

Transcript of the Testimony of
REV. DR. LEON FINNEY

Date: February 12, 2019

Case: IN RE: WOODLAWN COMMUNITY DEVELOPMENT
CORPORATION

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

IN RE WOODLAWN COMMUNITY)
DEVELOPMENT CORP.,)
) No. 18-29862
Debtor.) Chapter 11

This is the deposition of REV. DR. LEON D. FINNEY, JR., called by the Official Committee of Unsecured Creditors for examination, taken pursuant to the Federal Bankruptcy Rules, taken before PEGGY A. ANDERSON, a Certified Shorthand Reporter of the State of Illinois, at 135 South LaSalle Street, Suite 3705, Chicago, Illinois, on February 12, 2019, at 10:00 o'clock a.m.

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1 (WHEREUPON, the witness
2 was first duly sworn.)

3 WHEREUPON:

4 REV. DR. LEON D. FINNEY, JR.,
5 called as a witness herein, having been first
6 duly sworn, was examined and testified as
7 follows:

8 DIRECT EXAMINATION

9 BY MR. DAN:

10 Q State your name spell your last name
11 for the court reporter.

12 A My name is Reverend Dr. Leon Dorcy
13 Finney, Jr., F-i-n-n-e-y, J-r, as in junior.

14 Q Dr. Finney, what is your current
15 occupation?

16 A Interesting question. I am pastor of
17 the Metropolitan Apostolic Community Church.
18 From an occupation, I think that's about it
19 right now; and I should add parenthetically
20 that it's a nonsalaried position, and I have
21 never taken a salary in 23 years.

22 Q Can you tell me your education from
23 college forward?

24 A I have a master's degree in

1 **economics.**

2 Q And where from?

3 **A Goddard College in Burlington,**
4 **Vermont.**

5 Q Did you say Carter College?

6 **A Goddard, G-o-d-d-a-r-d.**

7 Q Goddard, okay.

8 **A I have a master's degree in arts and**
9 **theological studies.**

10 Q From where?

11 **A McCormick Theological Seminary.**

12 Q And where is that?

13 **A In the city of Chicago on the**
14 **University of Chicago campus.**

15 Q And any other degrees?

16 **A Doctorate of Ministry from the same**
17 **place, McCormick Theological Seminary.**

18 Q And how about college?

19 **A I have no college degree at all.**

20 Q No college degree. And when did you
21 get your master's in economics?

22 **A 1974.**

23 Q And the master's in arts and
24 theologies?

1 **A June 6th, 1990.**

2 **Q And the doctorate in ministries?**

3 **A I was awarded a dual degree at the**
4 **same time.**

5 **Q In 19 --**

6 **A Doctorate and master's at the same**
7 **time.**

8 **Q I apologize. I should have started**
9 **by going over the rules here, which I will do**
10 **now.**

11 First of all, have you ever been
12 **deposed before, Doctor?**

13 **A Yes, I have.**

14 **Q When was the last time you were**
15 **deposed?**

16 **A I have no idea.**

17 **Q Many years ago?**

18 **A Yes.**

19 **Q Well, I will ask you a series of**
20 **questions. I will ask that you try not to talk**
21 **over me, and I will do my best not to talk over**
22 **you, which I already did once and I apologize.**

23 We need to have a clean record for
24 **the court reporter. She can generally only**

1 take down one of us speaking at a time.

2 Also, since there's a court reporter,
3 your answers should be a yes or a no. Try to
4 avoid uh-huh or uh-uh and nodding of the head
5 and shrugging of the shoulders. If you don't
6 understand a question, ask me to repeat it,
7 rephrase it or whatever you need to do to
8 understand it. If you do answer a question,
9 I'm going to assume you understood it; is that
10 fair?

11 **A Yes.**

12 Q And if you need to take a break, let
13 me know. We can take a break as long as
14 there's not a question pending, okay?

