

NO. _____

IN THE SUPREME COURT OF THE UNITED STATES

KARLYNN TONES
DONTA LYYVOID BLACKMON
ARVIN TERRELL CARMEN

PETITIONERS,

vs.

UNITED STATES OF AMERICA,

RESPONDENT.

**APPENDIX D TO PETITION FOR WRIT OF CERTIORARI TO
THE UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT**

SUZANNE LEE ELLIOTT
Attorney at Law
Suite 1300, 705 Second Ave.
Seattle, WA 98104
(206) 623-0291

Attorney for Petitioners

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 1
G. MADISON/DI - VAN MARTER

1 we're done. Thank you.

2 (Law Clerk takes picture of the witness)

3 THE COURT: Go ahead, Ms. Van Marter.

4 MS. VAN MARTER: Thank you.

5

6 DIRECT EXAMINATION

7 DIRECT BY MS. VAN MARTER:

8 Q Good afternoon, Mr. Madison. Could you please state your
9 full name and spell your last for the record?

10 A Gilbert Madison.

11 THE COURT: Spell your last name, please.

12 THE WITNESS: M A D I S O N.

13 Q (BY MS. VAN MARTER) Can you pull the microphone a little
14 bit closer to your face.

15 A (Witness complies)

16 Q Thank you. And, Mr. Madison, are you a defendant in this
17 case?

18 A Yes.

19 Q And have you plead guilty to an offense or offenses?

20 A Yes.

21 Q What have you plead guilty to?

22 A CCE, continuing criminal enterprise. And conspiracy.

23 Q Conspiracy to do what?

24 A Distribute pills. OxyContin.

25 Q Okay. And what is your understanding, in terms of what you

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 1
G. MADISON/DI - VAN MARTER

1 plead guilty to, with regard to the continuing criminal
2 enterprise? What does that mean?

3 A Face 20 years to life.

4 Q Did you enter into an agreement with the United States?

5 A Yes.

6 Q What is that agreement?

7 A Open plea to continuing criminal enterprise and conspiracy
8 to distribute OxyContin, oxycodone.

9 Q And, in that agreement, did you agree to cooperate?

10 A Yes.

11 Q And what does that agreement to cooperate mean?

12 A To testify to my dealings in the conspiracy and, also, to
13 tell the truth on the conspiracy and take responsibility for my
14 actions.

15 Q And why did you decide to cooperate?

16 A Honestly, to tell the truth about, you know, the on-goings
17 and to give a true view of accountability of my actions.

18 Q And was the agreement to cooperate a difficult decision?

19 A Yes.

20 Q Why?

21 A It goes against everything that bred into me.

22 Q And what do you mean by that?

23 A Where I grew up, the streets, being antipolice.

24 Q So was it part of what you grew up with to not cooperate
25 with the police?

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 1
G. MADISON/DI - VAN MARTER

1 A Yes. In any manner.

2 Q Are there consequences to your agreement to cooperate?

3 A Severe.

4 Q What are they?

5 A Alienation. Death. Family, friends could be harmed.

6 Various things could happen.

7 Q So you entered into this agreement to cooperate with the
8 United States. What do you hope to happen to your case?

9 A Actually, it was to give an open plea in hopes that it
10 would actually shed light on what actually was going on. But,
11 also, to give accountability for my actions and, basically,
12 leave it up to the Courts to assign me whatever time they
13 deemed.

14 Q Do you hope that the Court will consider your
15 cooperation --

16 A Yes.

17 Q -- when it comes time to sentence?

18 A Yes.

19 Q What happens if you violate your agreement to cooperate
20 with the United States?

21 A If I lie, if I try to intimidate any witnesses that was
22 with me, that I could be facing life imprisonment.

23 Q And, as you sit here today, do you know what's going to
24 happen to you with your case and your sentence?

25 A No.

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 1
G. MADISON/DI - VAN MARTER

1 Q I want to ask you some questions about your background.
2 Okay? Where are you from?
3 A Los Angeles, California.
4 Q How long have you lived in the Los Angeles area?
5 A All my life.
6 Q Did you get involved with a gang?
7 A Yes.
8 Q And what gang?
9 A Eight Trey Gangster Crips.
10 Q And why is it called "Eight Trey"?
11 A Street in which our gang was formed. Well, we basically
12 broke away from the West Side Crips and joined from that -- that
13 number. In LA, everybody has a number.
14 Q What does that mean?
15 A Behind the gang. It's a number from First Street to
16 whatever other street. As far as Los Angeles, it would be -- it
17 can go as far as the street numbers.
18 Q So are gangs based upon the neighborhood that you are from?
19 A Excuse me?
20 Q Is the gang based upon the neighborhood that you're from?
21 A The number 83 is our neighborhood.
22 Q Okay. I'm going to show you what's been marked as
23 Government's Exhibit No. 56. And it's going to be a map of that
24 area. Okay? Is that showing on your screen, Mr. Madison? Is
25 there a map showing on your screen?

384

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 1
G. MADISON/DI - VAN MARTER

1 A Yes.

2 Q Okay. And, just for purposes of aiding in testimony to
3 talk about the neighborhoods, if you could take a look at that
4 map, do you recognize what that depicts? I can zoom it in a
5 little bit.

6 A Yes.

7 Q And what does it depict?

8 A Indicate a graft (sic) of, I guess, the location of my
9 neighborhood.

10 Q Okay. And would that help you to explain to the jury what
11 you were talking about in terms of the numbered streets?

12 A Yes. I guess that would be to the -- blow it up a little
13 bit more. I can't see the numbers.

14 Q I'm going to turn it sideways.

15 MS. VAN MARTER: Your Honor and move to admit to
16 publish to the jury.

17 THE COURT: Do you have the map already in it so north
18 is up? That oftentimes is helpful.

19 MS. VAN MARTER: Yes. I think that was the issue.

20 Q (BY MS. VAN MARTER) Do I have that right? Is that better
21 for you to see, Mr. Madison?

22 A Yes.

23 THE COURT: Do you recognize that as being the
24 neighborhood that you're talking about, Mr. Madison?

25 THE WITNESS: Yes.

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 1
G. MADISON/DI - VAN MARTER

1 THE COURT: All right. Any objection?

2 MR. HORMEL: No objection.

3 THE COURT: All right.

4 MR. CHRISTIANSON: Judge -- Judge, I would object
5 without some more foundation as to who drew the lines, who put
6 the names in designating each part of the neighborhood.

7 THE COURT: You can ask him that. He said it's an
8 accurate description. It would aid his testimony. So, is it
9 56?

10 MS. VAN MARTER: It is, your Honor.

11 THE COURT: Admitted.

12 (Exhibit No. 56 admitted into evidence)

13 MS. VAN MARTER: Thank you, your Honor.

14 Q (BY MS. VAN MARTER) So, Mr. Madison, when you were talking
15 about --

16 THE COURTROOM DEPUTY: Excuse me. Did you want that
17 displayed? 34

18 MS. VAN MARTER: Yes, please.

19 Q (BY MS. VAN MARTER) When you were talking about the Eight
20 Treys, does that map depict a particular area associated with
21 the Eight Treys?

22 A Yes

23 | Q Is that accurate?

24 A I need to blow it up a little bit. Move it to the right.
25 Pretty much so.

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 1
G. MADISON/DI - VAN MARTER

1 Q Okay. So, if we could look at the map when you were
2 talking about 83rd Street, where is that on this map? Can you
3 see?

4 A Go wider. Yeah. I see it now.

5 Q Okay.

6 THE COURT: I think, if you touch the screen, it
7 should mark on there.

8 MS. VAN MARTER: Yes, I was just going to say.

9 Q (BY MS. VAN MARTER) Okay. Is there a particular area
10 around 83rd that's associated with the Eight Treys? It looks
11 like we've got -- if you could discuss the cross streets and the
12 boundary?

13 A Cross streets? Oh, okay. That would be from, I guess,
14 Gage to Century and from Van Ness to Vermont.

15 Q I'm going to zoom in a little bit. And this map indicates
16 some other gangs that surround the Eight Trey area. Is that
17 accurate?

18 A Yes. Pretty much.

19 Q So there are other gangs that border the area in which the
20 Eight Treys have in Los Angeles. Is that fair to say?

21 A Yes.

22 Q Okay. So why is it based on neighborhoods or street?

23 A Excuse me?

24 Q Why is the gang based on your street number, 83?

25 A That's what it was founded on. 83rd and Western.

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 1
G. MADISON/DI - VAN MARTER

1 Q And how did you become involved in Eight Treys?

2 A Courted in at the age of 13.

3 Q What does that mean?

4 A Jumped in.

5 Q Are there different ways that you can be brought into the
6 gang?

7 A Yes.

8 Q And what are those?

9 A You can be walked on, like, grandfathered in because of --
10 like, being born in a set or robberies, graffiti.

11 Q So what does it mean to be "jumped in"?

12 A Two, three individuals jump you in for amount of time
13 deemed necessary. And, from there, you get, like, a
14 three-on-one, two-on-one, and, then, a one-on-one.

15 Q So why did you jump in at the age of 13?

16 A Because I got a gun pulled on me by the enemies before I
17 knew anything about Eight Trey, and I didn't like 'em. So I
18 chose to retaliate.

19 Q By joining the gang?

20 MR. CHRISTIANSON: Your Honor, I'm having a hard time
21 hearing him. If we could get him to speak up or speak into the
22 microphone.

23 THE COURT: Speak right into it, Mr. Madison.

24 THE WITNESS: Okay.

25 Q (BY MS. VAN MARTER) So what do you mean by the enemies?

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 1
G. MADISON/DI - VAN MARTER

1 A Rolling '60s.

2 Q And who are the Rolling '60s?

3 A The Rolling '60 Neighborhood Crips. They're our
4 archenemies.

5 Q And why are they enemies?

6 A Because of they killed one of our homies. And --

7 Q So I'm going to just -- so when there's -- with the gangs
8 and the streets and if there's an enemy, is there a history to
9 it that follows you into the gang?

10 A Yes. Some people -- depending on when you got put on is
11 who you deem your -- your archenemy is. It don't necessarily
12 mean that your archenemies are only the '60s. It could be any
13 neighborhood that we're at war with.

14 Q So, when you were jumped in, did you look to the Eight
15 Treys for protection?

16 A Yes and no.

17 Q What do you mean by that?

18 A Yes, for protection. In some instances, where it was maybe
19 out -- being out numbered, but not to the point to where that --
20 that was my reason. It was considered family. They would be
21 there for you.

22 Q And how old are you now?

23 A Forty-eight.

24 Q So how long have you been a part or member of the Eight
25 Trey?

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 1
G. MADISON/DI - VAN MARTER

1 A 35 years.

2 Q And do you have a moniker or a name within the gang?

3 A Yes.

4 Q And what is that?

5 A Sidewinder 2.

6 Q And what does the name or moniker mean?

7 A It's -- it's part of who you are.

8 Q And how -- how is it that that name is provided to you?

9 How do they -- how do you come up with the names?

10 A Given to you.

11 Q By who?

12 A By respectable member of your gang.

13 Q And, in this particular case when you're given a name, are
14 you given a name by the person who jumped you in?

15 A Not necessarily because my name was Mr. Nobody when I
16 started.

17 Q And why was it Mr. Nobody?

18 A Because I have no family or, at the point -- at the time, I
19 had no family and nobody knew where I came from.

20 Q So why did your name change from Mr. Nobody to Sidewinder?

21 A By my activities and being -- being good at what my
22 homeboys thought was necessary: Fighting, putting in work.

23 Q And what do you mean by your "homeboys"?

24 A Other members of Eight Trey.

25 Q Are -- within the Eight Trey, are there bosses?

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 1
G. MADISON/DI - VAN MARTER

390

1 A Yeah, I guess you can consider them that.

2 Q What do you consider it? What does it mean to you?

3 A Big homies.

4 Q And what are "big homies"?

5 A People that's been there before you.

6 Q And do they have a say in what happens within the Eight
7 Trey?

8 A Most of the time.

9 Q Are there different parts of the Eight Trey or different
10 sides of the Eight Trey?

11 A Yes.

12 Q And what are those?

13 A West, south, back west, far west, north side, and deep
14 south area.

15 Q And why are there different sides?

16 A For different parts of our neighborhood that was
17 established by other people that kind of got broke down.

18 Q And does each side have a particular group that associates
19 with it?

20 A Particular group? I don't understand.

21 Q Particular members of the gang that associate with a
22 particular side?

23 A Yes.

24 Q So what side are you associated with?

25 A The west side and the back west.

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 1
G. MADISON/DI - VAN MARTER

1 Q Why both sides?

2 A Because, even though I'm from the west side, I live in the
3 back west.

4 Q Are you all Eight Treys?

5 A Yes.

6 Q And, if you are new member of the gang, what are you
7 expected to do for the gang?

8 A Depends on who -- who are leading you.

9 Q What does that mean?

10 A At the point of when you get put on, there's certain people
11 that govern over you. Basically, most of the time, it's -- it's
12 people that are -- that put you on. And they, basically, tell
13 you what to do.

14 Q Are you expected to follow through with what they tell you?

15 A Yes.

16 Q So, if you're a member of the Eight Treys, is there a
17 code --

18 A Yes.

19 Q -- that you're expected to follow?

20 A Yes.

21 Q What is that code?

22 A No snitching.

23 Q Are there other parts to the code?

24 A Yes. You don't involve civilians. Civilians are off
25 limits. You don't sell drugs to pregnant women, little kids.

392

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 1
G. MADISON/DI - VAN MARTER

1 Rules of that nature.

2 Q And what happens if you violate one of these rules?

3 A Depending on how severe the rules are being broken, you
4 can -- it can be discipline as far as beat down or it could
5 be -- you can be killed.

6 Q Within -- you were talking about having to follow whoever
7 your leader is within the -- that side, whoever brought you. Is
8 there a term called the "shock collar"?

9 A Yes.

10 Q And what does that mean?

11 A Either shock collar, person with the keys. It's who you --
12 who was over that particular time, maybe, to have say-so to the
13 younger -- the younger people.

14 Q Do the names within Eight Trey have something to do with
15 your status? Your monikers?

16 A Sometimes.

17 Q And explain that.

18 A Most of the, I guess, big homies with names that has
19 respectability. If you have one of those names, then you get a
20 little bit more leeway.

21 Q And are there name differences? So, for instance, "big,"
22 "little," "tiny," "baby"?

23 A "Big," being first generation; "little," second; "baby,"
24 third; and so on down the chain.

25 Q And is your name, then, associated with your big homie?

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 1
G. MADISON/DI - VAN MARTER

1 A Yes.

2 Q If you are a big homie within your side, does that mean
3 you're a boss over everything that happens in Eight Trey?

4 A No.

5 Q Are there bosses above that?

6 A Yes.

7 Q What does the term "hustle" mean?

8 A Get money. It don't necessarily mean illegal, but it means
9 that you hustle to get money.

10 Q How does the hustle work within the leadership of the gang?

11 A Whatever your hustle is, is basically your hustle unless
12 it -- unless it runs into gang affairs. Meaning, you can hustle
13 T-shirts; but it don't really mean anything unless -- it's your
14 hustle unless the -- you bring your gang into it.

15 Q And, if the gang gets brought into it, what happens?

16 A Two things. I mean, you -- one, you have to share profits.
17 You get protection in certain situations that arises. Yeah.

18 Q If you have the hustle, what are you supposed to do with
19 the money made from the hustle?

20 A Supposed to take care of your family.

21 Q And the family is, again, who?

22 A Eight Treys.

23 Q After so many years of being a gang member, do you have
24 criminal history?

25 A Yes.

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 1
G. MADISON/DI - VAN MARTER

1 Q What is your criminal history?

2 A Convictions?

3 Q Convictions.

4 A Manslaughter, assault with a deadly weapon, possession of
5 controlled substance, and possession of firearm.

6 Q And, with that criminal history, is that consistent with
7 the way of life that you were raised?

8 A Yes.

9 Q Possession of firearms?

10 A Yes.

11 Q That consistent with daily life?

12 A Every day.

13 Q Fighting. Is that -- was that consistent with your daily
14 life?

15 A Younger, yes.

16 Q And why younger?

17 A Younger you have to prove yourself more. Older it's more,
18 you know, you -- you got to live by your reputation.

19 Q So you've promoted out of what was expected as you were
20 younger.

21 A Yes.

22 Q Does that have to do with how the gang is structured? You
23 start out a certain way, and over time you can elevate?

24 A Yes.

25 Q And what does that mean?

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 1
G. MADISON/DI - VAN MARTER

1 A Move up the chain to where you don't have to do the hard
2 stuff. The more -- I guess -- how can I put it? Meaning you
3 don't have to go out and do -- I guess you guys call it "grunt
4 work." Put in work against your enemies, things of that nature.

5 Q And your prior conviction for manslaughter. Did that
6 involve a firearm?

7 A Yes.

8 Q Does your criminal history mean something in the gang?

9 A Yes and no. It gives -- it gives substance to who you are
10 and who they're dealing with.

11 Q A reputation?

12 A Yes. Sometimes it's glorified, sometimes not so much.

13 Q And, being a part of a gang, did you fight with law
14 enforcement?

15 A Sometimes.

16 Q And you said that you weren't friendly with law
17 enforcement.

18 A Yes. A lot of run-ins. A lot of fights with the law
19 enforcement.

20 Q Is this the first time you've ever agreed to cooperate with
21 law enforcement?

22 A Yes.

23 Q Is this unusual?

24 A Highly unusual.

25 Q Why?

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 1
G. MADISON/DI - VAN MARTER

1 A Because that's not what you're taught. You're not taught
2 to tell on your family, your adoptive family, if you don't have
3 any family.

4 Q And was the Eight Trey your family?

5 A Yes.

6 Q And what is your status within Eight Treys now, before you
7 agreed to cooperate?

8 A Top. Top. The -- not the -- not the first meaning --
9 because I'm not first generation, but I had a lot of say-so.

10 Q So, being in that position, does that make your cooperation
11 even more unusual?

12 A Yes.

13 Q So, facing all of that and your family, why are you here
14 testifying?

15 A Because I don't think the truth was being told. And I
16 think that there's more to what's going on besides Eight Trey
17 because it -- it, necessarily, didn't have anything to do with
18 Eight Trey.

19 Q What did it have to do with?

20 A Taking care of our immediate family.

21 Q This -- this case you mean --

22 A Yes.

23 Q -- had to do with taking care of your family.

24 A Yes.

25 Q And why do you say that?

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 1
G. MADISON/DI - VAN MARTER

1 A Immediate family. Your kids, your wife, your -- your mom,
2 your dad, whomever.

3 Q Is that what you believed that this case was supposed to be
4 about?

5 A Yes.

6 Q And I have to ask you what your reputation was in the gang.

7 MR. CHRISTIANSON: Your Honor, once again, we're
8 having trouble hearing him back here. If we could get him to
9 speak up a little bit. I missed a whole bunch of that last part
10 of his testimony.

11 THE COURT: Try to concentrate on your microphone.

12 It's a very directional microphone, Mr. Madison.

13 THE WITNESS: Okay. All right.

14 Q (BY MS. VAN MARTER) Is that better?

15 A Yes.

16 Q Okay. So what was your reputation within the Eight Trey?

17 A One not to mess with.

18 Q Did you carry weight? Do you carry weight?

19 A Yes.

20 Q What does that mean?

21 A Influence, stature, reputation for being respectable, and,
22 if necessary, to be violent as possible.

23 Q Before you got involved in this investigation, did you have
24 another job?

25 A Yes.

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 1
G. MADISON/DI - VAN MARTER

1 Q Were you working?

2 A Construction.

3 Q And how long were you working construction?

4 A 2005, but I've been doing construction all my life with my
5 dad.

6 Q And why were you seeking other employment? Why were you
7 doing construction?

8 A Construction fell. The economy fell, and I was given an
9 opportunity to hustle again.

10 Q So have you ever -- before we get into the specifics of
11 that, have you ever tried to leave the Eight Trey?

12 A Yes, a feeble attempt but it still was an attempt.

13 Q And why was it a feeble attempt, and why couldn't you
14 leave?

15 A Because Eight Trey consumes you. It's -- it's a part of
16 what -- your world, your life. You don't know nothing else.

17 Q So why did you keep coming back to it?

18 A Because extended family that you learned that was there for
19 you in times of need.

20 Q So you started to talk about this particular -- I think you
21 called it a "hustle." Would you call this case a hustle? What
22 was going on?

23 A Yes.

24 Q How did you get involved in this?

25 A Got a phone call.

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 1
G. MADISON/DI - VAN MARTER

1 Q From who?

2 A Nino.

3 Q And do you know Nino by any other name?

4 A Kevin Miles.

5 Q I'm going to pull up for you --

6 MS. VAN MARTER: For the witness only.

7 Q (BY MS. VAN MARTER) Mr. Madison, do you recognize that
8 photograph?

9 A Yes, that's Kevin Miles.

10 MS. VAN MARTER: Okay. For the witness only. It's
11 for this -- that's okay. That's okay. I'll reask the question,
12 and, then, I'll ask to publish it, if it's all right with the
13 Court.

14 Q (BY MS. VAN MARTER) Do you recognize that photo?

15 A Yes.

16 Q And who -- how do you recognize that photo?

17 A That's Kevin Miles.

18 MS. VAN MARTER: Permission to publish to the jury,
19 your Honor?

20 THE COURT: What number is it?

21 MS. VAN MARTER: It's just a photograph. It's not
22 going to be an admitted exhibit. It's just for purposes of aid
23 in testimony.

24 THE COURT: Go ahead and display it.

25 Q (BY MS. VAN MARTER) And why did -- what was the purpose of

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 1
G. MADISON/DI - VAN MARTER

1 the phone call?

2 JUROR NO. 1: We're seeing it.

3 MS. VAN MARTER: Oh, wrong one.

4 Q (BY MS. VAN MARTER) What was the purpose of the phone
5 call? What was the purpose of the phone call? There we go.
6 Sorry.

7 What was the purpose of the phone call?

8 A To see if I wanted to hustle.

9 Q Hustle what?

10 A Make money.

11 Q Doing what?

12 A Selling pills.

13 MS. VAN MARTER: Your Honor, I don't know if the Court
14 wants -- we're going to get into a lot of detail at this point.
15 I don't know if the Court wants to take its afternoon break.

16 THE COURT: This would be a good time. We've been
17 here an hour-and-a-half. We'll take our 15 -- do you need --
18 maybe it will go 20 minutes. And please don't talk about the
19 case. That's a very important admonition. I'm going to keep
20 asking you to do that. So, we'll see you in 15 to 20 minutes.

21 (Jury out at 2:31 p.m.)

22 (Court recessed at 2:32 p.m.)

23 (Sealed Transcript of Proceedings filed separately at ECF
24 Document No. 2922)

25 (Jury in at 2:54 p.m.)

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 3
G. MADISON/DI - VAN MARTER

1 (Court reconvened at 2:55 p.m.)

2 THE COURT: Please be seated. Mr. Madison, you're
3 still on direct examination; and, Ms. Van Marter, you may
4 proceed.

5 MS. VAN MARTER: Thank you, your Honor.

6 THE COURT: And, Mr. Madison, your voice is quite low.
7 You have a low voice. So kind of concentrate, if you could --
8 if you would, please, on that microphone so everybody can hear
9 you.

10 THE WITNESS: Okay.

11 THE COURT: And, for those of you that are spectators,
12 going in and out can be a little distractible. So, if at all
13 possible, try to go in and out during recesses. Or, if you have
14 to go in and out, do it as quietly as you possibly can so we
15 don't cause a distraction for the jury. Thank you for your
16 cooperation.

17 Go ahead, Ms. Van Marter.

18 MS. VAN MARTER: Thank you, your Honor.

19 Q (BY MS. VAN MARTER) So who is Mr. Miles?

20 A Nino, associate of mine.

21 Q Is Nino an Eight Trey?

22 A No. Not -- he's considered associate of Eight Trey but not
23 actually a member.

24 Q And what does that mean?

25 A He didn't have to be jumped in or go through the same

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 3
G. MADISON/DI - VAN MARTER

1 ordeal that another person would that is an Eight Trey Gangster
2 member.

3 Q Does he still have respect within the Eight Trey?

4 A If he gets vouched for.

5 Q And how does -- what does that mean, be "vouched for"?

6 A Someone that has status can vouch for him, say that he's
7 good people, he's down, respectable.

8 Q And was Nino vouched for?

9 A Yes.

10 Q By who?

11 A Me.

12 Q And how did Nino bring you on to the pill game? Pill
13 hustle?

14 A Instructed me that he knew of a way to make money, but he
15 couldn't get his foot in and told me that a person that was
16 close to me had it on lock.

17 Q And who is that person?

18 A That had it on lock?

19 Q No, who was that person that was close to you? I'm sorry.

20 I didn't understand --

21 A School Boy.

22 Q And who is School Boy?

23 A Arvin Carmen.

24 Q Is Mr. Carmen in the courtroom today?

25 A Yes.

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 3
G. MADISON/DI - VAN MARTER

403

1 Q Could you please tell the jury where he's seated and what
2 he's wearing.

3 A I guess to the right, a ugly yet yellow tie, bald head,
4 glasses, black shirt.

5 Q And how long have you known School Boy?

6 A Since he was 16, 17 years old.

7 Q And is School Boy a part of Eight Trey?

8 A Yes.

9 Q Is he a part of any particular side?

10 A Back west.

11 Q So why would Nino need you to work in the pill game because
12 of School Boy? Explain that:

13 A He don't -- he doesn't know School Boy, but he knows that I
14 know School Boy.

15 Q So what did School Boy have to do with the pill hustle at
16 that time?

17 A He's the man. He the go-to, the person that control the
18 sale of OxyContin, oxycodone.

19 Q And, just so we have a time period, when -- when did this
20 first happen that Nino approached you?

21 A In 2009, approximately, summertime, beginning of summer.

22 Q So, were Nino and School Boy already involved in the pill
23 hustle at that point?

24 A Two different cities.

25 Q What cities?

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 3
G. MADISON/DI - VAN MARTER

1 A Nino was involved in Los Angeles, and School Boy was
2 involved in Spokane.

3 Q Had you ever heard of Spokane before?

4 A Yes.

5 Q Earlier on?

6 A Early -- early '90s, late '80s.

7 Q So why Spokane for the pill hustle?

8 A There were other Eight Treys that lived up in Spokane.

9 Q Was there anything in particular about pills in Spokane
10 that made it worth the time to hustle here?

11 A You can get double or triple the dollar amount.

12 Q So help us understand that. What do you mean "double and
13 triple the dollar amount"? As compared to what?

14 A Buy them in LA for, say, \$10 and sell them in Spokane
15 between 20 and \$30.

16 Q So, it was about what? The money?

17 A Money.

18 Q So what did you do after Nino contacted you in the summer
19 of 2009 about the pill hustle?

20 A I thought about it. And I'm not sure if I contacted Carmen
21 or he contacted me, but we spoke.

22 Q During that same time period?

23 A Yeah, right after the conversation with Nino.

24 Q And what did you speak about?

25 A Me coming up and getting involved in the sale of pills.

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 3
G. MADISON/DI - VAN MARTER

1 Q Did School Boy, or Carmen, want you to come up?

2 A Yes.

3 Q Why?

4 A He needed or wanted my presence to help sell pills in
5 Spokane and, for the most part, the connection in Los Angeles.

6 Q And, when he first contacted you, School Boy, did you come
7 right up to Spokane?

8 A No.

9 Q What happened?

10 A I talked to School Boy for -- say, off and on for about a
11 month and then I came up mid August.

12 Q Did you -- were you asked to send anybody up prior to that?

13 A Yes.

14 Q And who was that?

15 A YD.

16 Q Who asked you to send YD up?

17 A School Boy.

18 Q Why?

19 A Because he wanted a runner beforehand. Somebody that he
20 can trust. And Nino bought YD a ticket, and he came up to
21 Spokane before I did.

22 Q Okay.

23 MS. VAN MARTER: Just for the witness only, please.

24 Q (BY MS. VAN MARTER) Do you recognize that?

25 A Yes.

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 3
G. MADISON/DI - VAN MARTER

1 Q And how do you recognize that?

2 A That's YD.

3 Q Do you know his real name?

4 A Glen Turner.

5 Q And do you refer to them by -- individuals by their real
6 name, or do you call it something else? His government name?

7 A No. Monikers.

8 Q Okay. YD is his moniker.

9 A YD is his moniker.

10 Q And Glen Turner is what?

11 A His real name.

12 MS. VAN MARTER: Publish to the jury, please.

13 Q (BY MS. VAN MARTER) Okay. So who purchased YD's ticket to
14 come up at that time?

15 A Nino.

16 Q And how long was YD up here before you decided to come to
17 Spokane?

18 A About a month. Maybe a little bit more.

19 Q And why did you come to Spokane?

20 A Sell pills and help School Boy sell pills.

21 Q And what was YD's relation to School Boy? Did they know
22 each other?

23 A Not at all.

24 Q So how did that play that YD came up, then, to work for
25 School Boy?

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 3
G. MADISON/DI - VAN MARTER

407

1 A Because I knew School Boy. So he took it upon my word and
2 they got along.

3 Q So, when you -- by the time you got up here -- and, again,
4 when was that when you first came to Spokane for the pill game?

5 A August of 2009.

6 Q And, when you got up here, were there other Eight Treys up
7 here?

8 A Yes.

9 Q Were there other Eight Treys involved in the pill game at
10 that time?

11 A Yes.

12 Q . . . And who was that?

13 A YD, Peanut, Baby Crazy D, Mississippi Mike, Baby Chili.

14 | Q Were all of these people selling pills for Carmen?

15 A No.

16 Q Explain what they were doing.

17 A Some was freelance. I mean, they were on their own.

18 Q Um-hum.

19 A And other was helping School Boy to sell pills.

20 Q And was there anything going on, in terms of selling
21 School Boy's pills, that was creating friction?

22 A Yes. Taxation.

23 Q Explain that.

24 A We would bring the pills from Los Angeles to Spokane. And,
25 in order for us to get rid of our pills, School Boy would give

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 3
G. MADISON/DI - VAN MARTER

1 us a tax. Like, say, on the same -- like on cigarettes or
2 whatever. If we -- if the pills went for \$50, each individual
3 had a different tax. It could be \$5 up to 15.

4 Q How is it that he could tax?

5 A You couldn't get rid of them unless you used him.

6 Q What does that mean?

7 A He had all of the people -- we call them fadex in Spokane
8 -- that would -- that was exclusively his, and he would sell our
9 pills for us. And he would get between \$5 to \$50 -- \$15
10 taxation upon the sale of pills.

11 Q Okay. And, at that time --

12 A Yes.

13 Q At that time, what kind of pills were you selling?

14 A 80-milligram OxyContin.

15 Q And how much were you selling 80-milligram OxyContins?

16 A Initially, 45 -- 40 to \$45.

17 Q For -- I'm sorry, Mr. Madison. Is that per pill?

18 A Per pill. Per pill. 40 -- 40 to \$45 per pill.

19 Q Did that change?

20 A Yes.

21 Q How so?

22 A FDA -- FDA regulations started putting gel in the OxyContin
23 for people that was abusing the OxyContin to prevent them from
24 smoking it. So they became rare. So it went from 40 to 45 to
25 80 to 200.

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 3
G. MADISON/DI - VAN MARTER

1 Q Per pill.

2 A Per pill.

3 Q When you say, "they became rare," was there -- did the
4 supply of 80-milligram OxyContin pills change?

5 A Yes. It depreciated.

6 Q And based upon the changes in the pharmaceutical market.

7 A Yes.

8 Q So what, then, did you turn to selling if you couldn't
9 access 80-milligrams OxyContin pills?

10 A 60s. 60-milligram, 40-milligram, 30s, 20s, 15s, and 10s.
11 Later we went to opanas.

12 Q So did you, ultimately, end up selling a number of variety
13 of pills?

14 A Yes.

15 Q So I want to get back to this summer, fall of 2010 when you
16 came up to Spokane. Were you selling pills?

17 A 2009?

18 Q I'm sorry. 2009. Thank you for correcting me. Were you
19 selling pills?

20 A Yes.

21 Q And who were you selling pills for?

22 A School Boy.

23 Q So I want to understand something. With your role within
24 the Eight Trey, how is it that School Boy -- did School Boy have
25 the same stature as you within the Eight Trey?

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 3
G. MADISON/DI - VAN MARTER

410

1 A No.

2 Q So how is it that School Boy was able to tax you?

3 A First, I didn't have any money. I was coming aboard his --

4 Q It's okay. Go ahead and pull it just a little. I know we
5 wanted you to speak clearly, but --

6 THE COURTROOM DEPUTY: Excuse me. I think it's too
7 close now. I think that that's why it's popping out.

8 MS. VAN MARTER: Okay.

9 THE WITNESS: Excuse me.

10 Q (BY MS. VAN MARTER) We'll let you know. Counsel is going
11 to let us know if they can't hear you. So just pull back just a
12 little bit. . .

13 A Okay.

14 Q All right. So how is it, again, that School Boy was able
15 to tax you?

16 A The drug game is not like the gang. You don't come into
17 something that already exists and put down, what we call, a
18 bully move. Meaning, like, you come in and you take over what
19 somebody else has already started. That's a life or death
20 situation. You step on people's toes. So, even though he would
21 be considered my little homie, he had the pill game on lock. So
22 I had to go through him.

23 Q And does -- does the amount of money being made matter?

24 A The amount of money matters --

25 Q You -- you said you started --

411

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 3
G. MADISON/DI - VAN MARTER

1 MS. VAN MARTER: Excuse me. I talked over. I
2 apologize.

3 Q (BY MS. VAN MARTER) You first stated that you didn't have
4 any money.

5 A Right.

6 Q So why did that matter?

7 A Because I -- I came to the table with nothing other than
8 the product, meaning the pills. And, even though at the time
9 when I first came he didn't know that those were Nino pills
10 given to me to be sold, I was going to be taxed like the rest.
11 There was no gift.

12 Q So, at some point in time, was there a discussion about the
13 taxing that was going on --

14 A Yes.

15 Q -- by School Boy? And who was a part of that discussion?

16 A At this time, it was Nino, YD, Young Moe, Jay Loc, and
17 myself and Mayo. That was it.

18 Q And was Peanut a part of that?

19 A Peanut, yes.

20 MS. VAN MARTER: For the witness only, please.

21 MR. HORMEL: Excuse me. Could we have that last name
22 one more time?

23 | THE WITNESS: Peanut.

24 MR. HORMEL: Thank you.

25 MS. VAN MARTER: For the witness only.

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 3
G. MADISON/DI - VAN MARTER

1 Q (BY MS. VAN MARTER) Do you recognize that, Mr. Madison?

2 A Yes.

3 Q And how do you recognize that?

4 A Young Moe.

5 MS. VAN MARTER: Permission to publish to the jury?

6 THE COURT: Go ahead.

7 Q (BY MS. VAN MARTER) And, so, we're still talking about in
8 the spring and -- or summer and fall of 2009. Right?

9 A Yes.

10 Q And what was the purpose of the meeting between all those
11 individuals?

12 A To discuss the taxation of the pills and how different
13 people had different taxes, mine's being the highest, which --
14 that was contribute to myself of offering more.

15 Q So what were you being taxed?

16 A \$15.

17 Q Per pill?

18 A Per pill.

19 Q And what was YD being taxed?

20 A \$5.

21 Q And why was he being taxed so much less than you?

22 A School Boy made the numbers. It was his -- it was for him
23 to decide who got paid, how much he got paid in regards to how
24 many pills you brought up, and the time limit of which you'd
25 been up here. So you can actually go from \$15 down to \$5 or no

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 3
G. MADISON/DI - VAN MARTER

1 dollars. It depended on what School Boy wanted at the time.

2 Q And, at that time, how many pills -- just so we have an
3 idea -- how many pills were being sold?

4 A Being sold, like --

5 Q To fades.

6 A No, what I mean is per day, per week, per month?

7 Q Per day.

8 A Anywhere from 400 to 700 a day.

9 Q How many a month?

10 A For the 80s?

11 Q For the 80s. Fair to say thousands?

12 A Yes, probably over a time period of -- of a year since I've
13 been out there. Maybe a year.

14 Q So, when you were out selling pills, what did you call it?

15 A Hustle. My -- my job. That's what I did.

16 Q And, in Spokane, did there start to become an awareness
17 from fades that there was an access to pills?

18 A Yes. So it was being -- since it was so many of us that
19 had pills, now they knew that not just School Boy had pills.

20 Q So they could find any of you to get pills.

21 A Yes.

22 Q Was that creating an issue with passing out fades?

23 A That's what the other part of the meeting was was for --
24 for us, as a group, to leave School Boy alone.

25 Q Did you leave School Boy at that time?

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 3
G. MADISON/DI - VAN MARTER

414

1 A No, I didn't. I didn't think it was fair.

2 Q Why not?

3 A Well, he started -- he started the pill game; and I didn't
4 think it was fair that everybody would turn their back. And,
5 basically, even with the taxation, he still provided a service
6 in which nobody went to jail while he was doing it.

7 Q Speaking of that, did he ever give you an impression
8 regarding the pills and what would happen if you got caught
9 selling pills?

10 A Yes, that it was a minor infraction; that the Government
11 compares pills to marijuana. And it would be like a slap on the
12 wrists, like being sold some marijuana and don't have a
13 marijuana card.

14 Q And who told you this?

15 A School Boy.

16 Q So, during this first meeting that you were talking about
17 that they wanted to turn their backs on School Boy --

18 A Yes.

19 Q -- did you follow them anywhere after that meeting and
20 decide to -- to join them or did you immediately decide you
21 wouldn't turn your back on School Boy?

22 A I told them it wasn't fair and that they were wrong and
23 that they should -- if they don't like the taxation, they should
24 talk to him.

25 Q Did you ultimately have a meeting with Carmen about the

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 3
G. MADISON/DI - VAN MARTER

1 taxation?

2 A Yes. We invited him over to the big house.

3 Q What -- I'm going to stop you there for a minute,

4 Mr. Madison. What's the "big house"?

5 A The big house is where, after the meeting, one of the guys
6 has somebody get a house. And it was -- it was large. Six
7 bedrooms, three baths.

8 Q And which guy -- which guy got the house?

9 A Jay Loc.

10 Q And do you know Jay Loc's real name?

11 A Shorts.

12 Q And who was going to stay in the house?

13 A All of us.

14 Q And was Carmen invited to stay in that house?

15 A No.

16 Q So, when did you have this meeting with Carmen, then?

17 A A few weeks afterwards I told him it wasn't cool and if --
18 to invite him over and have another sit down.

19 Q And did Mr. -- did Carmen come to the sit down?

20 A Yes.

21 Q And when was that? Do you remember?

22 A Around October, November.

23 Q Of what year?

24 A Of 2009.

25 Q And what happened at that meeting?

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 3
G. MADISON/DI - VAN MARTER

1 A They decided to go with -- to go with Shorts and not be
2 taxed and go off of his phone because he illustrated he had just
3 as many fades, if not more than School Boy.

4 Q So what did you decide to do?

5 A I decided to stay with School Boy.

6 Q So what happened after that meeting? Did you stay in the
7 big house?

8 A No, I didn't.

9 Q Where -- where'd you go?

10 A I moved in with School Boy; and we -- he decided to give me
11 no taxes and come with him, as well. And I could sell my pills
12 through his fades at a faster rate.

13 Q So how long did you stay in Spokane, then, selling pills
14 while living with Carmen?

15 A A month or two.

16 Q And where was this house located that you lived with -- do
17 you remember?

18 A It was, I want to say, by See's Candy and Division -- off
19 of Division.

20 Q Okay.

21 A McDonald's. See's Candy.

22 Q Did anybody else live there with you besides you and
23 School Boy?

24 A Eventually YM came over periodically.

25 Q And that's the individual you previously --

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 3
G. MADISON/DI - VAN MARTER

1 A Yes.

2 Q -- identified? Young Moe?

3 A Young Moe.

4 Q And do you know his real name?

5 A Donald Lynch.

6 Q So you stayed and sold pills with Carmen for approximately
7 a month and -- month-and-a-half?

8 A Yeah, maybe more. I'm not sure.

9 Q So did -- what happened after that?

10 A Carmen would go to school, call me with instructions to
11 meet people at various places, and I would sell whatever pills
12 we had. His, mine's.

13 Q Would you sell other people's pills?

14 A Other people's?

15 Q Are there any other pills besides yours and Carmen's?

16 A No.

17 Q What happened after that?

18 A I got the boot.

19 Q What does that mean?

20 A It was decided that my presence was no longer needed; that
21 they needed to get a line on pills from LA to Spokane. They
22 needed me in Los Angeles, not in Spokane.

23 Q Who is "they"?

24 A That would be Nino and School Boy.

25 Q And what do you mean they needed a "line"?

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 3
G. MADISON/DI - VAN MARTER

1 A People from -- well, pills from Los Angeles to be brought
2 up to Spokane.

3 Q And why did they want you to do that?

4 A Because of my notoriety with different other neighborhoods
5 and the hustle that I was in previously, that I knew a lot of
6 people; and it would be more beneficial for me to open that line
7 up than to have me in Spokane.

8 Q So did you go back to LA?

9 A Yes.

10 Q And what was your role in this?

11 A Find pills.

12 Q And when did -- when was this that you went back to LA?

13 A Right before Christmas, and then I came back after the New
14 Year.

15 Q Came back to Spokane?

16 A Came back to Spokane, yeah.

17 Q And how come you came back to Spokane after the New Year?

18 A To talk to Carmen about the plugs that I had -- that I had
19 actually gotten.

20 Q What does "plug" mean?

21 A "Plug" meaning people or a person or a facility that I
22 could actually get pills from, and then we would figure out a
23 way to get them to Spokane.

24 Q At that point in time, was there a way in which pills were
25 getting up from LA to Spokane back in 2010 -- or 2009 to early

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 3
G. MADISON/DI - VAN MARTER

1 2010?

2 A Yes, body pack. Just about everywhere.

3 Q Did you use the mail?

4 A Postal, U.S. Mail, FedEx. But that was not good.

5 Q Why?

6 A Because you have a 50-50 chance of your package getting
7 intercepted.

8 Q So you said -- did you turn to a more reliable method?

9 A Yes.

10 Q What was that?

11 A We -- people. Male, female. Basically concentrated on
12 female or male, college-student-type look -- looking people.

13 Q Was that a conscious decision?

14 A That was Nino's decision.

15 Q Okay. And you said, "body pack." What does that mean?

16 A Well, you would put the pills around you or insert them in
17 you.

18 Q Did you have other ways of packaging the pills besides body
19 packing to bring them up?

20 A Yes. Vitamin bottles. Prenatal bottles. Phone chargers.
21 Phones.

22 Q And were these methods that developed over the entirety of
23 the case?

24 A Pretty much.

25 Q Okay. And, with respect to these vitamin bottles, was

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 3
G. MADISON/DI - VAN MARTER

1 there anything in particular that you would do with the vitamin
2 bottle to try and get it through security?

3 A You didn't need to do anything to get them through security
4 as long as you didn't break the seal. I guess the -- the rules
5 are, if the package -- if the seal is not broken, then the
6 officials, police, they wouldn't break the seal because, at that
7 point, you don't know what's in there. You can claim ignorance.

8 Q So did you have a way to put the pills in the bottle
9 without breaking the seal?

10 A Yes.

11 Q And what kind of vitamin bottles?

12 A Multivitamins. Vitamin C. Zinc.

13 Q How big were the bottles?

14 A 90-count bottles, 160-count bottles, 250-count bottles,
15 depending on what vitamins that was -- was being used.

16 Q And, approximately, how many pills could you fit into these
17 bottles? How many pills could you fit into the bottles?

18 A 90-count, 100. 160-count, you can put 2.

19 Q 200?

20 A 200. The -- the larger count, the ones that were
21 frequently used, you can put 3,000. There's 160. I think you
22 can put 500 to 1,000.

23 Q And did Carmen use all of these methods to get pills to
24 Spokane?

25 A Yes. Most of the couriers that we use, they -- he like to

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 3
G. MADISON/DI - VAN MARTER

1 use the body pack method for whatever reason.

2 Q And did other -- other individuals like to use other
3 methods?

4 A Yes. Everybody had their -- their chosen method, but he
5 liked the -- the degrading part for the women to insert them.

6 Q So how come everybody got to choose which method they
7 wanted to use?

8 A Depends on what couriers you used. If you use certain
9 couriers, they -- it's what was required through the person that
10 they was actually sending them to.

11 Q So did the courier get to choose which method?

12 A Not at first.

13 Q Why not?

14 A Because, at first, Carmen had his own method.

15 Q And what was that?

16 A Insertion. To have them inserted in the individual.

17 Q So we're going to talk a little bit more about the specific
18 couriers. But did -- did individuals share couriers?

19 A Yes. We all -- we all, at one time or another, would
20 piggyback off of the next person. Meaning, if -- if I sent the
21 package up and the timing was right, I could say, you know, "I
22 got something on the way." And somebody else -- if the timeline
23 was right, they'd say, "Well, hey, look, let me put something in
24 with you. Let me piggyback with you, and I'll split the -- the
25 costs." And the costs would be how much the courier get paid,

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 3
G. MADISON/DI - VAN MARTER

1 the travel arrangements, and we go half.

2 Q Okay. We're going to talk some specifics about that. So
3 you come back down to LA in order to get a line to get pills.

4 A Yes.

5 Q And did you get a line -- line or lines to get pills?

6 A Yes.

7 Q Did you start sending pills up?

8 A Yes.

9 Q Was that -- was that -- what was your role, then, from that
10 point forward in the pill game?

11 A Distributor. To open the line of pills to individuals that
12 would not actually have the -- the access for the pills, but I
13 could provide a service for them.

14 Q And who would you provide that service to?

15 A Initially, Carmen and Nino.

16 Q And did that change?

17 A Yes.

18 Q And who else did you end up providing pills to?

19 A TS.

20 Q Who is TS?

21 A Tiny Sodi, Richard Haynes. Tiny Menace, which is Alex James.

22 Q Let me get to -- how did TS get involved?

23 A At the time when the split up happen and I no longer was in
24 Spokane and YD was no longer working for Carmen, he needed
25 somebody. So --

423

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 3
G. MADISON/DI - VAN MARTER

1 Q Who needed somebody?

2 A Carmen needed another worker. He needed somebody to help
3 him with the -- that could go from LA to Spokane.

4 Q So how was it decided that that person would be
5 Richard Haynes?

6 A Because he was vouched for.

7 Q By who?

8 A By me.

9 Q So did Carmen ask you to send somebody up?

10 A Yes.

11 Q And did you choose TS?

12 A Yeah, along with a couple of other guys that didn't work
13 out. They was too volatile. Too violent.

14 MS. VAN MARTER: For the witness only, please.

15 Q (BY MS. VAN MARTER) Do you recognize that?

16 A Yes.

17 Q And how do you recognize that?

18 A That's Richard Haynes.

19 MS. VAN MARTER: Permission to publish to the jury?

20 THE COURT: Go ahead.

21 Q (BY MS. VAN MARTER) When did you send Richard Haynes up at
22 Carmen's request?

23 A I want to say around 2011 --

24 Q Early --

25 A -- roughly.

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 3
G. MADISON/DI - VAN MARTER

1 Q Do you know if it was early, mid, late?

2 A It was, like, mid -- mid 2011.

3 Q So, from the time that you came to LA to start to get pills
4 from the time that you sent Richard Haynes up, were you still in
5 the pill game.

6 A Yes. At that time, I was still part of the pill game but
7 not Spokane. Put it that way.

8 Q Were you focused in Los Angeles?

9 A Only in Los Angeles.

10 Q And, during that time period, where was Carmen?

11 A Spokane.

12 Q Was he still involved in the pill hustle?

13 A Yes.

14 Q So, after Carmen reaches out to you to Haynes, did he come
15 to Spokane?

16 A Yes, eventually.

17 Q And how did Haynes get to Spokane?

18 A Plane.

19 Q Do you remember if -- who bought the ticket for him or how
20 he got here?

21 A If I -- if I'm not mistaken, I think we -- we went half on
22 the plane ticket, but I don't remember who charged it or to that
23 nature.

24 Q Who's "we"?

25 A Myself and School Boy.

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 3
G. MADISON/DI - VAN MARTER

1 Q And what happened when Haynes got to Spokane?

2 A He was able to -- we get along with School Boy and to sell
3 pills.

4 Q And did you and School Boy talk about Haynes coming up and
5 what was going to happen?

6 A Yes.

7 Q And what did you talk about?

8 A What would be his role and would he be -- what he will be
9 doing while he's in Spokane and my connection with Haynes.

10 Q And why would you have to talk about that with Carmen?

11 A Because we were -- how you say it -- rekindling the
12 relationship. Meaning, like -- because we had -- there was a
13 pause for a moment where him and I didn't see eye to eye. We
14 didn't -- we didn't do the business at hand.

15 Q And is that time period you're talking about in the early
16 2010 until Haynes was brought up to Spokane?

17 A Yes.

18 Q Okay. So you and Carmen rekindled.

19 A Yes.

20 Q And did that start -- when that started, who reached out to
21 who?

22 A Well, of the needing of assistance?

23 Q Um-hum.

24 A School Boy reached out to myself.

25 Q And, so, when Haynes came up here, what did he understand

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 3
G. MADISON/DI - VAN MARTER

1 his role was going to be?

2 A Individual, but to assist and, also, run his own.

3 Q To assist who?

4 A School Boy.

5 Q And what do you mean by "run his own"?

6 A Have his own -- his own entitlement. Meaning, just as well
7 as Jay Loc and the rest of the guys became one entity and, then,
8 branched off to do their own individual things because they
9 wasn't doing it for Eight Trey. They were doing it for their
10 families. So, in fact, each individual became like a -- like
11 their own franchise.

12 Q Did they still -- if they were their own franchise, were
13 there still bosses?

14 A Yes.

15 Q Owners?

16 A Yes.

17 Q And was it important to you the distinction between doing
18 it for Eight Trey and doing it for your family?

19 A Yes.

20 Q Why?

21 A Because I wanted them to understand that, if it wasn't for
22 their family, then we -- it was -- what were we doing it for
23 because our neighborhood's going to be here.

24 Q Did that message start to get lost at some point in time
25 according -- in your opinion?

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 3
G. MADISON/DI - VAN MARTER

1 A I don't think they -- they grasp the totality of the -- of
2 the bigger picture until we had to make an example.

3 Q Okay. So, when -- when Haynes came up here and started to
4 be a part of the pill hustle, were there other individuals, even
5 if they were Eight Treys or not, that were selling pills with
6 them?

7 A Yes.

8 Q And do you know who they were?

9 A That was selling pills with School Boy?

10 Q School Boy or Haynes at that time when Haynes came in mid
11 2011.

12 A Yes. Tiny Menace. He came up to assist Haynes. Young
13 Ant, Baby Football, Tiny Football.

14 Q So were there quite a few?

15 A A lot.

16 Q And, once Haynes got up here, how did -- did the pill game
17 change at all?

18 A Yes.

19 Q How?

20 A It opened wide open.

21 Q What do you mean by that?

22 A Because Haynes is a people person. He hustles 24/7. He
23 hardly rests. And he -- if a request came for whatever amount,
24 it didn't make a difference if it was 5 or if it was 500, he was
25 there, like, on the spot.

