 19:11 six-inch 32:17 slang 14:22 slip 10:21; 11:3; 12:6 SMITH 1:23.5 snub 32:6 Soat 1:11 somebody 27:2 someone 10:8; 21:18 something 16:14,20,21; 21:22,23; 22:11,12; 28:14; 32:15, 24 sometime 2:21; 17:21; 19:15; 31:18 sometimes 5:18; 17:5 somewhat 5:7 somewhere 7:18; 9:14; 27:17 son 21:5 sorry 27:12 sounded 17:3 South 1:17 special 29:19; 31:9	specifically 30:17 spell 2:9 spent 8:14,18 spoke 13:9; 25:9 spoken 12:24 ss 34:1.5 starting 15:11 State 1:17; 7:16,19; 9:11,17; 27:23; 34:1,8 statement 1:14; 33:9; 34:10,15 statements 16:2 STATES 1:2.5 stationed 7:24 stay 3:23; 5:20; 19:4,6 stayed 6:15 stems 13:4 stenographic 34:11 stepped 23:17 still 18:10,11 store 25:20 strange 20:12 street 22:18 structure 10:9; 14:10 stuff 16:16 stupid 22:11 subpar 28:18 sudden 19:20 Sunday 9:24; 10:1 superintendent 11:16,17,18 superintenden- t's 8:1,20 superintenden- ts 11:14,15, 20 supervisor 18:21; 25:5 supervisor's 22:9 supervisors 23:23 suspect 18:13 suspects 15:5; 16:5; 17:7 sworn 1:14; 2:2,5; 33:8; 34:10,15	sympathetic 14:4 ----- T ----- Tactical 4:6 tactics 16:6 TAYLOR 1:22; 2:7; 30:7,11; 33:4 ten 29:6 tendered 30:15 term 14:22 terms 8:21; 11:6; 12:19 testified 2:5 testimony 34:16 there's 29:14 thing 18:13; 21:21; 22:3, 19; 28:6; 31:8,14,17 things 13:10; 20:12; 31:13 third 5:11,14; 16:3,5 three 2:20; 28:20 throw 28:11 Thursday 9:17 tip 25:12,13; 26:5,7,9 tires 13:4 Today 31:11 toes 23:18 took 9:10; 10:19; 19:14, 15 top 31:2 totally 12:22; 28:7 transcription 34:13 transferred 19:21; 24:5, 18,22 trial 21:4 true 34:13 trust 12:16 truth 23:15 truthfully 32:22 try 25:2 trying 27:4 Tuesday 9:16 turned 23:5 turning 13:8
--	---	---	---

TV 10:6  
two 7:6,10,14;  
27:22  
type 18:20;  
19:2  
-----

U  
-----

ultimately  
9:9; 19:24  
Um-hum 16:11;  
23:19; 29:4  
union 28:17  
unit 4:14,17  
UNITED 1:2.5  
unquote 13:8  
until 5:21;  
6:17; 17:21;  
19:13  
unusual 11:6  
up 7:1,21;  
8:9,11; 9:4;  
10:18; 11:24;  
12:1,20,24;  
13:9; 16:5,6,  
16; 17:6,21;  
20:2,21;  
25:24; 27:3,  
8,15,17;  
30:18; 32:16  
upper 7:22;  
9:2  
upset 13:23;  
24:3,9  
upstairs 10:24  
using 29:22;  
30:1  
-----

V  
-----

vacation 24:3  
various 30:13  
Violent 4:14,  
17; 17:22;  
19:17  
vs 1:9  
-----

W  
-----

wagon 16:13  
walked 10:24;  
11:3; 20:21;  
21:1  
Walter 4:23;  
28:21,23;  
29:2,6,9,10  
wanted 24:17;  
29:20

Ward 31:16  
Washington  
9:14  
watch 5:10,11,  
14,15,16;  
16:3,4,5,10;  
17:12  
watches 15:20  
way 8:15;  
12:15; 24:24;  
27:3,17  
week 31:18  
weekend 21:19  
weeks 24:4  
Western 1:17  
whatever 20:10  
whereof 34:16  
WHEREUPON 2:1;  
30:9,15  
whether 31:23  
white 8:15;  
20:24  
who's 29:4  
wife 29:12  
Wilson 10:2,3;  
11:1,22;  
12:2,3,10;  
25:13,19;  
26:11,16;  
27:6  
Wilsons 26:13  
within 1:16;  
12:23; 20:8  
witness 2:1,4;  
8:12; 9:13;  
10:16,18;  
30:16  
word 20:8;  
29:22  
work 3:17;  
4:17; 5:9;  
13:21; 15:11;  
16:12; 25:16;  
29:18,20  
worked 3:18;  
4:22; 5:13;  
6:24; 15:24;  
16:2,9;  
17:12; 18:3,  
17,19; 21:7;  
27:20; 29:9,  
20; 31:15  
working 7:1;  
18:1,6,10;  
19:8,21; 29:5  
workings 26:3  
world 27:4  
wound 7:1

written 15:22  
wrongdoing  
12:21  
-----  
Y  
-----  
year 3:1; 6:4,  
16  
years 2:14,20;  
4:1; 5:21,22;  
6:19; 15:4;  
17:21; 19:12;  
29:7,13  
yelled 14:14  
yelling 21:22  
young 4:23;  
21:2; 28:21,  
23; 29:2  
yourself 12:1;  
13:1  
-----  
-----  
34:17,  
18  
-----  
34:18  
-----  
-----  
34:20,24.5