15 **A As long as there's not --**

16 Q As long as there's no question
17 pending, we can take a break.

18 **A I understand.**

19 Q So you just have to answer whatever
20 is pending, and then we can take a break if you
21 need to. Okay. Do you work anywhere --

22 **A So let me check it out. So if I need**
23 **to take a break, then I must say I need to take**
24 **a break before there's a subsequent question?**

1 MR. OTTENHEIMER, III: Well, if he
2 says -- If he asks you a question, you
3 can't say, "Can I take a break?" You have
4 to answer the question first, and then take
5 the break.

6 THE WITNESS: Got it.

7 MR. DAN: Okay. Thank you.

8 BY MR. DAN:

9 Q Do you work anywhere other than at
10 the Metropolitan Apostolic Community Church?

11 A No.

12 MR. OTTENHEIMER, III: Excuse me,
13 Counsel. I'm really sorry to interrupt. I
14 wanted to put this on the record from the
15 beginning.

16 I want the record to reflect that
17 Dr. Finney was not properly served with his
18 subpoena. The return of service will
19 indicate as such, and Dr. Finney was given
20 a copy recently of the subpoena. That's
21 why we are here today; but given the short
22 amount of time that he had between the time
23 that he received the subpoena and now, I
24 don't think Dr. Finney has had an

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1 opportunity to produce all of the documents
2 that you have requested, but he will still
3 certainly produce those as soon as he gets
4 those. And I anticipate that if you have
5 questions on those documents, you'll
6 continue the dep to that point.

7 MR. DAN: And we'll get into the
8 documents and the subpoena shortly.

9 MR. OTTENHEIMER, III: Okay.

10 BY MR. DAN:

11 Q Dr. Finney, what is your home
12 address?

13 A My home address for voting purposes
14 is 649 East Groveland Park, but I have not
15 lived there in two years. And where I reside
16 now is 4906 South Greenwood, the city of
17 Chicago.

18 Q But you maintain your legal address
19 at 649 East Groveland Park?

20 A I just haven't changed it. It
21 slipped my mind.

22 Q Who resides at 649 Groveland Park?

23 A My wife who I'm -- My wife.

24 Q You're separated from your wife?

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1 **A Yes.**

2 **Q Where did you get the subpoena to**
3 **appear today? Who gave that to you?**

4 **A My wife.**

5 **Q When did she give that to you?**

6 **A I think it was either the 26th or**
7 **27th of -- maybe 28th of January. I can't**
8 **remember exactly. She brought that along with**
9 **mail, a bag of mail, and I don't remember**
10 **exactly. So it was in January. Let me put it**
11 **that way. It was not in February.**

12 **Q So -- but you still got it a little**
13 **over two weeks ago, correct?**

14 **A I think so.**

15 **Q Well, today, I believe, is February 12th,**
16 **correct?**

17 **A Yes.**

18 **Q And you stated that you got it**
19 **somewhere between the 26th and 28th of January?**

20 **A I believe so, but I wouldn't hold**
21 **that to me. I would have to talk to her and**
22 **get the exact time.**

23 **Q Okay. Now, let's go back to where we**
24 **were before. Do you work -- Is there anywhere**

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1 else that you work other than the Metropolitan
2 Apostolic Community Church?

3 **A No.**

4 **Q Do you own any --**

5 **A Let me ask you a question. Are you**
6 **saying "work," meaning paid compensation**
7 **meaning work? Is that how you -- Is that how**
8 **you define work?**

9 **Q No, I'm saying anywhere that you**
10 **work. I'm saying if you go somewhere and you**
11 **do work.**

12 **A If I go someplace and volunteer?**

13 **Q I'm not talking about volunteering at**
14 **a shelter or something like that. I'm talking**
15 **about at a place of business, if you go there**
16 **regularly and do any type of work.**

17 **A The only place it would be would be**
18 **the Lincoln South Central.**

19 **Q Did you say Lincoln South Central?**

20 **A Real estate.**

21 **Q We will get to Lincoln South Central**
22 **in a little bit. Currently, do you do anything**
23 **for Woodlawn Community Development Corporation?**

24 **A No.**

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1 Q When was the last time you did any
2 work for Woodlawn Community Development
3 Corporation?