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 3
G. MADISON/DI - VAN MARTER

1 Q You mentioned "Football" -- "Tiny Football." Who's that?

2 A Tiny Football? Lisbey.

3 Q And does Mr. Lisbey associate with any particular side?

4 A North side.

5 Q Did it come to matter -- when people were up here selling

6 pills, did it come to matter within the Eight Treys what side

7 you were from?

8 A Not at first; but, then, it -- it was like a changing of

9 the guards. It was -- at first, it was, I guess, the back west

10 and the far west. And, then, later it became more north siders.

11 Q And did you know north siders within the Eight Treys?

12 A Did I know them?

13 Q Um-hum.

14 A Yes.

15 Q And who are north -- who are some of the north siders?

16 A Tiny Football, G Man, Young Moe, Chico, Baby Nutty.

17 Q Did you know somebody by the name of Young Ant?

18 A Young Ant? Yes.

19 Q Is Young Ant a north sider, as well?

20 A Yes.

21 Q Do you know Young Ant's name?

22 A Maurice.

23 Q Do you know his last name?

24 A Not -- not offhand.

25 Q Okay. And you said, "Chico."

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 3
G. MADISON/DI - VAN MARTER

1 A Yes.

2 Q Do you know who Chico is?

3 A Yes.

4 Q And what's Chico's name?

5 A His -- Tones.

6 Q Is that individual in the courtroom today?

7 A Yes, he is.

8 Q Could you please tell the jury where he's seated and what
9 he might be wearing?

10 A First table, gray sweater, glasses, short haircut.

11 Q I know we're jumping around a little bit in the timeline,
12 but do you know if Chico came up to sell pills?

13 MR. CHRISTIANSON: I would -- I would object based
14 on --

15 (Interruption by the reporter)

16 MR. CHRISTIANSON: I would -- I'm trying here. I
17 would object until we have a foundation of basis of knowledge as
18 to how he knows.

19 THE COURT: Well, ask him basis of the
20 acquaintanceship.

21 Q (BY MS. VAN MARTER) How do you know Mr. Tones?

22 A He -- young Eight Trey from north side. He -- he cuts hair
23 down in -- on 83rd and Normandie for all of the participants.
24 But he's a -- one of the young homies from the north.

25 Q Do you know if he ended up coming to Spokane?

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 3
G. MADISON/DI - VAN MARTER

1 A Yes.

2 Q And who would he come up to Spokane with?

3 A He came up with Football.

4 Q And Football is who?

5 A Tiny Football.

6 Q And why -- why did he come to Spokane?

7 A Sell pills. To be a runner.

8 Q And you talked about --

9 MR. CHRISTIANSON: I'd object. Speculative.

10 THE COURT: You know from your own -- your own
11 knowledge --

12 THE WITNESS: Yes.

13 THE COURT: -- that's why he came here?

14 THE WITNESS: Yes.

15 THE COURT: Overruled.

16 Q (BY MS. VAN MARTER) You talked about -- let's talk a
17 little bit about Tiny Football, and you called it a "changing of
18 the guard." What did you mean by that?

19 A Tiny Football wanted more of the north siders to come up
20 and participate in the sale of pills.

21 Q And why would Tiny Football want more north siders? Did he
22 have a particular rank within the north side?

23 A Yes.

24 Q What's that?

25 A Like, field general. He was --

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 3
G. MADISON/DI - VAN MARTER

1 Q What does that mean?

2 A He had influence on his side of our neighborhood.

3 Q So how -- how was it that Tiny Football got into the pill
4 game, then? Do you know?

5 A Young Moe.

6 Q And when did Tiny Football get into the pill game?

7 A He got in, to my knowledge, 2011, somewhere then.

8 Q And do you know what happened or how it was that he came to
9 get involved?

10 A Young Moe brought him in.

11 Q And Young Moe, again, is who?

12 A Donald Lynch.

13 Q And do you know if Tiny Football had anything to do or had
14 to meet with Carmen for anything about it?

15 A In order for him to come up here?

16 Q Um-hum. Yes.

17 A No because he had hooked up with TS. So he didn't need to
18 speak with School Boy.

19 Q And why did it matter that he hooked up with TS?

20 A Because now TS is -- is his own individual.

21 Q So Tiny Football came up in -- or started to get involved
22 in 2011. Is that correct?

23 A Yes.

24 Q And when did he -- do you know if he came to Spokane?

25 A Tiny Football?

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 3
G. MADISON/DI - VAN MARTER

1 Q Um-hum.

2 A Yes.

3 Q And do you know, approximately, when that was?

4 A I actually don't know the -- the date, the time frame. I
5 just know it was sometime in 2011.

6 Q And do you know when, approximately, north -- north siders
7 started, then, coming up?

8 A The same time that TS came up then Young Ant came up and
9 just everybody started coming up around the same time within
10 2011 and 2013.

11 Q And you said, "everybody started coming up" and you kind of
12 made a gesture.

13 A Yes.

14 Q What does that mean?

15 A Like, it blew up. Like, it was a free-for-all.

16 Q What does that mean?

17 A That individuals would come up and expect, because there's
18 other Eight Treys up here, that they would get somewhere to
19 stay, somebody to get rid of their pills. And it, kind of like,
20 overwhelmed.

21 Q So had the word spread in Los Angeles about the pill hustle
22 in Spokane?

23 A Well, you -- a seizure happened. So, then, it couldn't be
24 hidden any more on how much was actually being made in Spokane.

25 Q And what seizure are you talking about?

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 3
G. MADISON/DI - VAN MARTER

1 A Miles of 160,700 pills.

2 Q And did that seizure hit -- did word get out about that
3 seizure?

4 A Yes.

5 Q And what happened once the word got out about that seizure?

6 A Our neighborhood didn't know that it was that much money
7 out here to be made.

8 Q And, so, did all of a sudden people become interested,
9 then, in the pill hustle?

10 A Very much so.

11 Q And where did that seizure take place?

12 A In Spokane.

13 Q And, when you're talking about that much money to be made,
14 how much money was being made out in Spokane selling pills?

15 A Again, weekly, daily, monthly?

16 Q Well, let's start this way: What's the most that you ever
17 personally knew was made in a weekend?

18 A A quarter of a million dollars.

19 Q And what would happen to that money?

20 A Some would get back to Los Angeles. Some would get
21 confiscated through couriers, but it would go back to LA.

22 Q And how would it get back to LA?

23 A Through couriers.

24 Q In what way?

25 A Suitcases, backpacks, bus, train, airport, bank accounts.

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 3
G. MADISON/DI - VAN MARTER

1 Q And was everybody making that kind of money?

2 A No.

3 Q Okay. Who was making that kind of money?

4 A To my understanding, to my knowledge, School Boy, Tiny
5 Menace, Tiny Sodi, Nocomie, Nino.

6 Q Okay. For the first time we've heard the name Nocomie.
7 Who's Nocomie?

8 A Female. She's a -- she's not a -- she's a -- a walk on
9 Eight Treylette.

10 Q And was she involved in the pill hustle?

11 A Yes.

12 Q And when did she get involved in the pill hustle?

13 A 2009.

14 Q So she was one of the earlier ones?

15 A Yes.

16 Q And did you work with Nocomie --

17 A Yes.

18 Q -- in the pill hustle?

19 A Yes.

20 Q Who else worked with Nocomie?

21 A School Boy.

22 Q And you've mentioned, a couple times, Tiny Menace. I'm
23 going to try and get his photo up here for -- and how do you
24 know Tiny Menace?

25 A He's a young homie. Came up to make money in the pill

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 3
G. MADISON/DI - VAN MARTER

1 game, as well. Basically, to assist Haynes.

2 Q Did Tiny Menace know Carmen?

3 A Yes, by name.

4 Q By name. Did he ever work with Carmen in the pill game,
5 too, that you know of?

6 A Not that I know of.

7 Q Okay. Sorry.

8 MS. VAN MARTER: For the witness only, please.

9 Q (BY MS. VAN MARTER) And do you recognize --

10 A Yes.

11 Q And how do you recognize that?

12 A That's Tiny Menace. . .

13 MS. VAN MARTER: Permission to publish to the jury,
14 please?

15 THE COURT: Go ahead.

16 Q (BY MS. VAN MARTER) So what was Tiny Menace's role in the
17 pill game?

18 A Started off as a runner, moved up to individual. Like I
19 say, he had his own franchise.

20 Q Okay. So he moved up. How did somebody move up?

21 A Make enough money and be able to pay for your own supply.

22 Q If you were able to move up and have your own franchise,
23 was there still an association with the other Eight Treys?

24 A You didn't have to but -- and not everybody did associate
25 with each other, but association doesn't mean -- didn't mean

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 3
G. MADISON/DI - VAN MARTER

1 that you had to sell pills for anybody other than who you sold
2 pills for. But you were still -- we would still socialize with
3 each other out in Spokane, though.

4 Q Okay. Do you know who School Girl is?

5 A Yes.

6 Q And who is School Girl?

7 A Sharita Horn.

8 Q And how do you know School Girl?

9 A She's my fiancée.

10 Q How long have you known School Girl?

11 A 2005.

12 Q And was School Girl involved in the pill game?

13 A Yes.

14 Q How so?

15 A School Boy brought her up with Haynes.

16 Q And what was School Girl's role?

17 A Courier/runner.

18 Q And what does that mean?

19 A That she would assist with bringing pills up and cash back
20 and the sale of pills while she's up here in Spokane.

21 Q All right. What was happening with Carmen when everything
22 blew up?

23 MR. NOLLETTE: Objection to the form of the question.

24 MS. VAN MARTER: I'll rephrase.

25 THE COURT: Go ahead. Rephrase.

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 3
G. MADISON/DI - VAN MARTER

1 Q (BY MS. VAN MARTER) What was Carmen's role when everything
2 blew up after Haynes got here?

3 A Still School Boy. He was -- he wanted in on the pills that
4 was coming up.

5 Q Pills coming up to who?

6 A To -- to TS.

7 Q And who was sending pills to TS?

8 A I was.

9 Q And for -- and how long were you sending pills to TS for?

10 A Little over a year.

11 Q And is that because he's the one that you sent up here?

12 A Yes.

13 Q And how often were you sending pills to TS?

14 A Initially, once, twice, maybe even three times, initially.
15 Small packages of 30 Percocets. Oxycodones. Eventually, not
16 including just myself, but he got up to, maybe, 10,000 a month.

17 Q And you said that, at some point, Carmen wanted in on those
18 pills.

19 A Yes.

20 Q Weren't you initially selling pills with Carmen? So how --
21 how is it that there's now a conversation about getting in on
22 those pills?

23 A It was, but not to that degree. Because, before TS was
24 here, Nocomie was. So I was dealing with Nocomie. Before
25 Nocomie, I was just dealing with Los Angeles after the big

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 3
G. MADISON/DI - VAN MARTER

1 seizure. He found out that I was dealing with Nocomie and
2 wanted me to deal with him. But, then, we had TS. So TS would
3 be the person that he -- that I was dealing with until he was
4 able to come to LA.

5 Q Okay. And, then, would TS and Carmen deal with each other
6 up here?

7 A That was on them, yes.

8 Q And you said, at one point, he came back to LA. Who came
9 back to LA?

10 A School Boy.

11 Q And do you know when he came back to LA?

12 A Around the end of 2011.

13 Q I'm sorry. I didn't mean to interrupt.

14 A Around Christmastime of 2011.

15 Q So he comes back to LA. Is he still in the pill game?

16 A Most definite.

17 Q And how do you know that?

18 A Because he came down to Los Angeles. Now he don't need
19 anybody, really; but he's looking for the bigger picture. He
20 wants -- he wants a -- he wants a doctor. He wants a -- he want
21 a main source.

22 Q So, when he's in LA, what's happening up in Spokane?

23 A Pills are still being moved through --

24 Q Do you know --

25 A -- through TS, through Tiny Menace, Young Ant, Young Moe.

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 3
G. MADISON/DI - VAN MARTER

1 He has his pills being moved through Mercedes.

2 Q And who's Mercedes?

3 A His girlfriend.

4 Q And did you know Mercedes?

5 A Met her through him.

6 Q Did Carmen utilize girlfriends for certain purposes?

7 A Yes.

8 Q Who else -- anybody else besides Mercedes?

9 A He would use Scrapp, School Girl, G-1, G-2.

0 Q Who's -- so let's first start with Mercedes. What do you
1 known about Mercedes -- Mercedes would do for Carmen?

2 A Sell his pills, run back and forth from Spokane to various
3 cities: Idaho, Arizona, Los Angeles.

4 Q And why would she do that?

5 A Because he told her to.

6 Q For what purpose?

7 A To obtain pills. Sometimes to bring weapons down to
8 Los Angeles depending on what was -- what was out here.

9 Q And what about money?

0 A Yes, money.

1 Q And do you know if Ms. Reeves had anything to do with the
2 couriers?

3 A Sometimes she would -- she would meet with the and either
4 grab the pills and she would sell them and -- and come down to
5 LA with the money while he was down here.

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 3
G. MADISON/DI - VAN MARTER

1 MS. VAN MARTER: For the witness only, please.

2 THE COURTROOM DEPUTY: Yes.

3 Q (BY MS. VAN MARTER) And do you recognize --

4 A Yes.

5 Q -- recognize that?

6 A Yes.

7 Q How do you recognize it?

8 A Mercedes.

9 MS. VAN MARTER: Permission to publish to the jury,
10 please?

11 THE COURT: Go ahead.

12 Q (BY MS. VAN MARTER) You mentioned "Scrapp." Who's Scrapp?

13 A Another one of Carmen's girlfriends.

14 Q And what -- what would Scrapp do?

15 A Recruit couriers and sell -- obtain pills in Los Angeles.

16 Meaning, like, buy -- buy them from the fades in Los Angeles
17 because the fades in Los Angeles and the fades in Spokane is
18 different. The fades in Spokane is people we sell the pills to.
19 The people in Los Angeles we call fades are who we buy the pills
20 from. So they're two different fades.

21 Q Was there anything unique about him working with Scrapp?

22 A He -- Scrapp would get more girls to come up.

23 Q Was Scrapp an Eight Trey?

24 A No.

25 Q Was Scrapp a gang member?

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 3
G. MADISON/DI - VAN MARTER

1 A Yes.

2 Q From where?

3 A She is from 40 neighborhood crip.

4 Q Was that an issue in this case?

5 A Yes. Major.

6 Q Why?

7 A Because neighborhoods are our enemies. And the way that
8 Los Angeles is situated, if you're a gangster, you're on this
9 side of the fence; and, if you're a neighborhood, you're on the
10 other side of the fence. More or less like Bloods and Crips but
11 we both are Crips. So, even though we are Crips, we don't get
12 along for individual wars that was created in the beginning of
13 our -- our history as coming out as being gang members. So,
14 even though they're -- we're Crips, we still don't get along.
15 This is a divided line. You stay over there. We stay over
16 here. So --

17 Q So the fact that Carmen was using '40s, was that learned
18 during the -- during the time of the pill hustle?

19 A Yes, which created havoc because we don't get along with
20 the '40s, yet they're bringing -- he brought in Scrapp, which is
21 a no-no. Like, you don't do that.

22 Q So you identified Mercedes Reeves and Scrapp. Who else did
23 Carmen have working directly with him?

24 A He had -- well, one moment.

25 (The witness turns toward Mr. Trejo)

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 3
G. MADISON/DI - VAN MARTER

1 Q (BY MS. VAN MARTER) And I can -- I can rephrase the
2 question, Mr. Madison. So who -- in terms of the pill hustle up
3 here, who else was Mr. Carmen using, if anybody, to help
4 facilitate the pills and --

5 A Okay. That's better. That would be -- he had a baby mom.
6 I think her name is Jessica. Another baby mom she stayed off of
7 division.

8 Q And -- and what would Jessica do, if anything, that you
9 know of?

10 A She would hold his money.

11 Q And do you know where Jessica lived?

12 A In the Valley. I'm not sure if it's still Old River Road.
13 when it goes down off of -- I think that's Pine by the 7-Eleven
14 -- behind the 7-Eleven.

15 Q All right. It keeps closing out.

16 Did you know -- did you know anybody by the name of Bone?

17 A Black Bone?

18 Q Who's Bone?

19 A A worker for Haynes.

20 Q And what do you known about what Bone did for Haynes?

21 A Same as with -- same as what Haynes did for School Boy,
22 which was assist to sell the pills and to get money back down to
23 Los Angeles after the pills were gone.

24 Q Did you personally know Bone?

25 A Yes.

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 3
G. MADISON/DI - VAN MARTER

1 Q And would you meet with Bone?

2 A Yes, in Los Angeles.

3 Q Why?

4 A To get pills up to Haynes.

5 Q Would you guys talk on the phone about what was going to
6 happen?

7 A Yes.

8 Q And would you talk a lot?

9 A Too much.

10 Q Okay. And why are you smiling?

11 A Yes, because the conversation over the telephones
12 arbitrarily was recorded; and we kind of put our feet in our
13 mouth. So --

14 Q By law enforcement.

15 A By law enforcements.

16 Q I want to ask you a little bit about your use of phones
17 during the course of this case. Did you use more than one
18 phone?

19 A Several.

20 Q Why?

21 A To prevent that.

22 Q To prevent law enforcement from listening to you?

23 A Yes.

24 Q Okay. So how often would you switch your phones?

25 A In a week, depends. If somebody gets -- somebody get

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 3
G. MADISON/DI - VAN MARTER

1 pulled over, they get, you know, detained by the officer, cop,
2 go to jail, phone gone.

3 Q So, in this case, would you keep tally if law enforcement
4 made stops of anybody involved?

5 A Try to. Not everybody was forthcoming. A lot of people
6 that got stopped by police, got money taken from 'em or pills
7 kept it to themselves. So --

8 Q And why would they keep it to themselves?

9 A Because they would be ostracized.

10 Q By who?

11 A By us. By everybody that's making money because you don't
12 want to be associated with a person that just got popped..

13 Q And, so, would you keep track of when money was taken?

14 A Yes.

15 Q And are you aware that money was taken in this case?

16 A Yes.

17 Q In what types of situations?

18 A Airplane, bus, highway, raids.

19 Q So what would happen when you would learn that money got
20 taken?

21 A Kind of steer clear of that individual. Or, if not, try
22 to, I guess, alleviate some of the -- the possibilities of how
23 they got caught and to rectify it by alternate routes.

24 Q Okay. So, before you go on to alternate routes, one of the
25 ways that you would do that would be to change phones?

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 3
G. MADISON/DI - VAN MARTER

1 A Change phones.

2 Q Did you ever talk about changing phones with Carmen or
3 Haynes?

4 A Yes.

5 Q And what would you talk about?

6 A Try to make it quick. To always say, "Pull up on me so I
7 can holler at you." Leave it short like that.

8 Q Meaning, your meeting short or your conversation.

9 A We -- our conversation short. Just pull up on me so that
10 we can talk face-to-face off the phone.

11 Q And would Carmen give you any instructions about that?

12 A Get rid of the phone if we found out any individual that
13 had got arrested or stopped.

14 Q And would you have these conversations with other people
15 who were up here selling pills?

16 A Yes.

17 Q Like who?

18 A Haynes, Menace, Bone, School Girl, YD, Y -- YM, Football.

19 Q So, pretty much anybody who might be involved in hustling
20 pills up here would you talk about it.

21 A No.

22 Q Why just those people?

23 A The main people. The people that -- that have, I guess,
24 the most to lose. The ones that was out here up the ladder, I
25 should say. Up the food chain.

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 3
G. MADISON/DI - VAN MARTER

1 Q Were they making decisions as to how things were going to
2 happen?

3 A Yes.

4 Q You talked about if -- if there was an arrest or a stop,
5 you would evaluate how to change what you were doing.

6 A Yes.

7 Q What does that mean?

8 A If somebody got caught in the airport, what made the
9 officer stop them? I mean, they have random checks. But almost
10 like the police say, "Driving while being black." When you go
11 through the airport, sometimes you're just stopped because
12 you're black. So we try to prevent the look, the tattoos, the
13 corn rolls, the -- you know, the -- the norm of spot checks.

14 Q Would you give instructions to couriers about that?

15 A Yes.

16 Q And who would give those kinds of instructions?

17 A Whoever is the person in charge. Like, it wasn't just one
18 individual. Each person had their couriers, and they would be
19 pissed if they didn't look a certain way.

20 Q So whoever is in charge of their own franchise.

21 A Right.

22 Q You -- did you ever change transportation away from the
23 airlines because of what was happening?

24 A Yes.

25 Q What'd you do?

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 3
G. MADISON/DI - VAN MARTER

1 A We started using the bus and started driving it back using
2 various types of banks. Mail again. The mail is 50-50. You
3 have people that work every day, and here you go, 50,000 in the
4 mail. You probably won't get it.

5 Q So -- and speaking of bringing -- we talked about cash
6 coming back with couriers. How did you not think that the
7 couriers are going to take the money out of the suitcase?

8 A Most couriers don't know what they're transporting.
9 They're paid amount to not pay attention. And sometimes their
10 bags are taken from them. And, when they get to their
11 destination, they're not asked to actually give the item or
12 whatever's in the bag. Just "Let me have your suitcase." So
13 they don't know.

14 So that keeps them from sticky fingers and, also, them
15 having knowledge of what's going on. It -- if they need to be
16 detained by officers, they didn't know. So --

17 Q And did you have couriers?

18 A Yes.

19 Q And how much would you pay couriers?

20 A Me? Depends. The baseline is \$500 per ride.

21 Q And, when you said, "me," are you aware that couriers are
22 paid different amounts?

23 A Initially -- sometimes, initially, when they first came
24 about, School Boy would pay \$200 and a pair of Air Jordans.

25 Q And how come that changed?

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 3
G. MADISON/DI - VAN MARTER

1 A It wasn't fair. It wasn't right.

2 Q Why do you say that?

3 A Because most of the couriers are no job. They're either in
4 school. They're on their own at some -- at some point or
5 another. So \$500 was established. And, at some point, we would
6 pay up to 1,000.

7 Q Is that why they were recruited based upon where they were
8 from or whether they had a job or whether they were in college?

9 A That was part of the criteria. Didn't matter male or
10 female. Just fitting the right profile. You couldn't -- you
11 couldn't send somebody to Spokane that looked like Busta Rhymes.
12 He's -- he's going to get stopped.

13 Q You said you had couriers. Which couriers did you use?

14 A Treasure. Treasure Brown.

15 Q And did you use any other couriers?

16 A Yes.

17 Q And who else?

18 A I used West Side Wee Wee. I guess it is Konisha.

19 MR. CHRISTIANSON: Objection, Judge. The voice is
20 trailing off again.

21 THE WITNESS: Oh, sorry. West Side Wee Wee.

22 Q (BY MS. VAN MARTER) Do you know how -- and you had
23 previously testified that you shared couriers, as well.

24 A Yes.

25 Q Do you know how many couriers, in total, were used in this

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 3
G. MADISON/DI - VAN MARTER

1 pill game?

2 A Do you want me to ramble them off? Is that what you're
3 asking?

4 Q No, just a number.

5 A 20, 30.

6 Q And do you know how many people came up to -- from the
7 neighborhood to sell the pills at one -- at any point in time?

8 Do you know how many total?

9 A I don't have a -- a total. But I know offhand it was
10 probably 30, 40 us out here at one time. Not all together but
11 just comings and going.

12 Q Did you ever know anybody that used the name Paco?

13 A Yes.

14 Q And who is Paco?

15 A Donta Blackmon.

16 Q And is Mr. Blackmon in the courtroom today?

17 A Yes.

18 Q Could you please identify him by where he's seated and what
19 he's wearing?

20 A Last table, red shirt, glasses, short haircut.

21 Q And how do you know Paco?

22 A He's from Eight Trey.

23 Q And did you ever know him or see him up in Spokane?

24 A Once, maybe twice, at the most. He wasn't -- he wasn't one
25 to hang out. Like, he didn't really hang with us like that.

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 3
G. MADISON/DI - VAN MARTER

1 Q And, based on your contact with Paco, do you know if he was
2 involved in the pill hustle?

3 A I just -- I knew that he was being recruited by School Boy.

4 Q How do you know that?

5 A School Boy told me he was trying to get him on his team
6 because he stayed out here in Spokane.

7 Q And why would that make a difference in terms of whether it
8 was an Eight Trey from Los Angeles or an Eight Trey from
9 Spokane?

10 A Well, most of the Eight Treys out here in Spokane didn't
11 get involved for whatever reason. And, if they did, it was,
12 like, low key. So he, kind of, like -- he didn't -- he wasn't
13 feeling the vibe to get involved with School Boy.

14 Q So when did this conversation occur when School Boy talked
15 about Paco?

16 MR. LEE: Objection. Foundation.

17 THE COURT: Overruled. She asked what occurred. Go
18 ahead. Go ahead and answer, Mr. Madison.

19 THE WITNESS: Can you repeat the question, please?

20 Q (BY MS. VAN MARTER) When did this occur that you had this
21 conversation with School Boy about Paco?

22 A We had met up in Spokane on one of my trips to Spokane and
23 met with Paco. Really didn't -- initially, I didn't remember
24 who he was. And, then, later on, I think, "Oh, yeah. Now I
25 remember who he is."

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 3
G. MADISON/DI - VAN MARTER

1 Q And do you remember which trip that was?

2 A In 2012.

3 Q And what happened when you met with Paco in Spokane?

4 A Talked briefly about him, what he was up to. Like, he
5 wanted to do his own thing.

6 Q Did you talk to him about what School Boy wanted? To
7 recruit him?

8 A Yes.

9 Q And what'd you talk about?

10 A He wasn't going for it. He -- he had something he wanted
11 to do. But, I guess, his plans was not what School Boy wanted.

12 Q Do you know if that ever changed?

13 A Eventually. And I'm not -- I guess because a situation
14 occurred where he had altercation with YD and --

15 Q What -- do you know what the nature of the altercation or
16 disagreement was with YD?

17 A Over a female, Amber.

18 Q And what about the female?

19 A They had a miscommunication over her over the -- she
20 suppose to have ran off with some money as she was selling pills
21 for another homie.

22 Q So why was it that there was an altercation between YD and
23 Paco about Amber running off with money and pills?

24 A Well, it initially started with Antonio, which is YD's
25 foster brother. And, then, the altercation ensued because Paco

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 3
G. MADISON/DI - VAN MARTER

1 was messing with Amber. That was his, I guess, his girlfriend
2 or whatever. I'm not sure, but --

3 Q So, when you're talking about running with money and pills,
4 this was during the time that YD's selling pills?

5 A Yes.

6 Q And, at that point in time, what was Amber doing?

7 A She was selling pills.

8 Q And, so, how was Paco involved in that? Just as a personal
9 relationship or was he involved in the pills?

10 A I don't know about the pills. I just know that he was
11 personally involved with Amber.

12 Q So how come it -- this got to your attention in your
13 conversation with Paco?

14 A Because School Boy jumped in, and they had an altercation;
15 and he -- he called me to tell me about the altercation --

16 Q And please continue. I didn't mean to interrupt you.

17 A Because it involved YD.

18 Q And YD was an associate of yours.

19 A Yes.

20 Q So what were you supposed to do about it?

21 A Peacemaker, to calm the situation before it -- it got
22 volatile because weapons was involved.

23 Q So how -- how did you calm the situation for Paco?

24 A I vouched for Paco because they misunderstood and thought
25 that he was a Spokane Eight Trey and not really originated from

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 3
G. MADISON/DI - VAN MARTER

1 Los Angeles.

2 Q So how -- so how is it that you straightened that out or
3 vouched for him?

4 A Because I know him from where he grew up on 94th and
5 Normandie.

6 Q So, after that point in time, is that when things changed,
7 if at all, between Carmen and Paco?

8 A Because Carmen came to his aid physically, they -- it made
9 Paco, like, you know, he-had-my-back-type thing.

10 Q So, after that, did Paco and Carmen work together?

11 A They were together as far as that -- as far as doing the
12 pills. I mean, that was part of the situation. It's, like, not
13 too many people said, "No" if School Boy asked you to, you know,
14 alliance yourself.

15 Q Not -- not too many people would say, "No"?

16 A No, because he had --

17 MR. CHRISTIANSON: If -- if -- if we could, the voice
18 is trailing off again. We were doing so well for so long. If
19 he could just keep it up a little higher.

20 THE WITNESS: Okay. Excuse me. Eventually, they
21 became, I guess, buddies; and they would hang out. I don't know
22 the business end of it. I wasn't -- me and Paco wasn't that
23 type. So to -- for him to acknowledge his -- his business part
24 of it with -- with School Boy.

25 Q (BY MS. VAN MARTER) Would it be common for you to just

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 3
G. MADISON/DI - VAN MARTER

1 walk up and talk business with somebody like Paco, then?

2 A No.

3 Q Why not?

4 A Because he -- he wasn't -- he wasn't -- I didn't know him
5 to that degree; and he wasn't one of the ones that was just,
6 like, trying to get in -- trying to get in where he fit in.

7 Q And, in fairness, he wasn't one of the ones that was
8 controlling anything. Right?

9 A No. No. So it wasn't really necessary for me to talk to
10 him about the pills.

11 Q And the same question for Mr. Tones. Would you ever talk
12 directly with Mr. Tones about pills?

13 A No. I never had any conversation with Tones or with
14 Blackmon about pills at all.

15 Q And would you have?

16 A No.

17 Q Why not?

18 A Because they never asked me to be put on. They wouldn't
19 ask me because we don't know each other to that -- to that
20 degree, but -- and they can go other places.

21 Q And does that have to do with what you talked about before
22 with who you might be directly associated with?

23 A Yes. Yes. Who -- who you -- what franchise, basically,
24 you would belong to or you associate with, whether it be
25 personal or business.

JURY TRIAL - DAY 3 - OCTOBER 16, 2014 - VOLUME 3
COLLOQUY

1 Q And would it be common for people to jump franchises?

2 A Very common.

3 Q And why?

4 A Because they think the grass is greener on the other side.

5 Q Well, what's the ultimate goal?

6 A To make money. To get -- to get paid.

7 Q So are people going to go where they're going to get paid
8 the best?

9 A Yes.

10 THE COURT: Are you at a breaking point on a big
11 subject?

12 MS. VAN MARTER: I am.

13 THE COURT: Let's take our evening recess. It's been
14 a long day. Ladies and gentlemen, it's very important you don't
15 talk about this case to anybody else. Keep that in mind. Have
16 a good evening. We pick up again tomorrow at 9:00. Paul? The
17 jury's excused.

18 (Jury out at 4:27 p.m.)

19 THE COURT: All right. Be seated. Tomorrow morning,
20 before we start with the jury at 9:00, it might be wise to get
21 together. Somebody may think of something to talk about in the
22 morning. What, 8:30?

23 MS. VAN MARTER: That's fine, your Honor.

24 THE COURT: All right.

25 MR. HORMEL: Judge, can we -- can we order a

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 THE COURT: Please rise for the jury.

2 (Jury in at 8:03 a.m.)

3 THE COURT: Please be seated. Good morning, everyone.

4 Mr. Madison is still on the stand. Direct examination

5 continues. Ms. Van Marter, you may proceed.

6 MS. VAN MARTER: Thank you.

7

8 DIRECT EXAMINATION (continuing)

9 DIRECT BY MS. VAN MARTER (continuing):

10 Q Good morning, Mr. Madison.

11 A Good morning.

12 Q We left off yesterday talking about the identification of
13 individuals who may have been working with Carmen during the
14 course of the pill hustle, specifically, females. Specifically,
15 Scrappie and Mercedes. Are you aware of any other females that
16 were working with Mr. Carmen during the course of the pill
17 distribution here in Spokane?

18 A Michelle. We used -- called her Sasha.

19 Q And who's -- do know Michelle's full name?

20 A Not her full name.

21 Q And how do you know Michelle?

22 A I grew up with her in Los Angeles. Frequent with her. A
23 friend.

24 Q Okay.

25 A Basically, she would be, like, my god-cousin. Like -- she

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 like -- we were kind of close.

2 Q And how would Michelle work for Mr. Carmen?

3 A She worked for Carmen and Haynes actually selling drugs and
4 to bring money back to LA when she was going back and forth
5 until she started staying in Spokane.

6 Q And do you know where she stayed in Spokane?

7 A I know the townhouses down by the Y, but I don't exactly
8 know the name of the -- the residence.

9 Q Do you know how she obtained that residence in Spokane?

10 MR. HORMEL: Objection, your Honor.

11 THE COURT: The question is does he know, and you can
12 answer that "yes" or "no."

13 MR. HORMEL: May I -- may I voir dire the witness,
14 your Honor?

15 THE COURT: Go ahead.

16 MR. HORMEL: You were just asked whether or not --
17 whether or not you know how Michelle Anderson acquired that
18 apartment. Correct?

19 THE WITNESS: Yes.

20 MR. HORMEL: Now, what you know is what you heard.
21 Correct?

22 THE WITNESS: From Haynes, yes.

23 MR. HORMEL: Yeah. So you heard it from somebody
24 else.

25 THE WITNESS: From Haynes.

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 MR. HORMEL: Objection. Hearsay, your Honor.

2 MS. VAN MARTER: Admissible for coconspirator's
3 statement made in furtherance of the conspiracy.

4 THE COURT: It's overruled. Go ahead.

5 Q (BY MS. VAN MARTER) And what did -- what -- how did -- how
6 did you know -- how did Michelle get the apartment first? Do
7 you know how?

8 A Through Haynes.

9 Q And what did Haynes tell you. Let me ask you this: When
10 did you have this conversation with Haynes about the apartment?

11 A After he came up and he need -- she -- she didn't want to
12 be in LA anymore, and they were boyfriend and girlfriend at one
13 time. And she wanted to come up, and she wanted to work with
14 him but initially not in the pill game.

15 Q And, so, was this during the time of the pill hustle?

16 A Yes.

17 Q All right. And what did Haynes tell you about this
18 apartment?

19 A That's where he stayed with Michelle and kept his stuff
20 there, you know, did their transaction business.

21 Q "His stuff" being what?

22 A Pills. Money.

23 Q And do you know who paid for that apartment?

24 A Haynes.

25 Q And do you know if anybody else stayed in that apartment?

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 A Complex?

2 Q Or in that apartment or that complex.

3 A Mercedes. She stayed in the apartment complex, as well.

4 Q And do you know if Mercedes was living alone in the
5 complex?

6 A Off and on she would live with Carmen, School Boy.

7 Q And do you know of any other females that were working with
8 Carmen here in Spokane?

9 A Working or associates?

10 Q Well, working. Let's start with working.

11 A In Spokane? He has a baby mom that stayed off of Division.

12 Q Is that who you talked about yesterday? Jessica?

13 A No. Jessica stayed the Valley.

14 Q Okay. So this is somebody different?

15 A Yes. That's another baby mom. She -- she drove a green
16 car. Green Impala or something like that. Lumina.

17 Q And how did this individual -- how do you know that this
18 individual worked with Mr. Carmen?

19 A I stayed with her through Carmen for a couple of days when
20 I first came up.

21 Q During the course of the pill game?

22 A Yes.

23 Q And what would this person do for Carmen?

24 A Whatever he asked. Hookup with the fades and distribute
25 pills, sell them.

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 Q Okay. Any other females in the Spokane area?

2 A There was Sally, but I think that was more personal.

3 Q And who's Sally? Do you know?

4 A I just know that she -- she owns or runs Flamin' Joe's.

5 Q And how were they associated? Do you know?

6 A Personal relationship. I don't know if she actually did
7 anything as far as pills.

8 Q Did Carmen ever talk to you about Sally?

9 A Yes.

10 Q And when -- when did he talk to you about Sally?

11 A In Los Angeles and in Spokane.

12 Q Was this during the course of the pill distribution?

13 A Yes.

14 Q And what did he talk to you about Sally?

15 A Needing her to help him with the business.

16 Q How so?

17 A He wanted to bring a Flamin' Joe's to Los Angeles and also
18 use her to -- for, like, credit. Her good name. You know, so
19 that he can obtain businesses in Los Angeles.

20 Q What do you mean "use her good name for credit"?

21 A Like, liquor license, tobacco license to open up stores in
22 Los Angeles.

23 Q Do you know how he was going to pay for these stores?

24 A Yes, out of the money we made.

25 Q From selling pills.

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 A From selling pills.

2 Q And do you know if Sally was ever able to do that for
3 Mr. Carmen?

4 A The last time we spoke he was staying -- he had apartment
5 in Glendale, and he was still trying to get Flamin' Joe's down
6 this way to, I guess, go through the paperwork. He had opened
7 a -- a minimart in Los Angeles.

8 Q So Mr. Carmen had a store in Los Angeles?

9 A Yes.

10 Q Do you know that store?

11 A Yes.

12 Q And what was the name of that store?

13 A Everything Goes Tobacco Minimarket.

14 Q Okay. And was there anything significant about the title
15 of the store?

16 A ETG, which is the initials of our neighborhood stating that
17 it's ours. It's part of Eight Trey.

18 Q And do you know how he paid for that store?

19 A Through the money from pills.

20 Q Would he use that store at all in LA for purposes of the
21 pill game?

22 A I've never -- I've never seen the pills brought into the
23 store itself, but there's apartment behind where transactions
24 was being done.

25 Q Okay. You talked about the one apartment -- the apartments

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 where Michelle -- Michelle was at one point and Mercedes. Do
2 you know what other residences, if any, Carmen used in Spokane?

3 A There -- the -- I'll call it "the little house." That's
4 what we named it; but that was off of Division, as well, around
5 the corner from his baby mom's house. The Valley where Jessica
6 stay, and just where Mercedes stayed.

7 Q And yesterday you testified as to the big house --

8 A Yes.

9 Q -- and where a number of individuals had stayed. Were
10 there other locations like that in Spokane where a number of
11 individuals would stay?

12 A Yes. If -- if they had, basically, hooked up with people
13 from out here in Spokane, they would stay with them. Like, a
14 girlfriend to that individual.

15 Q Do you know if there were any houses used to store things
16 for the -- for the group in the pill game?

17 A There was a house on Lacey that -- that was being used.

18 Q And how do you know that?

19 A I was there. I frequent there. Maybe two, three times I
20 been there.

21 Q And do you know how long they had that house?

22 A Approximately six, eight months.

23 Q And do you know who used that house?

24 A Haynes, Tiny Football, Black Bone, T Crazy, SG.

25 Q And that's -- I'm going to stop you there just so that we

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 can remember. There's a lot of monikers there.

2 A Yes. Yes.

3 Q Okay. So, you said Haynes and, then, Tiny Football.

4 Again, who is Tiny Football?

5 A Lisbey.

6 Q Okay. And T Crazy is who?

7 A That would be -- we call him Smooth out there, but he --

8 Bobby. Bobby Wines.

9 Q Okay. And SG?

10 A Sharita Horn.

11 Q Okay. And what did SG stand for?

12 A School Girl.

13 Q Okay. I didn't touch upon this yesterday. You called
14 Carmen "School Boy."

15 A Yes.

16 Q And Sharita Horn "School Girl."

17 A Yes.

18 Q Is there an association between Sharita and Carmen based on
19 those names?

20 A Yes. That's his immediate lil home girl. That's -- she
21 falls under him.

22 Q What does that mean?

23 A Like, I have a big homie. I'm under his name. But, when
24 you have a -- a female, it's, like, she runs in your clique.
25 Like, she's exclusive for that name.

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 Q Is there an expectation as to what she's supposed to do if
2 she was brought in by School Boy?

3 A Be loyal and back his play.

4 Q And who else do you know that frequented the Lacey Street
5 house?

6 A Princeton.

7 Q And do you know his full name?

8 A No. I just know -- he's Blue Stone --

9 Q Okay.

10 A -- is Princeton.

11 Q Okay. And do you know how they got the Lacey Street
12 address?

13 A They had a fade that would -- they would give pills to, and
14 they would -- he would go out and get residence through -- he
15 would make up checks, employment, things of that nature so they
16 can obtain a house or apartment.

17 Q How do you know this?

18 A I was -- because I was privy to the information through
19 Haynes and Sharita.

20 Q And, when they told you this information, was that during
21 the course of the pill distribution?

22 A Yes.

23 Q And, when you said, "checks and paperwork," was that real?
24 Were those real checks and real paperwork?

25 A No. Made up.

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 Q And did you ever meet this person?

2 A No. Not physically face to face, no.

3 Q Okay. And why wouldn't you have met this person?

4 A Because he never did any business with myself, and it
5 was -- I didn't need to know him. If we needed for him to
6 assist us to get another apartment or any other fads that we
7 ever used their name for the apartment, then they would go
8 through the people that actually stayed in Spokane. Like --
9 like, Haynes or Carmen or Young Moe or Ant, anything of that
10 nature.

11 Q And would you -- would you use individuals' names for
12 apartments?

13 A Yes.

14 Q Why?

15 A Because it's a trail. And want to keep -- you don't want
16 to put your name on anything out here of which you don't want
17 something. They can come back.

18 Q Okay. And do you know if there were any other apartments
19 utilized by groups aside from the Lacey Street house?

20 A The big house on Mission by Gonzaga. Then there was, like
21 I said, the other apartment that -- on Division. Well, off of
22 Division.

23 Q Okay. And do you know who would use that apartment off of
24 Division?

25 A School Boy.

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 Q Okay. Would you ever have fades meet you at these
2 locations -- at, like, the Lacey Street address?

3 A Not supposed to.

4 Q Okay. Why not?

5 A It's too close. Then they -- then the fades would know
6 where you stay, and some people had -- got their houses broke
7 into because the fades knew where they stayed.

8 Q So who was supposed to have the information about houses
9 like Lacey?

10 A The people that stayed out here because it was like a
11 rotation. They wouldn't stay out here all the time. So they
12 would rotate back to California and then back up to Spokane.

13 Q So, if people would rotate back and forth, would a group
14 come up and another -- would a group go down and another group
15 come up?

16 A Yes.

17 Q And, if a group was coming up from LA, would they know that
18 they could stay at those kind of houses?

19 A That -- that was a problem because some people just
20 automatically thought that, because it was Eight Treys up here,
21 that they could stay at these houses, and that's not how it was
22 supposed to be.

23 Q Why wasn't it supposed to be like that?

24 A Because, when we first came up here, everybody was under
25 the understanding that we would work from hotels, motels until

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 you actually gained responsibility to be in a house with other
2 individuals.

3 Q Well, is that something that was discussed amongst those
4 that were in charge?

5 A Yes.

6 Q And so did that change as time went on?

7 A Drastically.

8 Q Okay. And -- and how did that change? What happened?

9 A People came up and wanted in, and it became a problem of
10 where they was staying and what they had to do. So it was
11 discussed that we change things up a bit.

12 Q And how -- how were you to change things up?

13 A Change location and be more secretive about where we stay
14 and who would be staying at these places.

15 Q And, when you said people "wanted in," why, again, were
16 people wanting in?

17 A Because the dollar amount was -- it was being talked about
18 as far as how much money was being made out here in Spokane.

19 Q And, again, what did they want in on?

20 A Pill -- the sale of pills.

21 Q You mentioned a little bit -- we talked a little bit about
22 your possession of firearms, and we talked a little bit about
23 firearms during the course of the pill hustle.

24 A Yes.

25 Q Were -- what was -- why were firearms present during the

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 pill hustle?

2 A Unlike out here in Spokane, Los Angeles -- it's almost a
3 must that you keep a firearm, if not on you, close because
4 it's -- Los Angeles is volatile.

5 Q It's part of the way of life.

6 A Yes, it is.

7 Q So how did the firearms play a role in the pill hustle
8 here?

9 A Most of the time the fades, if they didn't have the money,
10 they would -- we would do barter type of -- pills for weapons,
11 furniture, TV, things of that -- you know, that nature.

12 Q And why weapons?

13 A Because they know that most people that sell drugs need
14 weapons.

15 Q Why do you need weapons?

16 A To protect yourself out here doing the -- the sale of
17 pills. A lot of people rob you, want to hurt you. So you need
18 the guns to ward off, you know -- if they know you packin', then
19 they -- they're not gonna -- they're gonna take a different look
20 upon trying to rob you.

21 Q And do you know if Carmen knew about the firearms being
22 possessed up here in Spokane?

23 A Yes.

24 Q And how do you know that?

25 A Because we obtain firearms together at one point.

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 Q You and Carmen?

2 A Yes.

3 Q And why did you obtain the firearms?

4 A He wanted them, and it was a -- it was a steal.

5 Q Why was it a steal?

6 A A few pills for assault rifles, handguns versus paying the
7 store price? It's a steal.

8 Q And do you know if there's any connection between firearms
9 and the Lacey Street address?

10 A Yes.

11 Q And how do you know that?

12 A Seen them. Seen them there.

13 Q And do you know if, in particular, any firearms had a
14 purpose when they went to the Lacey house? Were they supposed
15 to go somewhere, or were they staying in Spokane?

16 A No, they come to LA. They was only supposed to -- most of
17 the guns that was there would stay -- maybe a couple stay there
18 and, then, the rest would be transferred to Los Angeles.

19 Q And how would they get to Los Angeles?

20 A Driven or broken down and you take the bus with them --
21 take the chance on the bus. But most of the time they was
22 driven down.

23 Q And I just want to make sure that we're clear. When we're
24 talking about firearms, we're talking specifically about what
25 you knew in association with Mr. Carmen.

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 A Yes.

2 Q Okay. And, since we're on the Lacey Street address,
3 obviously you know there were search warrants executed at the
4 end of this case.

5 A Yes.

6 Q Did you know of anything specific about the Lacey Street
7 address and firearms at the time of the search warrants?

8 A I knew there was guns left behind that we wasn't able to
9 get back to LA.

10 Q And do you know if anybody in particular was supposed to go
11 get those guns?

12 A I knew that Tiny Football -- Lisbey -- he was supposed to
13 get his out of there and Haynes and -- supposed to get his and
14 Black Bone.

15 Q And do you know if any of them came to get those guns
16 before the search warrant?

17 A No. They didn't. The only person that was supposed to
18 come get them but he didn't come get them was Tiny Football.

19 Q Do you know if somebody tried to come get them?

20 A No. I didn't know that Black Bone was the only one that
21 was still there.

22 Q Okay. I want to talk again about now the phone calls. We
23 talked a little bit about that yesterday. You obviously know
24 that you were recorded.

25 A Yes.

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 Q Okay. During the time of the wiretap when you were
2 recorded, who were you talking to in this pill hustle?

3 A Different at various times. School Girl, School Boy, Tiny
4 Menace, Tiny Sodi.

5 Q All right. And, again, Tiny Menace is who?

6 A Alex James.

7 Q And Tiny Sodi is who?

8 A That would be Haynes. Richard Haynes.

9 Q And is there anybody in particular you were talking to more
10 than another?

11 A Yeah -- yes. The people that I was directly in contact
12 with.

13 Q Which would be who?

14 A School Boy, Haynes, James, YD, and --

15 Q And YD is who again?

16 A That -- Glen Turner.

17 Q And have you listened to those calls? Now, being a
18 defendant, have you had an opportunity to listen to some of
19 those calls?

20 A Yes.

21 Q Have you read transcripts about these calls?

22 A My lawyer, yes.

23 Q Okay. And, in preparation of your testimony today, did you
24 listen to particular calls and review transcripts?

25 A For --

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 Q For your testimony today, did you previously listen to some
2 calls and -- to be prepared?

3 A No. Mean -- you mean, like, for today?

4 Q Let me ask the question a different way.

5 A Yeah.

6 Q Prior to your testimony, did you meet with individuals from
7 the United States?

8 A Yes.

9 Q And, during that time, did you listen to some calls?

10 A Yes.

11 Q And do you -- when you were listening to the calls, did you
12 remember them?

13 A Yes.

14 Q And, when you reviewed transcripts, did you make any
15 corrections?

16 A Yes.

17 Q And why?

18 A Some of 'em was off base, wasn't clear, errors.

19 Q Okay. And, when you listened to the call, would you be
20 able to correct them because of your personal knowledge?

21 A Yes.

22 Q Did you also recognize the people in the call?

23 A Yes.

24 Q How?

25 A Through their voice in the conversation that they were

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 having with myself or being frequently around them.

2 Q And were you able to identify those people when you
3 listened to the calls?

4 A Yes.

5 MS. VAN MARTER: Okay. At this time, we're going to
6 start to play some calls. I don't know if the Court wants to
7 give an instruction while we --

8 THE COURT: Right. Ladies and gentlemen, we're going
9 to hear the calls over the speaker system in the courtroom; and
10 those calls, if I understand it correctly, are from some of the
11 disks that were admitted into evidence a day or two ago.

12 You will get transcripts. That's written transcript of the
13 calls. It's important for you to understand that the written
14 transcripts are not evidence. The evidence is what you hear in
15 your own ears. The transcripts are just to help you understand
16 what's being said. And, as soon as the calls are completed,
17 we're going to pick the transcripts up again. So pay attention.
18 Listen.

19 Go ahead.

20 MS. VAN MARTER: Your Honor, may I approach the
21 witness to provide copies of the transcripts?

22 THE COURT: You may.

23 MS. VAN MARTER: Thank you.

24 THE COURT: And you're going to have assistants
25 passing and picking up those transcripts.

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 (Discussion off the record)

2 MS. VAN MARTER: Yeah. All right.

3 Q (BY MS. VAN MARTER) So, Mr. Madison --

4 A Yes.

5 MS. VAN MARTER: We're going to start with, just for
6 the record, call session 195 off of Target Telephone 2 dated
7 August 17th, 2012. I'm going -- as I play this, I might stop it
8 a few times. Okay?

9 THE COURT: Do you have an extra transcript?

10 MS. VAN MARTER: Yes, your Honor. Just one moment.

11 MR. NOLLETTE: Exhibit number, too.

12 MS. VAN MARTER: This is, for the record, Exhibit
13 No. 2-3.

14 (Discussion off the record)

15 MS. VAN MARTER: Your Honor, I -- they are all in the
16 exhibit binders provided to the Court.

17 THE COURT: Okay.

18 MS. VAN MARTER: So I'll wait until the Court gets
19 there.

20 THE COURT: Well, I -- I'm not sure. Which book is it
21 in?

22 MS. VAN MARTER: I -- you know, I'll hand up my
23 copies, your Honor. I'll use the exhibit book. May I approach?

24 THE COURT: You may.

25 MS. VAN MARTER: My podium's getting very crowded.

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 All right. I just wanted to make sure that everybody was ready
2 before I hit the play button, your Honor.

3 THE COURT: Everybody ready to go over there, Defense?

4 Okay. Go ahead.

5 (Discussion off the record)

6 MS. VAN MARTER: My bad. I didn't switch it over.

7 Hold on. Too many buttons. Okay.

8 (Exhibit No. 2-3 was played)

9 Q (BY MS. VAN MARTER) I'm going to pause it right there.
10 And, Mr. Madison, who is in this call?

11 A Myself and Haynes.

12 (Exhibit No. 2-3 continued)

13 Q (BY MS. VAN MARTER) Okay. So, Mr. Madison, what is that
14 call about?

15 A Female had left.

16 Q A female had left where?

17 A For Spokane and I wasn't able to catch her. So --

18 Q Okay. So a female had left for Spokane? Is that what you
19 said?

20 A Yes.

21 Q Okay. What do you mean you weren't able to catch her? For
22 what?

23 A To give her Haynes' -- some pills to come up.

24 Q And what did Haynes say to you when you told him you
25 couldn't -- you didn't get her to send them up?

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 A He said that's okay. He got some.

2 MS. VAN MARTER: All right. So, going to call session
3 1178, Government's Exhibit 2-18. And, while this is being
4 handed out, this is in the August, 2012, time frame.

