

I observed Deputy Rodriguez give special privileges to known gang members. Deputy Rodriguez allowed Gang Activity to exist throughout the jail facility. Deputy Rodriguez facilitated communication between known gang members. On many occasions, Deputy Rodriguez showed me confidential gang intelligence information.

Deputy Rodriguez utilized departmental computers to run inmates information and then, Deputy Rodriguez would pass the information to known gang members.

I did not request nor want to see the dentist on December 5, 1996.

I felt that Deputy Rodriguez set him up to be intimidated by gang members.

I was in fear of my safety.

Deputy Rodriguez put the meeting together for the benefit of the gang and their business.

c. I told Mr. Russo that there was no way I could testify to all this because I only saw Deputy RODRIGUEZ once or twice a week, and was limited to movement within my housing unit, that Deputy RODRIGUEZ was on the 2nd watch, and that because the majority of activity occurs on the first watch it would be very obvious that he was lying.

d. That was when Mr. Russo referred to an inmate named "Fred" who I was supposed to have befriended and had conversations within the jail.

e. I was told that if Mr. Lehman asked during cross examination for "Fred's" last name, to simply state that I could not recall.

f. That at the hearing on May 14, 1996, I testified that Deputy RODRIGUEZ gave "trays" and "cigarettes" to special inmates, and this was not true.

g. I did testify at the May 14, 1996 hearing about a black guy named "Fred", but this evidence was not true or correct.

h. I did testify about certain connections between Deputy RODRIGUEZ and gang members, and none of these statements were true.

i. I have given statements recanting my testimony at the May 14, 1996 hearing to the following persons: David Lehman, Thomas Cronin, Mark Lamet and Chuck Goudie of the Channel 7 News.

j. I have not been offered anything in exchange for this affidavit, nor have I been coerced or under any duress.