4 A I don't remember the exact date, but
5 it was sometime in December, maybe November. I
6 can't remember exactly. It was -- You know it
7 better than I do. There was a time when there
8 was an objection to my being employed, and I
9 was taken off of payroll effective, I think it
10 was, November the 30th of 2018.

11 Q And have you received any payments
12 from Woodlawn Community Development Corporation
13 since November 30th of 2018?

14 A Yes.

15 Q When have you received payments?

16 A That would have been the pay that I
17 earned for -- We're always two weeks behind.
18 That would have been the pay that I would have
19 earned in November.

20 Q So that would be sometime in the
21 first two weeks of December then?

22 A Yes.

23 Q And since that time in early to mid
24 December, have you received any other payments

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1 from Woodlawn Community Development?

2 **A To the best of my knowledge, no.**

3 Q What is the -- To your understanding,
4 what is the business of Woodlawn Community
5 Development Corporation?

6 **A As the name suggests, it is a**
7 **community development corporation; and it's**
8 **purpose is to engage actively in rebuilding or**
9 **strengthening, through a variety of devices,**
10 **the neighborhood of Woodlawn and, to a degree,**
11 **south side neighborhoods.**

12 Q And how does it do that?

13 **A It actively works, has worked over**
14 **the years, in building subsidized housing,**
15 **managing subsidized housing, building for-sale**
16 **homes for mixed income families, being an**
17 **advocate for social justice.**

18 Q I don't want to interrupt. Does that
19 basically cover everything?

20 **A I think so. There may be something**
21 **else. Oh, and to engage in communications,**
22 **mass communications.**

23 Q And what kind of mass communications?

24 **A Multimedia communications, basically**

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1 **internet-based.**

2 Q For what purpose?

3 **A To influence public policy around**
4 **social justice issues.**

5 Q And how long were you involved with
6 Woodlawn Community Development Corporation?

7 **A Since 1971. I suspect that's**
8 **50-some-odd years. I don't know.**

9 Q That's fine. 1971 is fine. I think
10 that would be 47 years -- 48 years now or 49.
11 Were you involved in founding the Woodlawn
12 Community Development Corporation?

13 **A Yes, I was.**

14 Q When you were -- Strike that. As of
15 October 1st, 2018, what was your position at
16 Woodlawn Community Development Corporation?

17 **A I was the chief executive officer.**

18 Q From now on, I'm going to just call
19 it Woodlawn, if that's okay with you. Will you
20 understand --

21 **A That's fine.**

22 Q That's what I'm referring to? And at
23 some point, were you removed as CEO at Woodlawn?

24 **A Yes.**

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1 Q When was that?

2 A I think I have already stated it, but
3 I believe it was effective November 30th, 2018.

4 Q So at the time of the filing of the
5 bankruptcy, you were still CEO; is that
6 correct?

7 A Yes.

8 Q Were you also president?

9 A Same thing, they're fungible terms.

10 Q What is your relationship with
11 Clarence Nixon?

12 A He's a member of the board of
13 directors of the Woodlawn Community -- of
14 Woodlawn, let's say.

15 Q You can use the whole one. I'm just
16 shortening it to Woodlawn to make it easier,
17 but whatever you're comfortable with is fine.
18 How long has he been a member of the board?

19 A I don't really remember exactly.
20 It's been a long time, though. At least eight
21 to ten years, but I can't give you an exact
22 time.