5 Q (BY MS. VAN MARTER) During this time period, Mr. Madison,
6 just for the record, again, who were you working with in pill
7 distribution?

8 A Haynes. 2012. Haynes, James, Colbert, School Boy.

9 Q And Colbert is Black Bone?

10 A Black Bone.

11 Q And School Boy? And, at this point during the pill game,
12 this is that summer of 2012. And how many pills were coming up
13 during this time?

14 A A lot. Sometimes we didn't keep track, you know; but it
15 was -- it was a lot at that time.

16 Q And, during this time, were there a lot of individuals in
17 Spokane selling?

18 A Yes.

19 Q And who -- do you know who they were?

20 A Some, yes, that I knew. Later on, more that wasn't of my
21 knowledge. But majority of the ones that's on our indictment.

22 Q And were those individuals -- some of them Eight Treys?

23 A Yes.

24 Q And I know we talked about the fact that not -- not all the
25 Eight Treys were involved in this.

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 A No.

2 Q Is that true?

3 A That's true.

4 Q In Spokane, was there a reputation as to who controlled the
5 pill game?

6 A Yes.

7 Q And what was that?

8 A School Boy.

9 Q What about other Eight Treys?

10 A Haynes, Nino, Jay Loc.

11 Q All right.

12 MS. VAN MARTER: So does everybody have transcripts?

13 Okay. All right. Go ahead. Play this call.

14 (Exhibit No. 2-18 was played)

15 Q (BY MS. VAN MARTER) Okay. And who is in this call?

16 A Myself and Haynes.

17 Q Okay.

18 (Exhibit No. 2-18 continued)

19 Q (BY MS. VAN MARTER) Who are you talking about there?

20 A Baby Sodi.

21 Q And why -- why were you asking that question?

22 A He wants to come up.

23 Q Come up where?

24 A To Spokane.

25 Q And who is Baby Sodi? Do you know his name?

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 A Yes. That -- he's Simpson. I be get 'em mixed up
2 sometimes. Footh Footh --

3 Q Is it --

4 A -- is his brother. Huh?

5 Q Is it common within the Eight Trey that you may not know
6 their real name and only know their moniker?

7 A Well, his real name is Jeffron; but sometimes -- because
8 they so close in age, sometime we -- you know, we mistake 'em.
9 Whatever.

10 Q And is he related to Haynes?

11 A No. He's related to me.

12 Q So he wanted to come up for what?

13 A To make money in the pill game.

14 Q Okay.

15 (Exhibit No. 2-18 continued)

16 Q (BY MS. VAN MARTER) "Couple beans." What does that mean?

17 A Pills.

18 Q Is that how you referred to pills?

19 A Yes.

20 Q How else would you refer to pills?

21 A Skittles, beans, opanas 2, bananas, everybody got their own
22 termination -- terminology on what they use to call the pills
23 instead of "pills."

24 Q Well, how come you didn't say, "I have some oxycodone"?

25 A Not supposed to do that.

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 Q Why not?

2 A Because you're on the phone, and you're not supposed to --
3 things are supposed to be said where you would -- the next
4 person would understand what you talking about without alerting
5 individual that may be eavesdropping either through the phone
6 itself or people around you.

7 Q Okay. All right. Let's continue the call.

8 (Exhibit No. 2-18 continued)

9 Q (BY MS. VAN MARTER) Okay. I'm going to stop right there.
10 There's a couple of handwritten markings on the transcript?

11 A Um-hum.

12 Q Who did that?

13 A I did.

14 Q And why did you do that?

15 A Because it wasn't correct. It was -- they -- I guess they
16 overlapped our conversation, myself and Haynes.

17 Q So did you fix it based upon your knowledge of the
18 conversation?

19 A Yes.

20 Q And what is Haynes talking about when he says, you know,
21 you got to get your plane ticket, then I'll get you some beans?

22 A Right.

23 Q What's that about?

24 A So that he wouldn't have to come out of his pocket and
25 basically do everything for Baby to come up here to Spokane to

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 make some money.

2 Q So, if somebody wanted to come and get in the game, get up
3 here in the pill hustle, would they have to get themselves up
4 here?

5 A Yes or through means of themselves or others.

6 Q And, if they got up here, would they be able to get some
7 beans?

8 A No, not -- it doesn't work like that.

9 Q How does it work?

10 A You can't just come up here and expect for somebody to sell
11 you some Percocet 30s. You -- you either come up here with your
12 own or, once you're here and you sell out of what you have, if
13 you stay and you buy from who's ever in house, you're gonna be
14 charged an extra fee because it's harder to get them out here
15 than it is in Los Angeles.

16 Q And what did Haynes mean when he said, "And I need my money
17 back"?

18 A Yeah, he -- it wasn't a free ride. So he had to pay him
19 back.

20 Q So, even though individuals might be expected to bring up
21 their own product or get up here, once they got up here, did
22 they have to follow a certain set of rules if they wanted to get
23 in the game?

24 A Yeah, yes. Like, Baby Sodi. Even though that's Haynes's
25 big homie, he still has to -- he has to listen to Haynes. He

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 can't come up here and run his own program. The -- the status
2 in our neighborhood in Los Angeles is not the status out here in
3 the pill game. So he has to abide by his rules.

4 (Exhibit No. 2-18 continued)

5 Q (BY MS. VAN MARTER) I'm going to -- what did you mean
6 "trying to work against the system"?

7 A Yeah because they want to backdoor you; come with the
8 notion that they have things coming to 'em and they really
9 don't; to try to manipulate us into giving 'em a helping hand.

10 Q And who's "us"? What do you mean by "us"?

11 A The people that -- that has established theyself out here
12 in Spokane and in the pill game.

13 Q So is this during the time when the word had gotten out?

14 A Yes.

15 Q Everybody wanted to come up.

16 A Everybody want in.

17 (Exhibit No. 2-18 continued)

18 Q (BY MS. VAN MARTER) Okay. When you talk about "Boy," who
19 are you talking about?

20 A School Boy.

21 Q Okay. And what are you talking about there?

22 A How he treated me when I first came out here to Spokane to
23 sell pills and how he put me in rundown motels and, basically, I
24 had to wait, be patient, and let him come get at me when he had
25 the time.

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 Q Did you have to work your way up?

2 A Yes.

3 Q So, in this conversation when you were telling Haynes that
4 you talked to Boy about what was going on, what'd you talk to
5 Boy about?

6 A About that situation, about how Baby wanted to come up and
7 kept going to us three, like, to get what he wanted in order for
8 him to get some money in his pocket.

9 Q And did you talk to Boy at that point about how you were
10 talking about moving locations or letting people work their way
11 up?

12 A Yeah, like -- like he did with me, which was you start in
13 motels and you would, like, obtain a vehicle so you can get
14 around and you make your fades not inside the motels but around
15 Spokane locations.

16 Q Okay.

17 (Exhibit No. 2-18 continued)

18 Q (BY MS. VAN MARTER) Stop there. So what are you talking
19 about that's why you bought -- that's why you're getting the
20 Baby Football up there? Again, who's Baby Football?

21 A Tahei Moore.

22 Q Okay.

23 A He -- he came up and basically everything was handed to
24 him. Boy bought him a truck, put money in his pocket, sold his
25 -- his pills for him. And he came home, and he didn't take care

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 of his family. He spent his money in strip clubs, gambling,
2 clothes. He didn't take care of his -- his kids, his wife, or
3 nothing. So --

4 Q Was that an issue?

5 A A major issue.

6 Q And what side is -- is he from?

7 A He's from back west.

8 Q Okay.

9 (Exhibit No. 2-18 continued)

10 Q (BY MS. VAN MARTER) I want to stop. Haynes. We're gonna
11 cut the circle to a triangle. What does that mean?

12 A People gonna be out it. They gonna be put out of the --
13 the normal circle of which we operate in. So he's going to
14 basically cut people loose and let them fend for theyself. And
15 that way that you get less friction, less headaches, less
16 problems.

17 Q So, at the time, Haynes or TS, called it a circle.

18 A Yes.

19 Q And why?

20 A Because he feel as though that everybody he extended his
21 hand to was all of, you know, homies, Eight Treys.

22 Q And was it -- was it getting pretty big?

23 A It was gettin' huge.

24 (Exhibit No. 2-18 continued)

25 Q (BY MS. VAN MARTER) Trying to get everybody a piece. What

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 does that mean?

2 A Piece of the pie to where he -- so there won't be no hard
3 feelings. So that everybody gets some money in their pocket,
4 and there's no animosity.

5 Q And who -- who is "everybody"?

6 A Eight Treys that's coming up. The little homies.

7 (Exhibit No. 2-18 continued)

8 Q (BY MS. VAN MARTER) And who are you talking about there?
9 Baby?

10 A Baby Sodi.

11 (Exhibit No. 2-18 continued)

12 (Discussion off the record)

13 MS. VAN MARTER: I'm sorry. I did forget. Members of
14 the jury, please pass the ones that you've just used to the end;
15 and we'll pass new ones to you. Sergeant Meyer will pass the
16 new ones, and Agent Sullivan will collect the old. Thank you.

17 THE COURTROOM DEPUTY: Ms. Van Marter, do you want
18 this back?

19 MS. VAN MARTER: Thank you.

20 THE COURT: I found them. Thank you.

21 MS. VAN MARTER: You're welcome. The next call is
22 Government's -- which one did we just play? 2-18. The next
23 call is 2-19, call session 1292 on Target Telephone 2, ~
24 August 24th, 2012.

25 (Exhibit No. 2-19 was played)

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 Q (BY MS. VAN MARTER) I'm going to stop that right there.

2 Do you recognize the voices in this call?

3 A Yes.

4 Q And who is this?

5 A Haynes and James.

6 Q I'm sorry. Could you say the first name again?

7 A Haynes and James, Tiny Menace.

8 Q Okay.

9 (Exhibit No. 2-19 continued)

10 Q (BY MS. VAN MARTER) Okay. Who's Big Dog?

11 A Myself.

12 Q Okay. And do you know what they're talking about in this
13 call?

14 A Money.

15 Q Okay. And, specifically, what are they talking about?

16 A Do Haynes want James to give him the 35K -- thousand or
17 does he want to get me out of the way first.

18 Q What does that mean?

19 A Sell the pills that I sent up first.

20 Q So how did that work when you sent pills up? How did the
21 money work?

22 A Couple of ways. Either they would give me whatever they
23 wanted to purchase first and -- or would be a consignment
24 second, meaning I couldn't -- I couldn't give them a package for
25 myself to sell without giving them something. It was a half and

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 half. If you bought a thousand, then I could send a thousand.

2 If you bought 500, then I can send 500. But I couldn't just
3 send up a package of my own and get it -- and get it sold.

4 Q You had to send it up in conjunction with somebody up in --
5 for somebody in Spokane.

6 A Yes.

7 Q So you're talking a thousand and 500. A thousand and 500
8 of what?

9 A Pills.

10 Q Okay. So, in this particular call, they use 28, 7, 35.
11 What denominations are those?

12 A 28,000, 35,000, 7,000.

13 Q And did 35,000 represent a particular amount of pills?

14 A At that time, yes. It would be -- 35,000 would be just
15 shy, like, maybe a little bit over 1,500 pills.

16 (Exhibit No. 2-19 continued)

17 Q (BY MS. VAN MARTER) What are they talking about there?

18 A Money to be sent back to LA. 40,000, which is TS's,
19 Haynes. And the rest would be myself.

20 Q Okay.

21 (Exhibit No. 2-19 continued)

22 Q (BY MS. VAN MARTER) What do you mean he'll be done with
23 that before she lands?

24 A Before she gets --

25 Q That's okay. Just pull it back a little bit. There you

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 go.

2 A Before she get off the airplane.

3 Q And who is "she," in general?

4 A Whoever the courier may be at that time.

5 Q And what would he be done with?

6 A The package, selling of the pills.

7 (Exhibit No. 2-19 continued)

8 MS. VAN MARTER: All right. The next call will be
9 Government's 2-20, call session 1293, August 24th, 2012.

10 THE COURT: What number was it?

11 MS. VAN MARTER: Government's Exhibit No. 2-20.

12 (Exhibit No. 2-20 was played)

13 Q (BY MS. VAN MARTER) I'm going to stop it there. Do you
14 recognize -- I know it's a short bit, but do you recognize the
15 voices?

16 A Black Bone and TS, Haynes, and Colbert.

17 Q Black Bone and --

18 (Interruption by the reporter)

19 THE WITNESS: Colbert.

20 MS. VAN MARTER: That's what I was going to ask.

21 Okay. That's okay. I didn't hear that, as well. Thank you.

22 Okay. Play the call.

23 (Exhibit No. 2-20 continued)

24 Q (BY MS. VAN MARTER) All right. So what are they talking
25 about in that call?

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 A 18,000.

2 Q And did you have to do with that call?

3 A Excuse me?

4 Q When they referred to "Big Dog," was that you again?

5 A Yes. Yes.

6 Q And what did Colbert do for Haynes then?

7 A Just about everything. He would -- I would meet him in LA;
8 like, choreograph whatever transaction that we had going on,
9 which, if it was the pills or the money, I would get the money
10 from him and give him pills that was going up to Spokane.

11 Q So would Colbert know where Haynes would have his money in
12 LA?

13 A Yes.

14 Q Would Colbert also meet couriers who had money?

15 A Yes.

16 MS. VAN MARTER: Okay. Moving on to Government's
17 Exhibit 2-21, call session 1381, August 24th, 2012.

18 (Interruption)

19 THE WITNESS: (To Mr. Trejo) That's my phone.

20 (Exhibit No. 2-21 was played)

21 Q (BY MS. VAN MARTER) Okay. And, for the record, who is
22 this call? Who is in this call?

23 A Tiny Menace and Haynes.

24 Q I'll keep playing.

25 (Exhibit No. 2-21 continued)

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 Q (BY MS. VAN MARTER) Okay. During that call, did somebody
2 else get on the phone?

3 A Yes.

4 Q And who is that?

5 A Black Bone.

6 Q And what's going on in this call?

7 A They're trying to figure out what happened to the 300 pills
8 that he was supposed to get.

9 (Exhibit No. 2-21 continued)

10 Q (BY MS. VAN MARTER) Okay. First, there's a reference to
11 Erika. Do you know Erika?

12 A Erika Woods.

13 Q And who is Erika Woods?

14 A One of TS's friends.

15 Q And was Erika Woods involved in the pill hustle?

16 A Yes.

17 Q How so?

18 A Almost the same as -- as Black Bone but more courier and to
19 take care the money process.

20 Q And, in this call, there's a reference to "33. 3300." Do
21 you know what they're talking about?

22 A Pills. The dollar amount for the pills, for the 300 pills.

23 Q Okay.

24 (Exhibit No. 2-21 continued)

25 Q (BY MS. VAN MARTER) Okay. Who's YA?

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 A Young Ant.

2 Q Do you know his real name?

3 A Maurice. I don't remember his last name.

4 Q And we previously talked about him yesterday. What side is
5 he associated with?

6 A North side.

7 Q And so who was he associated with in the pill game up here
8 in Spokane?

9 A Back west.

10 Q And who was he working with directly?

11 A Haynes and Tiny Menace. They grew up together.

12 Q Okay. And what are they -- what are they talking about
13 right there with YA?

14 A He had pills down in Los Angeles that he wanted to
15 piggyback up here to Spokane. So he wanted to see if he could
16 send it with -- when TS sends his package, he wants to get in
17 and so he -- so he can get it up here with him.

18 Q So is that kind of that thing you were talking about in
19 sharing couriers?

20 A Yeah. That's -- that's how you piggyback. Try to catch it
21 before it comes out this way.

22 Q And, given the number of times couriers were coming up,
23 could you piggyback often?

24 A Yes. Depends on who's actually coming. It's the -- it's
25 the timing process. If you -- if you -- if you were into, I

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 guess, that -- the people that you was dealing with, then, yes,
2 you could actually come up. Like, if Black Bone and TS has
3 something coming, myself, or Carmen, whoever, and just say,
4 "Hey, look, can I -- you know. And I'll pay -- I'll pay for
5 half of, you know, the -- the fee."

6 Q Did you have to be working with that person or that group
7 in order to piggyback?

8 A No. You -- not necessarily. But you had to have some type
9 of common, like, understanding.

10 Q Okay.

11 (Exhibit No. 2-21 continued)

12 Q (BY MS. VAN MARTER) What are Hydros?

13 A Different names that we give to --

14 (Interruption)

15 Q (BY MS. VAN MARTER) I'm sorry about that. Please
16 continue?

17 A Yes. Different names that we give to the pills in
18 reference to, like, a slang name for, like, Narcos, Hydros,
19 bananas, other pills that were being asked for while we were up
20 here.

21 MS. VAN MARTER: Okay. All right. We'll move on to
22 Government's 2-25, call session 1858. 2-25, call session 1858
23 on Target Telephone 2, August 27th, 2012.

24 (Exhibit No. 2-25 was played)

25 Q (BY MS. VAN MARTER) I'm going to stop there. And who's in

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 this call?

2 A That would be James and Haynes.

3 Q Okay. And he told Boy again. Who is Boy?

4 A School Boy.

5 (Exhibit No. 2-25 continued)

6 Q (BY MS. VAN MARTER) Okay. All right. So YD. Who is YD
7 again?

8 A Glen Turner.

9 Q Okay. And who are they -- do you know who they're talking
10 about coming up on Greyhound?

11 A Young Ant and Baby Sodi.

12 Q Okay. And who's Young Ant?

13 A Maurice.

14 Q Okay. And what was Haynes talking about when he said, my
15 house is full, my manager be trippin'?

16 A The house that they're staying at on Lacey is full. And he
17 just, you know, basically saying, like, the manager trippin'
18 because of the people in and out.

19 Q So do you know if they were able to find other locations
20 for individuals coming up then?

21 A Yes.

22 Q And do you know where those locations were?

23 A No, not all of them.

24 (Exhibit No. 2-25 continued)

25 Q (BY MS. VAN MARTER) Okay. What does that mean: Gave 'em

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 \$300 and told him to trey safe?

2 A Yeah, \$300 and, you know, do his thing.

3 Q Was it \$300 in money?

4 A Yes. Cash.

5 Q Okay. And that was for the people that -- who was that
6 for?

7 A That was for Baby Sodi.

8 Q He wanted to come up and get in the game?

9 A Yes.

10 (Exhibit No. 2-25 continued)

11 Q (BY MS. VAN MARTER) Do you know who they're talking about
12 there?

13 A This -- one of TS's friends, like, chunky, fat white --
14 white lady. Girl.

15 Q What were they using her for?

16 A To get houses, spots.

17 Q So was Tiny Menace talking about a new spot he might have
18 found?

19 A Yes.

20 (Exhibit No. 2-25 continued)

21 Q (BY MS. VAN MARTER) What's a green dot?

22 A Money that -- it's basically like a credit card you put
23 money on. And you can -- it's, like, you can use it to transfer
24 money.

25 Q Do you know if green dots were used during the course of

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 the pill hustle up here?

2 A Yes.

3 Q And how so?

4 A Because it was easy to put the money on the green dot. You
5 don't have the cash on you. So you -- you come back to LA. You
6 just have a credit card or a green dot card.

7 Q And who would -- who would the green dots be used for the
8 most?

9 A The -- the most? Like, prison. Like for homies that --

10 Q No, I mean in this case. How would --

11 A No, I mean like -- like -- like, sometimes, like, when
12 people call me and they need money in prison, I'll just put it
13 on a green dot for them.

14 But, in this case, it's, like, instead of going through the
15 banks, instead of using couriers, or whatever, you put it on a
16 green dot. And you can just pay your bills or pay the person
17 with the green dot. Untraceable.

18 Q Another way to hide the cash.

19 A Yes.

20 (Exhibit No. 2-25 continued)

21 Q (BY MS. VAN MARTER) Okay. So -- I'm going to play the
22 rest of that.

23 (Exhibit No. 2-25 continued)

24 Q (BY MS. VAN MARTER) When they're talking about it being
25 slow, I'm staying in the house all day, what are they talking

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 about?

2 A Pills. The -- everything slowed up for one reason or
3 another.

4 Q Okay. And he's talking about it's the end of the month and
5 everybody's gone.

6 A Everybody's back in LA.

7 Q And, again, YA? "Where YA at?" Who's he talking about?

8 A Young Ant. Maurice.

9 Q Okay. And what's he making reference to?

10 A Where they -- where YA is staying and if they can be with
11 him.

12 Q Were they all staying -- was that a location they were all
13 staying at?

14 A Some. Some of the homies.

15 Q Okay.

16 (Exhibit No. 2-25 continued)

17 Q (BY MS. VAN MARTER) Do you know what they're talking
18 about, about getting a car bought?

19 A Yes.

20 Q What's that?

21 A So you can get around and -- because they have one car that
22 was used -- everybody was using the same car.

23 Q And so what does it mean if you were able to get a car
24 bought for you?

25 A You -- you in the game. You -- now you can get around and

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 make your own fades.

2 Q Okay. It was cutting out there a little bit. See if we
3 can get it going again.

4 (Exhibit No. 2-25 continued)

5 Q (BY MS. VAN MARTER) Who's Paco?

6 A Donta Blackmon.

7 Q And do you know who he's talking about "Cubby"?

8 A No.

9 Q And what is the reference "ignore partners out here."
10 What's that mean? Do you know?

11 A North. North side homies.

12 (Exhibit No. 2-25 continued)

13 Q (BY MS. VAN MARTER) What do you mean "hittin' these
14 corners"? What does that mean?

15 A Moving around, selling pills, making money.

16 (Exhibit No. 2-25 continued)

17 Q (BY MS. VAN MARTER) Okay. Again. Who's Big Dog?

18 A Myself.

19 Q And what are they talking about there?

20 A 18,000.

21 Q Why do you say "he gave him too much"?

22 A They -- I guess they say I wasn't supposed to get the 18.

23 (Exhibit No. 2-25 continued)

24 Q (BY MS. VAN MARTER) Why are they -- why are they laughing
25 at "flip your bread 'bout 5 times"? What does that mean?

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 A They give you a window on which they should be able to get
2 your money back to you. But a lot of times what they'll do is
3 they'll make your money -- get your money back down to LA, buy
4 some pills, get it back up here. And, by the time that -- that
5 time limit on when you're supposed to get your money, they made
6 three, four, five times what they were supposed to make and just
7 give you your money back, which you're supposed to get.

8 (Exhibit No. 2-25 continued)

9 Q (BY MS. VAN MARTER) What are they talking about there?

10 A Where -- give you five -- you pay for five and get fronted
11 five.

12 Q Five what?

13 A Hundred pills.

14 (Exhibit No. 2-25 continued)

15 Q (BY MS. VAN MARTER) Who's he referring to when he talks
16 about Ball?

17 A Tiny Football.

18 Q And, again, that is?

19 A Lisbey.

20 (Exhibit No. 2-25 continued)

21 Q (BY MS. VAN MARTER) Okay. So what's he talking about a
22 heavy load right now?

23 A Big package. A large amount of pills.

24 Q And what does he need to clear up between Haynes and -- and
25 you?

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 A Finish the sale of the pills.

2 Q Okay.

3 (Exhibit No. 2-25 continued)

4 MS. VAN MARTER: All right.

5 THE COURT: While we pause, it was my tentative plan
6 to take our first break about ten o'clock and, then, the next
7 one around noon, each break about 20 minutes, unless anybody
8 feels that we need to break before ten o'clock. If so, let us
9 know. Otherwise, couple more calls and we'll have our recess.

10 MS. VAN MARTER: Yes, your Honor.

11 All right. The next call is Government's Exhibit 2-27,
12 call session 2008, Target Telephone 2, August 28, 2012. Call
13 session 2008, Target Telephone 2.

14 (Exhibit No. 2-27 continued)

15 Q (BY MS. VAN MARTER) Okay. For the record, again, who's on
16 this call?

17 A Myself and Haynes.

18 Q Okay. I'm going to back it up just a little bit.

19 (Exhibit No. 2-27 continued)

20 Q (BY MS. VAN MARTER) Okay. Who are you talking about when
21 you said "Half Breed"?

22 A Tiny Menace, James.

23 Q And why did you call him that?

24 A Because he's half black, half Mexican, half white. Half
25 Breed.

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 Q Okay.

2 (Exhibit No. 2-27 continued)

3 Q (BY MS. VAN MARTER) What were you talking about when they
4 were hanging real loose carelessly?

5 A Our homeboys hanging out when it's a possible war going on.

6 (Exhibit No. 2-27 continued)

7 Q (BY MS. VAN MARTER) What -- is there something going on in
8 the background?

9 A Yes. Yes. Haynes is making a fade transaction.

10 Q Do you know where Haynes was during this call or during
11 this time?

12 A Spokane.

13 (Exhibit No. 2-27 continued)

14 MS. VAN MARTER: Government's Exhibit 2-29, call
15 session 2269, Target Telephone 2, August 30th, 2012.

16 (Exhibit No. 2-29 was played)

17 MS. VAN MARTER: I'm going to back it up a little bit.
18 Every time the podium shakes I think it interrupts the feed. So
19 I'm trying --

20 (Exhibit No. 2-29 continued)

21 Q (BY MS. VAN MARTER) And who is in this call?

22 A Myself and Haynes.

23 (Exhibit No. 2-29 continued)

24 Q (BY MS. VAN MARTER) What's a "Nifty 50"?

25 A 50,000.

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 (Exhibit No. 2-29 continued)

2 Q (BY MS. VAN MARTER) Okay. When you said a "three pack,"
3 what's a three pack?

4 A Over 3,000 pills.

5 Q And how much was 3,000 pills?

6 A LA price or Spokane price?

7 Q Let's start with LA price.

8 A 3,000 would be 33,000.

9 Q And why is there a difference between LA price and Spokane
10 price?

11 A Because in LA we get them for much cheaper. Almost half of
12 what they sell for out here sometimes. It can be one-and-a-half
13 more sold -- selling price out here.

14 Q So, when you were getting a three pack, what -- what would
15 you have to pay for that three pack?

16 A If you was getting a three pack from myself, normally it
17 would be -- really, it's -- it's actually 3,500. So it would be
18 1750 being paid for, which is 21,000; and, then, that's being
19 bought and that's yours. And, then, the consignment part of
20 being mine would be sent back of the other 1750.

21 Q Okay. So there's a lot of numbers right there.

22 A Yes.

23 Q So you said, "35." 35 what and how much?

24 A Hundred pills.

25 Q 3,500 pills.

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 A Yes.

2 Q And you said, "consignment." Is this that halves you were
3 talking about?

4 A Right. Half and half. Like, out of the 3,500, 1750 is
5 paid for upfront and, then, the other 1750 will be -- the money
6 will be made off of it and the profit and that money that they
7 use to get purchase will be sent back. So you would get,
8 basically, like, 35. Between 35 and -- depending on what
9 expenses are being paid because sometimes we -- we -- somebody's
10 expenses would be tacked on. So you'll get money that you paid
11 on a previous -- you get it back on the next one.

12 Q Okay. So, when you said, "40, got 42" --

13 A 42.

14 Q -- what's that in reference to?

15 A "42" is in reference to what was being paid for the pills.

16 Q So 42 what?

17 A Thousand.

18 Q So how many -- how much were you selling pills in Spokane
19 for?

20 A Twenty plus.

21 Q Twenty --

22 A Dollars per pill plus.

23 Q So how much profit would be made off of 3,500 pills? How
24 much -- how much is that worth in Spokane?

25 A In Los Angeles, they go between 11 and -- at one time, it

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 was 10 and 12. It went from \$11 to \$13 in Los Angeles. And, in
2 Spokane, it goes from \$20 to \$30 per pill.

3 Q So, when you're talking about going on halves and getting
4 your profit back, are you getting some profit from the elevated
5 sale of those pills is what --

6 A Yes.

7 Q And you said you -- you're also accounting for costs.

8 A Yes.

9 Q What kind of costs?

10 A Ticket for the airline, hotel costs, food, board.

11 Q For -- for who?

12 A For whoever's coming up. Courier.

13 Q And, when you say, "we," "we would put the pills in; we
14 would get the profit," who are you talking about?

15 A Who's ever is on the receiving end. It could be myself,
16 TS, TM, School Boy, Nino.

17 (Exhibit No. 2-29 continued)

18 Q (BY MS. VAN MARTER) So is counting for moneys owed and
19 pills sent part of the business?

20 A Yes. And normally -- at this time, a number of -- that
21 he's paying 42 for a 3 pack, that meant that he has actually
22 purchased the whole 3,500; and, then, I would be able to send up
23 3,500.

24 Q And that's what that call meant.

25 A Yes.

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 Q And that's one shipment?

2 A One shipment.

3 MS. VAN MARTER: Okay. Let's go to Government's
4 Exhibit 2-56, call session 4869 on Target Telephone 2,
5 September 25th, 2012.

6 (Exhibit No. 2-56 was played)

7 Q (BY MS. VAN MARTER) Okay. So who's in this call?

8 A Myself and Haynes.

9 Q Okay.

10 (Exhibit No. 2-56 continued)

11 Q (BY MS. VAN MARTER) I'm going to stop it there for a
12 second. Again, there's a reference here to "42"?

13 A Yes.

14 Q And what's that?

15 A For 3,500 pills.

16 Q And that's -- 42 is what number?

17 A \$42,000.

18 Q And this call happens in September, the end of September.

19 A Yes.

20 Q So are you still moving that quantity of pills on a regular
21 basis?

22 A Yes.

23 Q And I think you made a reference to "Nifty" again?

24 A Yeah, 50,000.

25 Q Okay.

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 (Exhibit No. 2-56 continued)

2 MS. VAN MARTER: Sorry. I'll back it up again. That
3 feed is getting interrupted again.

4 (Exhibit No. 2-56 continued)

5 Q (BY MS. VAN MARTER) Okay. When you said, "35" -- "It's
6 35, 35," what are you talking about there?

7 A 3500, 3500. 3500 for him, 3500 for myself.

8 Q 3500 what?

9 A Pills.

10 Q So is that one shipment?

11 A Yes.

12 Q Of a total of how many pills?

13 A 7,000.

14 Q And how much -- how much money are we talking in profit off
15 of 7,000 pills in one shipment?

16 A On my end for the -- for the 3500, I get 70,000; and he
17 pays me 40 -- 42,000 for his 35. Total of \$112,000.

18 Q And, in a shipment like that, if 35 is you and 35 is
19 Haynes, is it just your two pills? Your --

20 A No. No.

21 Q So what does that mean?

22 A Sometimes the -- because there's so many people that want
23 in and it's -- you have to try to appease the masses so that
24 they don't get upset, so you go around and you grab from
25 different people that want to put in. And you make sure that

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 they -- they pills get brought up here along with yours. And,
2 then, once they get back to LA, you disburse the money to where
3 it's supposed to go.

4 Q So accounting becomes important?

5 A Important.

6 Q And who's responsible for making sure the pills get
7 disbursed to the right people in Spokane?

8 A Who's on the receiving end.

9 Q And who might that be?

10 A TS, TM, School Boy, Black Bone, Nino, whomever the package
11 is going to. Normally, when a package get here, I may not be
12 privy to who all of those pills go to because, just as well as I
13 collect down in Los Angeles, there's somebody up here that's
14 collecting from Spokane.

15 Q So just because part of that package might be going to one
16 of those individuals you said, might they have others who are
17 selling the pills for them?

18 A Yes.

19 THE COURT: Did you finish that call?

20 MS. VAN MARTER: Yeah, I think it just -- it just
21 hangs up after that.

22 THE COURT: All right. Our recess. Twenty minutes
23 this time. And enjoy your doughnuts, but don't talk about this
24 case. We'll see you in 20 minutes.

25 (Jury out at 10:02 a.m.)

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 (Court recessed at 10:03 a.m.)

2 (Jury in at 10:27 a.m.)

3 (Court reconvened at 10:28 a.m.)

4 THE COURT: Please be seated. And, Ms. Van Marter,
5 you may continue direct examination of Mr. Madison.

6 MS. VAN MARTER: Thank you, your Honor. We did switch
7 the audio feed to counsel table, your Honor, in hope that that
8 will change, maybe, some of that interrupted feed that we were
9 getting.

10 THE COURT: Good.

11 MS. VAN MARTER: Okay. So we're going to move to
12 Government's 2-57, Call No. 4891, Target Telephone 2,
13 September 26th, 2012.

14 (Exhibit 2-57 was played)

15 Q (BY MS. VAN MARTER) So, just for foundation, who's in that
16 call?

17 A Myself and Haynes.

18 Q Okay.

19 (Exhibit No. 2-57 continued)

20 Q (BY MS. VAN MARTER) Okay. So what are you talking about
21 in that call?

22 A Taking responsibility for him being the leader of his crew,
23 should I say.

24 Q And so what's he complaining about?

25 A That he had -- had to find a house, furnish it, and

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 everything; but nobody wants to help put the furniture,
2 utilities, bills, of that nature.

3 Q And what are you trying to explain to him?

4 A That, if he's gonna run things, that he needs to take the
5 initiative to get his on the back end, which is, for his time
6 that he takes to do all of this stuff and they just come in, you
7 know, give him a fee -- a come-in fee. So he get it on the back
8 end.

9 Q And give who a come-in fee?

10 A Whomever wants to live with him and sell pills.

11 (Exhibit No. 2-57 continued)

12 Q (BY MS. VAN MARTER) Okay. What are you talking about
13 there?

14 A The room number and, then, the amount of the pills: "35,
15 35," 3500, 3500. 7,000 in total.

16 Q Okay. And, then, the "90"? That would be a total of 92?
17 What's that in reference to?

18 A "92" would be the 42 plus 50.

19 Q Fifty what?

20 A Thousand dollars that is owed to me.

21 Q Okay.

22 (Exhibit No. 2-57 continued)

23 Q (BY MS. VAN MARTER) And what's the rest of that call
24 about?

25 A About, if it's a large number, then we would have to go use

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 the Greyhound; and that means you have to sit for, like, a
2 day-and-a-half.

3 Q Why a day-and-a-half?

4 A It's, like, a day and ten hours because you're on a
5 Greyhound.

6 Q And why would you have to go on Greyhound if it's large
7 enough?

8 A Because they don't check. They don't check like the
9 airport would.

10 Q They don't check what?

11 A Your luggage.

12 Q And, when you say, "it might be large," large what? . .

13 A Large amount of money. Like, over 90,000.

14 Q Okay.

15 MS. VAN MARTER: So, Counsel, this -- this particular
16 call and transcript is on a separate disk, Government's Exhibit
17 No. 55T.

18 THE COURT: 55-T?

19 MS. VAN MARTER: Yes. It's -- it was an addition at
20 the end of the exhibit, your Honor -- or end of the exhibit
21 list. It should be at the back of the binder.

22 MR. CHRISTIANSON: Is this still the same binder
23 exhibit?

24 MS. VAN MARTER: No, this is -- this is a separate one
25 we gave yesterday. Does he have it? Your Honor, may I approach

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

524

1 the witness?

2 THE COURT: You may.

3 (Discussion off the record)

4 MS. VAN MARTER: Counsel? All right. Okay. Go
5 ahead.

6 (Exhibit No. 55-T was played)

7 Q (BY MS. VAN MARTER) Just for the record, who's on this
8 call?

9 A Myself and Haynes.

10 Q Okay. Please continue.

11 (Exhibit No. 55-T continued)

12 Q (BY MS. VAN MARTER) Okay. So do you know what Haynes is
13 talking about here?

14 A Yes.

15 Q What?

16 A He lost a large amount of money in the airport.

17 Q And do you know who was transporting that money for him?

18 A I think it was Erika.

19 Q And do you know how much money he lost?

20 A Over a hundred thousand.

21 Q So what's he asking you for?

22 A A care package in which he doesn't have to pay me right
23 away.

24 Q So what does it mean when he doesn't want to have to go
25 into the dirt?

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 A No dig his money up that he buried for a rainy day or just
2 to keep safe.

3 Q Was that common in this case where --

4 A Yes.

5 Q Would other individuals bury money?

6 A Yes.

7 Q Do you know who else?

8 A School Boy.

9 Q Do you know how much money they would bury?

10 A Over a hundred thousand at a time.

11 Q Do you know where they would bury it?

12 A No. That's -- that's something you don't throw around.

13 Q So, in this particular case when he's making reference to
14 not having to go into the dirt, what does he want you to do?

15 A To prevent for him to dig his money up, he wants me to
16 front him some pills.

17 (Exhibit No. 55-T continued)

18 Q (BY MS. VAN MARTER) Okay. There's cutting out there. Did
19 you know what you were talking about right there?

20 A Yes.

21 Q And what are you talking about?

22 A Once I found out he took a large hit, I asked around trying
23 to find him some more pills before he would bombard me with
24 asking so I would be ready for him.

25 Q And earlier in the call when he said he needed two days --

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 two days. Do you recall that part of the call?

2 A Yes.

3 Q And what's he talking about there?

4 A Two days to sell the pills that I had just sent him, which
5 was 35 and 35.

6 Q So --

7 A 3500 pills and 3500 pills, 7,000 pills.

8 Q And how many days did he need to sell that?

9 A Two days.

10 (Exhibit No. 55-T continued)

11 Q (BY MS. VAN MARTER) And towards the end of that
12 conversation, how many days did Mr. Haynes indicate it would
13 take him to catch up that loss?

14 A Total, like, four. Four days. Two days to do what he
15 already had and two days after that.

16 Q So, to make up the money that was taken, it would take a
17 total of four days? Is that right?

18 A No, two days.

19 Q Two days. All right.

20 MS. VAN MARTER: Let's go to Call No. 6928, Government
21 Exhibit 2-99 --

22 (Noise Interruption)

23 MS. VAN MARTER: -- on Target Telephone 2, for the
24 record, October 12, 2012. Okay.

25 (Exhibit No. 2-99 was played)

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 Q (BY MS. VAN MARTER) Okay. And, for the record,
2 Mr. Madison, who's on this call?

3 A Haynes and Colbert, TS and Black Bone.

4 (Exhibit No. 2-99 continued)

5 MS. VAN MARTER: Your Honor, we're going to try and
6 work on that feed because it keeps bumping in and out real
7 quick.

8 (Pause in the proceedings)

9 MS. VAN MARTER: I apologize for the brief delay.

10 THE COURT: That's okay.

11 (Pause in the proceedings)

12 (Exhibit No. 2-99 continued)

13 MS. VAN MARTER: Okay. So can you back it up just a
14 little bit, please? All right. I think we might have hopefully
15 resolved the issue.

16 (Exhibit No. 2-99 continued)

17 Q (BY MS. VAN MARTER) What does it mean "everybody slid" out
18 and "out working"?

19 A In the street out -- out selling pills.

20 Q And do you know where Haynes is during this call?

21 A On Lacey Street.

22 Q In Spokane?

23 A In Spokane.

24 (Exhibit No. 2-99 continued)

25 Q (BY MS. VAN MARTER) "Go to the auction" with you. Do you

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 know what he was talking about?

2 A Yeah. Sometimes we have a person that purchase cars for
3 us, Juney. And he'll go to the auction, and we will -- because
4 he has a dealer's license. And he'll get cars for us.

5 Q And, when you say "we," who would use Juney to purchase
6 cars?

7 A Myself, Carmen, Haynes, Menace, Tiny Football, a variety of
8 people. School Girl.

9 Q Do you know, during the time of this pill hustle when this
10 was going on, do you know what kind of cars Carmen had purchased
11 from Juney?

12 A A Porsche truck. Porsche truck and I think an Escalade,
13 Navigator, something of that nature.

14 Q And, do you know, was he the only one that drove that
15 Porsche truck?

16 A No.

17 Q Do you know what happened to that Porsche?

18 A He sold it to Menace.

19 Q And, do you know, did they change the truck in any way?
20 The Porsche?

21 A He bought it when it was gray, and he painted it wine --
22 metal flick wine color, put rims on it, new -- you know.

23 Q Do you know if they ever stored anything relative to the
24 pill game in that car?

25 A Weapons. Other than pills?

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 Q Do you know if they had a particular place that they would
2 store things in that car?

3 A He had a stash built in.

4 Q He had a stash built in?

5 A Yeah.

6 Q What's a "stash"?

7 A Where you could put money, pills, gun, and not have the
8 police find it.

9 Q Okay.

10 (Exhibit No. 2-99 continued)

11 Q (BY MS. VAN MARTER) Who are -- who are they talking about
12 there?

13 A School Boy.

14 Q And what are they talking about?

15 A He didn't come through with the pills.

16 Q So what does it mean "we still got that package"?

17 A That money.

18 Q Okay.

19 (Exhibit No. 2-99 continued)

20 Q (BY MS. VAN MARTER) How much did they give him?

21 A 60, 8500.

22 Q And 60 --

23 A 6,000 or 8500.

24 (Exhibit No. 2-99 continued)

25 Q (BY MS. VAN MARTER) Who are they talking about?

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 A School Boy.

2 Q So what are they talking about?

3 A Him lying, saying that he gonna look out for them, but,
4 basically, he shoot 'em to the left. Like, don't come through.

5 Q And what does that mean with respect to the pill game that
6 was going on up here?

7 A Something that you -- you don't want to get in the habit of
8 doing.

9 Q Why not?

10 A People won't respect you, respect your hustle.

11 Q Did that mean that Boy didn't have pills?

12 A .. No. That just meant that he -- for whatever reason, he
13 don't want to give Black Bone any pills. It could be only --

14 Q No, I don't want you to speculate.

15 A No.

16 Q But, on that occasion, that's what they're talking about.

17 A Yeah.

18 Q All right.

19 (Exhibit No. 2-99 continued)

20 Q (BY MS. VAN MARTER) Who are they talking about there?

21 A School Boy.

22 Q And what's the reference to "8, \$8"?

23 A \$8 or \$9 per pill, which is exceptionally low.

24 Q And so why is that significant?

25 A Because we're paying between 11 and 13 and \$8 is a -- like,

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 you'd have to have a real plug for \$8.

2 Q And, so, when Haynes says, "just let me buy my own beans,"
3 what's he talking about when he's talking about School Boy?

4 A His own pills.

5 (Exhibit No. 2-99 continued)

6 Q (BY MS. VAN MARTER) What are they talking about there?

7 A The people that have access to people on the street that's
8 in prison. He would take their money and grab pills and then
9 sell their pills for them, give them theirs. And, then,
10 whatever he gets from the people that's on the street, he would
11 just parlay -- meaning, like, put them on hold -- while he take
12 care of the people that's in prison.

13 Q All right. Who is "he"?

14 A School Boy.

15 Q So why is Haynes reacting the way he is to that?

16 A Because we're on the street and they're in jail and it's --
17 he feel as though that he puttin' the people in prison before
18 himself when he -- when he needs them.

19 Q Before the -- before who? "Putting the people in prison
20 before" who?

21 A Before himself, Haynes. And Black Bone.

22 Q What about the other people -- other -- rest of the crew
23 that's up here selling pills?

24 A He do everybody how he feel. If he want to put you on a
25 back burner, that's where you go.

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 Q Okay.

2 (Exhibit No. 2-99 continued)

3 Q (BY MS. VAN MARTER) Okay. Do you know who Terrai is?

4 A That's Haynes's girlfriend.

5 Q Did Haynes have other females work for him like we
6 previously discussed with Carmen?

7 A Yes.

8 Q And do you know how many females?

9 A Several.

10 Q Did he use them the same way that Carmen did?

11 A Yes.

12 Q And, so, what role did Terrai play?

13 A Same. Courier/take care of the money aspect, make sure the
14 money was situated right.

15 Q So how come they have the same structure where they're
16 using girls for the same thing?

17 A That's how it was designed. That's -- that's how we were
18 schooled by School Boy to utilize the couriers the best.

19 Q So -- so use the females rather than members of the Eight
20 Trey that were coming up to sell?

21 A Right.

22 Q Why?

23 A Some -- some of our homegirls we did use occasionally. But
24 people that had no gang ties, if stopped, then they wouldn't be
25 so quick to be searched and to be harassed.

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 Q And whose idea was it to utilize the girls in this fashion?

2 A School Boy and Nino.

3 (Exhibit No. 2-99 continued)

4 Q (BY MS. VAN MARTER) What are they talking about changing
5 up colors?

6 A Colors of the socks.

7 Q And what about the socks?

8 A Normally we have white socks in a bag that you -- they're
9 resealable. So you can put the money inside the socks and,
10 then, reseal it, and it doesn't look like it's open.

11 Q And how much money would come back in the socks?

12 A Depends.

13 Q So, in this particular call, I think he's talking about 50
14 and then asked how many packages. So how much are they talking
15 about there?

16 A Normally depends on if he using big bills or little bills.
17 The denomination is -- is how you can know how many bundles.
18 But he using big bills, which is 100s and 50s, then he may only
19 have to send back one bundle or two bundles of socks, which
20 is -- it's 8 to 10 pairs of socks in each bundle. And you would
21 insert them in the foot, fold them, put them back.

22 Q And how much would go in each pair of socks? How much
23 money?

24 A Depends. It could be anywhere from 5 to 10,000 in each
25 sock. Depends on, like I said, the amount that -- the dollar

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 amount of currency. Like -- like I said, hundreds or -- is
2 more -- even the denomination is higher so you get more hundreds
3 in one sock. But, if you got 5s, 10s, and 20s, you have to
4 break them down and kind of formulate a system so they stay
5 thin.

6 Q Have you ever heard the term "rack"?

7 A Racks is -- one rack would be \$1,000.

8 (Exhibit No. 2-99 continued)

9 Q (BY MS. VAN MARTER) And sending the money back down in
10 socks. Who came up with that system?

11 A Nino.

12 Q And did -- do you know if everybody used it?

13 A It was adapt -- it was adopted for the use of -- so we
14 wouldn't get caught.

15 Q And do you know who adopted it?

16 A All of us. School Boy, Tiny Menace, Football, Haynes,
17 Black Bone.

18 MS. VAN MARTER: Okay. Moving on to Government's
19 Exhibit 5-12, Target Telephone 5, Call No. 2508, October 1st,
20 2012.

21 (Exhibit No. 5-12 was played)

22 MS. VAN MARTER: Excuse me, your Honor. Got a little
23 confusion going on. The numbering system's a little off. All
24 right?

25 (Exhibit No. 5-12 was played)

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 Q (BY MS. VAN MARTER) Do you recognize the voices in this
2 call?

3 A Yes.

4 Q And who is this?

5 A Carmen and Haynes.

6 Q Okay.

7 (Exhibit No. 5-12 continued)

8 Q (BY MS. VAN MARTER) Okay. So what are they talking about
9 there?

10 A Took a loss of 100 -- over \$100,000.

11 Q And is this the loss that you previously testified to?

12 A Yes.

13 Q And who took the loss?

14 A TS.

15 Q And who's he -- what's he talking to Carmen about?

16 A The loss that he took for over 100 and the loss that he
17 just took for 25,000.

18 (Exhibit No. 5-12 continued)

19 Q (BY MS. VAN MARTER) Who's Daisy?

20 A School Boy's girlfriend.

21 Q And where's Daisy from?

22 A Los Angeles.

23 Q Do you know if Daisy helped Carmen out in the pill game?

24 A Not to my understanding.

25 Q Do you know if they lived together or had a location or

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 apartment anywhere?

2 A Yes, in Glendale.

3 Q And who was -- whose apartment was that -- whose name was
4 that apartment in? Excuse me.

5 A Mercedes.

6 (Exhibit No. 5-12 continued)

7 Q (BY MS. VAN MARTER) What are they talking about in that
8 part of the call?

9 A About Ant having his own spot out here in Spokane.

10 Q And, earlier in the call there, he's talking about getting
11 his own place; and there's reference to "Ant and "Ball." Again,
12 who is "Ant"?

13 A Young Ant and Tiny Ball. Lisbey.

14 Q And what are they concerned about? What are they talking
15 about about fades coming to the house?

16 A That's a no-no where you have the people that's buying
17 pills come to your residence or where you lay your head.

18 (Exhibit No. 5-12 continued)

19 Q (BY MS. VAN MARTER) What's he talking about there?

20 A Civilians that got license that don't have a record.

21 Q And why is that important?

22 A You don't want them stopped. And normally a person with no
23 record would be -- you can overlook them. They look common.
24 Taxpayers. They got license. They're not going to be hassled.

25 Q And who's talking about that?

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 A School Boy.

2 Q And, again, is this all part of the things that you all
3 talked about --

4 A Yes.

5 Q -- in order to get beans up and money down without getting
6 caught?

7 A Yes.

8 Q And, when he says, "you wanna make a rack? Go do this,"
9 what does that mean?

10 A If you proposition 'em with givin' 'em money in change for,
11 maybe, "Hey, I need you to go see one of my buddies. Don't
12 worry about it. Pack a suitcase. I gotch you. He give you a
13 rack." When you come back, you're not knowing that you -- you
14 may be trafficking pills because it's done to where you don't
15 under -- you don't know. You may be going up there to look
16 for -- he -- you know, like, "I need you to go out here in
17 Spokane to find a house." You go out there thinking you find a
18 house, but you're really trafficking pills. When you come back,
19 you got socks and everything else in your luggage. You don't
20 see the money. So you just think it's some socks and you come
21 back with the money.

22 Q And why isn't School Boy moving the pills and money
23 himself?

24 A He has a record. He's going to be stopped at any given
25 time.

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER.

1 Q And he doesn't want to get caught with it?

2 A No.

3 Q All right.

4 (Exhibit No. 5-12 continued)

5 Q (BY MS. VAN MARTER) All right. So, when he says: I'm
6 gonna grab whatever I can. Whatever bread you got, give it to
7 bro; and I'll work it out. What is he talking about?

8 A Give it to myself so that he can meet up with me and we can
9 go from there to getting whatever he need.

10 Q Who can meet up with who?

11 A I can meet up with School Boy when he gets to LA.

12 Q And why would that be?

13 A So that he can get some pills back up there to Haynes, TS.

14 Q And why didn't he want anybody to know he was going to be
15 in the LA area?

16 A He's -- sometimes he's secretive. He don't want people to
17 know his locations so he -- he'll say that he's here, but he's
18 not there. He be somewhere else. And then he can watch as you
19 pull up.

20 Q So why would he trust Haynes to tell him that?

21 A 'Cuz they're really tight. They're -- they became good
22 friends. Best friends.

23 Q And how did they become such good friends?

24 A Selling pills.

25 Q Because, early on, who was the one that sent Haynes up to

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 Spokane?

2 A I did.

3 Q So, from that process, they got tight.

4 A Yes.

5 (Exhibit No. 5-12 continued)

6 Q (BY MS. VAN MARTER) And, at the end of some calls, they
7 make a reference or they say, "Movin'." What does that mean?

8 A Oh, that's how we -- instead of saying, "Good bye," we use
9 our own gesture as "Movin'" or "Treys up," meaning, you know,
10 "See you later."

11 Or sometime it may be in reference to "That's a good
12 lookin' out," like, "Oh, that's movin'."

13 MS. VAN MARTER: Moving on to Government's
14 Exhibit 5-13, for the record Target Telephone 5, call session
15 2987 on October 3rd, 2012.

16 (Exhibit No. 5-13 was played)

17 Q (BY MS. VAN MARTER) Do you recognize those voices,
18 Mr. Madison?

19 A Yes.

20 Q And who are they?

21 A School Boy and Football.

22 Q And, again, Football's name is?

23 A Lisbey and Carmen.

24 Q Okay.

25 (Exhibit 5-13 continued)

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 Q (BY MS. VAN MARTER) All right. So what are they talking
2 about in this call?