23 Q Do you know who was involved in
24 getting him onto the board at Woodlawn?

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1 **A I don't remember.**

2 Q Do you know who is currently the
3 president and CEO of Woodlawn?

4 **A I don't want to speculate. So I**
5 **won't answer that question.**

6 Q So does that mean you don't know?

7 **A I don't know because I have seen -- I**
8 **don't know.**

9 Q Okay. You were about to say you have
10 seen. Were you --

11 **A The point is that -- Well, I think if**
12 **Herzog was here, he'd probably be able to**
13 **answer that.**

14 Q Well, actually, he can't. It's your
15 deposition. He's not allowed to answer any of
16 the questions. Only you can. If it's
17 something you don't know --

18 **A Well, I understand that the -- that**
19 **he either is or isn't -- Nixon is to be the**
20 **CEO, interim CEO.**

21 Q Okay. But you don't currently know
22 who is serving in that position?

23 **A I can't answer that question.**

24 Q After the filing of the bankruptcy

1 case, which I believe took place at the end
2 of -- if I'm not mistaken, around October 23rd.
3 Does that sound correct?

4 **A It sounds correct.**

5 **Q Okay.**

6 **A But be mindful, Counsel, I was in the**
7 **hospital when -- Most of these things you're**
8 **asking about, I was in the hospital at either**
9 **University of Chicago or Shirley Ryan.**

10 **Q Shirley Ryan AbilityLab?**

11 **A Yeah, and I did not get discharged**
12 **from there until December the 12th. So I was**
13 **an inpatient all of November and roughly half**
14 **of December.**

15 **Q When was it that you were admitted**
16 **for your surgery; do you recall?**

17 **A I want to say I was -- Maybe, it may**
18 **have very well been October the 29th or 30th.**

19 **Q And were you in the hospital or out**
20 **of the hospital at the time that the bankruptcy**
21 **was filed, the Woodlawn bankruptcy?**

22 **A What date was it filed?**

23 **Q I believe it was October 23rd.**

24 **A I was not in the hospital yet.**

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1 Q And I'll check on that date just to
2 make sure. Were you aware prior to the filing
3 of the bankruptcy of any negotiations with
4 Dr. Clarence Nixon regarding him being employed
5 as interim CEO and president?

6 A I don't remember. That's a level of
7 precision I'm not capable of responding to. I
8 don't remember.

9 Q Were you aware of any consulting
10 contracts entered into with Dr. Nixon prior to
11 or after the filing of the bankruptcy case?

12 A I was made aware that there was a
13 consulting contract, yes. The answer is yes.

14 Q Do you know when you were made aware
15 of that?

16 A No. It would have been while I was
17 still in the hospital.

18 Q So sometime in November or December?

19 A (Indicating.)

20 Q Is that a yes?

21 A Yes.

22 Q Remember, we have to make a record
23 with the court reporter.

24 Do you have any interest in the

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1 ownership of any business?

2 **A Yes.**

3 Q What businesses do you have ownership
4 interest in?

5 **A Lincoln South Central.**

6 Q That's Lincoln South Central Real
7 Estate Corporation?

8 **A Yes.**

9 Q Any other businesses?

10 **A When you say "interest," does that**
11 **mean -- that means stock or ownership or**
12 **whatever, right?**

13 Q Correct. And that could be for a
14 corporation, a partnership, an LLC, anything in
15 which you have --

16 **A Not to my knowledge.**

17 Q Are you involved at all with the
18 Leon's Barbecue Restaurants?

19 **A Yes.**

20 Q What is your involvement with Leon's
21 Barbecue Restaurants?

22 **A I am the son of the founder of Leon's**
23 **Barbecue, and I help them to -- volunteer to**
24 **help as I can to be true to the operation of**

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1 Leon's Barbecue as it was started in 1942 and
2 exists all the way through 2010, I believe. So
3 I have historical knowledge of how to make the
4 barbecue sauce, how to season, all of those
5 things. I helped to set it up. But, again,
6 not as a paid employee, as a volunteer.

7 Q And your involvement stopped in 2010?

8 A My involvement stopped in 2010 when
9 we closed. I think it was 2010 or 2011 when we
10 closed Leon's Barbecue. We were opening -- My
11 father -- Yeah, 2010. 2010 or 2011, we closed
12 all of Leon's Barbecue stores.