3 A That he -- he come into the neighborhood, to our set,
4 meaning our -- our neighborhood, and he stop by Ant house.
5 Young Ant.

6 Q And who, again, is Young Ant?

7 A Maurice.

8 Q And, again, Maurice involved in the pill game up here in
9 Spokane?

10 A Yes.

11 Q And, again, what side was Maurice from?

12 A North side.

13 Q And, so, you previously talked about how Lisbey was the
14 leader of the north side set?

15 A Yes.

16 Q So is this that crew that he was talking about?

17 A Pretty much including a few others.

18 Q And, again, who were those others?

19 A North Side Gray, Baby Nutty, Young Moe, Chico, a few others
20 that -- that's not part of the indictment.

21 Q Okay. And Chico is who again?

22 A Tones.

23 Q And why is it that Carmen would want YA to call him?

24 A They got business.

25 Q And what's the business?

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 A I don't know. He -- I couldn't say because I'll be
2 speculating at that point.

3 Q They certainly were talking to each other.

4 A Yes.

5 Q All right.

6 MS. VAN MARTER: All right. Let's go to
7 Government's 5-15, Call No. 3465, Target Telephone 5.

8 (Exhibit No. 5-15 played)

9 Q (BY MS. VAN MARTER) Do you recognize those voices?

10 A Yes.

11 Q And who are they?

12 A Mercedes and School Boy.

13 Q Okay.

14 (Exhibit No. 5-15 continued)

15 Q (BY MS. VAN MARTER) So what are they talking about?

16 A iPhone and like what the Government uses to track
17 individuals especially if you been incarcerated.

18 Q Was Carmen paranoid like that?

19 A Yes.

20 MR. NOLLETTE: Objection, your Honor.

21 (Interruption by the reporter)

22 THE COURT: Sustained.

23 Q (BY MS. VAN MARTER) Did -- was Carmen ever concerned about
24 the police?

25 A Yes.

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 Q How do you know that?

2 A Because we talked about it. Changing phones as far as them
3 following us and different things of that nature in our
4 neighborhood.

5 Q Would he ever change his behavior because of that?

6 A Yes.

7 Q How so?

8 A Change his phone. We wouldn't be able to contact him.
9 Change his car, clothes he wear. Just change up to the -- out
10 of the norm.

11 (Exhibit No. 5-15 continued)

12 MS. VAN MARTER: Sorry about that.

13 (Exhibit No. 5-15 continued)

14 MS. VAN MARTER: That call goes on for a couple more
15 pages. We're going to stop there if there's nothing. I think
16 they're just talking about other stuff.

17 All right. Let's go to Government Exhibit 6-8, Call
18 No. 208 on Target Telephone 6, November 4th, 2012.

19 Q (BY MS. VAN MARTER) Previously in one of the calls, there
20 was reference to Fat Boy. Do you know who Fat Boy is,
21 Mr. Madison?

22 A Perry -- Princeton.

23 Q And did he have a street name?

24 A Blue Stone.

25 MR. CHRISTIANSON: Could I inquire again what -- what

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 number we're going to?

2 MS. VAN MARTER: 6-8.

3 MR. CHRISTIANSON: Thank you.

4 MS. VAN MARTER: Target Telephone 6, No. 208.

5 Q (BY MS. VAN MARTER) And who is Mr. Perry?

6 A He's one of the homies but not like an active member.

7 Q What does that mean?

8 A He -- he has a job. He drives school buses. He hang out,
9 participate, you know, at his leisure.

10 Q And did he get involved in the pill hustle?

11 A Yes.

12 Q How did he get involved?

13 A TS, Haynes, let him come up once and told him he couldn't
14 come back.

15 Q Why not?

16 A Because he wanted -- that's TS's cousin, and he didn't want
17 him involved.

18 Q Do you know if Mr. Perry came back?

19 A Yes.

20 Q And how do you know this?

21 A He came back on his own. Talked to him. Seen him.

22 Q And who did he come back with if he wasn't going to work
23 with Haynes?

24 A Tiny Football. Lisbey.

25 Q Mr. Lisbey?

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 A Yes, Mr. Lisbey.

2 Q Excuse me. And was there any fallback because of that? If
3 -- if Haynes said he couldn't come up and then he came up and
4 worked with Tiny Football, what happened?

5 A Then he's basically on his own.

6 (Exhibit No. 6-8 played)

7 Q (BY MS. VAN MARTER) Do you recognize those voices?

8 A Yes.

9 Q And who are they?

10 A Princeton and Tiny Football. Lisbey.

11 (Exhibit No. 6-8 continued)

12 Q (BY MS. VAN MARTER) Okay.. And who -- who are they talking
13 about?

14 A Young Ant, Chico, Menace, and T Crazy.

15 Q And where are they?

16 A At the house on Lacey.

17 Q And there's -- on the transcript, there's a cross out with
18 a -- with a handwritten name.

19 A Chico.

20 Q Who did that?

21 A I did.

22 Q And why did you do that?

23 A We call him "Cheek" for short, but it's Chico, Young Chico.

24 Q And -- and, again, who is Chico?

25 A A young homie from Eight Trey.

545

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 Q And do you know his name? Just for the record, we have
2 to --

3 A Tones.

4 Q And who is T Crazy again?

5 A Bobby Wines.

6 Q And who is YA again?

7 A Maurice.

8 Q And, then again, Menace?

9 A Alex James.

10 Q Okay.

11 (Exhibit No. 6-8 continued)

12 MS. VAN MARTER: All right. And Government's Exhibit
13 No. 6-10, Target Telephone 6, Call No. 685 on November 11th,
14 2012.

15 (Exhibit No. 6-10 was played)

16 Q (BY MS. VAN MARTER) Okay. And do you recognize the voices
17 on there?

18 A Yes.

19 Q And who are they?

20 A Tiny Football, Lisbey, and T Crazy. Bobby Wines.

21 Q And is that a person you referred to from the last call?

22 A Yes.

23 | Q Okay.

24 (Exhibit No. 6-10 continued)

25 Q (BY MS. VAN MARTER) Okay. Who are they talking about when

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 they say, "SG"?

2 A School Girl.

3 Q Okay.

4 (Exhibit No. 6-10 continued)

5 Q (BY MS. VAN MARTER) "Ask Princeton. Ask Prince." Who's
6 that?

7 A Princeton Perry.

8 Q And is that the person that was on the previous call?

9 A Yes.

10 Q Okay.

11 (Exhibit No. 6-10 continued)

12 Q (BY MS. VAN MARTER) Okay. So what's -- what's Mr. Lisbey
13 talking about when his phone's "still boomin'?"

14 A Meaning -- that is the fades still calling to get pills.

15 Q Okay. And, again, "Chico" is a reference to who?

16 A Tones.

17 Q And what's he -- what's he worried about when he says don't
18 let them use his phone?

19 A Because people were stealin' other fades' numbers out of
20 the phones and using them for theirself and, then, that would
21 stop your money.

22 Q So was that becoming a problem?

23 A Yes.

24 Q And what was being done about it?

25 A You don't share phones.

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 Q So what does that mean, "sharing phones," in terms of the
2 pill game?

3 A Because you have a phone directly for the people here in
4 Spokane that buy pills. That's -- there's -- you don't mix the
5 numbers with people that's down there in LA to the people that's
6 here in Spokane because you want to leave that phone here and
7 not take it back to LA with you.

8 Q So why -- so you leave that phone here for what purpose?

9 A For some -- somebody that's in your circle to use to
10 continue to sell pills.

11 Q So you don't want to mix your Spokane phone with your
12 business phone from LA.

13 A No.

14 Q And, when you leave your phone in Spokane, what's the
15 expectation?

16 A That whoever got it will take care of it and make sure that
17 other people don't snatch numbers out of there and use it for
18 their own purpose.

19 Q Okay. So, if they're going to use a fade phone, they're
20 supposed to keep it to that fade phone.

21 A Yes.

22 (Exhibit No. 6-10 continued)

23 Q (BY MS. VAN MARTER) So, in this call, Lisbey makes
24 reference to Chico out takin' fades.

25 A Yes.

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 Q Why is that a problem?

2 MR. CHRISTIANSON: I'd object to the
3 characterization --

4 (Interruption by the reporter)

5 MR. CHRISTIANSON: Sorry. I would object to the
6 characterization, your Honor, of "Chico stealing fades." That's
7 not said in there.

8 THE COURT: Well, ask -- ask him like you have in the
9 past what that call means. The interpretation of that call.

10 MS. VAN MARTER: I'll strike that question.

11 Q (BY MS. VAN MARTER) What's the latter part of that call
12 mean?

13 A That he didn't want Young Chico to steal any fades or
14 anybody else that was in the house.

15 Q Are they from the same side?

16 A Yes.

17 Q So why couldn't he do that?

18 A He didn't get permission.

19 Q Why did he need to get permission first?

20 A Because that was the fades that was established through
21 Tiny Football's phone. So it's like he go out and he solicit
22 these people to buy, basically, exclusively from him but a lot
23 of them don't. They -- they say they are but they go other
24 places because they want to go to where the -- the pills are and
25 even if they can get a cheaper price. It don't matter if even

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 it's a dollar.

2 Q So what happens if you do get permission?

3 A Then you can use that phone.

4 Q Okay. Okay. So we are done playing calls. You can go
5 ahead and put those down. Okay.

6 So, aside from reviewing telephone calls, prior to that had
7 you met with myself and other members of law enforcement?

8 A Yes.

9 Q And do you know how many times we've all met?

10 A Numerous.

11 Q During those meetings, did you ever take notes?

12 A To -- of what we talked about? No.

13 Q Did you write notes down about what we talked about?

14 A No.

15 Q Did you ever write a report?

16 A No.

17 Q Have you ever read any reports about the meetings between
18 the Government and yourself?

19 A No.

20 Q At the end of this, we talked about some search warrants
21 that were executed. Were there any search warrants executed
22 relative to any of your residences?

23 A Yes.

24 Q And, Mr. Madison, we already talked about your use of
25 telephones.

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 A Yes.

2 Q You use more than one phone?

3 A Yes.

4 MS. VAN MARTER: Your Honor, permission to hand up
5 what's been marked as Government's Exhibit No. 14 for
6 identification to the witness.

7 THE COURT: Go ahead. Has 14 been admitted?

8 THE COURTROOM DEPUTY: Pardon me?

9 THE COURT: 14?

10 THE COURTROOM DEPUTY: I don't know.

11 Q (BY MS. VAN MARTER) Do you recognize that, Mr. Madison?

12 A Yes.

13 Q And how do you recognize it?

14 A My phone.

15 Q And was this a particular phone that you used often?

16 A Yes.

17 Q And did you have a phone book or contacts stored on that
18 phone?

19 A Yes.

20 MS. VAN MARTER: Your Honor, move to admit
21 Government's 14.

22 THE COURT: Any objections?

23 MR. HORMEL: No objection, your Honor.

24 THE COURT: All right. 14 --

25 MR. CHRISTIANSON: No objection, your Honor.

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 MR. NOLLETTE: I'm trying to locate it, your Honor.

2 It's in one of these books.

3 MS. VAN MARTER: It's a physical exhibit.

4 MR. NOLLETTE: Oh, it's one of those supplemental
5 ones?

6 MS. VAN MARTER: No, it's just a physical exhibit.

7 MR. NOLLETTE: Okay.

8 THE COURT: It's a telephone.

9 MR. NOLLETTE: No objection.

10 MR. LEE: No objection.

11 THE COURT: 14's admitted.

12 (Exhibit No. 14 admitted into evidence)

13 MS. VAN MARTER: Okay. And if I could please have the
14 control switched to the podium.

15 THE COURTROOM DEPUTY: Yes.

16 MS. VAN MARTER: Thank you. All right.

17 Q (BY MS. VAN MARTER) I'm now showing you what's been marked
18 for identification --

19 MS. VAN MARTER: And for the witness only, please.

20 Q (BY MS. VAN MARTER) -- as Government's Exhibit No. 14a.
21 Actually, you know what? I think it's probably better. I'm
22 going to hand this one up.

23 MS. VAN MARTER: Your Honor, may I approach?

24 THE COURT: You may.

25 Q (BY MS. VAN MARTER) Mr. Madison, if you could look through

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 those pages I've just handed up to you.

2 MS. VAN MARTER: This is on a disk provided to
3 counsel.

4 (Interruption by the reporter)

5 MS. VAN MARTER: He asked me if that exhibit was in
6 the book, and it was provided on a disk --

7 MR. NOLLETTE: Yes.

8 MS. VAN MARTER: -- with exhibit numbers.

9 Q (BY MS. VAN MARTER) And do you recognize anything in 14a,
10 Mr. Madison?

11 A Yes.

12 Q And what -- what do you recognize?

13 A The phone book.

14 Q And how do you recognize that as a phone book?

15 A By the numbers that was stored in my phone.

16 Q Was that your phone book?

17 A Yes.

18 Q From the phone that you just testified to?

19 A Yes. The small phone.

20 Q Okay. For instance, is there anybody that you've testified
21 to in the last couple of days -- is any of their names stored in
22 there in your phone book?

23 A Yes. YD.

24 Q Okay.

25 MS. VAN MARTER: United States would move to admit

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 Government's Exhibit 14a.

2 THE COURT: Mr. Hormel?

3 MR. HORMEL: Your Honor, it was provided to us on --

4 (Interruption by the reporter)

5 MR. HORMEL: Excuse me. I don't have any objection at
6 this point.

7 THE COURT: All right. Mr. Christianson?

8 MR. CHRISTIANSON: No objection.

9 MR. NOLLETTE: No objection.

10 MR. LEE: No objection.

11 THE COURT: 14a's admitted.

12 (Exhibit No. 14a admitted into evidence)

13 Q (BY MS. VAN MARTER) Okay. You can go ahead and set that
14 down.

15 MS. VAN MARTER: May I approach, your Honor?

16 THE COURT: You may.

17 THE COURTROOM DEPUTY: You might need to clear that.

18 The red.

19 MS. VAN MARTER: Oh, is it on mine?

20 (Discussion off the record)

21 THE COURTROOM DEPUTY: There.

22 Q (BY MS. VAN MARTER) Okay. So, when you said, "YD," could
23 you point to the reference in your phone book?

24 A Yes. (Witness complies)

25 Q And, again, who's that?

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/DI - VAN MARTER

1 A Glen Turner.

2 Q And does this phone book have all of your contacts that
3 you've testified to today?

4 A All my contacts?

5 Q Does this phone book contain all the contact -- the people
6 that you talked about today?

7 A Not all of them.

8 Q And did you have multiple phones?

9 A Yes.

10 Q Did we find all your phones?

11 A No.

12 Q Do you know what happened to those phones?

13 A I discarded some.

14 MS. VAN MARTER: Your Honor, if I could have a moment?

15 THE COURT: You may.

16 (Discussion off the record)

17 MS. VAN MARTER: Thank you, Mr. Madison. I don't have
18 any other questions right now.

19 THE COURT: This is a good time, then, to take our
20 second recess for 20 minutes. We'll come back at 12:15.

21 (Jury out at 11:57 a.m.)

22 (Court recessed at 11:57 a.m.)

23 (Jury in at 12:22 p.m.)

24 (Court reconvened at 12:22 p.m.)

25 THE COURT: Please be seated. Cross examine of --

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 examination of Mr. Madison ready to start?

2 MR. HORMEL: Yes, your Honor.

3 THE COURT: Mr. Hormel.

4

5 CROSS EXAMINATION

6 CROSS BY MR. HORMEL:

7 Q Good afternoon.

8 A Good afternoon.

9 Q What I'd like to do is I'd like to start and go back
10 through some of your background and area that you lived in and
11 ask a few more questions regarding your background. Is that
12 okay?

13 A Yes.

14 Q Okay.

15 MR. HORMEL: First of all, if we may publish to the
16 jury what's been admitted as Government's Exhibit 56. It's
17 published.

18 THE COURT: Go ahead.

19 Q (BY MR. HORMEL) Yesterday you described the area or the
20 neighborhood that you grew up in in Los Angeles, California; and
21 it was the area of the Eight Trey Gangster Crips. Correct?

22 A Yes.

23 Q And, surrounding your neighborhood that you grew up in --
24 and, if you have a hard time hearing me, would you let me know?

25 A Yes.

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 Q Surrounding the area that you grew up in are -- there's
2 other neighborhoods that have other gangs in them. Correct?

3 A Yes.

4 Q Could you describe some of the other gangs that are around
5 the Eight Trey Gangster Crip neighborhood?

6 A From which direction? North, south, east -- east, west?

7 Q Well, why don't we -- why don't we just start with the
8 south. And, if you would, just use your finger and point to it
9 on -- on the --

10 THE COURT: Do you have the top of the map up to the
11 north?

12 SPECIAL AGENT THOMAS SULLIVAN: Yes.

13 MR. HORMEL: Yes, thank you.

14 Q (BY MR. HORMEL) Yes. This south is where the green box
15 is.

16 A South would be, like, I want to say the Century. Century
17 side would be south. The Manchester side would be more -- is
18 north end Los Angeles. Like --

19 Q So is the map correct?

20 A Like, where Manchester is --

21 Q Yes.

22 A -- that's -- that would be -- between Manchester and
23 Century is where I grew up at. In that part of the
24 neighborhood. That would be, like, the back west.

25 Q So the back west side would be -- let's -- so you're

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 describing, now, the different sides within the Eight Trey
2 Gangster Crips?

3 A Yes.

4 Q Is that what you're doing?

5 A Yes.

6 Q Okay. Why don't we do that, then. Before -- before you
7 show us where those are, would you list the sides again because
8 I didn't list them all. And I know they've changed throughout
9 the years. Is that correct?

10 A Right. Yes.

11 Q Would you list those for me?

12 A West side.

13 Q Now, is this the original west side?

14 A Original west.

15 Q And, just to make it clear, I'm going to go through the
16 sides and, then, also, ask you to identify individuals that
17 belong to separate sides. But the original west side? Right?

18 A Yes.

19 Q Okay. And the next side?

20 A Would be the -- the back west.

21 Q Is the back west sort of a branch of the --

22 A Off -- off -- off the west side.

23 Q Off the west side. And that would be a branch of the
24 original west side.

25 A The branch of the original west.

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 Q Okay. And, then, the next side?

2 A Would the north side. Then we have the south side. Far

3 west. And there is another side, deep south; but we don't -- we

4 really don't use it.

5 Q You don't use the deep south?

6 A No.

7 Q Are there still individuals that consider themselves deep

8 south Eight Trey Gangster Crip gangsters?

9 A Yes. A few. Like, five, maybe.

10 Q So not many.

11 A Not many.

12 Q So, when you're talking about the far west side, you're

13 talking about a geographical area within the neighborhood of the

14 Eight Trey Gangster Crips that you described yesterday.

15 Correct?

16 A Correct.

17 Q Now, I'm hoping that my directions are okay; but would

18 this -- do you see this area here (indicating)?

19 A Yes. Florence.

20 Q Yes. Is that in the -- is that in the --

21 A Well, you have to -- you have to go over -- let's see.

22 Where -- no, to the -- go to the other side -- other way,

23 please. The other way. Yes. Okay. Okay. Gage to Florence.

24 Q Florence is there (indicating). Right?

25 A Yes, Florence is here; and Gage is here (indicating). And

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 that would be -- and from Western to Vermont.

2 Q Could you show where Western is, please. Do you need me to
3 zoom it in a little bit?

4 A Yes. You have to move the screen to your left. Other
5 left. Other way. Yes.

6 Q Other left?

7 A Yes. Other -- I don't see --

8 Q So -- well, let me ask you this because we could
9 probably -- this map is a little confusing only because there's
10 so many lines on it. Correct?

11 A Right.

12 Q Part of the Eight Trey Gangster Crip territory, actually,
13 goes into part of this purple area, too, doesn't it?

14 A It's -- it's -- it's like a jigsaw puzzle to where at some
15 point down in different sides you run into neutral zones or
16 other neighborhoods that separate your neighborhood from the
17 other one, which is, like, one street. So, when you come up
18 to -- that would be from Western to Van Ness. From Manchester
19 to Florence, that's the far west.

20 Q And, because you lived in the far west, you are a member of
21 the far west Eight Trey Gangster Crips. Correct?

22 A Not necessarily.

23 Q But -- oh, so, it doesn't matter -- how do you determine
24 which side you're on?

25 A Sometime it's not -- it's not your decision. Sometime it's

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 who put you on that you -- that that's the side you belong to.

2 But you can always change. It cause a conflict, but you can
3 change.

4 Q Say that last thing again so I can understand it.

5 A It causes a conflict, but you can change sides.

6 Q So, if you change sides, there's going to be tension
7 amongst the sides; but it can be done.

8 A It's like you been stole --

9 Q Okay.

10 A -- or manipulated from the side.

11 Q So there -- sorry about that. There are actually
12 territorial tensions between sides within the Eight Trey
13 Gangster Crips.

14 A Yes.

15 Q Correct?

16 A Yes.

17 Q But they are not considered archrivals of the Eight Trey
18 Gangster Crips.

19 A Oh, no.

20 Q And, as you discussed yesterday, the Rolling -- did you say
21 the Rollin 60s --

22 A Yes.

23 Q -- are archrivals? Correct?

24 A Rollin 60s, Rollin 40s, Rollin 90s, Rollin 100s.

25 Q All archrivals. Correct?

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 A Yes.

2 Q And, as I understand it, if you're doing -- if you're a
3 member of the Eight Trey Gangster Crips --

4 A Yes.

5 Q -- you are -- and I'll get this a little deeper -- then
6 you're not supposed to mix your personal business nor your gang
7 membership with the archrivals. Correct?

8 A You're not supposed to, but it happens.

9 Q That creates tension, also, doesn't it?

10 A Yes, it does.

11 Q You also said -- you said that you were a member of two
12 sides, so to speak. Didn't you say you were also associated
13 with the back west?

14 A Yes. They -- they gave me the status. I didn't change
15 sides; but the back west, being a young part of our
16 neighborhood, they kind of adopted me for the back west.

17 Q So the back west is actually a newer side within the Eight
18 Trey Gangster Crips.

19 A Came out in late '80s, early '90s.

20 Q Okay. We have gone through a lot of names in this case.
21 And you do -- you are familiar with a lot of names,
22 particularly, names of -- of folks who go by their moniker or
23 their street name. Correct?

24 A Yes.

25 Q And is it true -- and I don't know this for a fact. I just

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 heard this. Is it true that, if you're a member of the Eight
2 Trey Gangster Crips, you have your gang name. Correct?

3 A Um-hum.

4 Q What you're known by. In this case, we're calling it a
5 moniker. Is that correct?

6 A Yes.

7 Q And you have what I've heard is called is a government
8 name.

9 A Yes.

10 Q So the Government name is the birth name that you receive.

11 A Birth name.

12 Q And sometimes you don't know the birth names of -- of the
13 members of the Eight Trey Gangster Crips. Correct?

14 A Most of the time you don't know unless you're associated
15 with them on a personal level. Like, if you been knowing them
16 over some years, you may know they government. Being around
17 them, most of the time you may pick up on their government; but
18 it's just not thrown out there arbitrarily.

19 Q Your birth name is thrown out there arbitrarily?

20 A No, it's not.

21 Q Okay. The birth name is not.

22 A The birth name isn't.

23 Q And you said, generally, unless you're a close personal
24 friend of an Eight Trey Gangster Crip, you won't know their
25 birth name. Correct?

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 A Either -- like I said, either close or have some
2 association with over the period of time. Since I've been
3 around for a long time, I know a lot of their names just because
4 they -- they come to me for different things.

5 Q You've had to brush up on quite a few names in order to
6 prepare for testimony, though. Is that --

7 A No.

8 Q You have not?

9 A No.

10 Q So the names that you've been saying are names that you
11 know.

12 A Yes.

13 Q Okay. So let me ask you about this: There's -- there's
14 also a gang called the "Hoovers." Correct?

15 A Yes.

16 Q And the Hoovers, are they neighbors of the Eight Trey
17 Gangster Crips; or are they across neighborhoods?

18 A No. Neighbors and our alliance with them. We're alliance
19 with them.

20 Q So they're -- that's not an archrivalry.

21 A No. We have the same enemies.

22 Q And it's -- so what you're saying is -- can I use the word
23 "peaceful coexistence"? You guys exist peacefully.

24 A Yes.

25 Q My understanding is is that Arvin Carmen was originally a

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

564

1 member of the Hoovers. Is that your understanding?

2 A Is -- you want me to answer that question as far as what I
3 know?

4 Q Here's what I'll tell you -- here's how I'll ask the
5 question. What I understand from one of your interviews with
6 the DEA is that you indicated that Mr. Carmen was not originally
7 an Eight Trey Gangster Crip.

8 A He's original from Hoover.

9 Q But he is an Eight Trey Gangster Crip. Correct?

10 A But he is Eight Trey Gangster Crip.

11 Q And do you know what side he belongs to?

12 A Back west.

13 Q Okay. So that's -- that is what I want to do now is list
14 the members of the individuals you've discussed in this case.
15 And I would like to do this so that everybody has the ability to
16 place the name with the side for each person that you've talked
17 about in this case. Okay?

18 A Okay.

19 Q And I think that's important.

20 Richard Haynes. Is he back west?

21 A Far west.

22 Q Far west. Sharita Horn.

23 A She would be considered back west.

24 Q Now, she wasn't jumped in, though. Correct?

25 A Walked on.

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 Q She walked on. Was she -- is another word you use
2 "adopted"?

3 A Adopted, yes.

4 Q Alex James?

5 A Yes. Back west.

6 Q David Colbert?

7 A Not an Eight Trey.

8 Q Bobby Wines? T Crazy?

9 A T Crazy. He straddles, though, but he's original back
10 west.

11 Q Is he original west, then? Would you -- or is he --

12 A But that's -- see, that's the thing. He -- like I said,
13 like, when I said he straddles, he's an original west side
14 homie; but he -- he hangs with the back west.

15 Q Do you know if that caused any strife between the original
16 west and the back west?

17 A No because a lot of the original west turn back west.

18 Q Okay. So those two sides get along the most within --
19 between the sides and the Eight Trey Gangster Crips?

20 A I would say the -- the original west, the back west, and
21 the far west get along the best.

22 Q And, as I understand, the north side creates a rift between
23 the west siders.

24 A The north side and the back west -- they have a few --
25 they -- it's not volatile; but some people, depending on who

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 they are, they like to stay on their -- on their sides.

2 Q Now, the name "Jay Loc" came up.

3 A Um-hum.

4 Q Joseph Shorts?

5 A Joseph Shorts.

6 Q What side is he?

7 A Back west.

8 Q Donald Lynch? Young Moe?

9 A Is he north side.

10 Q Deandre Meighan?

11 A He's a north sider but was a west sider.

12 Q So he -- he went from the west to the north. Correct?

13 A Yes.

14 Q In fact, I read somewhere that that caused you a problem.

15 A Me?

16 Q Yes, in relationship to this case. You don't recall that?

17 A No.

18 Q We'll get back to that later. Now I said Donald Lynch was

19 Young Moe. Is Donald Lynch Young Moe or Flossy?

20 A Both.

21 Q Both? He -- both? Those are both monikers?

22 A Flossy is what he went by out here in Spokane.

23 Q Young Moe is his -- is his LA moniker.

24 A Yes.

25 Q Eight Trey moniker. Marlon Johnson. Loon.

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 A That was Loony.

2 Q Loony.

3 A Yes. Back west.

4 Q Is Loony what he went by in LA?

5 A Yes.

6 Q Do you know what he went by in Spokane?

7 A No. Just Loon.

8 Q Now, Anthony Miller goes by North Side Gray. I would take
9 it he's from north side?

10 A Yes.

11 Q Mr. Lisbey. Would you pronounce his first name "Inaliel"?

12 A Inaliel.

13 Q Inaliel Lisbey. And what side is he from?

14 A North side.

15 Q This name came up and I'm not sure of. Nocomie Moore.

16 A She, like adopted, walked on, back west.

17 Q Katriel Bulley?

18 A Katriel Bulley.

19 Q There you go.

20 A D3.

21 Q Yes, D3.

22 A Back west.

23 Q Roderick Govan, Ra Ra?

24 A Ra Ra. Back west. And he goes by Grump 6.

25 Q Grump 6?

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 A Newborn Grump.

2 Q That's his Eight Trey name? Harry Johnwell, Peanut or Nut?

3 A Peanut. Lil C Dog.

4 Q Lil Sea Hawk (sic)?

5 A C Dog.

6 Q Lil Z Dog (sic). Would he be a descendant of Z Dog (sic)?

7 A C.

8 Q C Dog.

9 A As in cat.

10 Q Would it then -- okay. C Dog.

11 A C Dog.

12 Q Thank you. Donta Blackmon.

13 A Paco.

14 Q Paco.

15 A Baby Paco.

16 Q And what did you say?

17 A Baby Paco.

18 Q Baby Paco. Which side?

19 A Back west.

20 Q Tahei Moore?

21 A Baby Football. Back west.

22 Q Maurice Shelmon, YA.

23 A Young Ant. North side.

24 Q James Ward?

25 A Young Sodi. Back west.

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 Q Do you know what he went by in Spokane?

2 A Actually -- actually, Ward, he hangs with the back west;

3 but he's from the far along with his cousins.

4 Q Originates from the far west, then?

5 A Yes.

6 Q And hangs with the back west?

7 A Back west.

8 Q Rufus Warnick (sic)?

9 A Warnock.

10 Q Warnock. Thank you.

11 A Yes. Baby Bam.

12 Q Baby Bam?

13 A Yes.

14 Q And --

15 A Back west.

16 Q -- back west? You've already identified Mr. Tones who went
17 by Chico.

18 A Young Chico.

19 Q North side.

20 A North side.

21 Q Donald Wright.

22 A Donald Wright is original west that went to back west.

23 Q Kevin London? Slim maybe?

24 A Slim. Original west.

25 Q Eric Jamerson. Baby Nutty.

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

570

1 A Baby Nutty. G Medals.

2 Q G Metals (sic)?

3 A Medals, like --

4 Q Like a medal (indicating)?

5 A Yes. G Medals.

6 Q And what side is he?

7 A North side. And -- no. Young Moe is also Big Nutty.

8 Q Young Moe is who, again?

9 A Big Nutty. Some of us have two names for LA.

10 Q So are you saying that Big Nutty would be Young Moe? And

11 that -- is that Donald Lynch?

12 A Donald Lynch. They'll adopt other names to create other

13 lil homies. It's like a clan so they can start their own.

14 Q And I'll -- and I'll get to that because I think we need to

15 understand the structure of the names from the Eight Trey

16 Gangster Crips, also.

17 Perry Princeton is not a member. Correct?

18 A No. Adopted.

19 Q Adopted? Not jumped in.

20 A Not jumped in.

21 Q If you're adopted, are you still considered an Eight Trey

22 Gangster Crip? A full member?

23 A Not a full member. People will still have your back

24 because they consider you an associate, but it's -- some people

25 have a problem with you. Some people won't. It all depends

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 what crowd you're around.

2 Q Is it fair to say, then, that an adopted member is an
3 associate at the Eight Trey Gangster Crips with privileges?

4 A Yes. You can say that.

5 Q Is that a good way to say that?

6 A That's a good way to say that.

7 Q You also testified that Kevin Miles who goes by No or Nino?

8 A Nino, yes, N O. Nino.

9 Q Is that N E N O or N I N O? Do you know?

10 A N I N O.

11 Q He's --

12 A Adopted.

13 Q -- adopted. Back west?

14 A Original west.

15 Q Original west. And, because of that, that's why you had to
16 vouch for him when he came to Spokane. Correct?

17 A Because, even though he went to school and grew up around
18 other Eight Treys, he was adopted. Meaning, like, he got along
19 with the rest of the Eight Treys.

20 Q And -- and he was actually well schooled, wasn't he? Two
21 college degrees?

22 A Two masters. North Ridge University.

23 Q So, when you talk about the fact that he was instrumental
24 in designing the system, would that be a large part because he
25 worked with members of your Eight Trey Gangster Crips, plus he

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 was, maybe, had education in economics and things like that?

2 A He worked with not just Eight Treys but other -- other
3 gangs. And, because he wasn't certified as an Eight Trey
4 gangster member, he could open more doors. People -- people
5 felt more comfortable with him.

6 Q Sounds like he could cross more lines than -- than if you
7 were an actual full member of an Eight Trey Gangster Crips?

8 A Or, if you had enough respect with other neighborhood, then
9 you can cross their line, as well.

10 Q So that's -- let's talk about respect. Growing up in the
11 neighborhood, is the name that you have or adopted, does that
12 signify, to some degree, the amount of respect you deserve as
13 a -- as a member going through the -- or as a member of the
14 Eight Trey Gangster Crips?

15 A You can have the name but don't have the same attitude
16 as -- as your big homie before you. And, if you don't have the
17 same type of a -- I guess, aggressive behavior through things
18 that come up, then you can be shunned upon, like, looked down
19 on.

20 Q So what -- can we use your name for an example? Your
21 Lil Sidewinder. Correct?

22 A 2.

23 Q You're Sidewinder 2?

24 A Lil Sidewinder 2.

25 Q Lil Sidewinder 2.

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 A One before me.

2 Q There was one Lil Sidewinder before you.

3 A Yes.

4 Q And, as you said yesterday, you were not -- and I want to
5 make this clear. What you said is you did not have family
6 within the Eight Trey Gangster Crips when you first started.

7 Correct?

8 A Correct.

9 Q You did have family in the -- you had your birth family in
10 the neighborhood. Correct?

11 A Initially, yes.

12 Q Yes. But what you were indicating to get jury -- I just
13 wanted to make this clear because it wasn't clear to me -- is
14 that, when you said you had no family, that's why they called
15 you Mr. Nobody -- or, excuse me. What was your name?

16 A Yes.

17 Q Mr. Nobody?

18 A Correct. Correct.

19 Q It was because you didn't have any family in the Eight Trey
20 Gangster Crips when you were first jumped in. Correct?

21 A And they didn't know where I came from. I was like a
22 nobody that just came up from out of nowhere.

23 Q And had no previous family connections within the Crips.
24 Correct?

25 A Or homeboys to vouch for me.

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 Q Okay. So you had to earn your respect. Correct?

2 A Yes.

3 Q And you worked really hard to earn your respect. Correct?

4 A True.

5 Q And -- and, I mean, in all fairness, this became your
6 lifestyle. Correct?

7 A Gangs?

8 Q Well, you said yesterday -- because what you're doing here
9 today and what you did yesterday, testifying in court against
10 other members, is a difficult thing for you --

11 A Yes, it is.

12 Q -- because of the mindset that you grew up with and became
13 as a member of the Eight Trey Gangster Crips.

14 A Yes.

15 Q Correct?

16 A Yes.

17 Q So that's what -- that's where I was coming from with that
18 question. So what I understand also from your testimony is that
19 you reminded some members of the Eight Trey Gangster Crips of a
20 person by the name of Sidewinder, or that your conduct was
21 considered somewhat similar to the -- to the behavior and
22 attitude of Sidewinder? Is that -- was that what -- did I
23 understand you correctly, or did I misunderstand you?

24 MS. VAN MARTER: I'm going to object. Outside the
25 scope. There was no discussion from direct on Sidewinder.

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 THE COURT: I don't remember it.

2 Q (BY MR. HORMEL) I thought that you indicated that your
3 name, Lil Sidewinder, was because you reminded -- I'm not trying
4 to get into little -- I'm not trying to get into Sidewinder.

5 What I'm trying to do is just find out how you got your name.

6 Why don't you tell us how you got your name, Lil Sidewinder.

7 A It was given to me by demonstrating mentality, fighting
8 ability to impress bigger homies to where they felt that I
9 deserved the name.

10 Q And, so, your name became Lil Sidewinder 2.

11 A Right.

12 Q Because there was a Lil Sidewinder 1. Correct?

13 A Yes.

14 Q So, in the hierarchy of names, big would -- would Big
15 Sidewinder be the biggest person in that --

16 A For my name?

17 Q Yes.

18 A Yes.

19 Q And, then, would -- does it go to Lil Sidewinder or does it
20 go to Sidewinder?

21 A It goes to Lil Sidewinder.

22 Q And, then, so, there's two Lil Sidewinders.

23 A It just happened to be two Lil Sidewinders in this case.

24 There's -- sometimes, when a person pass away, that you can
25 adopt that name of that person because he's not here, whether he

576
JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 passed away physically or he just no longer a part of Eight
2 Trey.

3 Q So -- so, if the -- if the Lil Sidewinder that was this Lil
4 Sidewinder before you is no longer in the group or the gang for
5 some reason, you can step into that place.

6 A That's why they gave me that, yes.

7 Q And that's how you got that name.

8 A Yes.

9 Q Okay. And with the name -- with the association of the
10 name, Lil Sidewinder, that, in itself, does it not, command a
11 certain amount of respect from other members of the -- younger
12 members of the gang?

13 A Not all the time.

14 Q Is it supposed to?

15 A It wasn't designed to do that because you have to hold your
16 own. And, if you don't hold your own and don't live up to the
17 mannerism, you know, being a man, of being able to -- you don't
18 have to run to your big homie, you know, to fight your battles
19 for you, then -- then the name doesn't suit you, whether it be
20 Sidewinder or whether it be Caveman, whether it be Lucky,
21 whatever name that you got. It's -- it's your mentality that
22 you hold responsible for.

23 Q So, what you're saying is that -- you were a member of the
24 Eight Trey Gangster Crips for 35 years, it sounds like.

25 A Yes.

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 Q And, so, it wasn't only in your youth that you had to prove
2 yourself; but you had to continue to prove your worth throughout
3 that 35 years. Correct?

4 A On and off, depending on what situation arose. Whether or
5 not I was in a -- around at the time.

6 Q What I understand from what you testified to yesterday,
7 there are certain rules that the Eight Trey Gangster Crips are
8 supposed to follow. Correct?

9 A Yes.

10 Q In the neighborhood.

11 A Yes.

12 Q And what I understood one of the -- probably the primary
13 role is take care of your birth family. Or your immediate
14 family. Your wife, your children. That was important as an
15 Eight Trey Gangster Crip that that be done. Correct?

16 A No.

17 Q So that was not one of the --

18 A Not as gang member. Because, when you enter into being
19 from Eight Trey, they considered that your family.

20 Q So, when the rule is "take care of your family," that means
21 take care of your Eight Trey family. Correct?

22 A No. You -- I think you misunderstand.

23 Q Okay, I am misunderstanding.

24 A Okay. When you join to be an Eight Trey Gangster member,
25 that becomes your adopted family. And, when you're -- have that

578
JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 adopted family, you're supposed to be there for them and show
2 your loyalty and support.

3 Your immediate family, they don't get put on the back
4 burner on purpose; but sometimes that happen. Majority of the
5 time it happens.

6 Q And that happened because there was gang business that
7 needed to be taken place. Correct?

8 A Yeah, because you're supposed to separate your gang
9 business from your -- your personal business.

10 Q Personal life. Correct?

11 A Yes.

12 Q And that's why you had the rule in the gangs that you were
13 not to involve civilians. Correct?

14 A Yes.

15 Q Because gang life had to be limited to gang life. Correct?

16 A Yes.

17 Q Involving civilians wasn't a way for a gang member to
18 survive in the neighborhood. Correct?

19 A Meaning?

20 Q Meaning, you didn't want to involve a civilian; and you
21 didn't want to bring the police in on the activities that were
22 going on if you involved a civilian. Correct?

23 A Like, for instance, you never want to do anything to a
24 civilian that causes a public outcry. To, you know,
25 something -- even if it's accidental, that's something that you

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 don't want to do.

2 Q And I think that's a good point because, just being a
3 member of a gang itself, you have the focus of law enforcement.
4 Correct?

5 A On you?

6 Q On -- on the gang and on you, individually.

7 A Not all the time because you have prominent gang members
8 that, just because they're gang members, that don't mean that
9 they're hideous or violent or have the attitude to to
10 demonstrate culpability to be -- to do drugs, to be violent, and
11 break the law. They just gang members.

12 Q Okay. So, when you talked about "being stopped while
13 black," that had -- what does that mean to you?

14 A In Los Angeles, that's a cliché that happens more often
15 than none, to where the police will stop you. You in the wrong
16 neighborhood. You -- I worked in Beverly Hills, and I got off
17 the bus. I would get stopped every day.

18 Q So, when it was important, then -- because of that -- when
19 it was important to not expose yourself to, let's say, the
20 civilian population as, let's say, a gang member, you indicated
21 yesterday that you would, perhaps, wear clothing to make
22 yourself look more normal, like, going through the airport or
23 something, to try to avoid --

24 A Yes.

25 Q -- detection? Is that true?

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 A Yes.

2 Q So you weren't broadcasting to the people from outside your
3 neighborhood that you were an Eight Trey Gangster Crip.

4 Correct?

5 A No, not broadcasting to other individuals. You want to
6 look as normal as possible, as far as with what society deems
7 normal.

8 Q Correct. And, so, you didn't want to be --

9 MS. VAN MARTER: Your Honor, I'm -- I'm going to
10 object and move to strike. There's a lot of commentary.
11 "Correct?" "This is important." Those kinds of terms.

12 THE COURT: Well, he can lead. I assume this is
13 background.

14 MR. HORMEL: It is, your Honor. It is, your Honor.

15 THE COURT: Try not to be repetitious.

16 MR. HORMEL: Thank you.

17 Q (BY MR. HORMEL) So what I understood you to say during
18 your --

19 MR. HORMEL: Excuse me. You okay?

20 Q (BY MR. HORMEL) What I understood you to say during your
21 direct examination yesterday was that there was a seizure in
22 Spokane, Washington, involving the pill hustle.

23 A Yes.

24 Q So would -- would the seizure be something akin to
25 everybody finding out you could make a buck and, as many people

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 as could make it up here, were trying to make it up here to make
2 a -- make a dollar?

3 A Not -- not initially.

4 Q Eventually.

5 A Eventually.

6 Q So the seizure would be something like a gold rush.

7 Correct? Do you under --

8 A No. For some, they would take it as, like, a stop sign.

9 Q As a what?

10 A A stop sign. And some other ones they'll take it as, "Wow,
11 I didn't know that much money was being made up there." Almost
12 like a heroin addict ODing, where they OD and they want that
13 product because it's so potent.

14 Q The money was very potent.

15 A Yes.

16 Q And the money drew -- eventually drew a lot of members of
17 the Eight Trey Gangster Crips to Spokane. Correct?

18 A And others, yes.

19 Q And what I understood you to say yesterday was it became
20 not about taking care of the members of the Eight Trey Gangster
21 Crips when some of the members were up here. It was all about
22 taking care of themselves first. Correct?

23 A Some people took care of themselves before they took care
24 of others and continued to take care of theirself and turn a
25 blind eye to everybody else.

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 Q And they turned a blind eye not only to their birth family
2 but they turned a blind eye to the Eight Trey Gangster Crip
3 family by the way they were operating up here. Correct?

4 A Yes.

5 Q That did not make you very happy, did it? Eventually.

6 A With the immediate people that I had contact with, that
7 was -- that was unacceptable behavior.

8 Q And yesterday I understood you to -- to say -- and, please,
9 correct me if I'm wrong -- that one of the reasons that
10 motivated you to -- to take the stand was because you wanted the
11 truth to come out as to what was actually happening up here in
12 Spokane. Correct?

13 A Yes.

14 Q And, so, in your -- in your view -- if I could say this --
15 is that you were not happy with how greed disrupted your
16 neighborhood.

17 A I don't think it was greed that -- in its totality for the
18 money but more for the power that money provides you with.

19 Q And that was contrary to how you were raised or came -- and
20 lived as an Eight Trey Gangster Crip. Correct?

21 A Well, my life wasn't based on living as an Eight Trey
22 Gangster Crip 24/7. I have a family, kids, and a job. But the
23 Eight Treys Gangster is part of my expanded family.

24 Q And you didn't like how the greed and the greed for money
25 or the greed for power was affecting or influencing your -- that

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 part of your life. Correct?

2 A No, not my life. When you have greed for power or money,
3 you have people from outside looking in seeing this amount of
4 money being made and they want to be violent sometimes to get
5 it. So, if you're not actually being fair, then it can be a
6 violent reaction behind it.

7 Q And you were worried about that, weren't you?

8 A Yes, I can say I was worried.

9 Q Or, I should say, you became worried about that because of
10 what you saw as this seizure that happened in your neighborhood
11 and people coming up here.

12 A No.

13 Q Okay. Explain, then, why you were concerned.

14 A Because people were becoming more like Allen Iverson. "Me,
15 me, me, I, I, I. Give me the ball. It's my thing. I did this.
16 I started that. I started this." And they would be a target.
17 Sooner or later they gonna be a target.

18 Q So you were worried about the exposure and -- and members
19 of the Eight Trey Gangster Crips that you'd known for a long
20 time putting a target on themselves or a target on the Eight
21 Treys as a whole?

22 A No, the person with that type of attitude putting a target
23 on themselves and whoever they're associating theirself with.

24 Q And, so, what you spoke about yesterday, then, is you did
25 speak -- you used the word "franchise," but, also -- I also read

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 the word, in some of the reports of your free talk, the word
2 "crew"?

3 A Crew.

4 Q Okay. So is "crew" synonymous with "franchise"?

5 A Yes.

6 Q Okay. So let's talk about, sort of, the evolution of the
7 pill hustle in Spokane, Washington. You were not the original
8 pill hustler in Spokane, Washington.

9 A No.

10 Q In fact, what I understood you to say is that Arvin Carmen
11 was the original -- one of the original pill hustlers in
12 Spokane, Washington.

13 A No. He was the original.

14 Q Okay. Was there anybody here about the same time as him
15 that -- that was also hustling pills?

16 A "About"? What do you mean?

17 Q Near the same time. Nocomie Moore.

18 A Nocomie came up -- when I physically visualize seeing her
19 was 2009.

20 Q So she eventually. So Arvin Carmen was the original pill
21 hustler in Spokane, Washington.

22 A Yes, to my knowledge.

23 Q To your knowledge.

24 A From his mouth to my ears.

25 Q Okay. So that's where you got that information.

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 A Yes.

2 Q So, if there's somebody else up here doing the pill hustle,
3 you wouldn't have know that.

4 A No, because I went through School Boy.

5 Q Okay. I also understand that you came up to Spokane to get
6 involved in the pill hustle with Arvin Carmen accompanied by
7 Glen Turner, YD?

8 A Yes.

9 Q And you said that Kevin Miles paid for YD's plane ticket?
10 Or half of it?

11 A I don't know. I'm not sure how he paid for the ticket. I
12 just know he gave him the money to come up here.

13 Q Okay. So Kevin Miles gave YD the money --

14 A Yes.

15 Q -- to come up here.

16 A Yes.

17 Q And, eventually, Ken Miles became involved in the pill
18 hustle, also.

19 A Yes.

20 Q So let's fast forward just a little bit because I don't
21 want to go through the whole history you went through yesterday.
22 So, there may be others; but I'm just going to try to make this
23 the Reader's Digest version, if we can, so you're not on the
24 stand for another two days. So there was Arvin Carmen, and did
25 he -- he had others working for him before you came up here.

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 A Yes.

2 Q And the reason you came up here is because you'd started
3 losing your ability to sustain yourself in California with your
4 construction business.

5 A Yes.

6 Q With your father's construction business?

7 A Yes.

8 Q And it was that work that helped pay for your mother.
9 Correct? And your mother's living.

10 A Excuse me?

11 MS. VAN MARTER: Your Honor, I'm going to object to
12 questions about personal family members who are not involved.

13 MR. HORMEL: That's fine, your Honor. I'll withdraw
14 that. I understand.

15 THE COURT: I'll sustain that. I don't think it's
16 necessary at all.

17 MR. HORMEL: No, I understand.

18 Q (BY MR. HORMEL) So were you aware of others who were
19 actually here in the pill game or pill hustle with Arvin Carmen
20 before you came up here with YD, Glen Turner?

21 A Eventually, yes.

22 Q "Eventually"? Would that be before you came or after you
23 came?

24 A Would not be -- when I came up here, the only person I knew
25 who was up here with School Boy, was YD.

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 Q Okay. Did YD come up here before you did?

2 A Yes, he did.

3 Q About a month?

4 A Yes.

5 Q Okay. And, then, you came about a month later.

6 A Yes.

7 Q Eventually, after that, did Kevin Miles come up?

8 A Yes.

9 Q And Jay Loc?

10 A Jay Loc was already here.

11 Q Jay Loc was already here. Was he here before YD or after
12 YD?

13 A He lives out here.

14 Q He lives here.

15 A Yes.

16 Q Is he a member of the Eight Trey Gangster Crips?

17 A Yes.

18 Q So he was in the pill game with Arvin -- was he in the pill
19 game with Arvin Carmen before --

20 A No. He sold crack.

21 Q He sold -- so he was in the crack game.

22 A Crack is whack.

23 Q Say that again.

24 A Crack is whack. So that's -- that how -- that's how he got
25 away from selling crack.

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 Q So he, eventually, transitioned into the pill hustle.

2 A Yes.

3 Q He transitioned and -- Jay Loc transitioned into the pill
4 hustle, then, after you arrived?

5 A Within the time that YD and myself had arrived up here.

6 Q How long after you arrived here with YD did Kevin Miles
7 arrive?

8 A Approximately, a month or two.

9 Q Okay. And, as I understand it, you arrived here in the
10 year 2009?

11 A Yes.

12 Q So, in 2009 -- and I'm just going to make this real brief
13 -- it was Arvin Carmen, YD, you, and Kevin Miles that some --

14 A Say that again?

15 Q Arvin Carmen. YD came up before you did. Correct?

16 A Yes.

17 Q You came up after YD came up.

18 A Yes.

19 Q And, then, at some point, Kevin Miles came up.

20 A At some point, yes.

21 Q Was there anybody else that came up here before him?

22 A There was -- yes.

23 Q And who was that?

24 A Peanut and Mel. They was already here.

25 Q They were already here, also.

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 A They was already here in Spokane.

2 Q Okay. And who is Peanut?

3 A That would be Johnwell.

4 Q Okay.

5 A Harry Johnwell.

6 Q Okay.

7 A And the other person is not a part of the indictment.

8 Q And -- and what was the moniker, again?

9 A Mel.

10 Q Mayo (sic) ?

11 A Yes.

12 Q Okay. And not part of this indictment.

13 A Not part of the indictment.

14 Q Was that person in the pill game, though, or eventually?

15 A Yes.

16 Q Okay. And Harry Johnwell or Peanut --

17 A Yes.

18 Q -- became, eventually, into the pill game, also.

19 A He -- they were doing the pills before myself.

20 Q Were they doing the pills for Arvin Carmen?

21 A Yes. They were being taxed by Arvin Carmen.

22 Q Okay. So that's where I'm -- I'm heading to next.

23 A Okay.

24 Q Peanut was here and Mayo (sic) was here, and they were in

25 the pill game before you arrived.

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 A Yes.

2 Q They were in the pill game because Arvin Carmen, as you
3 testified, allowed them to be by taxing them?

4 A Yes.

5 Q Peanut and Mayo (sic) had their own plugs? Or do you know?

6 A Yes.

7 Q They had their own plugs. Correct?

8 A Yes.

9 Q So they -- and, again, the plug is the source. Correct?

10 A Source.

11 Q So they had their own source yet Arvin Carmen taxed them
12 for being able to sell pills in this area. Correct?

13 A Yes.

14 Q In Spokane.

15 A Yes.

16 Q When you came to Spokane after YD, were you told you were
17 going to be taxed?

18 A Yes.

19 Q Were you told before you came to Spokane you were going to
20 be taxed?

21 A No.

22 Q That was a surprise to you, wasn't it?

23 A Yes.

24 Q Did YD know he was going to be taxed before he came to
25 Spokane?

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 A No.

2 Q Did Ken Miles know he was going to be taxed before -- did
3 the word get down to Kevin Miles?

4 A Kevin Miles never got taxed.

5 Q Kevin Miles never got taxed. You got taxed \$15 for --

6 A Initially -- initially, I got taxed \$12.

7 Q Did your tax get raised?

8 A I offered \$15.

9 Q And did you do that because you were grateful for the
10 opportunity that Arvin Carmen was giving you?

11 A Exactly.

12 Q So you're -- like I said, you were -- you were associated
13 with back west. Correct? You were either a -- you're a far
14 west and a back west.

15 A No. West side.

16 Q Original west and back west. And -- and Arvin Carmen's
17 back west.

18 A Yes, he is.

19 Q Okay. So you've known Arvin Carmen for a while.

20 A Late '80s. Mid to late '80s.

21 Q And in -- and, in your mind, he offered you an opportunity
22 to help get beyond your financial strife. Correct?

23 A Yes.

24 Q So you were willing to give him the tax.

25 A Yes.

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 Q He never taxed Nino.

2 A Because, by the time Nino came up, we were in the big
3 house.

4 Q Okay. That's -- that's where we're going to head to then.

5 The meeting that was had -- there was -- because of the
6 taxation, the other Eight Trey Gangster Crips, who were working
7 in Spokane and being taxed by Arvin Carmen, eventually had a
8 meeting. Correct?

9 A Yes.

10 Q And they had a meeting to discuss the taxation. Correct?

11 A Yes.

12 Q You, sort of, had a different view about what should happen
13 about the taxation than the other members of that meeting.
14 Correct?

15 A Correct.

16 Q Your view was, "Let's leave it as it is and talk to Arvin
17 Carmen because he's given us all an opportunity and we should
18 work it out through him." Correct?

19 A Not leave it as it is, but let's discuss it and -- because
20 he provided a service in which they agreed upon paying. They --
21 no one arm got twisted to pay the taxes.

22 Q But, eventually, they wanted all the money for themselves.
23 Correct? For their pill hustle.

24 A I don't understand the question. Can you repeat it?

25 Q Well, they had the meeting so they wouldn't be taxed by

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 Arvin Carmen any more. Correct?

2 A Right.

3 Q So they wanted to break away from taxation without
4 representation. Correct?

5 A Right.

6 Q Okay. So -- so that's what was decided at that meeting.

7 The majority of the Eight Trey Gangster Crips at that meeting
8 voted not to be taxed any more and to break away from Arvin
9 Carmen.

10 A True.

11 Q And you weren't necessarily happy with that decision.
12 Correct?

13 A Difference of opinion. Because, like I said, nobody was
14 stronghold -- strong arm in order to pay the taxes; and you
15 could possibly come up here and find your own people to buy the
16 pills. But, since he provided a safe way to sell the pills
17 without getting apprehended, you know, I was -- I was suggesting
18 to them that they reconsider.

19 Q Okay. I don't want to put words in your mouth because I --
20 I -- I, you know -- but were you a little bit worried, then,
21 that by breaking away and starting your own system that might --
22 might lead to a greater chance of being apprehended? Because --
23 because Arvin Carmen had set up a pretty good system?

24 A That -- that I would be apprehended?

25 Q Well, that the members of the Eight Trey Gangster Crips who

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 were up here, if they -- if they split apart -- united we stand,
2 divided we fall. Were you worried about that?

3 A No.

4 Q No. What were you worried about, then? I may not have --
5 I may be confused.

6 A Right. Okay. Together you bring more attention to
7 yourself when you are in groups and you set out, like, in crews.
8 The big house that we stayed at, it was five to seven people
9 there at a time. So it -- it calls us -- people to cast "Look
10 what they have going on over there." Not everybody look like
11 college students. And, if you were much smaller with the person
12 that's already been here, been established, he knows the town
13 he's been here, then you will be in a safer environment along
14 with Carmen. Just my opinion.

15 Q So you were worried about the big house. The -- having a
16 group of members in one big place --

17 A At one time, yes.

18 Q -- at one time caused you to worry.

19 A Yes.

20 Q So, by that time, Jay Loc was in the pill hustle. Correct?

21 A Yes.

22 Q Because he's the one that rented or found the big house.

23 A Yes.

24 Q And he's the one that invited all of the other members,
25 except for Arvin Carmen, to reside with him at the big house and

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 sell pills.

2 A Yes.

3 Q And Jay Loc, actually, was able to find his own plugs.

4 Correct?

5 A Actually, we didn't find out until we was actually in the
6 big house that whomever he was seeing at the time had people.
7 And, since he lived in Spokane, he had people combined. They
8 started off small and got bigger.

9 Q So he was developing his own network of plugs, then.

10 A Yes.

11 Q And you didn't know that before the big house was
12 established.

13 A Right.

14 Q You found out after the big house was established that he
15 had his own plug system. Correct?

16 A I was living at the big house at the time.

17 Q Yes. Now, you didn't live at the big house forever.

18 A No.

19 Q You decided -- you still owed some -- felt some loyalty to
20 Arvin Carmen so you went to stay with Arvin Carmen.

21 A Yes.

22 Q And you felt -- you felt somewhat indebted to him because
23 he was helping -- he had helped you out financially.

24 A Yes. True.

25 Q And, I think, a part of you -- tell me if I'm wrong --

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 still wanted to try to bring everybody back together.

2 A No.

3 Q You did not.

4 A No. I was --

5 Q Is that why you were booted, then?

6 A No. What I say by, "booted," I mean, like, kicked out of
7 Spokane is because they didn't -- felt it was unnecessary for me
8 to be in Spokane making fades, hand-to-hand sales. When
9 Arvin Carmen would go to college, I was making fades off of his
10 phone. So they was, like, not cool.

11 Q You were making fades off of Arvin Carmen's phone?

12 A Yes.

13 Q And that's not cool. Right?

14 A Right.

15 Q Because it's not good to be using other people's fades.

16 Correct?

17 A No. Not in that aspect. He -- while he go to school, he
18 would call me with people to meet for his fades.

19 Q So I miss why you were booted, then.

20 A Because they didn't want me here doing grunt work.

21 Q And they didn't want you here doing Arvin Carmen's grunt
22 work. Thank you. So -- so you left because you didn't want to
23 cause more strife with the big house.

24 A No. I left on the terms of speaking with Arvin Carmen to
25 get more pills to get plugs in Los Angeles to come up here.

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 Q So you wanted to help Arvin Carmen expand his business. To
2 gather up more plugs in Los Angeles to bring more pills up here
3 to him. Correct?

4 A Not just himself, but as -- because I came up here with
5 Nino's money. I didn't have any money. So Nino was backing me
6 financially.

7 Q Okay. But you were -- was -- was Nino in Jay Loc's house?

8 A Yes.

9 Q Okay.

10 A For a little while.

11 Q Did he eventually move out of the big house?

12 A Yes.

13 Q Okay. Now you talked about different crews. And I kind of
14 want to go through that early stages from, let's say, 2008 to
15 2010. And let's talk about the crews that eventually were here
16 in Spokane. Okay?

17 A Okay.

18 Q Would you have considered you and Arvin Carmen a crew
19 during that period before you got booted?

20 A No, because we -- we still function with the rest of the
21 guys that was here.

22 Q Arvin Carmen wasn't -- wasn't taxing them any longer,
23 though, at that point in time. Correct?

24 A No. No. Yes. We all, basically, now are coexisting.

25 Q You're coexisting. They have their plugs. Arvin Carmen

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 has his plugs. Correct?

2 A Correct.

3 Q Okay. So, instead of calling you and Arvin Carmen a crew,
4 why don't I just say you and Arvin Carmen were working together
5 before you left back to Los Angeles. Correct?

6 A Yes. And it's not like I left him hanging, you know. Once
7 it was decided that I would come back to gain plugs because of
8 the people that I knew -- I knew a lot of people. So,
9 therefore, come back and I would get the plug for -- sell the
10 pills.

11 Q Okay. So -- so, then, after you left, let's talk about the
12 crews that were left in Spokane after you left.

13 A Yes.

14 Q I mean at about the time you left. Was Nocomie Moore here?

15 A Yes.

16 Q Okay. And she had her own crew.

17 A Yes.

18 Q And her crew was who?

19 A Katriel Bulley and Ra Ra, which is Grump 6 --

20 Q Roderick.

21 (Interruption by the reporter)

22 Q (BY MR. HORMEL) Yeah. Sorry. I'll let you finish.

23 You --

24 A Ra Ra, which is Grump 6, and some other females.

25 Q Okay. So Ra Ra is Roderick Govan --

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 A Govan, yes.

2 Q -- or Govan? Yes. Okay. And he's not charged in this
3 case either, is he?

4 A No.

5 Q Okay.

6 A Or a few other people that's in her crew.

7 Q Right. And there -- okay. So did you say there was a few
8 other people in her crew?

9 A Yeah.

10 Q Who else was in her crew?

11 A They're not charged though. I'm not sure if --

12 Q Are they other Eight Trey Gangster Crips though?

13 A Yes.

14 Q Okay. We don't need to know the names. I just -- they
15 were Eight Trey Gangster Crips. Correct?

16 A Yes.

17 Q Okay. So let's talk about -- did Kevin Miles have a crew
18 up here in Spokane?

19 A Yes, and initially I guess I would be considered part of
20 his crew because I -- I got funded through him.

21 Q To come up here originally.

22 A Myself and YD.

23 Q Yes.

24 A And then YD brought YM, Young Moe.

25 Q And who is YM?

600

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 A Young Moe. Donald Lynch.

2 Q Thank you.

3 A Donald Lynch brought Meighan, which is G Man.

4 Q Donald Lynch went by --

5 A Oh, Donald Lynch brought G Man up eventually.

6 Q Yes. And that's Flossy. Donald Lynch brought Flacco in.

7 A Spokane street names?

8 A Yes.

9 Q So we can keep them straight?

10 A Yes.

11 Q Okay. So here's -- so here's how it went: You -- you felt
12 that, because Kevin Miles funded your travel to come to Spokane
13 to get into the pill hustle at that point in time, that you were
14 still part of him, his operation.

15 A He not only funded my transportation but I had his pills.

16 A I hadn't had my own yet.

17 Q Okay. So that's -- did you come up to Spokane with pills?

18 A Yes.

19 Q Did YD come up to Spokane with pills?

20 A Yes.

21 Q And those were pills from --

22 A Kevin Miles.

23 Q -- Kevin Miles. From his plugs.

24 A From his plugs.

25 Q His pills were being taxed by Arvin Carmen.

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 A Yes.

2 Q Okay. Now I understand what -- what you're saying.

3 So, when the breakup -- when the meeting took place and
4 everybody decided that they were going to break away from
5 Arvin Carmen, did -- did -- was YD still working for Ken Miles?

6 A Yes.

7 Q And was -- and, then, YD, you said, brought up
8 Donald Lynch.

9 A Yes.

10 Q And, then, Donald Lynch brought up Deandre Meighan.

11 A Yes.

12 Q And that was a -- and would that have been considered part
13 of Kevin Miles' crew?

14 A No.

15 Q Okay. Would -- we got to get this kind of squared away.

16 Would YD -- did YD have his own crew in your mind?

17 A No.

18 Q Okay.

19 A He just had -- it was just him and Young Moe.

20 Q Just him and Young Moe.

21 A In the beginning, it was just him and Young Moe. In the
22 beginning, it was him and School Boy; but then he had --
23 Young Moe came up eventually, but he still had his alliance with
24 School Boy.

25 Q Who did?

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 A YD.

2 Q Did YD -- did YD have his own plugs?

3 A No. We used Kevin's plugs.

4 Q You used Kevin -- so YD was using Kevin's plugs.

5 A Yes.

6 Q And YD was -- was YD still being taxed at that point in
7 time?

8 A No.

9 Q Was YD selling -- was Young Moe selling pills from Kevin --

10 A No.

11 Q -- Miles' plugs? Who was he selling pills from?

12 A His plugs.

13 Q So Donald Lynch had his own plugs.

14 A Yes.

15 Q Did Deandre Meighan have his own plugs?

16 A No.

17 Q Who was Deandre Meighan selling for?

18 A Young Moe.

19 Q Would you consider Deandre Meighan and Young Moe a crew?

20 A Just -- no. Like, boys. Like, partners.

21 Q Okay. Partners.

22 A Right.

23 Q Now, did you know Deandre Meighan's girlfriend Ash?

24 A Yes. I -- I met her a couple times.

25 Q You did?

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 A Yes.

2 Q Okay.

3 A Ashley, right.

4 Q Okay. Yes.

5 A Yes.

6 Q And was she involved in the pill game?

7 A Yes.

8 Q And that was with Deandre Meighan. Correct?

9 A Yes.

10 Q So Jay Loc. Did he have his own crew?

11 A Well, he opened the big house. It wasn't his -- his crew,
12 but he -- when he -- when everybody broke away, he provided a
13 service for Nino, Peanut, Mel, YD, YM.

14 Q What was his service?

15 A To sell pills.

16 Q So he offered a way of selling pills to these folks, also.

17 A Correct?

18 A Yes.

19 Q And it was -- and he was not being taxed by Arvin Carmen.

20 A No.

21 Q And he had his own plugs. He had his own plug system.

22 A Everybody came up with their own pills under the assumption
23 that Jay Loc would get rid of them for him.

24 Q Okay. So -- so Jay Loc -- I can't remember the term that
25 was used yesterday, but there are -- there were several folks in

604

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 Spokane that eventually had the higher level pill status. And I
2 can't remember the name that you used yesterday. But -- but,
3 like, for example, Richard Haynes eventually became very high up
4 in the pill --

5 A Yes.

6 Q -- hustle here in Spokane. Correct?

7 A Yes.

8 Q He was at a very high level.

9 A Yes.

10 Q Arvin Carmen was at a very high level.

11 A Yes.

12 Q Here in Spokane.

13 A Yes.

14 Q Actually, it sounds like Tiny Menace had a fairly
15 significant level.

16 A Yes.

17 Q And Jay Loc had a -- had a high level here in Spokane.

18 A No.

19 Q Was that Kevin Miles?

20 A Kevin Miles.

21 Q Kevin Miles had a high level.

22 | A Yeah,

23 Q Now, did YD eventually establish a high level himself?

24 A Not high level but I would put him under Menace, like, as
25 far as his -- his level of involvement.

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 Q His ability to sell pills?

2 A Yes.

3 Q And the number of fades that he had?

4 A Yes.

5 Q The fade phones are a very critical piece for somebody
6 who's in the pill hustle. Correct?

7 A Yes.

8 Q It's very important because that is how the pill seller
9 maintains contact with the customer, the fade.

10 A Yes.

11 Q And that's the word used here in Spokane. Correct?

12 A Yes.

13 Q And, at times, if a fade phone was left, let's say, at the
14 big house and one of the top dealers, Nocomie Moore -- now, you
15 talked about -- let's establish this first so I can -- was she
16 at the high level or was she more at a YD level?

17 A Higher -- higher than YD.

18 Q So she was at the level with Haynes and Carmen and all
19 them.

20 A She's at the level with Carmen.

21 Q She was at the level with Carmen.

22 A Maybe higher.

23 Q So I -- I read in -- in one of your reports that Jay Loc
24 actually invited her to the big house --

25 A Yes.

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 Q -- for the purpose of stealing her fade phone and
2 stealing -- no, stealing the numbers out of her fade phone.

3 A No, I never said that.

4 Q Nonetheless, the fade phone was a very important commodity,
5 correct, for the pill seller.

6 A Yes. Jay Loc and Nocomie are cousins.

7 Q Then maybe it could -- you know, I -- it could have been
8 written down wrong. But I -- I do need to find it, if you don't
9 mind.

10 A That's okay.

11 (Pause in the proceedings)

12 Q (BY MR. HORMEL) So you do recall being interviewed in
13 relation to this case several times, do you not?

14 A Yes.

15 Q And you have been asked to remember truthfully a lot of
16 detail about a lot of people. Correct?

17 A Yes.

18 Q And my guess is -- is that sometimes it's a little bit
19 difficult to remember everything. Correct? We're dealing with
20 a span of years.

21 A Yes. Some things would get -- might get lost,
22 mistranslated.

23 Q And you -- and you were interviewed on July 31st, over a
24 year ago, by Agent Sullivan and Sergeant Meyer. Correct?

25 A Yes, if that -- if the date is correct.

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 Q Yes. And that was one of what you call a "free talk"
2 interview where you -- you are debriefed. They call them a
3 "debriefing." Correct?

4 A If -- if that's what they call it, yes.

5 Q Okay. You just remember having a meeting with them.

6 A Yes, I remember having a meeting.

7 Q Okay. Do you recall telling --

8 MS. VAN MARTER: Your Honor, I'm going to object as
9 improper impeachment. These are not Mr. Madison's reports. He
10 already answered the question that was asked of him.

11 MR. HORMEL: Your Honor, I'm --

12 THE COURT: Just ask him if he said something.

13 MR. HORMEL: Yes. Yes.

14 Q (BY MR. HORMEL) You told the -- you told the agents, DEA
15 Agent Sullivan and Meyer, that Shorts -- and Shorts is
16 Joseph Shorts. Right?

17 A Yes.

18 Q -- offered up the big house as a place to stay for
19 Nocomie Moore so that Shorts could specifically get into her
20 cellular phone contact list without her knowledge and steal her
21 fades from her. Do you recall testifying to that? Or excuse
22 me.

23 MS. VAN MARTER: Objection as to characterization.

24 Q (BY MR. HORMEL) Do you -- do you --

25 THE COURT: That is not testimony.

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 MR. HORMEL: No, I understand.

2 Q (BY MR. HORMEL) Do you remember saying that to the DEA
3 agent?

4 A No, I do not remember saying that to the DEA agent.

5 Q Now, are you saying you did not say that?

6 A No, I'm not saying -- I said I don't remember saying that
7 to the DEA agent because I don't see that happening.

8 Q Okay. So that -- that could have been written down wrong.
9 Correct? You haven't seen it, have you?

10 A I haven't seen it.

11 Q Would you like to see it?

12 A Yes, please..

13 Q Yes. Would you like to see it on the monitor or in person?

14 A In person.

15 MS. VAN MARTER: Your Honor, I'm going to object to
16 showing the witness any of the reports. He's been testifying
17 from his memory, not from reviewing of any kind of reports.

18 THE COURT: Well, he can just show him that one
19 statement and -- and --

20 MR. HORMEL: May I, your Honor?

21 THE COURT: Go ahead.

22 MS. VAN MARTER: And -- and if we could please see
23 what that is or the page number or paragraph.

24 THE COURT: Just a minute. Did you have a chance to
25 read it, Ms. Van Marter?

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 MS. VAN MARTER: Not yet, your Honor.

2 (Pause in the proceedings)

3 Q (BY MR. HORMEL) I guess my point is, Mr. Madison, is -- is
4 the fade phones were an important commodity to the individual
5 pill sellers. Correct?

6 A Yes.

7 Q And they did -- we listened to a recorded conversation. I
8 believe it was between Mr. Lisbey and, I believe, Mr. Colbert --

9 A Um-hum.

10 Q Bone.

11 A Yes.

12 Q -- that discussed not leaving his fade phone with certain
13 individuals for fear that he would -- they would steal his
14 fades. Correct?

15 A Yes.

16 Q So that was -- a fear by the pill sellers was that some
17 other pill seller would have access to their fade phones.

18 A Yes.

19 Q So they protected them.

20 A By either holding on to them or leaving them in responsible
21 hands.

22 Q Giving them to somebody they trust.

23 A Yes. Some phones was even offered to -- for purchase.

24 Q So you could get a fade phone for money.

25 A Sure.

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 Q Because the whole idea behind the hustle -- the pill hustle
2 in Spokane was money. Correct?

3 A Yes.

4 Q And it didn't matter how you got it as long as you got
5 money. Correct?

6 A Natural.

7 Q Okay. Eventually -- so, when you went back to LA, that was
8 in about December of 2009?

9 A Approximately, yes.

10 Q And, at that point when you left, Kevin Miles was in
11 Spokane. Correct?

12 A Yes.

13 Q Because, eventually, Kevin Miles got arrested.

14 A 2010.

15 Q Yes. May of 2010? Does that ring a bell?

16 A Around about, yes.

17 Q Okay. When Kevin Miles got arrested, he moved back to LA.
18 Correct?

19 A Eventually.

20 Q Eventually. Did others follow him?

21 A Some stayed, some left.

22 Q So some stayed in Spokane to do the pill hustle?

23 A Yes.

24 Q And some left to avoid the heat.

25 A Yes.

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 Q After a while, some -- well, let's ask who -- who left to
2 avoid the heat. Did YD leave to avoid the heat?

3 A Yes.

4 Q Did Deandre Meighan leave to avoid the heat?

5 A He -- he had already left prior to the heat.

6 Q Okay. And Donald Lynch. Did he return to LA?

7 A Yes, he was still back and forth. He had already became
8 his own entity.

9 Q Oh, so by that time, Donald Lynch was his own entity?

10 A Yeah, his own franchise, as we put it.

11 Q Okay. So he was -- so he was -- and so he had his own
12 plugs, then, in LA.

13 A Yes.

14 Q So what you're saying is the reason he was still going back
15 and forth was because he was leaving to go get his pill supply
16 in LA. Correct?

17 A Yes.

18 Q And bringing it back here to sell.

19 A Yes.

20 Q So he had his own network going on. Correct?

21 A Yes.

22 Q And that would have been sometime early to mid 2010 that
23 that was going on.

24 A Yes.

25 Q Okay. Marlon Johnson. Loony.

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 A Yes.

2 Q So you know Loony. Loony was back west?

3 A Yes.

4 Q Okay. So when did Loony come to Spokane?

5 A He was living out here.

6 Q So he was already here.

7 A Yes.

8 Q He got involved eventually in the pill game. The pill
9 hustle.

10 A Yes. And I -- I don't know when.

11 Q You don't know when.

12 A No.

13 Q You did find out, though, he had his own plugs?

14 A No.

15 Q Where did he get his pills from?

16 A I don't know who he got his pills from.

17 Q You just know he was in the pill hustle.

18 A Yes.

19 Q Anthony Miller. He's North Side Gray.

20 A Yes.

21 Q Do you know Anthony Miller?

22 A Yes.

23 Q Was he in the pill game?

24 A Yes.

25 Q Did you see him here in Spokane?

613

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 A No.

2 Q He was not in the pill game when you were here in Spokane.

3 A No, not to my knowledge.

4 Q Okay. So he came up to Spokane at some point before the
5 big seizure or during the big seizure?

6 A After the big seizure.

7 Q So -- and are you aware he had his own plugs?

8 A I just know that he was dealing with Young Moe.

9 Q Donald Lynch?

10 A Donald Lynch.

11 Q And who else was dealing with Young Moe at that point in
12 time?

13 A Even though Meighan had left, he was dealing with him; and
14 it was other people in LA dealing with Young Moe but not
15 actually coming up to Spokane.

16 Q So did Young Moe recruit Anthony Miller, then, to be part
17 of his pill hustle?

18 A I don't know.

19 Q Oh, you don't know. You just know eventually he came up
20 here.

21 A Yes.

22 Q Okay. And you knew he was working with Donald Lynch.

23 A Yes.

24 Q Would I say "working with" or "working for"?

25 A With.

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 Q With. Okay. So let's talk about the -- how Richard Haynes
2 came to Spokane. Was he brought to Spokane by Arvin Carmen?

3 A For Arvin Carmen.

4 Q For Arvin -- Arvin Carmen. And who sent him up here for
5 Arvin Carmen?

6 A Myself.

7 Q Would you -- did you recruit him? Is that the word that I
8 would use or did you just -- did you ask him if he wanted to be
9 involved in the pill hustle?

10 A I told him that he -- that he was being discussed by a
11 bigger homie to see if he wanted to come up and make some money.

12 Q And eventually he agreed that he wanted to come up and make
13 some money.

14 A And he would have to deal with School Boy.

15 Q Directly.

16 A Directly.

17 Q And you indicated yesterday you believe that Richard Haynes
18 came to Spokane sometime in the middle of 2012? Excuse me.
19 2011.

20 A Somewhere around there.

21 Q Okay. I'm sorry. I was --

22 A Approximately.

23 Q I was a year off. And he wasn't in the pill game here in
24 Spokane before he came up here. Correct?

25 A No.

615

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 Q So you -- you pretty well know when he -- or at least you
2 have personal knowledge of when he first came up here.

3 A Approximately.

4 Q Did he come up here with anybody else?

5 A No. He was by hisself to my understanding initially.

6 Q And do you know when he came up here if he brought his own
7 pills?

8 A With him?

9 Q Yes.

10 A That I don't know.

11 Q So you didn't supply him pills to come up here.

12 A. Eventually I did.

13 Q Okay. But not on his initial trip.

14 A On his initial trip, I'm not sure.

15 | 0 Okay. How long was Mr. -- and he goes by TS --

16 A Yes.

17 Q -- right? How long was TS here, let's say, before
18 School Girl came up to Spokane?

19 A few months.

20 Q So it was --

21 A Maybe between -- I'd say a few months before. I don't know
22 -- I don't know the exact time because I don't know when she
23 came up.

24 Q Two or three -- two or three months?

25 A I would say within that -- that time.

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 Q And you mentioned someone -- a person by the name of
2 Michelle Anderson. Was she an adopted member of the Eight Trey
3 Gangster Crips?

4 A Yes but not -- just associate.

5 Q I guess you didn't mention her last name. Sasha is her --
6 is who you said.

7 A Sasha.

8 Q So you knew who Sasha was.

9 A Yes.

10 Q Now, you said that she didn't come up here originally to be
11 involved in the pill hustle. Correct?

12 A Right.

13 Q Do you know if, eventually, she became involved in the pill
14 hustle?

15 A Yes.

16 Q How long -- how long -- was she here before School Girl?

17 A I don't know.

18 Q Okay. So you're -- you don't know that. How long after
19 she came to Spokane? Do you know precise -- or not precisely.
20 Do you know generally when she came to Spokane?

21 A No. That was -- she was TS's girl. So I don't know when
22 she actually came up, like, date and time. No.

23 Q So you're -- you're not sure when she actually became
24 involved in the pill hustle?

25 A No.

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 Q You just know eventually she became involved in the pill
2 hustle.

3 A Yes.

4 Q So, when Richard Haynes came up here, he actually developed
5 a pretty good reputation for selling pills, didn't he?

6 A Yes.

7 Q You said he worked -- he was a good salesman because he was
8 -- he was willing to work 24/7 to sell pills.

9 A Yes.

10 Q So he eventually was able to build himself a network of
11 fades fairly quickly.

12 A Yes.

13 Q He came to a point where he didn't necessarily have to rely
14 on Arvin Carmen to get his pills to sell. Correct?

15 A Correct.

16 Q And you indicated that you actually were involved at times
17 supplying pills to be sold in Spokane for individual people.
18 Correct?

19 A Which individuals?

20 Q Well, okay. That's what I'm getting to. That's what I was
21 going to ask you. But what I -- what I'm really trying to say
22 is that -- is that you said -- I believe you said that you
23 supplied, at times, Nocomie Moore?

24 A Yes.

25 Q You supplied, at times, YD?

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 A Yes.

2 Q You supplied, at times, Richard Haynes?

3 A Yes.

4 Q You supplied, at times, Arvin Carmen?

5 A Yes.

6 Q Donald Lynch?

7 A No.

8 Q Tiny Menace?

9 A Yes.

10 Q What I also understood from your testimony is that,
11 eventually, most of the pills that you were sending up were
12 pills destined for either School Girl or Richard Haynes.

13 Correct?

14 A No. For School Boy or Richard Haynes.

15 Q Okay. Did you ever send pills directly to -- or directly
16 for School Girl to sell?

17 A No.

18 Q Did you ever send an individual by the name of Kevin London
19 with some pills up to Spokane to -- for School Girl to sell?

20 A I sent -- what I did was I asked for School Girl to meet up
21 with Kevin London in order to get the pills that he had brought
22 up here for me.

23 Q And for her to sell.

24 A To give to her.

25 Q Correct. Kevin London was to give School Girl those pills.

619

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 A Yes.

2 Q Okay. So those pills were from you to School Girl from
3 Kevin London.

4 A For her to -- yes. To -- to meet up and get them from her.

5 Q So, eventually, the pills that you were coordinating you
6 were -- I -- I understand eventually you were coordinating them
7 with a person by the name of David Colbert or Back Bone (sic)?

8 A Black Bone.

9 Q Black Bone. Okay.

10 A Yes.

11 Q Just an aside so I don't forget this, have you ever heard
12 of an individual by the name of Fish Bone?

13 A Yes.

14 Q And Fish Bone is different than Black Bone.

15 A Yes.

16 Q And Fish Bone was up here selling pills, too. Correct?

17 A He's not part of the indictment.

18 Q No, he's not. Okay. Was he in the pill hustle though?

19 A He's not part of the indictment.

20 Q Okay.

21 MR. HORMEL: Your Honor, if I may have just a second
22 with --

23 (Discussion off the record)

24 Q (BY MR. HORMEL) I will move on, and we'll address it
25 later. Okay?

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 A Okay.

2 Q So let's talk about Bones -- Black Bone's involvement.

3 Okay?

4 A Okay.

5 Q Black Bone, I understand, was also in the pill hustle
6 helping get pills from you to Spokane. Is that correct?

7 A To get pills from me --

8 Q Was he getting pills from you to send to Spokane?

9 A For TS.

10 Q For TS. Correct?

11 A Yes.

12 Q Okay. That was my question. You were -- you, eventually,
13 were supplying, primarily, TS. Correct?

14 A Yes. At one time, yes.

15 Q Yes. And let's talk about, during the period of time that
16 we just heard a bunch of communication intercepts, you were
17 intercepted by the phone talking to -- to TS. Correct?

18 A Yes.

19 Q And you're talking about numbers of pills and money and
20 that sort of thing. Correct?

21 A Correct.

22 Q And you're talking also with Tiny Menace.

23 A Yes.

24 Q And Tiny Menace worked with and for Richard Haynes.
25 Correct?

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 A Yes.

2 Q So it was during that period of time that you were
3 primarily sending pills up to TS through Black Bone. Correct?

4 A Through Black Bone or Tiny Menace.

5 Q Or Tiny Menace.

6 A Yes.

7 Q Was Tiny Menace involved in what you would call
8 piggybacking?

9 A Yes.

10 Q He would take his own pills, but he would also take pills
11 up to TS.

12 A A few people did that.

13 Q Who was -- who was the other person?

14 A No, I'm saying a few people would do that. And sometimes
15 I'm not privy to that information. Because, once it's handed
16 off and they on their way, sometimes I'm not privy to that
17 information.

18 Q You're not privy to who actually brought it to Spokane.

19 A Who actually either brought it to Spokane, or who they're
20 actually going to --

21 Q Okay.

22 A -- once they get here.

23 Q But you -- so let me ask you this: Generally, if you gave
24 pills to Tiny Menace to give to TS, you trusted him to give
25 those to TS. Correct?

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 A Yes, and they would distribute them as see fit.

2 Q Yes. And the same with David Colbert. If you gave
3 David Colbert pills to ship to -- to have shipped to TS, you
4 trusted that those pills would eventually be obtained by TS to
5 be sold here in Spokane. Correct?

6 A I guess that would be correct. But, once they in his
7 hands, it's not about trust. It's about, you know, whether or
8 not he gets them there through the proper channels.

9 Q So Richard Haynes certainly had to trust the proper
10 channels. Correct?

11 A To the best of his knowledge.

12 Q Yes. So you were involved in the pill hustle from -- from
13 about the early 2009 to the end of 2009? Is that a fair --

14 A No.

15 Q Mid 2009 to late 2009?

16 A August of 2009.

17 Q To December?

18 A Yes.

19 Q Okay.

20 A You're talking about as far as my physically being here?

21 Q Yes.

22 A Yes.

23 Q Okay. You did indicate, though, you would fly up here on
24 occasion just to meet with people and check things out.

25 Yesterday.

623

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 A No. Came back in January to meet with School Boy.

2 Q January of what year?

3 A 2010.

4 Q Was that the last time you were up here?

5 A No.

6 Q Okay. How many times after you left in December of 2011 do
7 you think you were up here in Spokane?

8 A Can you repeat the question?

9 Q How many times after you left in 2011 do you think you came
10 back to Spokane between January of 2012 and February of 2013?

11 A I'm not sure of the exact amount of time. At that time, I
12 was seeing School Girl. So I would -- whenever she was in town,
13 I would try but not all the time that I always come up.

14 Q Okay. So you're -- you're in a relationship with
15 School Girl --

16 A School Girl.

17 Q -- who goes by Sharita Horn.

18 A Yes.

19 Q Or Sharita Horn who goes by School Girl.

20 A Yes.

21 Q Okay. So let me talk about how -- how pill sales took
22 place in Spokane. A fade would contact someone who had a fade
23 phone who knew had -- hopefully had a supply of pills. Correct?

24 A Correct.

25 Q The pill supplier didn't always have a supply. Correct?

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 A Not always.

2 Q So oftentimes a fade would have an alternate supplier.

3 Correct?

4 A Yes.

5 Q And the alternate supplier didn't always have to be an
6 Eight Trey Gangster Crip.

7 A True.

8 Q True? Because there were other pill sellers in Spokane.

9 Correct?

10 A Yes.

11 Q A very common way to sell pills in Spokane -- correct me if
12 I'm wrong but I hear a lot that parking lots at stores are used.

13 A Sure.

14 Q Like a grocery store like Fred Meyer's or something like
15 that? Walmart?

16 A Yes.

17 Q And the reason that remote -- places remote from where
18 someone lays their head is used is so that the place in which
19 the drug -- the pill seller is living isn't -- is less likely to
20 be detected. Correct?

21 A Yes, to be burglarized or robbed.

22 Q So, when we hear the term "out in traffic," is that what
23 that means?

24 A Yes.

25 Q Okay. "Turning corners" same thing?

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 A Same thing.

2 Q Okay. And -- and that's because you're literally -- the
3 pill -- the pill seller is out in traffic.

4 A Right.

5 Q And sometimes jumping from one parking lot to another to
6 meet fades.

7 A Yes.

8 Q And sometimes -- and oftentimes fades are addicts. Right?
9 Pill addicts?

10 A No. Sometimes they are people that use pills and hustle on
11 the side.

12 Q Correct, but sometimes they're people -- well, you wouldn't
13 know if a person's an addict or not when he's selling pill.

14 Right?

15 A Exactly.

16 Q Okay. You do know that some individuals might have started
17 out smaller and wanted more and more and more. Correct?

18 A Correct.

19 Q But you wouldn't have known whether that was caused by an
20 addiction or something else. Correct?

21 A No because some -- some fades become workers.

22 Q Correct. But you weren't here in Spokane. Well, you
23 weren't here in Spokane during the -- after 2011 -- December of
24 2011 selling pills. Correct?

25 A Physically?

JURY TRIAL - DAY 4 - OCTOBER 17, 2014
G. MADISON/CR - HORMEL

1 Q Yes.

2 A No.

3 THE COURT: Let's -- let's break. We discussed
4 yesterday about our -- our Monday schedule. And I'm a little
5 uncertain as to whether or not we all agreed we were going to
6 start at ten o'clock or we were going to start at nine o'clock.
7 Was there a choice of the jury to start at ten o'clock rather
8 than nine o'clock? I don't see any heads going up and down.
9 Oh, they are saying -- you're saying, "Yes"? There are several
10 of you from out of -- okay. Okay. It will be ten o'clock.

11 Remember, don't talk about this case over the weekend.
12 Just have a good weekend and relax, and we'll be here to start
13 at ten o'clock in the morning.

14 Now, as far as counsel is concerned, I'll see all of you,
15 what, 9:30 on Monday.

16 MR. NOLLETTE: 9:30, your Honor?

17 THE COURT: Pardon me?

18 MR. NOLLETTE: It's 9:30?

19 THE COURT: 9:30.

20 MR. NOLLETTE: Thank you.

21 THE COURT: If nothing else, we'll be in recess until
22 ten o'clock Monday -- 9:30 Monday.

23 (Jury out at 2:00 p.m.)

24 (Court recessed at 2:00 p.m.)

25

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - HORMEL

1 have any problem with that revised schedule?

2 And, depending on how the testimony goes this afternoon, we
3 may continue on until 4:30. I'd indicated the end of last week
4 that we were going to adjourn at 4:00. But it may be more
5 appropriate, for reasons that I don't need to discuss now, that
6 we go till 4:30 instead of 4:00. But we won't go beyond 4:30.

7 All right. Mr. Madison is still on the stand under oath.

8 And, Mr. Hormel, your cross examination of Mr. Madison may
9 continue.

10 MR. HORMEL: Thank you, your Honor.

11 THE WITNESS: Good morning, your Honor.

12

13 CROSS EXAMINATION

14 CROSS BY MR. HORMEL:

15 Q Mr. Madison, on Friday, we mentioned a lot of names and
16 went through a lot of information about individuals that are
17 involved in this case. And, so, I don't want to go through,
18 obviously, everything again. But I do want to ask you --

19 MR. HORMEL: Without publishing to the jury --

20 THE COURT REPORTER: I can't do that.

21 MR. HORMEL: I'll get back to it.

22 THE COURT REPORTER: I don't think it's published,
23 though, but --

24 MR. HORMEL: That's okay. I'll get back to it.

25 Q (BY MR. HORMEL) When we ended on Friday, I was discussing

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - HORMEL

1 with you the -- what a fade is. Do you recall that?

2 A Yes.

3 Q Okay. And a fade is a customer of the pill seller.

4 Correct?

5 A In Los Angeles or --

6 Q Oh, excuse me, in Spokane.

7 A Spokane. A person that you would sell pills to.

8 Q That's right. So the -- the pill seller would sell the
9 pills to a fade. Correct?

10 A Yes.

11 Q And a fade could be a person who is a drug user. Correct?

12 A Yes.

13 Q A fade could be a person who might, depending on the
14 quantity they -- they buy, might -- might have their own thing
15 going on and sell to other people. Correct?

16 A True.

17 Q But, oftentimes, the fade that is dealing with -- the fade
18 will have more than one supplier. Correct?

19 A Possible.

20 Q So that's -- that's a possibility --

21 A Yeah.

22 Q -- that a fade will have more than one supplier.

23 A That's possible.

24 Q And are you -- when you were selling, were you aware of the
25 fades who were actually using the pill or smoking the pill or

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - HORMEL

1 addicted to the pill?

2 A No. I wouldn't be privy to that information. I would have
3 to know them personally.

4 Q So you didn't really get to know your fades personally to
5 that degree. Correct?

6 A Not to that degree.

7 Q I also want to wrap up a little bit of -- and talk about
8 who, again, the big players in Spokane were that you knew of
9 during the time you were here and during the time you were in LA
10 furnishing pills to individuals in Spokane. Okay? Who the big
11 players are?

12 A From what time to what time?

13 Q Well, I would say, from the time you were here in Spokane
14 until the time you left, would you say the big players were
15 Carmen?

16 A Yes. Yes.

17 Q Kevin Miles?

18 A Yes.

19 Q And Nocomie Moore.

20 A Yes.

21 Q And, then, after you left, another big player became
22 Richard Haynes, when he came up here -- after you left and he
23 came up here. Correct?

24 A Yes.

25 Q Now, what you referred to as a "big player" is those

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - HORMEL

1 individuals that you knew who were making a lot of money on
2 selling pills. Correct?

3 A No, not making a lot of money in detail. They may have
4 been controlling their -- whoever was in charge. Like, they
5 could have been controlling their crew.

6 Q So what you're referring to, then, also as the "big
7 player," is the person who was controlling their crew. Correct?

8 A Yes.

9 Q Now, there were other -- and I don't want to get into the
10 names, but there were other big players in Spokane during that
11 period of time, was there not?

12 A Yes.

13 Q And those other big players that you knew were also
14 connected to the Eight Trey Gangster Crips. Correct?

15 A In some form or fashion.

16 Q Okay. Some were either associates or some were members.
17 Correct?

18 A Yes.

19 Q And, when you talk about those others who were big players,
20 they had their own crews also. Correct?

21 A I'm not sure if they had other players or not. I just know
22 what they -- as far as what I was privy to when they dealt with
23 me and what I heard. But --

24 Q So what you know about the others is just what you heard.
25 Correct?

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - HORMEL

1 A No. Like I said, it was either I dealt with them or what I
2 heard from others.

3 Q Okay. You also mentioned individuals that had their own
4 suppliers who were up here in Spokane dealing while either you
5 were here or while you were down in LA. Do you remember that?

6 A Yes.

7 Q And -- if you'll excuse me. Let me put my glasses on so I
8 can find it. Now, you indicated yesterday that -- that
9 Sharita Horn did not have her own suppliers. Or did I -- was I
10 confused?

11 A You didn't ask me that.

12 Q Okay. Sharita Horn did have her own suppliers. Correct?

13 A I would suppose that she might have.

14 Q Okay.

15 A Um-hum.

16 Q Now, you're her fiancé. Correct?

17 A Yes.

18 Q Okay. Now -- and you recall that this year, on May 30th,
19 2014, that you had an interview with Agent Sullivan and
20 Agent Meyer and the United States Attorney's office. Correct?

21 A Correct.

22 Q Okay. And --

23 A Approximately.

24 Q -- would it refresh your recollection if I gave you a
25 document that showed who you listed as individuals who had their

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - HORMEL

1 separate suppliers?

2 MS. VAN MARTER: Your Honor, I'm going to object,
3 again, to improper impeachment. This witness didn't write any
4 documents, and he testified from his memory and answered the
5 question.

6 MR. HORMEL: I'm asking if it would refresh his
7 memory, your Honor.

8 THE COURT: Would it refresh your memory? Do you
9 understand his question?

10 THE WITNESS: If it would refresh my memory as far
11 as --

12 THE COURT: To look at a document he has.

13 Q (BY MR. HORMEL) If you look at a recitation of the report
14 that Agent Sullivan prepared in relation to your -- your
15 discussion with him on May 30th, would it help refresh your
16 memory as to what you said?

17 A It may.

18 MR. HORMEL: May I publish to the jury -- or to the
19 witness --

20 THE COURT: Approach.

21 MR. HORMEL: -- without publishing to the jury?

22 THE COURT: Is that -- is that in evidence? Not to
23 the --

24 MR. HORMEL: It's not in evidence. I'm just using it
25 to refresh.

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - HORMEL

1 MS. VAN MARTER: So it's for the witness only?

2 MR. HORMEL: For the witness only.

3 THE COURT: It is witness only.

4 Q (BY MR. HORMEL) Do you see this paragraph here
5 (indicating)? Can you read that?

6 (Pause in the proceedings)

7 Q (BY MR. HORMEL) So does that help you recall whether or
8 not you indicated that Sharita Horn had her own suppliers?

9 A Yes.

10 Q And she did. Correct?

11 | A Excuse me?

12 Q She did. Correct?

13 A Yes, at some point.

14 Q The other folks that had their own suppliers was Tiny --
15 or, excuse me. Alex James.

16 A Yes.

17 O Donald Lynch.

18 A Yes.

190 Maurice Shelton.

20 A Yes.

21 0 Richard Haynes. We've already talked about him.

22 A Yes.

23 Q Arvin Carmen. We've talked about him.

24 A Yes

25 Q Mr. Lisbey.

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - HORMEL

1 A Yes.

2 Q We talked about him.

3 A Yes.

4 Q And Nocomie Moore. Correct?

5 A Yes.

6 Q They had their own suppliers down in Los Angeles that
7 would -- that they -- and they -- those suppliers -- the pills
8 that were supplied to them would eventually come to Spokane for
9 distribution. Correct?

10 A Yes.

11 Q In your direct examination, if I recall this correctly, you
12 indicated that, in the pill game or the pill hustle here in
13 Spokane, that your hustle was your hustle. In other words, what
14 you hustled belonged to you. Is that an accurate statement?

15 A Meaning -- I don't -- I'm not following you.

16 Q Well, I'm -- I'm talking about the money. When
17 Richard Haynes sold pills on his behalf, he kept his money.
18 Correct?

19 A That's not correct.

20 Q Did he share with others who helped him sell?

21 A However he seen fit because he was the one that was running
22 it.

23 Q Okay. So he controlled his money. So he placed it where
24 he saw fit. Correct?

25 A Or who -- whoever he was in business with.

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - HORMEL

1 Q Or -- at the time. Correct?

2 A At the time, before, beyond.

3 Q And you talked about him digging money. Digging up holes
4 for money. Correct?

5 A He talked about digging up money.

6 Q Okay. You test -- yes, you are correct. You interpreted a
7 communication intercept where Richard Haynes was talking about
8 not wanting to dig up money after he lost \$100,000. Correct?

9 A Go in the dirt, yes.

10 Q Yeah. So one of the ways he saved his money was digging up
11 holes in the ground and putting money in holes in the ground.
12 Correct?

13 A Yes.

14 Q And -- and, in your understanding, is that a similar way
15 that Mr. Carmen --

16 A Yes.

17 Q -- saved his money?

18 A Some of it. I can't say all of it.

19 Q Right. But you knew he used the digging-in-the-ground
20 method. Correct?

21 A Yes, I did.

22 Q And, then, Nocomie Moore. She kept -- she kept and managed
23 her money from her crew?

24 A Yes. I would suppose so.

25 Q And, then, the same is true with Kevin Miles. Correct?

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - LEE

1 A Yes.

2 MR. HORMEL: So now I'd like to publish to the witness
3 without publishing to the jury.

4 Q (BY MR. HORMEL) Do you recognize what's been marked as
5 defendant's -- do you recognize who's depicted in the photograph
6 that's marked as Defendant's Exhibit 1044?

7 A Do I know who that is?

8 Q Yes.

9 A Not right offhand.

10 Q Not offhand?

11 A No.

12 Q Does it look like T Crazy?

13 A Nope.

14 Q Nope? Okay.

15 MR. HORMEL: Your Honor, if I may have a moment?

16 THE COURT: You may.

17 (Discussion off the record)

18 MR. HORMEL: That's all I have, your Honor.

19 THE COURT: All right. Who wants to go next?

20 Mr. Lee? Mr. Lee?

21 MR. LEE: Yes.

22

23 CROSS EXAMINATION

24 CROSS BY MR. LEE:

25 Q Mr. Madison.

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - LEE

1 A Good morning.

2 Q Good morning. So you're pretty high up in the Eight Trey
3 organization?

4 A Reputation wise? Is that what you're saying?

5 Q Yes. Let's start reputation wise.

6 A Yes, I would suppose so.

7 Q What about in the hierarchy? Where do you -- where do you
8 rate to, say, Carmen?

9 A As far as he's -- he would be my Lil Homie.

10 Q Okay. So you have -- is another way to talk about this
11 your rep?

12 A Reputation, stature. Like, your résumé.

13 Q And you do have a lot of stature.

14 A Yes.

15 Q Okay. What about in the -- you refer to it as a pill
16 hustle here in Spokane. Do you have a lot of -- are you high up
17 there, do you consider yourself?

18 A I wasn't at first.

19 Q But, then, eventually, you --

20 A We all did.

21 Q And you know a lot of people that are working in the pill
22 game here in Spokane. Right?

23 A Not everyone but I know most of the people.

24 Q A great -- a great deal.

25 A Great deal, yes.

651

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - LEE

1 Q All right. And some of them are Eight Treys?

2 A Some are.

3 Q Some are non-Eight Treys.

4 A Yes.

5 Q And you even have information. You even know about people
6 that are in the pill hustle that are not Eight Treys. Right?

7 A Yes.

8 Q And the reason you want -- I mean, when you're in the --
9 when you're in the pill game, you want to know who's working for
10 you. Right?

11 A Not necessarily.

12 Q Why not?

13 A Because you're focus is, whoever you're dealing with, you
14 would trust that they would distribute however they see fit.
15 You don't have to know every player.

16 Q But people that you're dealing with. I mean, you want to
17 know what people are doing here in Spokane. Do you ever -- do
18 you ever hear that phrase "knowledge is power"?

19 A Yes.

20 Q I mean, do you believe in that?

21 A Depends on where you apply it to.

22 Q Okay. But you want to know what people are doing here. Do
23 you -- let me ask you this: Do you want to know if people are
24 competing against you?

25 A No. That's not my job. That's not -- that's not how I

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - LEE

1 think. You know, then that gets into, like, micromanaging the
2 situation that you have no control over.

3 Q So you wouldn't want to know if there's somebody that's
4 also involved in the pill game?

5 A Me personally?

6 Q You personally or people you work for.

7 A Some people -- some people would like to micromanage
8 whatever they got going on.

9 Q I'm not talking about micromanaging, but would you want to
10 know if other people are involved?

11 A Again, I'm asking you, myself or just as an individual?

12 Q Yourself.

13 A No.

14 Q Now, in the Eight Trey, this -- this pill hustle, you
15 mentioned the term "green dot cards."

16 A Green dot, yes.

17 Q Green dot cards. And that's how you would pay couriers --
18 a lot of these people would pay couriers. Am I right?

19 A Somewhat.

20 Q Would it also be a way to transfer money from here to LA?

21 A Yes.

22 Q Or other places --

23 A Yes.

24 Q -- I suppose? And the reason is -- the reason that people
25 would use those cards is untraceable.

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - LEE

1 A Yes.

2 Q So you wouldn't want to pay by methods that there could be
3 a record.

4 A A check or Money Order?

5 Q Correct.

6 A No.

7 Q Okay. Now, you had mentioned in your testimony, also, that
8 there would be Eight Treys that would hang out and socialize
9 with other Eight Trey members here in Spokane. Is that right?

10 A Yes.

11 Q And, then, there was also some non-Eight Treys that would
12 hang out and socialize with Eight Treys in Spokane.

13 A Yes.

14 Q The name Amber Branch. You mentioned Amber Branch.

15 Mr. Blackmon was in a dating relationship with her at one point?

16 A Yes. I would --

17 Q As far as -- as far as you know.

18 A As far as I know. I'm not sure to the extent. That's kind
19 of personal. So --

20 Q Okay. Fair enough. Do you know if Amber Branch was
21 involved with other people?

22 A Rumors.

23 Q Okay. Stuff you heard.

24 A Of course.

25 Q What about Joseph Shorts? Do you know if she had a

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - LEE

1 relationship with Joseph Shorts?

2 A Same thing.

3 Q Same thing. Do you know if that was a business
4 relationship?

5 A To my understanding, those both lie kind of close together;
6 but I wasn't privy to, you know, go in-depth and find out.

7 Q Okay. What about Turner? Glen Turner? Do you know if she
8 was involved with him?

9 A Possibly.

10 Q You mentioned the name "Thomas," I think, in your
11 testimony. Antonio? Is that Antonio Thomas?

12 A Yeah, Antonio. I don't know his last name, but --

13 Q She had something with him as far as you know?

14 A I just know it was a situation that arose around them.

15 Q Did you have information that Branch was distributing --

16 A Yes.

17 Q -- in Spokane?

18 A At some point.

19 Q So that's information you learned that you know.

20 A That came about through a incident that occurred.

21 Q Okay. Now, this fight. You said that Mr. Blackmon -- that
22 Donta got into a fight in Spokane, at one point, over Branch.
23 Was that right? Was that your -- that was your testimony.