13 Q Okay. There are --

14 A And did not re-open until later on.

15 Q But there are a number of Leon's
16 Barbecues open now in Chicago, correct?

17 A Yes.

18 Q How many?

19 A I have no idea.

20 Q Do you have any involvement with the
21 Leon's Barbecues now?

22 A I'm sorry?

23 Q Today, do you have any involvement
24 with the Leon's Barbecue restaurants?

1 **A** **I said that I had involvement as a**
2 **volunteer with one. I have already spoken to**
3 **that, Counsel.**

4 **Q** **Okay. Well, you had stated that that**
5 **stopped in 2010. So I'm just trying to find**
6 **out. So --**

7 **A** **You may want to rephrase your**
8 **question.**

9 **Q** **Okay. You were involved in the**
10 **restaurants until 2010 or '11 when they closed.**
11 **Since that time, a number of Leon's Barbecue**
12 **restaurants have opened since then. And --**

13 **A** **That's not correct.**

14 **Q** **That's not correct?**

15 **A** **No.**

16 **Q** **Okay.**

17 **A** **We -- There were -- My family, my**
18 **father, owned all of the Leon Barbecue places**
19 **that were under his name; and that was Leon's**
20 **Barbecue, Inc.: One at 59th and Racine, one at**
21 **83rd and Cottage Grove and one at 79th, east on**
22 **79th Street.**

23 **However, there were other Leon's**
24 **Barbecues that were operated by other people**

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1 that my dad licensed or permitted to operate.
2 They continue to operate after the three stores
3 that my dad owned closed.

4 Q Okay. So they've always -- They have
5 been in operation for more -- since before 2010
6 or '11?

7 A Right, right, but I don't want you to
8 think that we had anything to do with those.

9 Q That's fine. That's just what I'm
10 trying to find out, sir.

11 Since the three stores that you're
12 family had had all closed by 2010 or '11, have
13 you had any involvement with Leon's Barbecue
14 since that time with any of the others whether
15 they are franchised or licensed, whatever they
16 are?

17 A Yes and no.

18 Q Okay. Let's start with the yes part.

19 A The yes part is that one of the
20 owners -- I asked him to assist me in
21 validating the recipe for the barbecue sauce
22 according to what he was selling in his stores.

23 Q He asked you or you --

24 A I asked him.

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1 Q You asked him. Is this to make sure
2 that it was being true to the original recipe?

3 A You got it, and so -- Yes.

4 Q And when was that?

5 A I have no -- Sometime in 20 -- I
6 don't remember exactly the date, but it would
7 have been either 2017 -- It may have been 2017,
8 2018.

9 Q Do you know -- I'm sorry. I believe
10 you said you don't know how many Leon's
11 Barbecue restaurants there are currently; is
12 that correct?

13 A No.

14 Q No, you don't, okay. And are you --
15 Other than working regarding the recipe around
16 2017 or whenever it was, do you have any
17 involvement currently with any of the Leon's
18 Barbecue restaurants?

19 A The ones that we never had any
20 involvement with or --

21 Q Let's start with the licensed or
22 franchised Leon's Barbecues.

23 A I have nothing to do with them.

24 Q Is there currently a Leon's Barbecue

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1 that is owned by the family again?

2 **A I'm sorry?**

3 **Q That is owned by you or the family?**

4 **A Not by me. I have no ownership. I**
5 **help. Do you follow me?**

6 **Q Who owns the Leon's Barbecue that you**
7 **help with?**

8 **A There is a corporation, I think, that**
9 **Cheryl Brown is a member of it.**

10 **Q And who is Cheryl Brown?**

11 **A Cheryl Brown is a former employee of**
12 **the original Leon's. She ran the store at 59th**
13 **Street and 83rd Street.**

14 **Q And where is her restaurant?**

15 **A That would be at 1518 -- 1528 East 63rd**
16 **Street.**

17 **Q And what is your involvement there?**

18 **A That's the one that I volunteer to**
19 **help.**

20 **Q And what do you do?**

21 **A Well, help her. Do whatever I can,**
22 **help. I don't serve food, you know. So I help**
23 **her with promotions, price setting. I help in**
24 **verifying -- Well, I was helping with verifying**

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1 receipts and expenditures but my --

2 Q And how --

3 A But mind you, this would have been
4 prior to -- Well, I don't want to say more.
5 Let me just -- Go ahead. You ask the question.