24 A Yes.

25 Q Were you there?

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - LEE

1 A No.

2 Q And that -- this is stuff, also, that you heard from
3 somebody else?

4 A I was -- someone called me.

5 Q Okay. But, as far as you heard, you heard it was about
6 Amber sleeping with somebody else?

7 A No. I just heard that they fought around -- about her but
8 not whether she slept with anybody. There -- other rumors came
9 up.

10 Q Do you know if she -- do you know if she slept around?

11 A Yes.

12 MS. VAN MARTER: Objection, your Honor, relevance.

13 THE COURT: Sustained. I think we've gone far enough
14 into that personal.

15 Q (BY MR. LEE) Now, let's talk a little bit about monikers.

16 A moniker is a street name. Right?

17 A Not necessarily. It could be marker that anybody give you
18 but don't have to be street name. It could be a nickname that
19 your family give you.

20 Q Okay. But people with -- but Eight Treys. Let's focus
21 specifically on Eight Treys. They would go by that name,
22 oftentimes, in dealing with other people.

23 A Yes. Or a change.

24 Q And, in fact, that's how you know some of the people by
25 their -- their moniker.

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - LEE

1 A Right. Not personally by their government name.

2 Q Right. In fact, I think a couple individuals you didn't
3 know their last name; but you knew them by that -- that moniker.

4 A Yes, just by the moniker.

5 Q All right. Let's -- let's get this out. You brought the
6 name Flacco up during your testimony. F L A C C O?

7 A Flacco?

8 Q Flacco?

9 A Yeah, but it's pronounced Flacco.

10 Q Flacco, I'm sorry. But that's somebody with a name.

11 Right?

12 A Yes.

13 Q That's different than Paco. I just want to make that
14 distinction.

15 A Yeah, that's not Paco.

16 Q And, oftentimes, with these monikers, does it get confusing
17 for you to deal with these monikers?

18 A I'm not perfect. So, I mean, I pretty much try to
19 understand who has what name because some names, they change.
20 Some sides change. You can't keep up with everybody and
21 everything.

22 Q Right.

23 A It's just some -- just information.

24 Q And you said that name -- sometimes people adopt the same
25 name. Is that right?

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - LEE

1 A Yes, of other people.

2 Q Right. Sometimes people have two that they go by.

3 A Or three.

4 Q Or three.

5 A Yes.

6 Q Sometimes some people had two in Los Angeles and, then, had
7 different ones up here in Spokane even.

8 A Correct.

9 Q Now, some clarification on the monikers. There's Big?
10 There's some prefixes that follow monikers. Is that correct?

11 A Prefixes in which way?

12 Q Prefixes. Like, let me give you an example. Big. Like,
13 Big Paco.

14 A Yes.

15 Q All right. Is that -- does that signify the highest up?
16 Or where is that in the order of, say, "Little"?

17 A You can be a -- a Big and don't be, actually, say, at the
18 top of the food chain. It's a lot of people that are a Tiny, a
19 Young, and they would often change their name to be a Big
20 because their age will -- they want to -- they want their own
name.

22 Q Okay. But there's -- so there is a Big.

23 A Yes. There's a -- yes.

24 Q A Big? A Little?

25 A Yes.

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - LEE

1 Q A Baby.

2 A Yes.

3 Q Tiny?

4 A Yes.

5 Q Young?

6 A Yes.

7 Q Is there a -- is there even a further one, Newborn?

8 A Yes.

9 Q Okay. So, for any given name, there could be one, two,
10 three -- six prefixes, six names in front of it. For instance,
11 Little Sidewinder.

12 A Um-hum.

13 Q Now, there's -- with -- in your knowledge, there's more
14 than one Paco.

15 A Yes.

16 Q How many? Is there four?

17 A Four.

18 Q Four Pacos.

19 A Big, Little, Baby, Tiny that I know of.

20 Q And -- and sometimes people, when they're -- when they're
21 dealing with -- with the name, they'll just throw out the name
22 "Paco." They won't necessarily say, "Baby Paco," "Big Paco,"
23 "Little Paco." It's just "Paco."

24 A True.

25 Q In fact, you did, I think, in your testimony. You referred

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - LEE

1 to Mr. Blackmon as "Paco;" and, at one point further on in the
2 testimony, you said, "Baby Paco" and clarified.

3 A Yes.

4 Q Now, do you know the name Roy Williams?

5 A Roy Williams?

6 Q Yes.

7 A Doesn't ring a bell right offhand.

8 Q Okay. So you wouldn't know if he goes by the name "Paco."

9 A The name, itself, don't even ring a bell. So I'm not sure
10 what he would go by.

11 Q Okay. Damian Johnson. Is that name familiar?

12 A Yes.

13 Q He goes by Paco?

14 A Yes.

15 Q Is -- in your knowledge, he's involved in the pill game up
16 here in Spokane.

17 A He's not involved in indictment.

18 Q He's not involved in the indictment, but is he involved in
19 the pill game?

20 A He's not involved in the indictment.

21 MR. LEE: Your Honor, I'd ask the Court to instruct
22 the witness to answer the question.

23 THE COURT: Well, if he knows. He just asked if he's
24 involved in the pill game in Spokane. If you know, answer. If
25 you don't, say so.

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - CHRISTIANSON

1 THE WITNESS: Okay. Yes.

2 Q (BY MR. LEE) And is he actually a pretty big player up
3 here in Spokane that you know of?

4 A I'm not sure of his stature as far as him being a big
5 player.

6 Q Okay. But is he involved.

7 A Yes.

8 Q And he does go by Paco.

9 A Yes.

10 MR. LEE: I don't have any more questions.

11 THE COURT: All right. Who's next? Mr. Christianson?

12 MR. CHRISTIANSON: It's going to take me just a second
13 to set up, sir.

14

15 CROSS EXAMINATION

16 CROSS BY MR. CHRISTIANSON:

17 Q You ready?

18 A Yes, sir.

19 Q Good morning, sir.

20 A Good morning.

21 Q Let's clarify a couple things for the record. The pill
22 hustle up here was not a gang operation.

23 A No. It didn't start off like that.

24 Q There were people from the gang in it. There were people
25 not from the gang in it. There were even people from rival

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - CHRISTIANSON

1 gangs in it.

2 A Yes.

3 Q So it was not a -- an Eight Trey Gangster Crips gang
4 operation pill hustle in Spokane.

5 A Exclusively, no.

6 Q Okay. What do you mean by exclusively? Was it a gang
7 operation, or were there just gang members in it?

8 A Gang members from different parts of California, Spokane.

9 Q Okay. Now, you -- before you were arrested, you'd already
10 made the decision that you're going to roll on everybody and
11 give evidence and try to make yourself a deal. Correct?

12 A I'm not sure if you saying that correctly.

13 Q How would you say it?

14 A I spoke to my lawyer and asked him to look into my
15 cooperation for the Government.

16 Q And that was before you were arrested.

17 A Yes.

18 Q Okay. So, from the time you were arrested, you already had
19 a plan that you were going to cooperate.

20 A A plan?

21 Q A -- a plan that it was your intent you were going to
22 cooperate.

23 A Yes.

24 Q Okay. So, when you're talking to -- to the investigators
25 and everything, you don't have any reason to hide anything

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - CHRISTIANSON

1 because you're cooperating, at this point.

2 A When I'm talking to get investigators? At what point?

3 Q After you were arrested.

4 A I instructed the arresting officers that, before I could
5 speak with them, I wanted to speak with my lawyer and that I'm
6 not saying that I'm not going to cooperate. I'm saying that I
7 wanted to at least have counsel there when I do.

8 Q Okay. Let me -- let me -- let me ask it a little
9 differently. You gave, I think, five prior free talks with the
10 investigators. Correct?

11 A Yes.

12 Q July 31st, 2013. August 22nd, 2013. A two-day,
13 September 16 and September 17, 2013. Then one in May 29th of
14 2014, and one just as recently as September 15th, 2014.
15 Correct?

16 A If those days are on there.

17 Q Okay. During all of those, you already had a deal in place
18 where you were going to cooperate.

19 A A deal?

20 Q An agreement.

21 A That I would cooperate?

22 Q Yes.

23 A That had already -- had -- no. I had free talks at that
24 time. I'm not sure where you -- to understand your question.

25 Q Did you have any reason to lie to the investigators during

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - CHRISTIANSON

1 those free talks?

2 A I gave them an accurate account of my -- my comings and
3 goings.

4 Q Okay. As far back as your first free talk of July 31st,
5 2013, those were all accurate.

6 A As to my memory, I would suppose.

7 Q Okay.

8 MS. VAN MARTER: Your Honor, I'm going object. May --
9 it's already been established this witness has not reviewed any
10 of those reports. So, if -- if the intention is to admit those
11 reports or use those reports in any fashion, this witness does
12 not have any knowledge as to what's in the reports.

13 THE COURT: Right. So don't base your questions on
14 the content of the reports. He's had nothing to do with them.

15 MR. CHRISTIANSON: I understand that, Judge. And I'm
16 not moving to admit them or anything. I'm just making sure that
17 he's telling the truth during those.

18 THE COURT: Just ask him that.

19 MR. CHRISTIANSON: Okay.

20 Q (BY MR. CHRISTIANSON) You indicated during your
21 testimony -- I believe it was -- it had to have been last
22 week -- that -- talking about Paco, that you wouldn't really
23 have known his business. Something about it would not be common
24 to just walk up and talk business. We don't know each other
25 like that. Correct?

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - CHRISTIANSON

1 A Correct.

2 Q Do you remember that?

3 A Yes.

4 Q And -- and that just means that you know who he is and
5 everything but, you know, you're not going to walk up and ask
6 him his personal business.

7 A No, I'm not gonna ask him -- other than what's going on.

8 As far as anything other than that casual conversation, no. If
9 anything else comes up after that, then we speak on it.

10 Q And he's not gonna ask you your personal business.

11 A Unless he -- personal?

12 Q Is he gonna ask you how you -- how you're dealing your
13 drugs?

14 A Only if he want in.

15 Q Okay. And -- and you indicated that you had never talked
16 directly with Mr. Tones about any of this business.

17 A As far as making money out here?

18 Q Yeah.

19 A Him coming out here?

20 Q Yeah.

21 A Anything of that nature? Him and I never had that
22 conversation as far as I can remember.

23 Q And you never went and -- and hung out at the apartment
24 that Shelmon was running.

25 A I didn't go to that apartment.

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - CHRISTIANSON

1 Q All right. Kind of a free, wild kind of place that you
2 wanted to keep yourself a little distant from?

3 A No. It just -- I never got invited. I never wanted to --
4 to go over there.

5 Q Okay. So -- so you never talked to Mr. Tones. You never
6 went out and watched him sell drugs or anything. So everything
7 you know about Mr. Tones and his involvement in this pill game
8 is what you've heard from others.

9 A Yes. I haven't heard anything from him.

10 Q Okay. You've never watched him sell a pill. You've never
11 had him tell you he sold a pill.

12 A No.

13 Q Okay. So it's just, basically, what you hear on the
14 streets.

15 A Yes.

16 Q Okay. And you don't know him well enough that you guys
17 would sit down and talk private business.

18 A Private business? I'm not sure. We talk. He cuts my
19 hair. You know, I got a lot of hair so he trim me up every now
20 and then.

21 Q Does it -- is it usually longer than that? Or -- or does
22 he shave it? Or I --

23 A Yes.

24 Q I look at your -- for the record, it's a bald head, and
25 you're talking haircuts. So he's shaved your head a few times?

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - CHRISTIANSON

1 A Yes.

2 Q He runs a -- a chair down in LA?

3 A Yes.

4 Q You guys talk drug business during the haircut?

5 A It may come up.

6 Q Your business or his business?

7 A Business.

8 Q Okay. Fade phones. We've talked about they're an
9 important commodity. Right? It's kind of like a customer list.

10 A Rolodex?

11 Q A Rolodex. You know, a list of who I can, maybe, sell some
12 drugs to.

13 A You can't just pick up the phone and call them.

14 Q Okay. But, then, I would have the number that they're all
15 going to call.

16 A Right.

17 Q And that's where the value is.

18 A The value is them calling in. Sometimes people do take the
19 initiative to call them and let them know that they're ready to
20 deal or they -- they can also contact them, also.

21 Q Okay. So I want to make sure. You testified, it must have
22 been last week, that, at one point, you were living with
23 Mr. Carmen.

24 A Yes.

25 Q And you were operating his fade phone while he was at

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - CHRISTIANSON

1 school?

2 A No. He would call me on my phone. He would have his
3 phone. He's not going to give that phone to me.

4 Q Okay. But he let you run his fades because you were
5 working for him.

6 A Yes, while he go to school.

7 Q Okay. So you were -- you were -- you were dealing with his
8 fades for him because you were working for him.

9 A Yes.

10 Q Okay. You remember testifying that -- you remember hearing
11 a telephone conversation that the Government played last week
12 that indicated -- I believe you said the voices were Mr. Lisbey
13 talking to somebody saying he does not want Shelmon or Tones
14 having any access whatsoever to his fade phone.

15 A Yes, I did.

16 Q When you testified last week, you used the word "franchise"
17 quite a few times. Do you realize that?

18 A Possibly.

19 Q When the Government was asking you questions, you both used
20 the word "franchise" quite a few times. Is that normally what
21 you would call this hustle?

22 A It depends. I was trying to clarify of what stature that
23 it would actually be also recognized as.

24 Q If I were to hand you reports from your five prior
25 conversations with the Government, would you be willing to look

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - CHRISTIANSON

1 through those and see if you can find the word "franchise" once?

2 MS. VAN MARTER: Objection, again, your Honor.

3 Relevance. Those are not his reports. He's never reviewed
4 them.

5 THE COURT: Sustained.

6 Q (BY MR. CHRISTIANSON) Do you remember using the word
7 "franchise" even once during your prior conversations with the
8 Government?

9 A I may have, but I don't remember that -- that I have or
10 that I didn't.

11 Q But yet you remember using it quite a few times in front of
12 the jury here the other day.

13 A Well, I was explaining to, I guess, Hormel and getting
14 up -- getting into detail of what it could also be considered.

15 Q Let's talk about the organization of the Eight Trey
16 Gangster Crips. Mr. Lee talked about you had a position of
17 stature. Are you, like, president of the Eight Trey? You the
18 king? You the -- do you have a title?

19 A No.

20 Q Does -- does -- I guess I don't even know your educational
21 background. What is your educational background? Any college?

22 A Two years.

23 Q Two years? I'm guessing business college?

24 A Nope.

25 Q What?

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - CHRISTIANSON

1 A Construction, fitness, nutrition and health.

2 Q You're very articulate and very bright. Would you agree?

3 A I guess, if you would -- if that's the compliment you're

4 giving me.

5 Q Observation.

6 A Thank you.

7 Q You're welcome. You think about business a lot?

8 A Construction wise I guess I would.

9 Q Okay. You've been running a construction company?

10 A I guess you would call it my -- my dad and myself business.

11 We both share in running it.

12 Q Okay. I guess what I'm trying to get at is you understand

13 how business organizations work. You'll have a -- a president.

14 You'll have a -- a chief financial officer. You'll have a head

15 of distribution. Then you'll have -- is that the way the Eight

16 Trey Crips are set up?

17 A Relatively, it could be. It can be construed as such,

18 but --

19 Q It could be construed; but it's not the way it's set up, is

20 it? Let me rephrase. You could go back and you could look at

21 the Crips and you could say, "Well, you know, he's kind of like

22 the -- the president. And he'd be kind of like in charge of

23 this." But that's not the way it is set up, is it?

24 A It's -- it's set up -- I guess I would refer to, like,

25 somewhat like Army, military.

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - CHRISTIANSON

1 Q People have ranks?

2 A Well, yeah.

3 Q Wouldn't it be more accurate to say, if you've been around
4 a while and have you some age and experience, people maybe look
5 up to you; but you don't get a designated rank?

6 A True.

7 Q So it's not that you -- you get a title and a position.

8 It's just, if you've been around and you've, you know, helped
9 people make money, people are going to look up to you.

10 A It's not relatively the money aspect. It may be just a
11 respect issue of you being forthwith, fair, respectable.

12 Q Would you liken it more toward the Native American tribes
13 where the older people get respect if they've been fair and done
14 nice things without titles?

15 A That don't happen with gangs.

16 Q What -- what happens with gangs as far as organization?

17 A Well, you have some of the -- sometimes you have a
18 generation gap and which, in fact, the youngsters are not in
19 place to be -- to have tutelage and you miss an era. And, then,
20 you have the youngsters that feel as though they don't have a
21 big homie. And, then, they -- they consider themselves the big
22 homie.

23 Q But, then, the mentors from the older generations will come
24 down and mentor them that they're not that big. Correct?

25 A And sometimes it doesn't come out positive. Sometimes it's

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - CHRISTIANSON

671

1 a negative.

2 Q Okay. But let's get back to organizational structure. Is
3 there a president or king or tsar, or whatever you want to have,
4 of the Eight Trey Gangster Crips?

5 A There is top members of our neighborhood.

6 Q "Top members." Kind of like people who've been around a
7 long time.

8 A Or people that started -- start my neighborhood. Like,
9 gave them their name and represent the first generation. And
10 there's people that -- not from our neighborhood -- that are
11 from first generation that still has influence over some of our
12 big homies.

13 Q Okay.

14 A Example?

15 Q Example, yeah. Do they -- do they have titles? Do they
16 have offices? Do they have -- is it like a business
17 organization? Or do you even understand the business model
18 enough to -- to understand where I'm headed with this?

19 A You can ask me exactly where you're headed, and then I can
20 clarify for you.

21 THE COURT: It seems to me, Mr. Christianson, that you
22 did ask him those questions; and he answered. And he said it's
23 more similar to a military organization. You might want to
24 follow up on that.

25 Q (BY MR. CHRISTIANSON) Are there ranks? Designated ranks?

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - CHRISTIANSON

1 "You are a private. You are a colonel. You are a general." Or
2 is it just some people respect you more, some people won't
3 respect you as much, and that kind of gives you a level without
4 giving you a designated level.

5 MS. VAN MARTER: Objection. Compound question.

6 MR. CHRISTIANSON: Probably was.

7 THE COURT: It was; but, if you can answer it,

8 Mr. Madison, go ahead.

9 THE WITNESS: A lot of times people are
10 self-proclaimed titles, and, then, sometimes they are given to
11 you as -- as your title as a big homie. Somebody that you look
12 up to. And it could be various ways. Money could be one.
13 Power. Prestige.

14 Q (BY MR. CHRISTIANSON) Okay. Where were you in the gang
15 hierarchy compared to, let's say, Mr. Carmen?

16 A Above. He would be my little homie.

17 Q Yet you testified that, when you came up here, he was
18 taxing you.

19 A Sometimes. Well, it's his hustle. And sometimes that
20 happen.

21 Q Do generals get taxed by privates?

22 A I'm not sure. I've never been in military.

23 Q Beautiful. Thank you. Wouldn't it be more accurate that
24 "crew" is how you would describe the different little pieces of
25 up here rather than "franchise"?

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - CHRISTIANSON

1 A Crews, franchise, subsidiaries.

2 Q Do you understand that franchise has business meanings that

3 are -- are definitional -- definitional?

4 A Franchises?

5 Q Yeah.

6 A They have different -- they have other meanings?

7 Q Let's just say -- let's just assume they might.

8 A Well, let's assume that they don't.

9 Q Okay. Well, let's assume they do. Are you saying that

10 everything that was going on up here would fit within the

11 definition of franchise?

12 A I can't say that, sir.

13 Q Thank you. In reality, what we had up here was everybody

14 trying to make their own buck.

15 A I can contest (sic) to that, yes. I can say that.

16 Q Okay. You -- let me under -- just correct me if I'm wrong.

17 Mr. Carmen was up here. He had his hustle -- his hustle going.

18 A Yes.

19 Q You wanted to see if there's some way you could get your

20 hustle to make a little money, too, without interfering with his

21 hustle.

22 A Not -- confused. I don't understand.

23 Q Well, were you trying to interfere with his ability to make

24 money?

25 A No, sir.

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - CHRISTIANSON

1 Q No. You're just trying to get your hustle kind of side by
2 side with his so you can make a buck while he's making a buck.

3 A That wasn't my understanding. My understanding was to help
4 him, not just make my extra buck.

5 Q Was -- was your motivation to help him or was your
6 motivation to make money?

7 A Both.

8 Q You were going to make money by helping him.

9 A Yes.

10 Q But was your motivation to get involved in all this just to
11 say, "What can I do to help you? I don't care about me making
12 money."

13 MS. VAN MARTER: Your Honor, this has been asked and
14 answered.

15 THE COURT: It is getting repetitious,
16 Mr. Christianson.

17 Q (BY MR. CHRISTIANSON) Isn't it true that what was going up
18 here was basically capitalism at its finest?

19 A I need to know the definition of "capitalism."

20 Q Everybody just trying to make their own buck.

21 MS. VAN MARTER: Again, asked and answered.

22 THE COURT: It is repetitious, Mr. Christianson.

23 Sustained.

24 Q (BY MR. CHRISTIANSON) Do you remember the -- or, hold on,
25 hold on, hold on. Do you remember you testified that Mr. Tones

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - CHRISTIANSON

1 came north to Spokane and that he came with Football?

2 A He came north?

3 Q He came north to Spokane from LA. He flew up. Do you
4 remember saying that Mr. Tones came to Spokane, and he came with
5 Football?

6 A I can't remember that I said he came with Football.

7 Q Okay. So you don't know if he did or not anyhow.

8 A No.

9 Q Okay. And -- and you --

10 A I don't know their travel arrangements.

11 Q Okay. So -- so, if you had testified that he came up with
12 Football, you would retract that because you really don't know.

13 A I wouldn't retract anything. I would just say I don't
14 remember.

15 Q But you can't say to the jury that he came with Football.

16 A I can't say to the jury that they rode on the same plane,
17 bus, or car.

18 Q Okay. Fair enough. Do you remember telling the
19 Government -- just a minute -- when they were talking about
20 Mr. Shelmon and Mr. Tones that Mr. Tones originally came up to
21 Spokane to just --

22 MS. VAN MARTER: Object, your Honor. If he's reading
23 from the report, that is not a report authored by this witness.

24 MR. CHRISTIANSON: I'm asking a question.

25 THE COURT: All right.

676

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - CHRISTIANSON

1 Q (BY MR. CHRISTIANSON) Do you remember telling the -- or
2 did you tell the Government that Mr. Tones originally came up to
3 Spokane to just chill with Shelmon but that eventually tones
4 started slinging oxy? Do you remember telling the Government
5 that?

6 A Vaguely. Vaguely.

7 Q Would that have been on May 30th of 2014, just a couple
8 months ago?

9 A I'm not sure of the date.

10 Q Would you like to refresh -- would you like to look at the
11 document from that --

12 A I did already. Mr. Hormel showed me the same.

13 Q Would you like to look at this paragraph?

14 THE COURT: Well, he answered the question already,
15 Mr. Christianson.

16 Q (BY MR. CHRISTIANSON) Do you recall saying that?

17 A He refreshed my memory, and I answered the question.

18 Q Do you recall saying that Mr. Tones originally came up to
19 Spokane to just chill with Shelmon --

20 MS. VAN MARTER: Objection, asked and answered.

21 THE COURT: It was.

22 MR. CHRISTIANSON: Okay. I thought the Court asked me
23 to re-answer -- ask it.

24 THE COURT: He said he may have said it, and that is
25 an answer to the question.

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - CHRISTIANSON

1 MR. CHRISTIANSON: Okay.

2 Q (BY MR. CHRISTIANSON) One last thing, just to make sure
3 we're not leaving any misconceptions for the jury. Last week
4 you testified that -- and correct me if I'm wrong --

5 MS. VAN MARTER: Objection. Move to strike to the
6 preface to the question.

7 THE COURT: Yeah. Just ask the question without the
8 preliminary.

9 Q (BY MR. CHRISTIANSON) Last week you testified -- correct
10 me if I'm wrong -- that Mr. Carmen told you that getting caught
11 slinging oxy would just be a slap on the wrist.

12 A Yes.

13 Q It's not, is it?

14 MS. VAN MARTER: Objection, your Honor, relevance.

15 THE COURT: Sustained.

16 MR. CHRISTIANSON: May I -- may I be heard on that,
17 your Honor?

18 THE COURT: No.

19 MR. CHRISTIANSON: Thank you.

20 THE COURT: That's not an issue in the case.

21 MR. CHRISTIANSON: I have no further questions.

22 THE COURT: Mr. Nollette?

23

24 / / / / /

25 / / / / /

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

678

2 | CROSS BY MR. NOLLETTE:

3 | Q Good morning, Mr. Madison.

4 A Good morning.

5 Q How are you today?

6 A Fine. Yourself?

7 Q Now, were you born in Los Angeles?

8 A California, yes.

9 Q I'm sorry?

10 A Los Angeles, California. White Memorial Hospital.

11 Q And you're 48?

12 A Yes.

13 Q And -- and were you born into the neighborhood that is the
14 Eight Trey Gangster Crip area?

15 | A No.

16 Q What area of Los Angeles did you -- did you live in your
17 youth?

18 A Before I moved to Eight Trey Gangster neighborhood?

19 Q Before you -- when you were a kid.

20 MS. VAN MARTER: Your Honor, I would object to
21 anything prior to the relevance of the testimony in terms to
22 where he grew up prior to Eight Trey.

23 THE COURT: Well, this is just I trust --

24 MR. NOLLETTE: Just background information.

25 THE COURT: -- brief background.

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 MR. NOLLETTE: Just background information, Judge.

2 THE COURT: Keep it brief.

3 MR. NOLLETTE: I will, Judge.

4 THE WITNESS: East LA. East Los Angeles.

5 Q (BY MR. NOLLETTE) Is that different than the area in which
6 the Eight Treys operate?

7 A I don't understand what you mean by "different."

8 Q Well, is it the same location as the Eight Trey Gangster
9 area in south central Los Angeles?

10 A No. One -- one is east Los Angeles and one is south
11 central Los Angeles.

12 Q Okay. So it's a different area in Los Angeles.

13 A Yes.

14 Q And Los Angeles is a big city, is it not?

15 A Yes. Los Angeles County is huge.

16 Q And, in fact, the south central area where the Eight Trey
17 Gangster Crips originated or operate is a rather substantial
18 area, also. Is it not?

19 A Not as far as -- other gangs may be bigger as far as our
20 neighborhood.

21 Q Okay. But it's a large area -- south central is a -- is a
22 pretty big area. Is it not?

23 A Yes, it is.

24 Q Maybe a million people in that whole area?

25 A I don't know the -- the numbers.

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

680

1 Q Okay. When did you move to that area?

2 A 1973.

3 Q '73?

4 A If I'm -- '72, '73, I think.

5 Q And were you a member, then, of any gang at that time when
6 you moved over?

7 A No.

8 Q Were you called Mr. Nobody at that time?

9 A No.

10 Q When did you become Mr. Nobody?

11 A That would be early/mid '80s I guess that would be.

12 Q. Okay. Did you live in the '70s in that area?

13 A Excuse me?

14 Q In south central?

15 A In the '70s?

16 Q Yes, sir.

17 A Are you talkin' about the street or the year?

18 | Q The years. The decade. The '70s.

19 A Yes, from '73 until, I guess, like, '79, '80. Somewhere up
20 to that point.

21 Q What happened in 1979 or '80, then? Were you -- did you
22 move then?

23 A We moved. We moved to Inglewood

24 Q And how -- is that -- that's a different area of
25 Los Angeles. Correct?

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - CHRISTIANSON

1 because you're cooperating, at this point.

2 A When I'm talking to get investigators? At what point?

3 Q After you were arrested.

4 A I instructed the arresting officers that, before I could
5 speak with them, I wanted to speak with my lawyer and that I'm
6 not saying that I'm not going to cooperate. I'm saying that I
7 wanted to at least have counsel there when I do.

8 Q Okay. Let me -- let me -- let me ask it a little
9 differently. You gave, I think, five prior free talks with the
10 investigators. Correct?

11 A Yes.

12 Q July 31st, 2013. August 22nd, 2013. A two-day,
13 September 16 and September 17, 2013. Then one in May 29th of
14 2014, and one just as recently as September 15th, 2014.
15 Correct?

16 A If those days are on there.

17 Q Okay. During all of those, you already had a deal in place
18 where you were going to cooperate.

19 A A deal?

20 Q An agreement.

21 A That I would cooperate?

22 Q Yes.

23 A That had already -- had -- no. I had free talks at that
24 time. I'm not sure where you -- to understand your question.

25 Q Did you have any reason to lie to the investigators during

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - CHRISTIANSON

1 those free talks?

2 A I gave them an accurate account of my -- my comings and
3 goings.

4 Q Okay. As far back as your first free talk of July 31st,
5 2013, those were all accurate.

6 A As to my memory, I would suppose.

7 Q Okay.

8 MS. VAN MARTER: Your Honor, I'm going object. May --
9 it's already been established this witness has not reviewed any
10 of those reports. So, if -- if the intention is to admit those
11 reports or use those reports in any fashion, this witness does
12 not have any knowledge as to what's in the reports.

13 THE COURT: Right. So don't base your questions on
14 the content of the reports. He's had nothing to do with them.

15 MR. CHRISTIANSON: I understand that, Judge. And I'm
16 not moving to admit them or anything. I'm just making sure that
17 he's telling the truth during those.

18 THE COURT: Just ask him that.

19 MR. CHRISTIANSON: Okay.

20 Q (BY MR. CHRISTIANSON) You indicated during your
21 testimony -- I believe it was -- it had to have been last
22 week -- that -- talking about Paco, that you wouldn't really
23 have known his business. Something about it would not be common
24 to just walk up and talk business. We don't know each other
25 like that. Correct?

664

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - CHRISTIANSON

1 A Correct.

2 Q Do you remember that?

3 A Yes.

4 Q And -- and that just means that you know who he is and
5 everything but, you know, you're not going to walk up and ask
6 him his personal business.

7 A No, I'm not gonna ask him -- other than what's going on.

8 As far as anything other than that casual conversation, no. If
9 anything else comes up after that, then we speak on it.

10 Q And he's not gonna ask you your personal business.

11 A Unless he -- personal?

12 Q Is he gonna ask you how you -- how you're dealing your
13 drugs?

14 A Only if he want in.

15 Q Okay. And -- and you indicated that you had never talked
16 directly with Mr. Tones about any of this business.

17 A As far as making money out here?

18 Q Yeah.

19 A Him coming out here?

20 Q Yeah.

21 A Anything of that nature? Him and I never had that
22 conversation as far as I can remember.

23 Q And you never went and -- and hung out at the apartment
24 that Shelmon was running.

25 A I didn't go to that apartment.

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - CHRISTIANSON

1 Q All right. Kind of a free, wild kind of place that you
2 wanted to keep yourself a little distant from?

3 A No. It just -- I never got invited. I never wanted to --
4 to go over there.

5 Q Okay. So -- so you never talked to Mr. Tones. You never
6 went out and watched him sell drugs or anything. So everything
7 you know about Mr. Tones and his involvement in this pill game
8 is what you've heard from others.

9 A Yes. I haven't heard anything from him.

10 Q Okay. You've never watched him sell a pill. You've never
11 had him tell you he sold a pill.

12 A No.

13 Q Okay. So it's just, basically, what you hear on the
14 streets.

15 A Yes.

16 Q Okay. And you don't know him well enough that you guys
17 would sit down and talk private business.

18 A Private business? I'm not sure. We talk. He cuts my
19 hair. You know, I got a lot of hair so he trim me up every now
20 and then.

21 Q Does it -- is it usually longer than that? Or -- or does
22 he shave it? Or I --

23 A Yes.

24 Q I look at your -- for the record, it's a bald head, and
25 you're talking haircuts. So he's shaved your head a few times?

666

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - CHRISTIANSON

1 A Yes.

2 Q He runs a -- a chair down in LA?

3 A Yes.

4 Q You guys talk drug business during the haircut?

5 A It may come up.

6 Q Your business or his business?

7 A Business.

8 Q Okay. Fade phones. We've talked about they're an
9 important commodity. Right? It's kind of like a customer list.

10 A Rolodex?

11 Q A Rolodex. You know, a list of who I can, maybe, sell some
12 drugs to.

13 A You can't just pick up the phone and call them.

14 Q Okay. But, then, I would have the number that they're all
15 going to call.

16 A Right.

17 Q And that's where the value is.

18 A The value is them calling in. Sometimes people do take the
19 initiative to call them and let them know that they're ready to
20 deal or they -- they can also contact them, also.

21 Q Okay. So I want to make sure. You testified, it must have
22 been last week, that, at one point, you were living with
23 Mr. Carmen.

24 A Yes.

25 Q And you were operating his fade phone while he was at

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - CHRISTIANSON

1 school?

2 A No. He would call me on my phone. He would have his
3 phone. He's not going to give that phone to me.

4 Q Okay. But he let you run his fades because you were
5 working for him.

6 A Yes, while he go to school.

7 Q Okay. So you were -- you were -- you were dealing with his
8 fades for him because you were working for him.

9 A Yes.

10 Q Okay. You remember testifying that -- you remember hearing
11 a telephone conversation that the Government played last week
12 that indicated -- I believe you said the voices were Mr. Lisbey
13 talking to somebody saying he does not want Shelmon or Tones
14 having any access whatsoever to his fade phone.

15 A Yes, I did.

16 Q When you testified last week, you used the word "franchise"
17 quite a few times. Do you realize that?

18 A Possibly.

19 Q When the Government was asking you questions, you both used
20 the word "franchise" quite a few times. Is that normally what
21 you would call this hustle?

22 A It depends. I was trying to clarify of what stature that
23 it would actually be also recognized as.

24 Q If I were to hand you reports from your five prior
25 conversations with the Government, would you be willing to look

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - CHRISTIANSON

1 through those and see if you can find the word "franchise" once?

2 MS. VAN MARTER: Objection, again, your Honor.

3 Relevance. Those are not his reports. He's never reviewed
4 them.

5 THE COURT: Sustained.

6 Q (BY MR. CHRISTIANSON) Do you remember using the word
7 "franchise" even once during your prior conversations with the
8 Government?

9 A I may have, but I don't remember that -- that I have or
10 that I didn't.

11 Q But yet you remember using it quite a few times in front of
12 the jury here the other day.

13 A Well, I was explaining to, I guess, Hormel and getting
14 up -- getting into detail of what it could also be considered.

15 Q Let's talk about the organization of the Eight Trey
16 Gangster Crips. Mr. Lee talked about you had a position of
17 stature. Are you, like, president of the Eight Trey? You the
18 king? You the -- do you have a title?

19 A No.

20 Q Does -- does -- I guess I don't even know your educational
21 background. What is your educational background? Any college?

22 A Two years.

23 Q Two years? I'm guessing business college?

24 A Nope.

25 Q What?

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - CHRISTIANSON

1 A Construction, fitness, nutrition and health.

2 Q You're very articulate and very bright. Would you agree?

3 A I guess, if you would -- if that's the compliment you're
4 giving me.

5 Q Observation.

6 A Thank you.

7 Q You're welcome. You think about business a lot?

8 A Construction wise I guess I would.

9 Q Okay. You've been running a construction company?

10 A I guess you would call it my -- my dad and myself business.
11 We both share in running it.

12 Q Okay. I guess what I'm trying to get at is you understand
13 how business organizations work. You'll have a -- a president.
14 You'll have a -- a chief financial officer. You'll have a head
15 of distribution. Then you'll have -- is that the way the Eight
16 Trey Crips are set up?

17 A Relatively, it could be. It can be construed as such,
18 but --

19 Q It could be construed; but it's not the way it's set up, is
20 it? Let me rephrase. You could go back and you could look at
21 the Crips and you could say, "Well, you know, he's kind of like
22 the -- the president. And he'd be kind of like in charge of
23 this." But that's not the way it is set up, is it?

24 A It's -- it's set up -- I guess I would refer to, like,
25 somewhat like Army, military.

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - CHRISTIANSON

1 Q People have ranks?

2 A Well, yeah.

3 Q Wouldn't it be more accurate to say, if you've been around
4 a while and have you some age and experience, people maybe look
5 up to you; but you don't get a designated rank?

6 A True.

7 Q So it's not that you -- you get a title and a position.

8 It's just, if you've been around and you've, you know, helped
9 people make money, people are going to look up to you.

10 A It's not relatively the money aspect. It may be just a
11 respect issue of you being forthwith, fair, respectable.

12 Q Would you liken it more toward the Native American tribes
13 where the older people get respect if they've been fair and done
14 nice things without titles?

15 A That don't happen with gangs.

16 Q What -- what happens with gangs as far as organization?

17 A Well, you have some of the -- sometimes you have a
18 generation gap and which, in fact, the youngsters are not in
19 place to be -- to have tutelage and you miss an era. And, then,
20 you have the youngsters that feel as though they don't have a
21 big homie. And, then, they -- they consider themselves the big
22 homie.

23 Q But, then, the mentors from the older generations will come
24 down and mentor them that they're not that big. Correct?

25 A And sometimes it doesn't come out positive. Sometimes it's

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - CHRISTIANSON

1 a negative.

2 Q Okay. But let's get back to organizational structure. Is
3 there a president or king or tsar, or whatever you want to have,
4 of the Eight Trey Gangster Crips?

5 A There is top members of our neighborhood.

6 Q "Top members." Kind of like people who've been around a
7 long time.

8 A Or people that started -- start my neighborhood. Like,
9 gave them their name and represent the first generation. And
10 there's people that -- not from our neighborhood -- that are
11 from first generation that still has influence over some of our
12 big homies.

13 Q Okay.

14 A Example?

15 Q Example, yeah. Do they -- do they have titles? Do they
16 have offices? Do they have -- is it like a business
17 organization? Or do you even understand the business model
18 enough to -- to understand where I'm headed with this?

19 A You can ask me exactly where you're headed, and then I can
20 clarify for you.

21 THE COURT: It seems to me, Mr. Christianson, that you
22 did ask him those questions; and he answered. And he said it's
23 more similar to a military organization. You might want to
24 follow up on that.

25 Q (BY MR. CHRISTIANSON) Are there ranks? Designated ranks?

672

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - CHRISTIANSON

1 "You are a private. You are a colonel. You are a general." Or
2 is it just some people respect you more, some people won't
3 respect you as much, and that kind of gives you a level without
4 giving you a designated level.

5 MS. VAN MARTER: Objection. Compound question.

6 MR. CHRISTIANSON: Probably was.

7 THE COURT: It was; but, if you can answer it,
8 Mr. Madison, go ahead.

9 THE WITNESS: A lot of times people are
10 self-proclaimed titles, and, then, sometimes they are given to
11 you as -- as your title as a big homie. Somebody that you look
12 up to. And it could be various ways. Money could be one.
13 Power. Prestige.

14 Q (BY MR. CHRISTIANSON) Okay. Where were you in the gang
15 hierarchy compared to, let's say, Mr. Carmen?

16 A Above. He would be my little homie.

17 Q Yet you testified that, when you came up here, he was
18 taxing you.

19 A Sometimes. Well, it's his hustle. And sometimes that
20 happen.

21 Q Do generals get taxed by privates?

22 A I'm not sure. I've never been in military.

23 Q Beautiful. Thank you. Wouldn't it be more accurate that
24 "crew" is how you would describe the different little pieces of
25 up here rather than "franchise"?

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - CHRISTIANSON

1 A Crews, franchise, subsidiaries.

2 Q Do you understand that franchise has business meanings that
3 are -- are definitional -- definitional?

4 A Franchises?

5 Q Yeah.

6 A They have different -- they have other meanings?

7 Q Let's just say -- let's just assume they might.

8 A Well, let's assume that they don't.

9 Q Okay. Well, let's assume they do. Are you saying that
10 everything that was going on up here would fit within the
11 definition of franchise?

12 A I can't say that, sir.

13 Q Thank you. In reality, what we had up here was everybody
14 trying to make their own buck.

15 A I can contest (sic) to that, yes. I can say that.

16 Q Okay. You -- let me under -- just correct me if I'm wrong.
17 Mr. Carmen was up here. He had his hustle -- his hustle going.

18 A Yes.

19 Q You wanted to see if there's some way you could get your
20 hustle to make a little money, too, without interfering with his
21 hustle.

22 A Not -- confused. I don't understand.

23 Q Well, were you trying to interfere with his ability to make
24 money?

25 A No, sir.

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - CHRISTIANSON

1 Q No. You're just trying to get your hustle kind of side by
2 side with his so you can make a buck while he's making a buck.

3 A That wasn't my understanding. My understanding was to help
4 him, not just make my extra buck.

5 Q Was -- was your motivation to help him or was your
6 motivation to make money?

7 A Both.

8 Q You were going to make money by helping him.

9 A Yes.

10 Q But was your motivation to get involved in all this just to
11 say, "What can I do to help you? I don't care about me making
12 money."

13 MS. VAN MARTER: Your Honor, this has been asked and
14 answered.

15 THE COURT: It is getting repetitious,
16 Mr. Christianson.

17 Q (BY MR. CHRISTIANSON) Isn't it true that what was going up
18 here was basically capitalism at its finest?

19 A I need to know the definition of "capitalism."

20 Q Everybody just trying to make their own buck.

21 MS. VAN MARTER: Again, asked and answered.

22 THE COURT: It is repetitious, Mr. Christianson.

23 Sustained.

24 Q (BY MR. CHRISTIANSON) Do you remember the -- or, hold on,
25 hold on, hold on. Do you remember you testified that Mr. Tones

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - CHRISTIANSON

1 came north to Spokane and that he came with Football?

2 A He came north?

3 Q He came north to Spokane from LA. He flew up. Do you
4 remember saying that Mr. Tones came to Spokane, and he came with
5 Football?

6 A I can't remember that I said he came with Football.

7 Q Okay. So you don't know if he did or not anyhow.

8 A No.

9 Q Okay. And -- and you --

10 A I don't know their travel arrangements.

11 Q Okay. So -- so, if you had testified that he came up with
12 Football, you would retract that because you really don't know.

13 A I wouldn't retract anything. I would just say I don't
14 remember.

15 Q But you can't say to the jury that he came with Football.

16 A I can't say to the jury that they rode on the same plane,
17 bus, or car.

18 Q Okay. Fair enough. Do you remember telling the
19 Government -- just a minute -- when they were talking about
20 Mr. Shelmon and Mr. Tones that Mr. Tones originally came up to
21 Spokane to just --

22 MS. VAN MARTER: Object, your Honor. If he's reading
23 from the report, that is not a report authored by this witness.

24 MR. CHRISTIANSON: I'm asking a question.

25 THE COURT: All right.

676

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - CHRISTIANSON

1 Q (BY MR. CHRISTIANSON) Do you remember telling the -- or
2 did you tell the Government that Mr. Tones originally came up to
3 Spokane to just chill with Shelmon but that eventually tones
4 started slinging oxy? Do you remember telling the Government
5 that?

6 A Vaguely. Vaguely.

7 Q Would that have been on May 30th of 2014, just a couple
8 months ago?

9 A I'm not sure of the date.

10 Q Would you like to refresh -- would you like to look at the
11 document from that --

12 A I did already. Mr. Hormel showed me the same.

13 Q Would you like to look at this paragraph?

14 THE COURT: Well, he answered the question already,
15 Mr. Christianson.

16 Q (BY MR. CHRISTIANSON) Do you recall saying that?

17 A He refreshed my memory, and I answered the question.

18 Q Do you recall saying that Mr. Tones originally came up to
19 Spokane to just chill with Shelmon --

20 MS. VAN MARTER: Objection, asked and answered.

21 THE COURT: It was.

22 MR. CHRISTIANSON: Okay. I thought the Court asked me
23 to re-answer -- ask it.

24 THE COURT: He said he may have said it, and that is
25 an answer to the question.

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - CHRISTIANSON

1 MR. CHRISTIANSON: Okay.

2 Q (BY MR. CHRISTIANSON) One last thing, just to make sure
3 we're not leaving any misconceptions for the jury. Last week
4 you testified that -- and correct me if I'm wrong --

5 MS. VAN MARTER: Objection. Move to strike to the
6 preface to the question.

7 THE COURT: Yeah. Just ask the question without the
8 preliminary.

9 Q (BY MR. CHRISTIANSON) Last week you testified -- correct
10 me if I'm wrong -- that Mr. Carmen told you that getting caught
11 slinging oxy would just be a slap on the wrist.

12 A Yes.

13 Q It's not, is it?

14 MS. VAN MARTER: Objection, your Honor, relevance.

15 THE COURT: Sustained.

16 MR. CHRISTIANSON: May I -- may I be heard on that,
17 your Honor?

18 THE COURT: No.

19 MR. CHRISTIANSON: Thank you.

20 THE COURT: That's not an issue in the case.

21 MR. CHRISTIANSON: I have no further questions.

22 THE COURT: Mr. Nollette?

23

24 / / / / /

25 / / / / /

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 | CROSS EXAMINATION

2 CROSS BY MR. NOLLETTE:

3 Q Good morning, Mr. Madison.

4 A Good morning.

5 | Q How are you today?

6 A Fine. Yourself?

7 Q Now, were you born in Los Angeles?

8 A California, yes.

9 Q I'm sorry?

10 A Los Angeles, California. White Memorial Hospital.

11 Q And you're 48?

12 A Yes.

13 Q And -- and were you born into the neighborhood that is the
14 Eight Trey Gangster Crip area?

15 | A No.

16 Q What area of Los Angeles did you -- did you live in your
17 youth?

18 A Before I moved to Eight Trey Gangster neighborhood?

19 Q Before you -- when you were a kid.

20 MS. VAN MARTER: Your Honor, I would object to
21 anything prior to the relevance of the testimony in terms to
22 where he grew up prior to Eight Trey.

23 THE COURT: Well, this is just I trust --

24 MR. NOLLETTE: Just background information.

25 | THE COURT: -- brief background.

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 MR. NOLLETTE: Just background information, Judge.

2 THE COURT: Keep it brief.

3 MR. NOLLETTE: I will, Judge.

4 THE WITNESS: East LA. East Los Angeles.

5 Q (BY MR. NOLLETTE) Is that different than the area in which
6 the Eight Treys operate?

7 A I don't understand what you mean by "different."

8 Q Well, is it the same location as the Eight Trey Gangster
9 area in south central Los Angeles?

10 A No. One -- one is east Los Angeles and one is south
11 central Los Angeles.

12 Q Okay. So it's a different area in Los Angeles.

13 A Yes.

14 Q And Los Angeles is a big city, is it not?

15 A Yes. Los Angeles County is huge.

16 Q And, in fact, the south central area where the Eight Trey
17 Gangster Crips originated or operate is a rather substantial
18 area, also. Is it not?

19 A Not as far as -- other gangs may be bigger as far as our
20 neighborhood.

21 Q Okay. But it's a large area -- south central is a -- is a
22 pretty big area. Is it not?

23 A Yes, it is.

24 Q Maybe a million people in that whole area?

25 A I don't know the -- the numbers.

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

680

1 Q Okay. When did you move to that area?

2 A 1973.

3 Q '73?

4 A If I'm -- '72, '73, I think.

5 Q And were you a member, then, of any gang at that time when

6 you moved over?

7 A No.

8 Q Were you called Mr. Nobody at that time?

9 A No.

10 Q When did you become Mr. Nobody?

11 A That would be early/mid '80s I guess that would be.

12 Q Okay. Did you live in the '70s in that area?

13 A Excuse me?

14 Q In south central?

15 A In the '70s?

16 Q Yes, sir.

17 A Are you talkin' about the street or the year?

18 Q The years. The decade. The '70s.

19 A Yes, from '73 until, I guess, like, '79, '80. Somewhere up

20 to that point.

21 Q What happened in 1979 or '80, then? Were you -- did you

22 move then?

23 A We moved. We moved to Inglewood.

24 Q And how -- is that -- that's a different area of

25 Los Angeles. Correct?

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 A Yes.

2 Q Did you then move back to south central?

3 A No. I was a youth. I lived with my parents.

4 Q All right. What year were you born?

5 A 1966.

6 Q So, in 1980, you were how old?

7 A 1980? About, I guess, 14 or so.

8 Q You were born what year?

9 A 1966.

10 Q Okay. So you'd be 24, then, in 1980. Correct?

11 THE COURT: 14.

12 Q (BY MR. NOLLETTE) Or 14? You'd be 14, then, when you moved over?

14 A Excuse me?

15 Q Okay. I'm sorry.

16 A I was -- I was 11 when I moved to our neighborhood.

17 Q To the neighborhood of south central?

18 A Yes.

19 Q Okay. And did you reside there continuously until your arrest?

21 A Did I reside in Eight Trey Gangster neighborhood until what arrest?

23 Q This arrest in this case.

24 A No.

25 Q Okay. Where did you live then?

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 MS. VAN MARTER: Objection, your Honor, in terms of
2 specific residences.

3 THE COURT: Yeah.

4 MR. NOLLETTE: I'm just trying to find out a little
5 background information as to location.

6 THE COURT: Well, are you asking him where he lived
7 when he was arrested?

8 MR. NOLLETTE: No. I'm trying to work up to the point
9 where he was living at that time and how long he had lived in
10 this particular neighborhood.

11 THE COURT: Go -- go -- reframe your question,
12 Mr. Nollette. You've got him moving to Inglewood in 1980.

13 MR. NOLLETTE: Okay. That -- he's -- I'm just going
14 to let him confer with his lawyer.

15 (Witness converse with his lawyer)

16 MS. VAN MARTER: Your Honor, the nature of our
17 objection, just so that we're clear, is getting into any matters
18 relative to Mr. Madison's family or locations and residences.

19 MR. NOLLETTE: Oh, I'm not going to get into that.

20 THE COURT: Just limit your question to the general
21 geographic area, whether south central or north central or
22 whatever.

23 MR. NOLLETTE: Okay.

24 Q (BY MR. NOLLETTE) Now -- so you -- when you were arrested
25 in this case, you were living in where?

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 A In Los Angeles County.

2 Q And was it in the Eight Trey Gangster Crip area?

3 A No.

4 Q Okay. Did you -- did you just relocate from there, or how
5 long had you lived in that other area?

6 A Approximately two years.

7 Q Okay. Now, when was it that you were called Mr. Nobody?

8 A Again, mid '80s.

9 Q In the mid '80s. Okay.

10 A When I was 18, 19, around that time.

11 Q Okay. And had that -- had you been living in the Eight
12 Trey area at that time?

13 A When I was 18 or 19?

14 Q Yes, sir.

15 A No.

16 Q Okay. When did you, then, locate in the Eight Trey
17 neighborhood?

18 A When we moved over in the early '70s.

19 Q To the Eight Trey Gangster Crip area?

20 A Yes.

21 Q And, then, you moved out of there and then you moved back?

22 A No. I moved out and I used to walk back or drive back,
23 catch a bus back, or -- but I was in my neighborhood.

24 Q So, after the '80s, you didn't live in the Eight Trey
25 Gangster Crip area. Is that correct?

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

684

1 A I didn't live there since my family had relocated.

2 Q And that was in the '80s.

3 A '78, '79, '80. Approximately that time -- in between that
4 time. I don't know the exact time my mom and my dad purchased
5 their house.