6 Q I assume you were going to say this
7 was prior to November with your surgery?

8 A Yeah, yeah.

9 Q Okay. And you are not paid for your
10 work there, correct?

11 A (Indicating.)

12 Q Is that a no?

13 A Yes. I am not paid for work there.
14 Yes, I am not paid.

15 Q I'm just clarifying because you shook
16 your head.

17 A Because I was about to say, no, I am
18 not paid.

19 Q No, no, I understand, Doctor.

20 A That would have been inappropriate.

21 Q I'm just making sure that we take
22 down a yes or no for the court reporter. I
23 understood what you were saying. We just can't
24 have a nodding of the head or a shaking of your

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1 head no. We have to have audible answers.

2 You are not -- And you are not paid
3 for your work by Cheryl Brown or her
4 corporation, correct?

5 **A No.**

6 Q May I ask how it is that you support
7 yourself if you don't earn an income from the
8 church or from any other work at this point?

9 **A You may ask. I may not be able to**
10 **answer.**

11 Q Okay. Can you try to answer for me?

12 **A The sole place I have -- had benefits**
13 **from that I have been denied, of course,**
14 **benefits from Woodlawn that I'm no longer able**
15 **to access. And so any income that I have to**
16 **survive on or with must come from Lincoln South**
17 **Central.**

18 Q Lincoln South Central Real Estate
19 Corporation, are you one of the owners of that
20 corporation?

21 **A Yes.**

22 Q Does anyone else own it with you?

23 **A My daughter. Because of my age, 81**
24 **years -- 80 years old, I willed the Lincoln**

1 **South Central to my daughter some years back.**

2 Q Did you give her complete ownership?
3 partial ownership?

4 **A I'm not real sure.**

5 Q Do you know --

6 **A Let me put it this way: She would be**
7 **the survivor, and she would be sole owner**
8 **should I expire, but I don't know if I -- I**
9 **have no idea whether I retained any percentage**
10 **of it.**

11 Q Currently?

12 **A Prior to my death.**

13 Q Do you have a corporate attorney for
14 Lincoln South Central?

15 **A No.**

16 Q Do you have anyone who does the
17 annual report or corporate minute book or file
18 things with the Secretary of State?

19 **A Yeah, I probably filed it myself**
20 **and/or asked one of our friends to help.**

21 Q And do you know if you are current --
22 if that company is current with the Secretary
23 of State?

24 **A I have no idea. No.**

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1 Q No, you don't know or, no --

2 A No, I don't know. I do not know.

3 Q Okay.

4 A I'm trying to answer this thing yes
5 or no, so no.

6 Q Lincoln South Central Real Estate
7 Corporation, what is their business?

8 A Real estate management and it engages
9 in real estate management as well as it engages
10 in social justice.

11 Q And how many properties does Lincoln
12 South Central Real Estate Corporation manage?

13 A One for fee.

14 Q And what property is that?

15 A 1500 to 1528 East 63rd Street.

16 Q Does it also manage other properties?

17 A Not for fee.

18 Q So it does it for free?

19 A Yes.

20 Q And what other properties does it
21 manage?

22 A Maybe I want to amend that and say
23 that sometimes I get confused between Lincoln
24 South Central and Woodlawn Community

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1 Development Corporation; and since when I was
2 the COE of the Woodlawn Community Development
3 Corporation, many of the properties -- one
4 property on 41 -- on King Drive, I kind of
5 manage that. That's where the media center is.
6 But my point is the roles of being CEO of WCDC
7 and president of Lincoln, that one property may
8 sort of overlap.