6 Q Okay. When were you, then, a member of the Eight Treys?

7 When did you become a member?

8 A Let's see. Like, '78, '79.

9 Q '78, okay. And you were how old at that time?

10 A Like, 12, 13, 14, somewhere around there.

11 Q Okay. Had you been a member of a gang before that?

12 A No.

13 Q Okay. So that you were -- how did you get into the Eight
14 Treys at that time at age 13 or 14?

15 A Jumped in.

16 Q Oh. Would you tell the jury what "jumped in" means.

17 A Where two, three people would -- you'd have to fight two or
18 three different people for a time frame. And, then, it would
19 either be three people, two people, one people -- one person.
20 And, afterwards, you were deemed in the gang.

21 Q You had to get beat up?

22 A Basically. Or, if you fight well enough, you can be the
23 victor.

24 Q Okay. And that's what happened to you, isn't it? You were
25 the victor.

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 A No, not that time.

2 Q Not that time. How -- how big are you? How tall are you?

3 You're a very tall man.

4 A I was -- I had an abnormal growth spurt.

5 Q Okay. But how tall and how much do you weigh?

6 A Six feet.

7 Q You're only six feet?

8 A Only.

9 Q Okay. And your weight's a little over 200?

10 A Now I do.

11 Q Okay. Now, in this particular case, you've mentioned the
12 indictment a few times. Correct?

13 A I'm not sure.

14 Q You're not sure?

15 A You said I mentioned the indictment?

16 Q Yeah. You mentioned a couple times, "Well, they're not in
17 the indictment."

18 A Yes, sir.

19 Q So were you shown the indictment?

20 A We have redacted copies of the indictment.

21 Q You have a redacted copy of the indictment?

22 A The -- our charges.

23 Q Were you shown a copy of the indictment?

24 A No. I've -- what I was shown was a redacted copy of --
25 where it just have my name and, then, everybody is, like,

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

686

1 blacked out --

2 Q Okay.

3 A -- of the charges of which I was being charged with, which
4 was criminal -- continuing criminal enterprise and conspiracy to
5 distribute OxyContin, oxycodone pills.

6 Q In fact, those are the two charges that you plead guilty
7 to. Correct?

8 A Yes.

9 Q All right. And your cooperation is really essential to the
10 type of sentence that you're going to ask the Court for when
11 this is all over with. Correct?

12 A I have an agreement, open plea.

13 Q Right. So, in other words, your cooperation is necessary
14 for you to try to get a better sentence. Right?

15 A My cooperation is deemed on me to give the evidence -- the
16 question -- answer the questions in which I'm asked according to
17 my memory.

18 Q But that's essential for you to be able to ask for a lesser
19 sentence. Correct?

20 A I don't know how essential because it's not up to me. It's
21 up to the prosecution, the Judge, and whatever reports that's
22 being made.

23 Q Okay. Now, did the -- you've met with them on, apparently,
24 seven different occasions or eight with the Government and the
25 prosecutors?

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 A I don't know the number, but I've met with them. Yes.

2 Q You met with them on July 31st of '13. Correct?

3 A I'm not sure of the date, but you --

4 Q Would it be fair -- it was about six months after you were
5 arrested?

6 A Approximately.

7 Q And you met with them for about five hours? Is that
8 correct?

9 A I'm not sure. It -- it could be.

10 Q I'm sorry?

11 A I'm not sure. It could be.

12 Q Okay. And, then, you met with them again the next month in
13 August. Do you remember that?

14 A I don't know the precise dates, but I did meet with them on
15 numerous occasions.

16 Q Okay. And you met with them for about five-and-a-half
17 hours that day?

18 A I'm not sure. I'm not sure of the length.

19 Q And, then, you met with them in September two days in a
20 row, correct, of '13?

21 A Approximately.

22 MS. VAN MARTER: Your Honor, these questions have all
23 been asked and answered.

24 THE COURT: They are. So run through it quickly.

25 MR. NOLLETTE: The duration of time was not explored,

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 your Honor.

2 THE COURT: I understand that.

3 Q (BY MR. NOLLETTE) On September 16th and 17th, you met with
4 them for about six hours, correct, of '13.

5 A Approximately.

6 Q And, then, May of this year you met with them again for
7 about seven hours. Is that correct?

8 A May of this year?

9 Q What?

10 A You said May of this year?

11 Q Yes, sir.

12 A That might be correct.

13 Q And, then, you met with them last month on two consecutive
14 days in trial preparation. Is that correct?

15 A On what day?

16 Q September the 9th and 10th.

17 A It might be. That might be correct.

18 Q That about right?

19 A Yes.

20 Q For about seven hours?

21 A Give or take, yes. Approximately.

22 Q Would it be fair to say that you've talked with them in
23 relation to this trial for over 30 hours?

24 A I'm not sure what the numbers are, sir; but whatever the
25 document is, that's what it is.

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 Q Okay. So you spent a lot of time with them in relation to
2 your preparation for trial. Correct?

3 A No. I've spent a lot of time with them answering their
4 questions. There has been no prepping for trial for me.

5 Q Okay. If they want to call it "trial prep," but --

6 A Okay.

7 Q Okay. Now, were you in a gang before you became an Eight
8 Trey?

9 A No.

10 Q Okay. And, when you became an Eight Trey, you were
11 Mr. Nobody because nobody knew you. Correct?

12 A Right.

13 Q Okay. And, then, you've been a continuous Eight Trey since
14 age 14 -- 13 or 14?

15 A Somewhere around that time.

16 Q Okay. Now, somehow you, then, became the Big Dog.
17 Correct?

18 A Excuse me?

19 Q Were you called the Big Dog?

20 A Yes.

21 Q Or Lil Sidewinder?

22 A Yes.

23 Q And those were titles of respect. Is that correct?

24 A Often given. I call some of my buddies, my Lil Homies, Big
25 Dog to that fashion, too, as well.

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 Q Is Big Dog better than Lil Sidewinder, or do they equate?

2 A All depends on who's telling -- who's calling you it. It
3 depends.

4 Q Neither one of those terms are negative, are they?

5 A In what perspective? I don't -- I don't understand.

6 Q Well, you know what "negative" means, don't you?

7 A Yes, but I mean by -- by whom are you referring to?

8 Q By anybody. Do those terms -- are they equal terms?

9 A Well, yes. I mean -- but, if an officer called you the
10 "Big Dog," that would be a negative.

11 Q It would be a negative?

12 A If an officer might have called you that, it would probably
13 be, like, a negative.

14 Q You mean an officer. When you say that, a police officer.

15 A Officer, corrections, whatever.

16 Q Okay. In gang life, you -- how do you get respect?

17 A Various ways. It's for --

18 Q Why don't you tell the jury how the various ways are.

19 A Fighting. Being fair in different aspects. Being fair.
20 Like, you know, you can be someone that people can confide in,
21 talk to. You -- we call different aspects of fighting
22 "behavior." Some people respects the violent behavior of
23 others.

24 Q Bottom line, that's really how you get respect, is it not?
25 By violent behavior?

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 A No, that's not.

2 Q Oh, it isn't.

3 A You can get respect -- some people try to get respect
4 through money aspects. They get respect from being a bully. It
5 depends on that individual.

6 Q Well, you talked with the -- when -- during the talks with
7 the Government, you expressed that Mr. Carmen had lost some
8 respect because he didn't engage in violent behavior. Correct?

9 A That he lost some respect?

10 Q Yes.

11 A Not that he didn't conduct himself in violent behavior; is
12 that he initiated a situation that warranted that he be violent
13 and he didn't.

14 Q So, in other words, they -- he should have engaged in some
15 violent behavior and he did not.

16 A He initiated it.

17 Q However it was initiated, because of that confrontation,
18 because he didn't shoot somebody, he lost respect. Is that a
19 true statement that you made to the police?

20 A Because he didn't shoot a previous witness for the
21 Government.

22 Q There was an incident, was there not, where he was alleged
23 to have pointed a gun or had a gun in an altercation with
24 somebody in the gang? Do you remember that?

25 A He -- he pointed a gun and more violence ensued, and there

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 was gunfire and that erupted. In other words, violence did
2 erupt afterward. He didn't end up on a good end of the -- of
3 that altercation.

4 Q And -- and -- and because of that, did you not explain that
5 he lost respect because he didn't retaliate?

6 A He lost respect because of how he handled the situation.

7 Q Right.

8 A Not that -- not that he wasn't violent, he just handled the
9 situation and posed a threat. And, then, he got the short --
10 got the short end of the altercation.

11 Q And didn't retaliate after that so, therefore, lost
12 respect.

13 A He did retaliate later on, physically, by beating up the
14 witness -- the Government witness.

15 Q Okay. Now, you're a -- your status within the Eight Treys
16 is what? You're sort of up in the upper level, are you not?

17 A Than -- than whom?

18 Q I'm sorry?

19 A I said, "than whom"? I'm like -- I'm -- I don't understand
20 what you -- like --

21 Q At home you say?

22 A No. I say for whom? You know, you said my status is up.
23 I'm -- meaning, like, there's people above me. There's people
24 below me. I'm trying to understand what you're saying.

25 Q In the Eight Trey Gangster Crips, your status is what?

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 Pretty high up, isn't it?

2 A Somewhat so.

3 Q What?

4 A I say somewhat so, sir.

5 Q Somewhat so. Now, your reputation is obtained -- why? Why
6 did you obtain such high respect?

7 A Because of my reputation, whether it was confirmed or
8 denied, of me handling myself adequately in different
9 situations.

10 Q Handling yourself in adequate -- in -- in different
11 situations. That's, in other words, engaging in violent
12 behavior. Correct?

13 A Not all the time. Sometimes I had to be the mediator.
14 Sometimes I had to be -- negotiate things not would be in my
15 benefit but in the benefit of -- of the individuals involved.

16 Q But wouldn't you agree with me that you obtain respect and
17 status because of violent behavior?

18 A Not in its totality.

19 Q Okay. That's -- but that is a significant part, is it not?

20 A It could be used as a measuring tool.

21 Q As a what?

22 A Measuring tool. Meaning, measuring the status of where you
23 are. But it's not -- it doesn't give you the ultimate hierarchy.

24 Q Okay. Ultimate hierarchy is obtained how?

25 A You would -- that's like -- almost like a founding father.

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 Like somebody that actually been around way longer than you.

2 Q Have you been -- you get status because you just live long
3 enough?

4 A You can, I mean; but it doesn't mean that you lack the
5 respect. It's also how you conduct yourself with individuals.

6 Q Okay. Now, when did you first come to Spokane?

7 A August of 2009.

8 Q August of 2009. And how long were you in Spokane at that
9 time?

10 A Month or two. Then I left, and then I came back.

11 Q Okay. And you went back to Los Angeles at that time?

12 A Yes.

13 Q And how did you come up to Spokane? How did -- airplane?
14 Bus?

15 A Bus, airplane.

16 Q Which was it?

17 A That -- which particular time?

18 Q Well, you just mentioned one time, which is August of 2009.
19 Correct?

20 A Oh.

21 Q When was it and how did you get up here?

22 A I came up on a bus.

23 Q I'm sorry?

24 A I came up on a bus.

25 Q Okay. And you stayed for two months. A month or two?

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

695

1 A About a month. About a month at that time.

2 Q Okay.

3 A Month and some change. I'm not sure of the exact time.

4 Q Okay. And who did you meet with up here?

5 A School Boy.

6 Q All right. That's -- that's my client, Mr. Carmen.

7 A Mr. Carmen.

8 Q Okay. And is it Lil School Boy or just School Boy?

9 A It's -- he's School Boy. Some -- you know, some people
10 call him Baby School Boy. BS. But it can be whoever
11 addressing. Not any of it is not relevant to who he is.

12 Q Okay. And what's an OG?

13 A They have, like, original gangsters that originate -- the
14 originators. Somebody that has a time, order, stature, been
15 around.

16 Q So OG means original gangster?

17 A Yes. That's cliché, but yes. It just mean original
18 gangster.

19 Q Okay. You indicated in some questioning that -- that
20 you -- you came clean and wanted to cooperate with the
21 Government in this case. Correct?

22 A Yes.

23 Q And what were you facing if you didn't?

24 A I didn't know at the time what I was facing.

25 Q You weren't advised that you were facing life in prison?

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 A No.

2 Q You weren't?

3 A No.

4 Q In any event, you are hoping to get a sentence of, what,
5 ten years or --

6 MS. VAN MARTER: Objection, your Honor.

7 THE COURT: Sustained. The -- the consequence is not
8 an appropriate issue to discuss. You can speak in general
9 terms.

10 Q (BY MR. NOLLETTE) Your -- your motivation for coming
11 forward is, to a certain extent, because of your own self
12 interests. Correct?

13 MS. VAN MARTER: Your Honor, we've already --

14 THE WITNESS: No.

15 MS. VAN MARTER: Objection. Asked and answered.
16 We've already gone over what his expectation was from the plea
17 agreement.

18 MR. NOLLETTE: I have --

19 THE COURT: Go ahead and -- go ahead and answer the
20 question.

21 THE WITNESS: Can you repeat the question, please?

22 MR. NOLLETTE: If I could ask it to be -- the Court
23 Reporter to read the question back, please.

24 (Pending question was read by the Court Reporter)

25 THE WITNESS: No, sir.

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 Q (BY MR. NOLLETTE) Is it motivated by trying to assist your
2 fiancée, Ms. Horn?

3 A No, sir.

4 Q Not part of your cooperation.

5 A To assist her?

6 Q Yeah.

7 A I can't assist her.

8 Q What is your relationship with her?

9 A She's my fiancée.

10 Q Now, you're married but --

11 A Yes.

12 Q -- you still have a fiancée. Now, I'm going to ask you
13 some questions. Would it be fair to say that the term "crew"
14 and "franchise" are pretty much interchangeable?

15 A Interchangeable?

16 Q Do you know what "interchangeable" means?

17 A Yes, sir. They have similarities.

18 Q Or they're equal to?

19 A Or equal to.

20 Q Would you agree that "crew" and "franchise" mean,
21 basically, the same thing in this case?

22 A It could have the same meaning.

23 Q It does have the same meaning?

24 A It could have the same meaning, sir.

25 Q And, in this particular case, would the use of the term

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 "crew" and the use of the term "franchise" by you mean the same
2 thing?

3 A Yes, it could.

4 Q What?

5 A I said, yes, it could, sir.

6 Q Okay. Now, some of the testimony that you've given was of
7 personal knowledge. Correct?

8 A Personal in what was told to me by individuals.

9 Q Well, that's what I want to get at. So some of the stuff
10 that you've talked to the jury about has to do with items of
11 information that you know of because you saw it or heard it.
12 Correct?

13 A Or told to by that person.

14 Q Or -- I'm sorry?

15 A Or the person in which I've given -- got that information
16 told me so.

17 Q Okay. In other words, some of it is your own observation
18 of what you heard. Correct?

19 A What I've seen.

20 Q And what you've seen.

21 A Seen and heard.

22 Q And, then -- and, then, others is what you've heard from
23 people.

24 A What was told to me.

25 Q Or told to you.

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 A Yes.

2 Q Now, let me talk about your association with certain
3 people. You -- let's just say you dealt with Mr. Haynes on a
4 personal basis in relation to this charge of distributing
5 OxyContin. Correct?

6 A Correct.

7 Q You say that you dealt with Black Bone, or Colbert, on a
8 personal basis. Is that correct? Or did you?

9 A Meaning personal because you -- I mean, there's -- are you
10 giving me two distinction? Personal? Business? Sometimes they
11 interchange. Sometimes there are similarities.

12 Q Well, I'm talking about this drug conspiracy that you plead
13 guilty to is what I'm talking about and whether or not you had
14 personal conversations and dealings with these people.

15 A Oh, yes.

16 Q So did you have with Colbert?

17 A Yes.

18 Q When was that?

19 A Personal dealings?

20 Q Yes.

21 A Throughout 2012.

22 Q Okay. Anything before then?

23 A Before 2012?

24 Q Yes, sir.

25 A I'm not sure. I don't know the exact time at which he came

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

700

1 about.

2 Q Did he work directly with you?

3 A What do you mean by "directly"?

4 Q What do you understand "directly" to mean?

5 A Well, I didn't know anything about him, like, personally.

6 He was referred to me through Haynes.

7 Q Okay. So Haynes brought him up. Correct?

8 A Yes.

9 Q Did you have any personal dealings with Mr. Colbert?

10 A Prior to -- what do you mean by "personal"? I don't
11 understand.

12 Q Did you have any -- you had personal dealings with Haynes
13 in relation to distributing OxyContin. Correct?

14 A And other things. I mean, for -- not distributing but just
15 meaning, like, casual, personal business? Like --

16 Q No. I want -- I'd like you to focus strictly on -- on why
17 we're here: The charge of conspiracy to distribute.

18 A Yes.

19 Q So did you have any personal dealings with Mr. Haynes in
20 relation to that charge?

21 A Yes.

22 Q Okay. Did you have any personal dealings with Mr. Colbert
23 in relation to the charge?

24 A To the charge, yes.

25 Q And when was that?

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 A I just answered. I don't know the exact time, but I said
2 through sometime in 2012.

3 Q And where was that?

4 A In Los Angeles. That's where it initiated.

5 Q All right. But did you have -- do you remember how many
6 conversations that you had with Mr. Colbert?

7 A No, I do not.

8 Q You don't remember how many times?

9 A No, sir.

10 Q But did you talk to him about the distribution of
11 OxyContin?

12 A Yes.

13 Q And do you remember how many times you talked to him about
14 it?

15 A No, sir.

16 Q You don't remember.

17 A No, I do not.

18 Q Do you remember the content of any of the conversations
19 that you had with him?

20 A We talked about obtaining pills.

21 Q Obtaining pills?

22 A Yes. Buying 'em. Selling 'em.

23 Q And do you remember how many times you talked to him about
24 it?

25 A No, I do not.

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 Q Okay. But you do remember that you did talk to him about
2 that.

3 MS. VAN MARTER: Objection. Asked and answered.

4 We're going around the same questions.

5 THE COURT: It is. He said he did.

6 MR. NOLLETTE: Okay.

7 Q (BY MR. NOLLETTE) How about -- did you have any
8 contacts -- "contacts," I'm saying meaning in relation to this
9 charge -- with School Girl?

10 A You say contact?

11 Q Yeah.

12 A Contact? What you mean by "contact"?

13 Q Yeah. I mean -- well, just what I'm saying. I'm gonna ask
14 this question about all of these people eventually. But the
15 contact that I'm asking about has to do with the distribution --
16 the conspiracy and distribution of OxyContin.

17 A Yes.

18 Q Okay. So did you have some with her?

19 A Yes.

20 Q All right. And your testimony is that you dealt directly
21 with her in relation to this conspiracy. Correct?

22 A Yes.

23 Q All right. And did you have any direct contact with
24 Mercedes Reeves in relation to this?

25 A Mercedes?

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 Q Correct.

2 A Yes.

3 Q You did?

4 A Yes.

5 Q When?

6 A In the course of the conspiracy, I guess. I don't know
7 exact what time or date that you're trying to narrow me down to,
8 but I don't -- I don't know the date, sir.

9 Q I'm just trying to ask you a question as to when you had
10 contact with her about this particular distribution charge for
11 which you have plead guilty to.

12 A I've been in the company of Mercedes numerous times.

13 Q You've been in the company of her. Correct? During the
14 distribution?

15 A Yes.

16 Q Okay. How about Young Outlaw? Do you know him?

17 A Yes.

18 Q What's his given name or government name?

19 A Outlaw. I don't --

20 Q Is it T Crazy or Wines?

21 A No.

22 Q It isn't?

23 A No.

24 Q Do you know him as Smooth?

25 A Excuse me?

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 Q Do you know him as Smooth?

2 A Talking about Outlaw?

3 Q Yes, sir.

4 A Okay. Bobby Wines is -- has another moniker of Outlaw, but
5 that's not who -- I'm not sure if that's who you're asking me
6 about --

7 Q Yeah, I'm --

8 A -- because there's -- there's people that have two names,
9 three names. So you have to, please, be specific -- specific.

10 Q Okay. And how about -- do you know Baby Sodi?

11 A Baby Sodi, yeah.

12 Q Do you know that person?

13 A Yes.

14 Q Did you have any dealings in relation to this charge with
15 Baby Sodi?

16 A Yes.

17 Q When was that?

18 A Somewhere in 2012.

19 Q Okay. Now, we're still trying to separate out what you
20 personally dealt with them and what you heard. Correct?

21 A That's the question?

22 Q Yeah. I mean, I'm trying to separate -- I'm asking you
23 these questions in relation to your own personal activity with
24 these people versus what you heard was going on.

25 MS. VAN MARTER: Your Honor --

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 Q (BY MR. NOLLETTE) Did you have any personal dealings with
2 Baby Sodi?

3 A He's not part of the indictment, sir.

4 Q I'm sorry?

5 A You're asking me he -- his name come up. I'm asking you
6 are you saying as far as that he's part of the indictment or
7 just a conspiracy? I don't know what you're asking me.

8 Q Well, I'm sorry. I'll try to -- I'll try to be more clear.
9 Do you know whether he's in the indictment?

10 A I don't -- I don't know if he's in our particular
11 indictment or have -- I just know the people -- our defendants.

12 Q Okay. Now, you mentioned Tiny Menace. He's TM?

13 A Yes.

14 Q Did you have any dealings with him in relation to the
15 distribution of OxyContin in Spokane?

16 A Yes.

17 Q When?

18 A I think the year 2012. I'm not sure anything beyond that
19 or after it.

20 Q Okay. Let me see if I can ask you this question: You came
21 up here for a month or two in '09. Correct?

22 A Yes.

23 Q And, then, you went back to Los Angeles. And, then, when
24 was the next time that you came to Spokane?

25 A Around November, December of 2009.

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 Q So -- so the same year you came up another time?

2 A Yes, I did.

3 Q How did you travel to Spokane that time?

4 A I'm not sure. I couldn't pinpoint. I just know how I came
5 up here the first time because I used to use different
6 transportation. So I'm not sure exactly.

7 Q Okay. The first -- the first time you came up was in the
8 fall of '09?

9 A 2009, August.

10 Q Okay. And you stayed for a month or two?

11 A Yes.

12 Q And, then, you came back a second time in that year or not?

13 A Yes.

14 Q Okay. And how long after you went down to Los Angeles did
15 you, then, come back to Spokane?

16 A After August? After August?

17 Q Well, after you returned, obviously.

18 A Went back to Los Angeles for a few weeks and, then, came
19 back up here.

20 Q And how did you get back up here the second time?

21 MS. VAN MARTER: Asked and answered. He doesn't
22 remember.

23 MR. NOLLETTE: I don't --

24 Q (BY MR. NOLLETTE) You don't remember?

25 A No, I don't remember that time, sir.

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 Q Did you come back to Spokane after those two trips in '09?

2 A Yes.

3 Q When?

4 A 2010.

5 Q When in 2010?

6 A First part of the year.

7 Q Could you narrow it down any closer?

8 A I think it was right after January. Somewhere in January.

9 Q And how long did you stay that time?

10 A Not long.

11 Q Can you estimate or remember how long?

12 A Maybe a week or two.

13 Q And do you know how you arrived or went back?

14 A Plane, I think, at that time.

15 Q Okay. And, then, after that, did you come back to Spokane

16 in 2010?

17 A Yes.

18 Q When that was?

19 A I don't know. I don't remember exact dates to that -- to

20 that fact.

21 Q Can you narrow it down to a month?

22 A I just know that I came back numerous times in '10.

23 Q How many times in 2010 did you come back to Spokane, then?

24 A I'm not sure, sir.

25 Q Can you estimate as to how many trips you took?

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 A No, I can't.

2 Q Okay. Did you come up in 2011?

3 A Yes.

4 Q When was the first time in 2011?

5 A I'm not sure, sir.

6 Q How many trips did you take in 2011?

7 A I'm not sure.

8 Q Was it less than two, or was it more than two?

9 A I'm not sure.

10 Q Are you sure that you came up to Spokane in 2011?

11 A Yes. I'm -- there was a lot going on. So it's possible

12 that -- that I did come up here.

13 Q That you didn't?

14 A That I did.

15 Q Now, you were arrested in the fall of 2011 in Los Angeles,

16 were you not?

17 A No, I was not.

18 Q When -- when was it, then?

19 A 2010.

20 Q Was it 2010?

21 A August 15th, 2010.

22 Q Okay. And -- and did that involve this case?

23 A No, it didn't.

24 Q Okay. Did it involve OxyContin?

25 A Yes, it did.

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JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 Q By the way, this is not -- this is not your first -- first
2 venture into drug distribution, is it?

3 A Excuse me?

4 Q This is not your first venture into drug distribution, is
5 it?

6 A I don't follow you.

7 Q What?

8 A I don't follow you. Can you clarify for me?

9 MS. VAN MARTER: Your Honor, if we're asking about
10 criminal history. Beyond that, we would object to matters
11 outside of criminal history.

12 THE COURT: I assume that's what you are asking about.

13 Be specific.

14 MR. NOLLETTE: I'm -- I'm -- okay. I will.

15 Q (BY MR. NOLLETTE) You have -- were involved in cocaine
16 distribution before you out involved in this stuff, were you
17 not?

18 A I have no convictions of drugs.

19 Q You have no convictions for drugs?

20 A I have no convictions for drugs for cocaine.

21 Q So you weren't involved in --

22 MS. VAN MARTER: Objecti

23 THE COURT: He answered. He

24 MR. NOLLETTE: Okay.

25 Q (BY MR. NOLLETTE) At some

Page 10 of 10

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 went to obtain plugs from old sources of prior activity in the
2 drug business. Correct?

3 A Yes.

4 Q And -- and those were people that got older and had doctors
5 and could get prescriptions. Correct?

6 A No. I don't know if they had prescriptions or whatever.

7 Q Well, didn't -- isn't it true that you went back and
8 contacted some of your old buddies or some --

9 MS. VAN MARTER: Objection, your Honor. I know --

10 THE COURT: What's your objection?

11 MS. VAN MARTER: Your Honor, we're getting into
12 matters outside -- matters that were touched upon by this Court
13 in pretrial.

14 THE COURT: I think that's right, Mr. Nollette.

15 Q (BY MR. NOLLETTE) Would it be fair to say that your
16 activities in relation to OxyContin was not the first time you
17 were involved in the distribution of drugs?

18 MS. VAN MARTER: Objection, your Honor. Asked and
19 answered.

20 THE COURT: That -- that's true, Mr. Nollette. And
21 you can ask regarding convictions.

22 MR. NOLLETTE: Okay.

23 Q (BY MR. NOLLETTE) You do have convictions. You were
24 convicted of --

25 A I have a conviction for --

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 Q -- manslaughter. Right?

2 A Yes.

3 Q And, then, for -- what are the rest of them?

4 A Assault with a deadly weapon.

5 Q Assault with a deadly weapon.

6 A Yes. And possession of controlled substance. Possession
7 of a firearm.

8 Q Now, I'm going go back, now, to the -- during these trips
9 that you took up to Spokane. I'm just making reference to that
10 now. I'm changing a little bit of the subject matter. So I
11 don't want to surprise you. And I'm trying to ask you questions
12 having to do with your association with certain people. Okay?

13 A Yes, sir.

14 Q All right. Now, did you have any association with Ward?

15 Mr. Ward? Do you know who Ward is?

16 A Yes, I do.

17 Q And, in relation to this particular charge, did you have
18 any association with him?

19 A I had association with him.

20 Q You did?

21 A I had association with him.

22 Q And when did you have association with him?

23 A Down in Los Angeles.

24 Q And when was it?

25 A Various times. As far as, like -- are you asking me as far

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 as the distribution, or are you talking about personal because I
2 had a relationship, basically, with a lot of the defendants. So
3 you have -- could you please clarify for me?

4 Q My focus is only on the distribution, not on personal stuff
5 that --

6 A Okay.

7 Q -- family and so forth. I'm not -- I'm not asking that.

8 A Okay.

9 Q So you did have conversations and dealings with Mr. Ward?

10 A Not with the OxyContin.

11 Q Not at all.

12 A I had no recollection of having any dealings with him.

13 Q Okay. How about -- who's Jevi? J E V I.

14 A Excuse me?

15 Q Do you know who that is? Maiden? Do you know a Mr. Maiden
16 or --

17 A Jevi? I don't --

18 Q Do you recognize that name?

19 A I don't know the personal name. Maiden?

20 Q Um-hum. You don't recognize that?

21 A Not by what -- how you're pronouncing it. Maybe -- maybe
22 you're pronouncing it wrong. I'm not sure.

23 Q I could be. How about Tiny Menace?

24 MS. VAN MARTER: Asked and answered, your Honor.

25 MR. NOLLETTE: You know, Judge, I think I did ask

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 that. I apologize for that. Withdraw that question.

2 THE COURT: Yeah.

3 Q (BY MR. NOLLETTE) How about Wright? Do you know that
4 person?

5 A Donald?

6 Q Yeah.

7 A Yes.

8 Q And what's his moniker? D?

9 A Yeah. Baby Crazy D.

10 Q What is it?

11 A Baby Crazy D.

12 Q Baby Crazy D. And did you have any dealings with him in
13 relation to this pill game?

14 A Not that I remember. Nope.

15 Q Okay. How about Ramzy? Do you know a Ramzy?

16 A Yes.

17 Q And who is that person in relation to Mr. Haynes?

18 A Nacriissa?

19 Q He's a cousin?

20 A Yes.

21 Q All right. And did you have any dealings with him in
22 relation to the distribution of OxyContin?

23 A Haynes or Nacriissa.

24 Q Right. Ramzy, the cousin.

25 A No.

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 Q You didn't.

2 A No.

3 Q Okay. Now, Nocomie Moore was involved in drug
4 distribution. Correct?

5 A Yes.

6 Q Did you have any personal knowledge of that person's
7 involvement in this case?

8 A Yes.

9 Q You do? And what information that you have with regard to
10 that? Would you tell the jury about it.

11 A Excuse me?

12 (Interruption by the reporter)

13 Q (BY MR. NOLLETTE) Would you -- you do have some personal
14 knowledge of Nocomie Moore and involvement in the OxyContin
15 trade? Or is it just what you heard?

16 A No. Personal.

17 Q Okay. What is that?

18 A She's -- was part of the drug distribution.

19 Q Okay. But everybody that we've named has been involved in
20 that drug distribution you said. Right?

21 A So you -- I need you to clarify what you're asking me.

22 Q Okay. Do you have any personal knowledge of
23 Nocomie Moore's involvement in the distribution of OxyContin in
24 this case?

25 A Yes.

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 Q Okay. And what is that?

2 A That she's a part of the distribution of OxyContin,
3 oxycodone.

4 Q Okay. And what personal -- you have personal knowledge of
5 this?

6 A Yes.

7 Q Why don't you tell the jury about that personal knowledge.

8 A That I work with her.

9 Q When?

10 A 2000, I think, '10, '11. Around that time.

11 Q You worked with him. What's that mean?

12 A Worked with her 2010, 2011.

13 Q And what did you mean "work" Nocomie Moore?

14 A I assisted her with distribution of OxyContin, oxycodone --

15 Q Okay.

16 A -- 2010, 2011.

17 Q And how -- how did you do that?

18 A Same way I did with Carmen.

19 Q Can you be more specific in relation to Moore?

20 A Yes. I obtained OxyContin pills -- oxycodone pills for
21 Nocomie Moore.

22 Q You obtained them for her?

23 A Yes.

24 Q Okay. And when was that?

25 A I just explained --

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 MS. VAN MARTER: Asked and answered, your Honor.

2 MR. NOLLETTE: He didn't answer the question. He
3 avoided the --

4 THE WITNESS: Yes, I did.

5 THE COURT: He said 2010, 2011. Is there anything
6 else you'd need to add to that answer?

7 THE WITNESS: No. That was -- that was it, Judge.

8 Thank you, your Honor.

9 THE COURT: That's the answer.

10 Q (BY MR. NOLLETTE) Sometime in 2010 or '11.

11 A Between 2010, 2011.

12 Q And can you tell the jury how many times?

13 A Several.

14 Q Okay. And how -- how did they occur? Let's say the first
15 one. How did that occur?

16 A We bumped into each other in Los Angeles.

17 Q Do you know when more specifically?

18 A No, I don't know the specific date or the month.

19 Q Do you remember where you were?

20 A In Los Angeles. Inglewood, California.

21 Q And was -- were you alone?

22 A Yes.

23 Q And was Moore alone?

24 A Yes.

25 Q And what was discussed?

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 A The distribution of OxyContin or -- and oxycodone.
2 Q More specifically, what was discussed?
3 A To -- for me to see if I can get her pills in order for her
4 to sell here and wherever she was going.

5 THE COURT: Mr. Nollette --

6 MR. NOLLETTE: Yes, your Honor.

7 THE COURT: -- we thought about adjourning a little
8 early. We missed our morning recess. So we'll adjourn now
9 until 1:00. And, ladies and gentlemen, please remember, we
10 don't talk about the case.

11 (Jury out at 11:48 a.m.)

12 (Court recessed at 11:48 a.m.)

13 (Court reconvened at 1:00 p.m.)

14 THE COURT: Be seated. Mr. Nollette, you wanted to
15 bring a question.

16 MR. NOLLETTE: I did, your Honor. It's come to my
17 attention that, during the testimony of Mr. Madison, people at
18 the prosecutors' table are nodding their heads when questions
19 are being addressed to Mr. Madison; and I think that shouldn't
20 be done.

21 THE COURT: Okay. Yeah. No verbal or other type of
22 communication. And, along the same line, speaking of
23 communication, I've had a meeting with the marshal's service
24 about the propriety of -- of certain individuals not being
25 allowed to attend court session because of their personal

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 conduct and efforts to communicate in and out of the courtroom.
2 And, so, they're -- the marshals have discretion to control that
3 issue. Complete discretion per the authority of the Court.

4 MR. NOLLETTE: I know that the one matter related but
5 -- to that issue, has to do with, when we were in chambers
6 dealing with that other matter --

7 THE COURT: It's all related.

8 MR. NOLLETTE: Right. But, at that -- an inquiry was
9 made from one of the marshals that was present at that time as
10 to whether there was any communication between my client and the
11 witness. And I believe that he would testify that there wasn't.
12 I just want the Court to know that.

13 THE COURT: Well, it depends on the term
14 "communication." Verbal? No.

15 MR. NOLLETTE: Right. But there, apparently, was a
16 threat or some inferred threat. And that's, obviously,
17 something that you --

18 THE COURT: Right. I was apprised of that, and that's
19 the kind of conduct we're not going to allow to have happen.

20 MR. NOLLETTE: Right. And I also wanted to remind the
21 Court -- I don't know. I'm sorry. That's the wrong term. But
22 that the recordings are available having to do with both of
23 those instances.

24 THE COURT: Not everything that I'm alluding to
25 necessarily happens here in this room. Let's -- if you're

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 ready, we'll bring the jury in.

2 MR. NOLLETTE: Thank you, your Honor.

3 MR. TREJO: The defendants, too, your Honor.

4 THE COURT: Oh, yeah. Okay. Yeah, he should be here.

5 MR. TREJO: Witness.

6 THE COURT: It's just Mr. Madison.

7 MR. TREJO: Yeah.

8 THE COURT: Wait a minute until Mr. Madison comes in.

9 (Pause in the proceedings)

10 (Discussion off the record)

11 THE COURT: All right. Ms. Foe, bring the jury in.

12 (Jury in at 1:05 p.m.)

13 THE COURT: Good afternoon and please be seated.

14 Mr. Nollette, you may continue with your cross examination of

15 Mr. Madison.

16 MR. NOLLETTE: Thank you, your Honor.

17 Q (BY MR. NOLLETTE) I believe I finished my questioning
18 having do with your dealings with Nocomie Brown -- or Moore.
19 I'm sorry. And you indicated that you did have some dealings
20 with Nocomie Brown -- or Moore. I'm sorry.

21 A Yes.

22 Q And when were -- when was that?

23 A 2010, '11, around about.

24 Q I'm sorry. When?

25 A Around about 2010 or '11. '10 and '11.

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 Q Can you narrow it down a little bit more for the jury?

2 A I can't at this point in time.

3 Q You can't.

4 MS. VAN MARTER: Your Honor, these have all been asked
5 and answered.

6 THE COURT: Yeah. We went into that in some detail,
7 Mr. Nollette.

8 MR. NOLLETTE: It was just a preliminary to the next
9 questions, but --

10 THE COURT: Go ahead.

11 Q (BY MR. NOLLETTE) Okay. So how about RaRa? Do you know
12 RaRa?

13 A Yes.

14 Q And did you have any dealings with Mr. -- or with RoRo (sic)
15 -- RaRa?

16 A Yes.

17 Q And when was that?

18 A 2012.

19 Q And when -- where was that?

20 A Los Angeles.

21 Q And when was it down there in 2012?

22 A I don't remember the actual month, the day.

23 Q And would you tell the jury --

24 A Just 2012.

25 Q What?

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 A Just 2012.

2 Q Okay. And what was that dealing that you had with RaRa?

3 A Personal? Distribution? What? I'm not sure what -- what
4 you're asking me.

5 Q Did you have any dealings having to do with the
6 distribution of OxyContin?

7 A Yes.

8 Q And that was in 2012?

9 A Yes.

10 Q And in Los Angeles?

11 A Yes.

12 Q And, would you tell the jury, was it on one occasion or
13 more than one occasion?

14 A Him, personally, one occasion in 2012. 2000 and -- between
15 2010 and '11, it was through Nocomie.

16 Q And, then, you broke off the situation with Nocomie?

17 A Excuse me?

18 Q Did you continue with the association with Nocomie Brown --
19 Moore?

20 A No.

21 Q That continued up until the end?

22 A Up until she had an incident.

23 Q I'm sorry?

24 A Until she had an incident.

25 Q Well, what do you mean "an incident"?

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 A She got kidnapped.
2 Q Okay. And you didn't have any dealings after that, then,
3 with RaRa?
4 A With RaRa?
5 Q Yeah.
6 A Yes. Not her.
7 Q Okay. You were talking about Moore, then?
8 A Nocomie Moore, yes.
9 Q So I was focusing on RaRa. RaRa is Govan. Right?
10 A I don't know his last name.
11 Q Okay. You know him as RaRa.
12 A RaRa. Grump 6.
13 Q What is it?
14 A Grump 6.
15 Q Grump Sticks?
16 A Like Newborn Grump.
17 Q Okay. And how many dealings in 2012 did you have with
18 RaRa?
19 MS. VAN MARTER: Your Honor, asked and answered.
20 MR. NOLLETTE: I -- he said --
21 THE WITNESS: One.
22 MR. NOLLETTE: -- he was confused because he thought I
23 was talking about Moore, and I was actually --
24 THE COURT: Go ahead. He answered it right now. One.
25 Q (BY MR. NOLLETTE) Once. Okay. And when in 2012 was that?

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 A Just in 2012. I don't remember the exact date.

2 Q Do you remember the details of that contact?

3 A He needed help. He wanted me to help him out with
4 getting -- making some money. Just -- he just, "Hey, I need
5 you. It's kind of an emergency. I need you if you can hook him
6 up if you can."

7 Q I'm sorry. I didn't understand.

8 A He asked if I could look out for him, hook him up, whatever
9 I could do for him.

10 Q He asked you to hook him up?

11 A Yes. Whatever I could do for him at that point.

12 Q What did you mean that to be?

13 MS. VAN MARTER: Your Honor, I'm going to object to
14 relevance. This is not an individual before the Court.

15 MR. NOLLETTE: Your Honor, it has to do with the
16 multiple conspiracy.

17 THE COURT: All right. Just --

18 MS. VAN MARTER: Objection. Move to strike counsel's
19 comment.

20 THE COURT: Go ahead. He had one contact, request to
21 help him out. Is there anything else?

22 MR. NOLLETTE: Right.

23 Q (BY MR. NOLLETTE) And did -- was that in relation to drug
24 distribution?

25 A Yes.

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 Q Okay. And did you help him out?

2 A Yes.

3 Q Okay. Did you have any association or dealing with D3?

4 A Yes.

5 Q When was that?

6 A Through Nocomie, same time.

7 Q "Same time," meaning when?

8 A 2010, 2011. 2010, 2011.

9 Q Okay. And -- and how about -- do you know a Kovar Moore?

10 MS. VAN MARTER: Objection, your Honor. Relevance.

11 MR. NOLLETTE: It isn't -- it --

12 THE COURT: I'm not sure what it is. Overruled.

13 MR. NOLLETTE: It is relevant, your Honor, to the --

14 THE COURT: Just ask the question.

15 Q (BY MR. NOLLETTE) Do you know a Kovar Moore?

16 A I know a Kovar.

17 Q Did you have any dealings with Kovar Moore in relation to
18 drug distribution?

19 A Yes.

20 Q When?

21 A 2010.

22 Q And what was that? And where was that, first of all?

23 A Los Angeles.

24 Q Okay. And what was that particular incident about?

25 A He needed pills.

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 Q I'm sorry?

2 A He needed pills.

3 Q And what happened in response to his request for pills?

4 A I obtained them for him.

5 Q You did. Okay. How about Chastity Barlow? Do you know
6 that person?

7 A Not by -- I don't think by that name.

8 Q Okay. You know most of these people by the moniker.

9 Correct?

10 A Most -- most monikers. Some names depending on, like I
11 said, our comings and goings.

12 Q Now, you've testified today about certain contacts with
13 some people. Right?

14 A Yes.

15 Q And are some of those contacts on the telephone?

16 A Telephone. In person.

17 Q Okay. I'm gonna break that down, but some of them had to
18 do with what they told you on the telephone. Right?

19 A I don't understand.

20 Q Well, did some of the discussions that you had with some of
21 these people have do with your contact with them over the
22 telephone?

23 A Involved in the distribution of drugs or just in contact,
24 period?

25 Q In the distribution of drugs.

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 A Some of the people, yes.

2 Q All right. And some of the information that you've relayed
3 has to do with what those people told you. Isn't that correct?

4 A Some of it is what they told me, yes.

5 Q All right. And they told you things about other people,
6 did they not?

7 A Yes. Whether it was over the phone or in person. Over the
8 phone or in person.

9 Q Okay. I'm just talking about the phone now, Mr. Madison.
10 When they talked to you on the phone when you were in Los
11 Angeles, they talked about what they did?

12 A They talked about multiple things.

13 Q I'm sorry?

14 A They spoke on multiple things.

15 Q Okay. But part of what you're testifying about is what
16 they told you. Correct?

17 A In part, yes.

18 Q And, so, they would tell you about what's going on in
19 Spokane; and, then, you've testified about what your
20 understanding was. Correct?

21 A Yes.

22 Q Okay. And, so, a lot of the information that you've
23 provided today has to do with what other people have told you.
24 Correct?

25 A You said most of it?

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 Q Well, a large part of it, isn't it?

2 A I would say some of it.

3 Q Okay. Let's -- now, did you know Kevin Miles?

4 A Yes. I already said. Yes, I know him.

5 Q And -- now, is he related to Rayford Miles?

6 A No relation.

7 Q What?

8 A No relation.

9 Q And who is Rayford Miles?

10 MS. VAN MARTER: Objection, your Honor. This was
11 covered at pretrial.

12 THE COURT: Sustained.

13 Q (BY MR. NOLLETTE) Now, you mention Shelmon. He's known as
14 Young Ant. Correct?

15 A Yes.

16 Q Did you have any specific dealings with him in relation to
17 this distribution of OxyContin?

18 A No.

19 Q So any information you have about him is what you've heard
20 from other people. Correct?

21 A Or what I witnessed myself.

22 Q What?

23 A Or what I witness myself.

24 Q Okay. Did you witness anything yourself in relation to
25 Shelmon in relation to this charge?

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 A Obtaining pills in Los Angeles.

2 Q And when was that?

3 A I don't remember the date.

4 Q Do you remember the year?

5 A No, not really.

6 Q Okay. Who's Baby G Man? Do you know that person?

7 A Deandre Meighan.

8 Q Meighan. Meighan is the Government name, so to speak.

9 Right?

10 A Yeah.

11 Q Did you have any dealings regarding the distribution of

12 OxyContin with that person?

13 A No.

14 Q None at all?

15 A Not to my understanding.

16 Q I'm sorry?

17 A Not to my recollection.

18 Q Okay. How about with Lynch? Do you know Lynch as Flossy?

19 A Yes. Donald Lynch.

20 Q Did you have any dealings directly with Donald Lynch in

21 relation to the distribution?

22 A Not that I can remember.

23 Q How about Turner? YD. Young Diamond.

24 A Yes.

25 Q Did you have any direct --

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 A Yes.

2 Q When was that?

3 A 2009 through 2010. That would be -- yes, August. I spoke
4 with him before August. And, then, he came up to Spokane; and
5 we met up here in -- in mid August.

6 Q I'm sorry?

7 A We met up here in mid August of 2009.

8 Q Okay. And was anybody else with you when you met him?

9 A What do you mean? Could you have some clarity, please?

10 Q Was he alone when you met him?

11 A It was -- it was him and I, and we met up with School Boy.

12 Q Okay. And where did you meet?

13 A Northtown Mall.

14 Q Okay. And, at that time, did you discuss the distribution
15 of OxyContin?

16 A We discussed a lot of things.

17 Q I'm sorry?

18 A We discussed various things, a lot of things.

19 Q So did you discuss the distribution of OxyContin with him
20 at that time?

21 A Yes.

22 Q Did you meet with him at any other time?

23 A In Spokane?

24 Q Any place.

25 A Yes.

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 Q And when was that, sir?

2 A 2010 or '11. Right around there. I'm not sure what -- I
3 met with him frequently. He's not just -- he's a good friend.

4 Q He's what?

5 A Good friend.

6 Q He's a good friend?

7 A Yes.

8 Q And, during the meeting with him, did you discuss the
9 distribution of OxyContin?

10 A Yes, amongst other things.

11 Q And do you remember what that discussion was about?

12 A More or less, he was still coming back and forth from Los
13 Angeles to Spokane dealing with School Boy and Donald Lynch.

14 Y -- Young Moe.

15 Q He what?

16 A Donald Lynch. Donald Lynch. Young Moe.

17 Q He brought him -- he brought him up, didn't he?

18 A Yes. Correct.

19 Q So did you have contact with him regarding the drugs?

20 A With whom?

21 Q With Lisbey.

22 A Lisbey or Lynch?

23 Q I'm sorry. I think I may have overstated. I'm sorry.

24 A Okay.

25 Q Did have you any contact with -- with -- with Jay Loc.

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 A Jay Loc?

2 Q Shorts? That's Shorts?

3 A Yes.

4 Q When was that?

5 A 2009.

6 Q You're sort of -- you were sort of the boss of all this
7 whole thing, weren't you?

8 A No, sir.

9 Q Okay. You -- you -- a lot of the information you have
10 is -- is information that you've gotten from other people.
11 Right?

12 A Some of it is.

13 Q Is it difficult to differentiate what you personally know
14 or what somebody else told you?

15 A Is it hard for me to differentiate?

16 Q Yeah. I mean, sometimes is it difficult to "I don't know
17 if I dealt with them directly or whether somebody told me that
18 this happened."

19 A No. I don't -- I don't smoke. I don't drink. I don't do
20 no drugs. So --

21 Q Your memory's pretty good.

22 A It's -- it's okay sometimes.

23 Q From time to time.

24 A It's okay.

25 Q Okay. Did you know Nutty?

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 A Baby Nutty.

2 Q Johnwell. Isn't that Nutty?

3 A Peanut is Johnwell.

4 Q Then did you have any dealings with Johnwell or Nutty in

5 relation to the distribution of OxyContin?

6 A Two different people.

7 Q Okay.

8 A Those are two different people.

9 Q One's -- one Johnwell is Nutty. Right?

10 A Johnwell is Lil C Dog. Peanut.

11 Q Is his -- Peanut is his name?

12 A Peanut or Lil C Dog.

13 Q Okay. And how about -- what's the other one? The other

14 Johnwell?

15 A There's not -- what do you mean?

16 Q Did you say that there's two Johnwells?

17 A No. You said that.

18 Q Okay. There's only one Johnwell.

19 A You -- there's only one -- there's only one Johnwell that I

20 spoke to in Spokane.

21 Q Okay. But that was Nutty or Peanut?

22 A Peanut. Lil C Dog.

23 Q Okay. Now, how about Baby G Nutty? Do you know who that

24 is?

25 A Baby Nutty?

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 Q Yeah.

2 A Just Baby Nutty. Not Baby G Nutty.

3 Q Is that Mr. Jamerson?

4 A Jamerson.

5 Q Did you have any dealings with Mr. Jamerson in relation to
6 the distribution of OxyContin?

7 A I don't remember.

8 Q How about T. Haynes or Tiny Outlaw? Do you know him as
9 Tiny Outlaw?

10 A Tiny Outlaw? Yes.

11 Q And do you know who I'm talking about?

12 A Yes.

13 Q Did you have any dealings with him directly about the
14 distribution of OxyContin?

15 A Yes.

16 Q When was that?

17 A 2011 and 2012, I think -- I believe.

18 Q Where was it?

19 A Los Angeles.

20 Q All the contact was in Los Angeles?

21 A Yes.

22 Q And do you remember the kind of -- what the -- what the
23 contact was about?

24 A He sold me pills.

25 Q I'm sorry?

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 A He sold me pills.

2 Q He sold you pills.

3 A Yes.

4 Q And do you know how he got them?

5 A No, I do not.

6 Q And, then, you bought -- what did you do with the pills?

7 A Sold them to whomever was asking for them.

8 Q Okay. Now, there -- there was some mention of taxes in
9 this case. You said that the -- that Carmen, apparently, was
10 taxing people?

11 A Yes.

12 Q When you -- when you're paying taxes, then, it goes to the
13 upper people. Right? Is that how it works?

14 A Not necessarily.

15 Q Okay. Not necessarily. How did it work, then,
16 Mr. Madison?

17 A For instance, School Boy had provided a service so I gave
18 him a bottle of 80 -- 100 80-milligram OxyContin. He, in turn,
19 bought a Cadillac with it. Made the money and bought a CTS
20 Cadillac. It didn't go to no upper people.

21 Q They go to upper people?

22 A It didn't go to upper people. He use the money off of the
23 pills, and he bought him a Cadillac.

24 Q Now, how much money did you personally get out of this
25 whole operation?

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 A I'm not sure. A lot of it didn't directly come to me. So
2 I don't know. Like, I don't have a number.

3 Q Well, did -- did you receive money from this whole
4 operation?

5 A Yes, I did.

6 Q And was that money that -- of pills that you gave to
7 somebody else to take to Spokane to sell?

8 A Yes.

9 Q Was that the only way that you got that money?

10 A I don't understand.

11 Q Well, did you ever receive any tax money?

12 A Tax money? Carmen was the only one that taxed anyone.

13 Q Okay. When you pay taxes to the Government, the Government
14 gets that tax. Right?

15 A So Carmen's the Government?

16 Q What?

17 A So Carmen is the Government. Is that what you're saying?

18 Q No. That's not what I'm saying. My question is: When
19 you -- when you pay taxes to the Government, the Government gets
20 the taxes. Right?

21 A Yes. So Carmen would be the Government.

22 Q Okay. Now, at one point, you mentioned that -- that --
23 that Carmen probably would not have lived but for his being
24 arrested. Is that correct?

25 A That's what I believe.

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 Q Okay. And your position -- you're in a position of know
2 how in that respect. Right?

3 A A lot of people kind of confide -- they come to me with
4 personal and business situations that arises and -- yes. I was
5 privy to some information in regards to him.

6 Q You were privy to some information about him in respect to
7 his living.

8 A In respect to his activity and his behavior during his,
9 say, him controlling his -- himself in public.

10 Q Controlling himself in public?

11 A Yes.

12 Q Okay. You -- you mentioned that Ms. Horn, Sharita Horn, is
13 your fiancée. Correct?

14 A Yes.

15 Q And have you talked with her since you've been in jail,
16 arrested in February of '13?

17 A Talk to her --

18 Q On the telephone.

19 A She in jail.

20 Q Pardon me?

21 A She's in jail.

22 Q I'm sorry. I didn't hear your answer.

23 A I said we're in jail.

24 Q When you were on the telephone with her.

25 A Excuse me?

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 Q Have you had contact with her since you've been in jail?

2 A We've rode up in the van together. We've been processed
3 together.

4 Q Okay. You've also had three-way phone calls with her.

5 Isn't that correct?

6 A Three-way phone call? That would be incorrect.

7 Q So you haven't had any -- you know what a three-way call
8 is, do you not?

9 A Can you clarify?

10 Q Do you know what a three-way call is?

11 A Yes. Somebody calls in on one line and another line calls
12 another person.

13 Q Okay. And isn't it true that you've had at least 38
14 different conversations with her through three-way conversations
15 on the phone?

16 A We can't call the -- we can't call the jail. But have I
17 spoke with Sharita when we came up here? Yes.

18 Q I'm sorry. What? Did you -- I didn't hear your answer,
19 sir.

20 A I said that I have spoken to Sharita coming up here on the
21 bus.

22 Q Okay. And I'm talking about the telephone and three-way
23 telephone conversations with her.

24 A Yes.

25 Q You've had over 30 calls -- conversations with her.

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 A You said 30 calls?

2 Q Over 30 calls.

3 A Oh.

4 Q Would that be a fair statement?

5 A I'm not sure.

6 Q But you've had multiple calls, have you not?

7 A With Sharita?

8 Q Yes.

9 A Yes.

10 Q That's a yes.

11 A Not three-way but, as you said, I have talked to her on the
12 phone.

13 Q They weren't three-way calls?

14 A Well, three-way, to my understanding, is you have to call
15 somebody and, then, they have to call that person.

16 Q Right.

17 A You can't call the Judge -- the jail -- the jail.

18 Q I know that, but the three -- what I'm referring to is a
19 three-way call where you would call a relative and, then, that
20 other person would call a relative and, then, that conversation
21 between that other person would be connected.

22 A Oh, yes.

23 Q So those are --

24 A That's -- that's correct.

25 Q Those are the types of calls I've -- I've asked you about

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 in relation to her.

2 A And I'm saying, "Yes" --

3 Q Okay.

4 A -- since you clarified it.

5 Q Thank you. Now, did you deal at all with Mr. Hunka?

6 A No.

7 Q Do you know who Mr. Hunka is?

8 A Yes.

9 Q All right. Who is he?

10 A Person that's part of the defendants in our case.

11 Q Okay. But you don't know him personally.

12 A No.

13 Q How about DeCaro? Big Nick?

14 A No.

15 Q How about Figueroa brothers?

16 A No. Most of these people that you're asking about, we come
17 in contact with each other in the jail system.

18 Q The what?

19 A In the jail system.

20 Q In the jail system.

21 A Yes.

22 Q So some of the information you're talking about is stuff
23 that you accumulate -- or got it when you were in jail?

24 A No.

25 Q Oh.

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 A I've not testified to any of the information that I found
2 out in jail.

3 Q None of your testimony has to do with that.

4 A Not to my knowledge.

5 Q Okay. Do you know the Figueroa brothers?

6 A No.

7 Q Okay. Do you know Sally Guthrie?

8 A Yes.

9 Q And did you have any contact with her?

10 A I was introduced -- introduced from School Boy that that
11 was his girl.

12 Q Okay. Did -- do you have any knowledge, personal
13 knowledge, of her in relation to the distribution of OxyContin?

14 A No.

15 Q Do you know Mr. Warnock or Bam?

16 A Yes.

17 Q Do you have any information about him in relation --
18 personal knowledge of him in relation to the distribution of
19 OxyContin?

20 A Yes.

21 Q And what is that?

22 A He sells pills.

23 Q Okay. And did you know -- you know -- do you know that as
24 a matter of fact?

25 A Yes.

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 Q And when did you have dealings with him in relation to
2 that?

3 A 2012.

4 Q Where?

5 A Los Angeles.

6 Q And what was that? Where was it, first of all?

7 A In our neighborhood. Los Angeles.

8 Q And what was the discussion about?

9 A To sell pills.

10 Q Specifically, what was the discussion about?

11 A He wanted to sell pills. He was trying to get pills.

12 Q He was trying to get pills from you?

13 A Yes, and other people.

14 Q And -- and, during 2012, you spent most of your time in
15 Los Angeles. Correct?

16 A Unless I was up here with Sharita.

17 Q And when were you up here with Sharita in 2012?

18 A Various times.

19 Q Okay. Let start in January. Did you have any time up here
20 in January of '12 with her?

21 A I don't know the exact time, like, months I was up here. I
22 would just frequently fly up here and spend some time with her.

23 Q Do you remember the month that you might have done that?

24 A It was few -- it was a few flights.

25 Q I'm sorry?

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 A It was a few times.
2 Q How many times?
3 A I don't know. I don't know exactly.
4 Q How about Princeton Perry? Do you know that person?
5 A Yes, I do.
6 Q And how do you know Princeton Perry?
7 A That's Haynes's cousin.
8 Q Is he an Eight Trey?
9 A Adopted, walk-on, basically.
10 Q Okay. Do you know a Balka? Maybe you know him by Wheels?
11 A No, not offhand.
12 Q Okay. How about Michelle Fried?
13 A I met her in the jail system transfer -- transferring.
14 Q Only in -- that's the only -- you don't know her from the
15 standpoint of any distribution of OxyContin.
16 A No.
17 Q How about Jessica Clinton? Do you know her?
18 A No.
19 Q Do you know who she is?
20 A No.
21 Q Okay. Did you know Auntie or Fowler?
22 A Auntie? Not to my recollection. Not by that name.
23 Q How about Sada or George?
24 A Sada George?
25 Q Yeah.

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 A Carmen's girlfriend.

2 Q Okay. And do you know of any incidents where she was
3 involved with you in the distribution of OxyContin?

4 A Not to my knowledge.

5 Q But you just knew her because she was involved with Carmen.

6 A Yes.

7 Q How about Erika Woods? Do you know that person?

8 A TS's girlfriend.

9 Q I'm sorry?

10 A Haynes's girlfriend.

11 Q Okay. Do you know her in relation to any distribution of
12 OxyContin?

13 A As far as -- can you -- can you clarify for me?

14 Q I'm sorry?

15 A Can you clarify for me?

16 Q You know Erika Woods.

17 A Yes.

18 Q And do you know her in relation to any distribution of
19 OxyContin?

20 A I don't know of her having any OxyContin.

21 Q Okay. Do you know a G-2?

22 A Yes.

23 Q Who's that?

24 A She's one of the young home girls. Like, a Eight
25 Treylette, as we call them.

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 Q Eight Trey what?

2 A Eight Treylette.

3 Q Okay. And do you know her government name? Do you know it

4 as Martin?

5 A Yes. Leslie Martin.

6 Q But no relation to OxyContin distribution. Correct?

7 A No.

8 Q Okay. How about Angela Collins? Do you know that person?

9 A No.

10 Q No, you don't know that person?

11 A Angela Cotton (sic)?

12 Q Um-hum.

13 A Not to -- not by that name.

14 Q Do you know who G-1 is?

15 A Yes.

16 Q You don't.

17 A Yes. I say I do.

18 Q What's the Government name for G-1?

19 A Last name White.

20 Q Do you know any information -- any personal information in

21 relation to White's involvement with the OxyContin distribution?

22 A You didn't -- with the distribution of pills? I know she

23 had a script in her name.

24 Q How do you know that?

25 A She showed me and told me.

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 Q So she got pills for you?

2 A No.

3 Q But she showed you that she had a script?

4 A Yes.

5 Q Is that all you know about her in relation to this?

6 A No. Other than the fact is, she would be, like, a courier
7 for different people.

8 Q For different people?

9 A Yes.

10 Q Was she a courier for you?

11 A No.

12 Q Do you know a Shamika English?

13 A Yes.

14 Q And how do you know Shamika?

15 A That's Tiny School Boy baby mom.

16 Q Tiny School Boy. Who's that?

17 A Baby -- Baby School Boy Lil Homie.

18 Q And what's the Government name for that person?

19 A Jessie.

20 Q I'm sorry?

21 A Jessie.

22 Q Jessie?

23 A Yeah.

24 Q Is that the first name or last?

25 A First name Jessie. Last name Stringer.

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 Q Stringer?

2 A Yes. He's deceased.

3 Q Do you have any information -- personal information as it
4 relates to Shamika's involvement in the distribution of
5 OxyContin?

6 A She's not part of the indictment.

7 Q So you seem to know everybody in the indictment, huh?

8 A No. I just know that she's not on the indictment.

9 Q Where do you get that information?

10 A Excuse me?

11 Q How do you know that?

12 A How do I know that she's not part of the indictment?

13 Q Yeah.

14 A She's not part of the 64 people that's been indicted.

15 Q And how do you know that?

16 A Well, our paperwork tells us that.

17 Q The paper -- you said yours was redacted except for your
18 name.

19 A That initial paperwork was redacted, but -- (To his
20 attorney) what is that PACER? Is it PACER? But I obtained
21 information from my daughter off of PACER.

22 Q Okay. So you've been exposed to all the people that have
23 been indicted in this case.

24 A Exposed?

25 Q You have been made aware of all of the people that are

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 indicted in this case.

2 A I've read all the -- the names of which was -- of which was
3 included in PACER, public knowledge.

4 Q So you have been made aware of that. Correct?

5 A I'm aware of it.

6 Q Do you know Lady Dev?

7 A Lady Dev?

8 Q Maybe a government name of Glass?

9 A I think I'm -- in transportation I've seen her, heard her
10 name.

11 Q Do you know who she is?

12 A I know that she's -- how do I say -- part of our
13 transportation to and from other county jails. I don't know her
14 personally.

15 Q Do you have any information that you could share with the
16 jury in relation to her involvement in the OxyContin --

17 A No.

18 Q -- pill game?

19 A No.

20 Q Do you know an Erica McDonald?

21 A Yes.

22 Q You do know --

23 A Yes.

24 Q -- Erica? How do you know Erica?

25 A Through Tiny Menace and Haynes.

748

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 Q Okay. And did you have any dealings with Erica McDonald in
2 relation to the distribution of OxyContin?

3 A I'm not sure if I picked up her or her sister one time, but
4 that was about it.

5 Q And that's Diamond McDonald, is it not?

6 A Diamond. That's -- okay. Yeah, her --

7 Q So it was one of those two?

8 A One of those two. I don't remember which one it was that I
9 picked them up before.

10 Q Okay. And you picked them up where?

11 A From the airport.

12 Q And took them to where?

13 A To their house.

14 Q And was that in relation to the distribution of OxyContin?

15 A Yes.

16 Q How do you know that?

17 A How do I know? 'Cuz she was introduced to me through
18 Haynes and Alex James.

19 Q But you picked her up at the airport and took her
20 someplace. And that -- was that in relation to the distribution
21 of OxyContin?

22 A Yes.

23 Q How was it in relation to that?

24 A She gave me money to hold for them.

25 Q She gave you money that trip?

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 A Yes.

2 Q And how much money did she give you?

3 A I don't remember.

4 Q When did she give you the money?

5 A I don't remember when.

6 Q And do -- but you -- and you don't remember how much?

7 A I don't remember how much. I don't remember the date and
8 time, either.

9 Q You don't remember when it was or how much money or
10 anything.

11 A I just know it was 2012.

12 Q It was in 2012?

13 A I think it was in 2012.

14 Q Now, in 2012, what you were doing is you were getting plugs
15 in LA. Right?

16 A Getting plugs?

17 Q You know what a plug is, don't you?

18 A Yes.

19 Q The plug is where you get the drugs. Right?

20 A Yes.

21 Q Isn't that what you were doing in 2012?

22 A Mostly, yes.

23 Q You'd spend most of your time in Los Angeles obtaining
24 pills. Correct?

25 A 2012.

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

750

1 Q Is that correct?

2 A Yes.

3 Q But you came up to Spokane a few times?

4 A Yes.

5 Q How many times?

6 MS. VAN MARTER: Objection. Asked and answered.

7 THE COURT: We've gone over that a number of times,
8 questions and answers, Mr. Nollette.

9 MR. NOLLETTE: I'm just trying to narrow down when it
10 was, though, Judge.

11 THE COURT: Well, you tried that before.

12 MR. NOLLETTE: Okay.

13 Q (BY MR. NOLLETTE) Now, do you know a Porsha Marcus?

14 A I can't say that I do.

15 Q Do you know a Lady Gucc? Last name of Brown?

16 A Again, transportation only.

17 Q What do you mean -- what do you mean by --

18 A Like, when we transfer around to county jails, I've seen or
19 heard their name. Same as in Michelle and Hunka and a few other
20 people.

21 Q But there's nothing on the -- that you knew about before
22 you were arrested and put in jail.

23 A No.

24 Q How about Treasure Brown?

25 A Yes.

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 Q Same thing?

2 A Same thing as far as?

3 Q Well, when did you -- how do you know her?

4 A Through -- that was Nino's girlfriend.

5 Q I'm sorry?

6 A That was Nino's girlfriend.

7 Q Okay. Did -- did you have any dealings with her in

8 relation to the distribution of OxyContin?

9 A Yes.

10 Q When was it?

11 A Off and on, different times throughout. I say --

12 Q Off and on throughout what?

13 A I'm kind of thinking. I'm trying to think of the time

14 frame. I think -- I think it's 2010 up until, like, 2013.

15 Something around there.

16 Q From 2010 through 2013?

17 A I think, like, the first month in 2013, I want to say, I

18 was in contact with her.

19 Q Where?

20 A Excuse me?

21 Q Where?

22 A Los Angeles.

23 Q And you were arrested on the 28th of February of that year.

24 Correct?

25 A Yes.

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 Q So it had to be in January or February. Right?

2 A Yes.

3 Q And you had contact with her down there during January,
4 February of '13?

5 A No. I hadn't had contact with her in January of 2013.

6 That would be, I think, like, February -- February I think I
7 seen her.

8 Q February?

9 A I seen her in -- in February. Like --

10 Q That was in Los Angeles.

11 A Yes.

12 Q And was that in relation to the distribution of OxyContin?

13 A No, not when I seen her there.

14 Q I'm sorry?

15 A Not when I seen her in February of 2012.

16 Q Okay.

17 A I didn't -- I didn't, like -- we didn't, like, meet up or
18 anything like that. I just seen her. Like --

19 Q You just saw her.

20 A I saw her.

21 Q Did you have any involvement with her in the distribution
22 of OxyContin?

23 A Yes.

24 Q And when was that?

25 A 2012. 2011.

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 Q When in 2011?

2 A I'm not sure the dates.

3 Q Can you narrow it down to the month?

4 A Sure couldn't.

5 Q You sure can?

6 A I sure couldn't.

7 Q How about the 2012? When in 2012?

8 A I don't know. I just know it was during that time, 2012.

9 I don't know the exact months.

10 Q Did you -- you didn't know her in 2012?

11 A I said I don't know the exact month that I would see her.

12 I didn't --

13 Q How many contacts in 2012 did you have with her?

14 A Multiple. Multiple contacts.

15 Q And where were those?

16 A Los Angeles.

17 Q And let's describe the first one. Would you tell the jury

18 about the first time.

19 A The first would be she was coming up to see Miles, and

20 Miles would send her down with money.

21 Q That's your understanding what was going on.

22 A Yes.

23 Q And is that because of your leadership position in the

24 Eight Treys?

25 A No.

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 Q You just heard it through the grapevine, so to speak?

2 A I was working for Miles and School Boy at that time.

3 Q Okay. And how did you hear it? About Treasure Brown?

4 A Miles asked me to pick her up from the airport.

5 Q Okay. And did -- where did you take her on that first
6 occasion?

7 A To her house.

8 Q And did she give you the money that she had?

9 A I was told to take her suitcase.

10 Q And what did you do with the suitcase?

11 A Took the socks out of the suitcase and gave her back her
12 suitcase.

13 Q And how much money was in the suitcase?

14 A I don't remember at the time.

15 Q But that money was for you. Is that correct?

16 A The money was for Miles.

17 Q Okay. Kevin Miles?

18 A Kevin Miles.

19 Q And how about the second time in that year? Or was there a
20 second time?

21 A In 2000 --

22 Q Well, when -- when was the first one that you just talked
23 about? Was that in '11 or '12?

24 A That was in 2000 -- I want to say 2010 if I want to be
25 precise. I think it was 2010.

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 Q Are you sure?

2 A Yes. I'm pretty much -- pretty much sure it was 2010.

3 Q Pretty sure it was -- okay.

4 A Pretty sure.

5 Q Was there only one contact in 2010?

6 A No. It was different times. I don't remember the amount
7 of times. Whenever Miles would have me come pick her up, I just
8 go pick her up.

9 Q Now, were you below Miles in this hierarchy of the Eight
10 Treys?

11 A "Hierarchy of Eight Treys"? No. Miles is not really a --
12 he's, like, a walk-on, adopted Eight Trey.

13 Q So you're above him, aren't you?

14 A In -- in what? In relevance?

15 Q In the Eight Treys.

16 A Yes. Not in the drug transactions.

17 Q I'm sorry. What?

18 A Not in the drug game.

19 Q Did you have more seniority than he in the Eight Treys?

20 A Yes, but not in the drug game.

21 Q But not in the drug game? He had more than you?

22 A He bought me in. He financed me coming in.

23 Q In fact, he originally brought you in, did he not?

24 A That's what he did.

25 Q And when was that?

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 A August of 2009.

2 Q August of 2009. And was that the first time you came to
3 Spokane?

4 A Yes, it was.

5 Q And how long did you stay in 2009 --

6 MS. VAN MARTER: Objection. Asked and answered.

7 THE COURT: Yes. Sustained.

8 Q (BY MR. NOLLETTE) Do you know Irreis or Heiress? Or
9 Heiress, I guess, is the -- last name of Burns.

10 A Irreis Burns? Is that what you said?

11 Q Heiress, yeah. Like an heir of --

12 A Oh, not -- that name doesn't ring a bell.

13 Q Doesn't ring a bell? Okay. How about Hoodbear? Does
14 that -- have you heard that name?

15 A Only in transportation.

16 Q And the last -- Government name Jones? Is that your
17 recollection of that person?

18 A Yes. That's what I knew her by, Yes.

19 Q Do you know that person?

20 A Only in transportation.

21 Q In transportation --

22 A Meaning, like, from county jail to county jail. That type
23 thing.

24 Q What?

25 A Meaning, in transportation.

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 Q What do you mean by "transportation"?

2 A Like, as we are moving around from county jail to county
3 jail.

4 Q Okay. So it was after you were arrested.

5 A Um-hum.

6 Q Otherwise you didn't know the person.

7 A No.

8 Q And that applies to a lot of these folks, does it not?

9 A That I don't know them?

10 Q That you knew about what was going on. A lot of this
11 information that you've supplied to the jury is because it's
12 information you got while you were in jail.

13 A No, sir.

14 Q Okay. How about Sanchez? Antoinette Sanchez? Do you know
15 that name?

16 A Not offhand.

17 Q You don't.

18 A Not right offhand.

19 Q How about Triviah Robinson? Do you recognize that name?

20 A No.

21 Q You don't?

22 A Say Triviah? I don't -- the name again?

23 Q How about Lady Whiz?

24 A No.

25 Q Okay. Terrai Traylor?

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 A Temar? What is that?

2 Q Terrai, T E R R A I, Traylor.

3 A No.

4 Q Doesn't ring a bell at all.

5 A Not -- no.

6 Q Aaronika Durousseau? Does that ring a bell?

7 A No.

8 Q How about Killa B? Collins?

9 A No.

10 Q Now, did you -- you indicated earlier that you had dealt
11 with Nocomie Moore. Is that correct?

12 A Yes.

13 Q And was there a time when you didn't deal with --

14 MS. VAN MARTER: Objection. Asked and answered.

15 MR. NOLLETTE: It's a different question, Judge. It
16 has to do with disassociation.

17 THE COURT: All right. Go ahead.

18 Q (BY MR. NOLLETTE) Was there a time when you disassociated
19 with Nocomie Moore?

20 A I don't understand what you mean by "disassociated."

21 Q Well, you've indicated that you had some dealings with her.
22 Is that correct?

23 A Yes.

24 Q Was there a time when you discontinued that?

25 A There was time where we mutually decided to part ways.

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 Q When was that?

2 A It was after -- after her incident.

3 Q After --

4 A Her incident.

5 Q And that incident was what?

6 A I don't know. I don't know what time it was. The date,

7 time, I don't know. I --

8 Q What was the incident about?

9 A She got kidnapped and shot in the eye.

10 Q That had nothing to do with this case, though, did it?

11 A I don't know.

12 Q Okay.

13 MR. NOLLETTE: Just one second, your Honor.

14 (Pause in the proceedings)

15 Q (BY MR. NOLLETTE) Would it be fair to say -- oh.

16 (Witness confers with his attorney)

17 THE WITNESS: Yes, sir.

18 Q (BY MR. NOLLETTE) Would it be fair to say you indicated

19 that you were privy to a lot of information?

20 A Yes. Some wanted; some not wanted. So --

21 Q And -- and who -- who provided this information to you?

22 A Various individuals.

23 Q And that's how you kept track of what was going on in

24 Spokane. Correct?

25 A No.

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 Q Oh.

2 (Pause in the proceedings)

3 THE COURT: Anything further?

4 MR. NOLLETTE: Yes, your Honor. I was just waiting.

5 I thought maybe you had some --

6 THE COURT: No. I'm waiting for you.

7 Q (BY MR. NOLLETTE) At some point, is it fair to say that
8 word got back down to Los Angeles about the money that was being
9 made in Spokane?

10 A Yes.

11 Q And -- and, because of that, there were a lot of people,
12 then, coming up here doing their own thing in that respect.

13 Correct?

14 A Or just obtaining pills to be able to send them up.

15 Q Right. In other words, there were -- once word got out
16 that you could turn 2,000 into 15 or 20,000, there were people,
17 other than the Eight Trey Gangster, that came up here.

18 A Yes.

19 Q Correct?

20 A Yes.

21 Q And it was the attraction of the money that caused these
22 people to come up. Correct?

23 A Yes.

24 Q And those folks weren't necessarily tied together with you.
25 Were they?

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 A No.

2 Q Or to anybody else. They were just doing their own thing.

3 A Yes.

4 Q And it was because of the money.

5 A Yes, sir.

6 Q Okay. And -- and when a person -- let's say you talked
7 about taxes. If there was a tax, then the tax went to that
8 individual. Correct?

9 A Yes.

10 Q Okay. Now, during your conversations with the Government,
11 you were provided with these -- some of these phone calls, were
12 you not?

13 A Excuse me?

14 Q During your meetings with the prosecutor over the months,
15 you were provided, were you not, with tape recordings of
16 wiretaps. Isn't that correct?

17 A Audio? Video? I'm not understanding.

18 Q Well, were you given any video?

19 A That's what I'm asking you. What are you -- is that what
20 you're asking me? Because I wasn't given any video. Audio.

21 Q Were you provided with a --

22 A With -- I --

23 Q -- tape recording of the wiretaps?

24 A Oh, yeah.

25 Q They gave you those.

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 A They didn't give them to me.

2 Q They played them for you.

3 A Excuse me?

4 Q They played them for you. Is that correct?

5 A Yes.

6 Q And, then, they would stop them at times and ask you
7 questions about them. Is that correct?

8 A Yes, for clarification.

9 Q Or identification.

10 A Or identification.

11 Q Okay. Would it be fair to say that the -- you ever heard
12 about the gold rush?

13 A Yes.

14 Q Hundred years ago?

15 A Hundred years ago. "Go West."

16 Q What?

17 A The term "Go West."

18 Q Yeah. Gold -- gold rush.

19 A Yes.

20 Q Wouldn't it be fair to say that, because of what was going
21 on in these -- the pill game, that it was a gold-rush type of
22 activity?

23 A Somewhat so.

24 Q Did people have to come and ask your permission to do
25 anything --

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

763

1 A No.

2 Q -- in Spokane?

3 A No.

4 Q In fact, people didn't have to ask permission to come up
5 here and sell their drugs, did they?

6 A In the beginning, yes.

7 Q Okay. But, then, after word got out that the gold rush --
8 I'll call it that -- was on, then everybody was coming up.

9 A Yes.

10 Q Because they could come up and make their money and, then,
11 go back down and -- and take their money with them. Is that
12 fair to say?

13 A Unless they was working for someone.

14 Q What?

15 A Unless they was working for someone.

16 Q Somebody outside of the Eight Trey?

17 A No. They can be working for Eight Treys that was already
18 established up here.

19 Q Okay. Or they could be working for the Rollin 60s or 40s
20 or whatever. Somebody else. Correct?

21 A I don't know any 60s or 40s that was up here working in
22 that capacity.

23 Q Do you know any of those others that were working then?

24 A I don't know -- I don't know any 60s or 40s that were
25 working along with ourselves up here in Spokane.

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/CR - NOLLETTE

1 Q They could be doing it without your per -- your knowledge
2 because they didn't have to ask for your permission. Right?

3 A I didn't control anything.

4 Q Is the lifestyle in the -- in that area in Los Angeles
5 pretty much the same as life here in Spokane?

6 A No.

7 Q Quite a bit different, isn't it?

8 A Extremely different.

9 Q You mentioned something about weapons and so on and so
10 forth, and you used the term "we keep them close." Right?

11 A In Los Angeles.

12 Q In Los Angeles..

13 A Yes. Some -- some people adapted it out here in Spokane,
14 as well.

15 Q But down there you pretty much had to have weapons with
16 you.

17 A Or close.

18 Q Or close.

19 A You don't necessarily have to have them on you 24/7, but
20 you needed to have them close.

21 Q And the racial makeup down there is what? Five percent
22 white in that neighborhood?

23 A I'm not sure what the ratio is.

24 Q Would that be -- there's not a lot of whites in that area,
25 are there?

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/REDI - VAN MARTER

1 A In our neighborhood?

2 Q Yeah.

3 MS. VAN MARTER: Your Honor, I'm going to object to
4 relevance.

5 THE COURT: That is not relevant, Mr. Nollette.

6 Q (BY MR. NOLLETTE) You mentioned something about
7 Donald Lynch. He had his own franchise. Is that what you're
8 saying?

9 A Franchise. Crew.

10 Q Or crew.

11 A Yes.

12 Q "Crew" and "franchise" are interchangeable. Correct?

13 A Interchangeable.

14 Q Okay.

15 A That was just for clarity of -- of me answering
16 Mr. Hormel's question so that he would understand what I was
17 talkin' about.

18 Q Okay.

19 MR. NOLLETTE: That's all the questions I have.

20 THE COURT: Redirect, Ms. Van Marter?

21

22 REDIRECT EXAMINATION

23 REDIRECT BY MS. VAN MARTER:

24 Q Good afternoon.

25 A Good afternoon.

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/REDI - VAN MARTER

766

1 Q Several times you have testified to the effect "they're not
2 in the indictment."

3 A Yes.

4 Q Were you given specific instructions, based upon the
5 Court's order, who you were supposed to talk about and not talk
6 about?

7 A Who I was supposed to talk to as far as --

8 Q Were you given any instructions about talking about
9 individuals who were not yet charged?

10 A Yes.

11 Q And what was that instruction?

12 A Don't do that.

13 Q And was that an instruction given to you by the United
14 States based upon the Court's order?

15 A Yes.

16 Q So are you trying to hide anything about those individuals?

17 A No. I was just instructed that it was a ongoing
18 investigation and not to me, personally, bring them up unless
19 they was involved in my conversation.

20 Q Is there a difference between the gang business and the
21 pill business?

22 A Definite difference.

23 Q Please explain.

24 A In the pill game, you can be a boss because of the money
25 that you derive from. You could, as our terminology is, "call

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/REDI - VAN MARTER

1 shots;" tell even a person that has more stature in our gang
2 what he can and can't do as far as the pills. Meaning, like,
3 how much they sell for, who -- who that they actually sell for,
4 and that nature.

5 But, if you're down in Los Angeles as a -- you have to --
6 you have to go by who you are and where you -- and where you are
7 as far as your criteria in the neighborhood. Sometimes people
8 gain money and they think that, because of the money that they
9 have, now they can come down and, in the gang situation, they
10 can tell people what to do or buy their respect. It doesn't
11 work that way. So, therefore, it causes conflict and turmoil.

12 Q So, the individuals that may be in charge of the pill game,
13 is that different than the hierarchy within the gang, itself?

14 A Yes.

15 Q So, when you were talking about the way that this pill
16 hustle or pill game worked, is that different than talking about
17 how the gang structure works?

18 A Totally different.

19 Q Why?

20 A Because the -- because, when it comes down to it, you have
21 to come in with money. And, if you don't have any money, you
22 have to work, as we -- as we say, "grunt work." You have to
23 work your way up until you become somebody that can have his own
24 crew, franchise, or whatever.

25 Q So, when you said -- I want to make sure because I think

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/REDI - VAN MARTER

1 terminology is important. When you said, "franchise," what does
2 that mean to you? What is your definition?

3 A My definition of franchise is, like, we all had different
4 crews. We had -- we had established -- different people was
5 doing different stuff. So, whatever they establish, they
6 establish overall. Initially, as it came down, we had one boss
7 because we only had one phone. So that person control all of
8 the pills that were being sold. There was nobody else to go to.

9 Q And was that person in the beginning?

10 A School Boy.

11 Q And, as things developed, how did they change?

12 A Like a -- like a chain.. People started posting up and
13 giving their -- their own chains, their own crews, and they
14 started to sell and not everybody had to pay taxes anymore.

15 Q So, when we're talking about how this whole thing started,
16 who was the person that set up the structure on how it started?

17 A School Boy.

18 Q And, in the beginning, who were the individuals that came
19 up and helped School Boy create the structure?

20 A In the beginning, it was myself, YD, Peanut, and Mel.

21 Q And, again, Peanut is?

22 A Harry Johnwell.

23 Q And YD is?

24 A Glen Turner.

25 Q And Mel is?

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/REDI - VAN MARTER

1 A I don't know his last name. Just Mel for Melvin.

2 Q And, again, who determined what the structure would be when
3 it started?

4 A School Boy did.

5 Q Once the structure started, then what began to happen with
6 respect to the pill game?

7 A It blew up because it was -- everybody went by example of
8 what School Boy had established, and that's how we was able to
9 make the money that we did. I branched off with him. He -- I
10 guess, he -- I wanted to go with him. I felt as though I owed
11 it to him. He needed me. I guess he needed my clout. So we
12 came together.

13 Q And, when things blew up --

14 A Yes.

15 Q -- and crews or franchises started, could they just come up
16 on their own and start at the beginning?

17 A No, not at beginning.

18 Q Explain that.

19 A Because, if they came up at the beginning, it wasn't -- it
20 wasn't nobody up here that actually had fades. If you came up
21 here -- it was already down at LA that, if you came up here, you
22 were gonna be taxed. So you're -- most of the people that's
23 coming up, they don't want to pay taxes. So they want to --
24 they were trying to avoid the taxes and avoid to deal with
25 School Boy because he has a keen way of doing business.

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/REDI - VAN MARTER

1 Q So, once things started to blow up, individuals that were
2 involved in this case -- when they came up, would they share
3 couriers?

4 A Yes.

5 Q Would they share residences?

6 A Yes.

7 Q Would they follow a particular model on how to do things?

8 A Yes. They -- they, basically, had to because that was
9 shown that most of the time that, when you went outside the
10 scope of what -- of what School Boy showed us, you would get
11 caught up. So a lot of people started getting arrested.

12 Q So, when you were asked about a business model --

13 A Yes.

14 Q -- did you guys sit down and develop a business model?

15 A No.

16 Q Okay. So, when you sit down and -- and you have meetings
17 or you talk about it, where do these meetings happen?

18 A Restaurants, house, park, and, sometimes they just kind of
19 happen. The meeting in question that we had -- we -- I didn't
20 -- I didn't feel it was right for him to be out of the -- the
21 loop. So I asked 'em to call 'im.

22 Q And you're talking about the meeting that occurred early
23 on.

24 A Yes, early on.

25 Q Okay. How come you don't remember what specific day or

771

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/REDI - VAN MARTER

1 month things happened?

2 A Because I have -- I have a family, as well. And a lot of
3 things that transpire, if it didn't have any significance of
4 when this occurred and when that occurred, then I didn't really
5 pay attention as far as the dates.

6 The reason I know my arrest, it -- the last arrest I had
7 was on my son's birthday.

8 Q So do you remember specific events -- or dates because of
9 specific events?

10 A Specific events.

11 Q So, at the time that you were involved in supplying pills,
12 were you writing down every occasion you supplied some pills?

13 A No. I didn't take any -- I didn't write anything down.

14 Q And were you writing down every time you spoke to
15 School Boy?

16 A No.

17 Q Alex James?

18 A No.

19 Q Were you tallying a total amount of -- of pills for purpose
20 of your testimony today?

21 A No.

22 Q So are you testifying from your memory?

23 A From my memory. That'd be a fair and accurate because I
24 couldn't testify no other way.

25 Q So, when you were asked about the structure of the Eight

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/REDI - VAN MARTER

1 Treys and the hierarchy and you gave the example of a military
2 model, was that specific to the gang life?

3 A No. I was trying to give a reference to the stature of
4 which you -- you gain respect but not the stature in which you
5 gain respect in the pill game. And just because you're a
6 general in this aspect and you -- you got your respect, you got
7 your -- your time in and everything, that doesn't necessarily
8 mean, when you come into the pill game, that somebody's going to
9 say, "Oh, that's the general. Let's go ahead and just give him
10 10,000 pills." That's not gonna happen especially -- especially
11 when you -- you been here and you establish yourself of doing
12 your hustle, you put in the work to get your hustle, and you
13 controlling this. It would be like he stepping on your toes.

14 Q Let's talk about, again, what -- your role, with respect to
15 the pill hustle, developed into a pill supplier.

16 A Yes.

17 Q Is that a fair way to say it?

18 A That would be fair.

19 Q So do you know what happened to every shipment of pills
20 that you sent up here?

21 A No. I don't know where they went. And a lot of times when
22 I obtain pills, it wasn't only for my monetary gain. Sometimes
23 I had to -- because of the gang structure and how different
24 people, they tend to be like -- they -- they fester on each
25 other, I had to sometimes go behind other people's back and send

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/REDI - VAN MARTER

1 other people pills up here without the knowledge of who they
2 were going to with respect that they would not lose the pills,
3 they would not go anywhere else, that the money would come up --
4 or the pills would come up, the money would come back, and it
5 would serve as a purpose of keeping the peace because, with that
6 amount of money being made, it was a lot of people that was
7 being disrespectful.

8 Q So, when you sent the pills up, let's say, to Mr. Haynes,
9 did Mr. Haynes sell each and every one of those pills. Do you
10 know?

11 A I can't say he sold every -- each one of those pills.

12 Q Would he have other people sell for him?

13 A Yes.

14 Q Would you know all the people that he would have distribute
15 for him?

16 A Some people, but not everybody.

17 Q Same question as to School Boy. Would he sell each and
18 every one of his pills?

19 A No.

20 Q Would he have other people sell for him?

21 A Yes.

22 Q Do you know all the people that were selling for School
23 Boy?

24 A No.

25 Q Same question for Mr. Lisbey. Do you know if he sold every

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/REDI - VAN MARTER

1 one of his pills?

2 A No.

3 Q Would he have other people sell for him?

4 A Yes.

5 Q Do you know -- we previously had you discuss, specifically,
6 with respect to Mr. Lisbey and his connection to the north side.

7 A Yes.

8 Q Did he bring a crew up from the north side?

9 A Yes.

10 Q And how do you know that?

11 A We talked about it.

12 Q Who's "we"?

13 A Him and I. Me and Lisbey had a conversation of -- of
14 people that he trusted.

15 Q And who did he trust?

16 A He trust a lot of -- more -- some of his people, but he
17 kind of handpicked from other sides of who he would deal with.

18 Q So would that be an example of a franchise or a crew?
19 Lisbey's?

20 A Like, I guess, starting it, yes.

21 Q And you previously testified about some of the members of
22 the -- of the crew that you knew of. And who were they?

23 A Of different crews?

24 Q Of Lisbey's crew.

25 A Well, he dealt -- as far as my knowledge, because I can't

775

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/REDI - VAN MARTER

1 speak on anybody else's -- but he dealt with Princeton, T Crazy,
2 Haynes, Tiny Menace, Young Chico, Baseball, different
3 individuals of that nature.

4 Q Young Ant?

5 A Young Ant. But Young Ant was his own entity. But he
6 still -- because they bros. So they -- they still hooked up.

7 Q And you were asked some questions, again, about the
8 stealing of the fade phone. And, specifically, about Lisbey
9 being concerned about Chico -- and I forget somebody else --
10 taking his fade phone.

11 A Yeah. T Craze -- Young Ant and -- he was talking to
12 T Crazy. And Young Ant and Chico -- he didn't want them to have
13 his fade phone because they was accused of taking people's
14 numbers. Not -- to my knowledge, not Chico himself, but Young
15 Ant taking the fade phone and taking people numbers out of
16 there. And --

17 Q Could Chico have sold some fades for Lisbey?

18 A Yes. Or whomever else he was up to.

19 MR. CHRISTIANSON: I'd object to speculation --

20 (Interruption by the reporter)

21 MR. CHRISTIANSON: I'd object to speculation, Judge.

22 THE COURT: If you know the answer, you can give it.
23 If you don't know, don't speculate, Mr. Madison.

24 THE WITNESS: Yes.

25 Q (BY MS. VAN MARTER) Could he have just taken the fades

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/REDI - VAN MARTER

1 without permission?

2 A Yes.

3 Q And was that part of what was going on during that time
4 period that was of concern?

5 A It was getting real hectic.

6 Q Fair to say people could lose control of their crew?

7 A Yes.

8 Q There's some terms that were used, and I just want to make
9 sure we're all on the same page as to what the definition is.
10 When you were asked whether you did "personal business" with
11 somebody, what does that mean to you?

12 A That meant, like, that we had a personal relationship in
13 order to -- like, I was giving them pills specifically for them
14 to come up here and sell pills.

15 Q So is that different than asking whether you know if
16 they're involved in the pill hustle?

17 A Yes. That's different. To me, that would be different.

18 Q Okay. How so?

19 A Because as an older homie and -- I have a fair reputation
20 for doing what's right. And sometime it's just not right for
21 one individual but overall it's right for everybody. So a lot
22 of times they come to me with situation that arose just as
23 School Boy did when he acted -- him and Donta Blackmon had the
24 altercation with YD. Because that -- that could just blow up
25 and it become from a physical altercation to gun play. And a

777

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/REDI - VAN MARTER

1 lot of times I have to, like, amass my big homies to squash that
2 beef.

3 Q So just because you may not have had personal dealings with
4 an individual, does that mean they were not involved in the pill
5 came?

6 A No, that doesn't.

7 Q For instance, did you have personal dealings with all the
8 fades in this case?

9 A No.

10 Q Why wouldn't you have dealings with the fades?

11 A Because, at -- in the beginning, I went out and did what I
12 was -- was asked to do in order to make the money, the fades, or
13 whatever. And, later on, that wasn't part of my description of
14 the hustle.

15 Q So, just because you don't know who a particular fade is or
16 a particular courier, does that mean they weren't involved in
17 the pill hustle?

18 A No, it doesn't.

19 Q And you were asked a bunch of questions about different
20 females. And how many couriers, in total, do you know that were
21 utilized during the course of this case?

22 A A lot. I mean, that -- like I said, some of them are part
23 of it. Some of them is not. Twenty, thirty, I would say.
24 Maybe more.

25 Q Did you personally know all of them?

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/REDI - VAN MARTER

1 A No.

2 Q So, for instance, when you were asked questions about
3 Treasure Brown, you were asked if you personally -- if she
4 distributed pills in the oxy game personally. What was her
5 role?6 A See -- and that's -- that's where it kind of get tricky
7 because a lot of the couriers that brought pills up here, some
8 of them didn't know that they were bringing pills. Some of them
9 just thought they were coming up here to see a particular
10 person, hang out, get treated to a shopping spree, and, then,
11 they would come up. Their luggage would be taken from them.
12 The pills would be taken out. And, when it's time for them to
13 leave, the luggage, again, is -- is taken. The socks is puttin'
14 in or the clothes -- is hidden in the clothes or the socks.
15 And, then, it would come down. And, when they get back to LA,
16 they would -- it would be taken out. They would be paid.17 Q So they may have been utilized, but they may not have
18 personally known what was going on.19 A Some of the -- some of the people was -- they pretty naive.
20 So it -- they had -- could have came up here and had no
21 knowledge of either coming up here with pills or not because
22 their luggage wouldn't be there at one time or another. Like I
23 say, we -- we -- they'll come up here and say, "Oh, yeah,
24 because I'm gonna be up here for a weekend," or whatever, "let's
25 go to the restaurant." And, while they're at the restaurant,

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/REDI - VAN MARTER

779

1 I'll have her car key. Like, give it to one of my homies.
2 Like, "Look, go get her luggage." And, then, she doesn't -- her
3 luggage is there when she get back so she wouldn't know. So,
4 when it's time to go, the same thing. It would be the same
5 process. A lot of times they wouldn't know.

6 Q You were asked some questions, though -- some more specific
7 questions about the role of a fade. And I'm not going to go
8 back over what a fade is or what a fade phone is or anything
9 like that. But you did say some fades became workers in this
10 case.

11 A Yes.

12 Q What does that mean?

13 A A lot of the fades -- they want to support their habit, but
14 they don't have the -- the means. They don't have the money.
15 So, if their buddy, you know, is gonna buy, say, five pills,
16 another buddy buy five pills, another buddy buy five pills,
17 while he's obtaining 15 pills, when he comes to get pills from
18 the people that's here, he just made a 15-pill transaction but
19 maybe he only spent a portion of that money to get the 15 pills.
20 So now he's actually hustling it for his habit. So he becomes a
21 fade/worker.

22 Q And do you know if fades helped facilitate, or do anything
23 else for the group when they were up here in Spokane?

24 A Yes. Again, because they can't always pay for their --
25 their habit. Sometimes they would need fades to get a

780

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/REDI - VAN MARTER

1 rent-a-car. And, then, they are -- rent their vehicle, get a --
2 a house, produce some paperwork for them to rent a house,
3 different things of that nature.

4 Q And you were asked some questions about Paco.

5 A Yes.

6 Q You had made reference to Paco and, then, there's some
7 other Pacos in that same line. Lil Paco. Big Paco. Are you
8 confused as to, when you're talking about "Paco," about
9 Donta Blackmon?

10 A No.

11 Q So your testimony relative to Donta Blackmon, that Paco, do
12 you have an independent memory as to what occurred with Donta
13 Blackmon?

14 A Yes.

15 THE COURT: Do you have much more, Ms. Van Marter.

16 MS. VAN MARTER: I don't have much more, your Honor.

17 Q (BY MS. VAN MARTER) And, also, a bunch of names were read
18 off to you by Mr. Nollette. Different pronunciations. Do you
19 know a person by the name of Terrai?

20 A Terrai? Oh, yes, Terrai Moore or --

21 Q Do you know a female by the name of Terrai?

22 A Terrai. Yes. That's Ts's girlfriend.

23 Q So, in some of the names that were being asked of you, did
24 you have a hard time understanding who he was talking about?

25 A Yes. I think he was pronouncing the -- their names wrong.

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/REDI - VAN MARTER

1 Q Okay. So, during your direct testimony, if you talked
2 about a particular person or a particular name, was that based
3 on your independent memory?

4 A Yes.

5 Q You were asked lots of questions about whether it comes
6 from your personal observations or what you heard or what you
7 talked -- or who you talked to. When you testified about
8 individuals, was that information that you testified to -- did
9 that come from the time period that you were involved in the
10 pill hustle?

11 A Yes. My -- my recollection of what was going on. Not from
12 what I heard as far as after the arrest and anything of that
13 nature.

14 Q And it also included specific conversations with
15 individuals involved in the pill hustle.

16 A Yes.

17 MS. VAN MARTER: If I could have a moment, your Honor?
18 (Discussion off the record)

19 MS. VAN MARTER: I have no other question. Thank you,
20 Mr. Madison.

21 THE WITNESS: Thank you.

22 THE COURT: We'll take our recess. Fifteen minutes,
23 ladies and gentlemen. Please don't talk about the case.

24 (Jury out at 2:30 p.m.)

25 (Court recessed at 2:31 p.m.)

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/RECR - CHRISTIANSON

1 (Jury in at 2:52 p.m.)

2 (Court reconvened at 2:52 p.m.)

3 THE COURT: Good afternoon. Be seated. Cross
4 examination, Mr. Hormel, if we go in the same order. And please
5 limit your cross to the scope of the redirect, and let's try not
6 to be repetitious.

7 MR. HORMEL: No questions, your Honor.

8 THE COURT: Oh, that's good. Let's see. Mr. Lee, you
9 were next.

10 MR. LEE: I have no questions, your Honor.

11 THE COURT: Mr. Christianson?

12 MR. CHRISTIANSON: Very briefly, your Honor.

13

14 RECROSS EXAMINATION

15 RECROSS BY MR. CHRISTIANSON:

16 Q I just wanted to set some time frames here real quick. So
17 let's talk about three different things. First off, you just
18 testified that, in the beginning, it was pretty organized:
19 Taxing, everything else going on in the beginning.

20 A Yes.

21 Q Very organized.

22 A Excuse me?

23 Q Very organized.

24 A We went with what was there. What was in place.

25 Q Okay. And, then, in the end, it was getting pretty crazy.

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/RECR - CHRISTIANSON

783

1 A Yes.

2 Q The organization -- the -- the structure of it was pretty
3 much gone.

4 A We wasn't a organization.

5 Q Okay. In the end, it was -- it was -- it was crazy.

6 A Yes.

7 Q What I'm looking for is: When did it make that transition
8 from -- from tightly organized under rules, taxation, all this,
9 to just being people coming up and doing their own thing?

10 A I don't know the exact time but, I guess, when different
11 people was -- was questioned about who could come up and who
12 couldn't come up. And, since Carmen was the one in charge, you
13 know, and everybody -- everybody feels that they have to come
14 and get his permission.

15 Q Okay. Did it -- did it kind of make the transition and
16 open way up right around the time the \$100,000 was seized and
17 people heard about how much money's up here?

18 A Relatively or, like, slightly afterwards.

19 Q Okay. But that, kind of, was the start of opening up the
20 flood gates.

21 A Pretty much so. Yes, sir.

22 MR. CHRISTIANSON: Thank you. I have no further
23 questions.

24 THE COURT: Mr. Nollette?

25

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/RECR - NOLLETTE

784

1 RECROSS EXAMINATION

2 RECROSS BY MR. NOLLETTE:

3 Q Mr. Madison, you indicated that, at some point, this whole
4 thing, this pill game, just blew up.

5 A Yes, sir.

6 Q And that -- that was because of the money that was
7 involved?

8 A It was a few different things that had happened. But, as
9 far as the different people wanting to come up here, it was
10 happen -- it happened after the big seizure from Kevin Miles.

11 Q After Miles -- the seizure from Miles?

12 A Yes.

13 Q And when was that?

14 A Approximately, 2010.

15 Q Could have been 2011?

16 A Excuse me?

17 Q Could it have been 2011?

18 A I don't think so.

19 Q Okay. Now, you indicated that -- well, let me strike that.
20 Would it be fair to say that there was competition in
21 relation to the pill game?

22 A Yes, you can say that.

23 Q If people were able to find out who your fades were, people
24 would jump in front of you and sell them to them. Correct?

25 A They could do that.

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/RECR - NOLLETTE

1 Q They could do that, couldn't they?

2 A Yes, they could.

3 Q Okay. Now, the prosecutor, on redirect, made some comment
4 about all these different couriers and some of the names that I
5 asked you about specifically. Do you remember that?

6 A Yes, sir.

7 Q She asked you about those?

8 A Yes.

9 Q And -- and she asked you with regard to whether or not
10 people were using the same courier or different couriers.

11 Correct?

12 A Yes.

13 Q Now, when I asked you specific questions about the
14 individuals, you answered those questions as best you could
15 remember. Correct?

16 A Yes, I did.

17 Q I'm sorry? Yes, you --

18 A Yes, I did.

19 Q You did. Now -- and, so, each crew or franchise was, in
20 fact, different, was it not?

21 A With some similarities at some point in time.

22 Q Some people didn't operate with other folks. Correct?

23 A Correct.

24 Q All right. And -- and, so, would it be fair to say that --
25 that this wasn't just an Eight Trey Gangster Crip drug

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/RECR - NOLLETTE

1 conspiracy?

2 A Fair to say. Fair to say.

3 Q It was a conglomeration of a whole bunch of independent
4 people. Some were working together, but some were working
5 completely separate.

6 A Yes.

7 Q Okay. Now, when did you first get to know Carmen?

8 A Get to know him?

9 Q When did you first meet him?

10 A First met him?

11 THE COURT: You know, this goes back to testimony we
12 had yesterday, Mr. Nollette.

13 Q (BY MR. NOLLETTE) Well, did you know him before 2008?

14 A Yes.

15 Q And did you work with him before 2008?

16 MS. VAN MARTER: Your Honor, this is beyond the scope.

17 THE COURT: It is, Mr. Nollette. We've already gone
18 over all this.

19 Q (BY MR. NOLLETTE) Okay. Your testimony on Friday and
20 today has to do with your memory of circumstances. Correct?

21 A Correct.

22 Q Did any of that -- any of those meetings that you had with
23 the Government, the 30 plus hours, assist you in that?

24 MS. VAN MARTER: Objection, your Honor. Beyond the
25 scope.

JURY TRIAL - DAY 5 - OCTOBER 20, 2014
G. MADISON/RECR - NOLLETTE

1 MR. NOLLETTE: No, it isn't.

2 THE COURT: It is.

3 Q (BY MR. NOLLETTE) As a general statement, was there a
4 competition between you and Mr. Carmen?

5 A Not at any time unless it was on his account.

6 MR. NOLLETTE: Nothing further.

7 THE COURT: That concludes your testimony,

8 Mr. Madison. Thank you very much, sir.

9 THE WITNESS: Thank you, sir.

10 THE COURT: Mr. Smoot?

11 MR. SMOOT: Our next witness is Salimah Glass.

12 THE COURT: What's her first name?

13 MR. SMOOT: Salimah.

14 THE COURT: Spell it.

15 MR. SMOOT: S A L I M A H. H. A H. H is the last
16 letter on that. My apologies.

17 (Pause in the proceedings)

18 Your Honor, may I approach and remove the water glasses?

19 THE COURT: Yes, you may.

20 (Pause in the proceedings)

21 THE COURT: I assume the delay is caused in just the
22 transportation.

23 MR. SMOOT: That's my understanding, your Honor.

24 THE COURT: Logistics.

25 (Witness enters courtroom)