9 Q So you're not -- As you sit here now,
10 you're not sure if it's Lincoln South Central
11 that manages it or if it's WCDC?

12 A Properly, now, it would be the --
13 Properly, Counsel, it would be under the aegis
14 of the Woodlawn Community Development
15 Corporation.

16 Q Do you know the address on King
17 Drive?

18 A 4108 South Martin Luther King, Jr.
19 Drive.

20 Q What about Lincoln South Central,
21 though, are you aware of any other properties
22 it manages other than, obviously, the 1500 to 28
23 East 63rd?

24 A Counsel, what I was submitting was

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1 for fee. Once you put the "for fee" in, then
2 it's makes only one. You know, for instance,
3 we have helped, in other instances, management.
4 We have tried to be helpful as Lincoln South
5 Central in other aspects of operation of
6 properties that WCDC owns.

7 Q So it's been involved in other
8 Woodlawn Community Development properties?

9 A Yes.

10 Q Which it wasn't paid for. Are there
11 any properties that Lincoln is involved in that
12 do not involve Woodlawn?

13 A I would have to say, Counsel,
14 649 East Groveland Park.

15 Q Which is your former residence,
16 correct?

17 A Yes.

18 Q Where your wife currently is at?

19 A Yes.

20 Q What did Lincoln South Central do
21 there?

22 A Helped in construction. Code
23 violations. That's the correct -- Code
24 violations.

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1 Q Does Lincoln South Central have any
2 employees?

3 A No.

4 Q Who does the work for Lincoln South
5 Central, is that you or someone else?

6 A Me and people who volunteer and/or --
7 You know, I have maintenance people who I --
8 They do work and I pay them. They are not
9 regular salary people. Contractors.

10 (WHEREUPON, Finney Exhibit
11 No. 1 was marked for
12 identification.)

13 BY MR. DAN:

14 Q I'm going to show you what I have
15 marked as Exhibit 1. I will show you that this
16 a subpoena regarding your deposition. Have you
17 seen this document before?

18 A Yes.

19 Q And this is the one that you
20 testified previously that your wife brought to
21 you, correct?

22 A Yes.

23 Q And I would like you to turn to the
24 second page, if you could, and there is a rider

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1 attached there asking you to bring documents
2 today. Do you see that rider?

3 **A Yes.**

4 Q And it asks for all records regarding
5 ownership of Lincoln South Central Real Estate
6 and any and all leases, master leases and
7 evidence of rent payments regarding the
8 property commonly known as 1500 to 1528 East
9 63rd Street, Chicago, Illinois. And you saw
10 that before coming today, correct?

11 **A Yes.**

12 Q And did you bring any documents
13 responsive to that rider?

14 **A Yes. I brought these documents, some**
15 **of which I think you have already.**

16 Q Okay.

17 **A I brought some for the other**
18 **attorney.**

19 Q This is a copy I can keep?

20 **A Yes.**

21 Q So the first thing we have is a lease
22 between American National Bank and Trust and
23 Lincoln South Central Real Estate Group, Inc.,
24 dated January 1st, 1992. And it looks like

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1 this is a lease for Lincoln South Central to be
2 a tenant and also it looks like maybe for the
3 Woodlawn organization to be a tenant?

4 **A I brought what I could find, Counsel.**

5 Q Okay. And this is -- I just need to
6 find the address that this is for. Do you know
7 what this lease is for?

8 **A Yes. It's for the 1500 to 1528 East**
9 **63rd Street.**

10 Q Okay. Well, this one, the landlord
11 on this is American National Bank and Trust
12 Company under a trust dated June 1st, 1979,
13 Trust Number 46087. So this is something from
14 roughly 36 -- Well, now 37 years ago. This is
15 regarding leasing space at the 1500 to 1528
16 East 63rd Street; is that correct?

17 **A Yes.**

18 Q All right. At some point, though,
19 this trust was no longer the owner of 1500 to
20 1528 East 63rd Street, correct?

21 **A Yeah, yes.**

22 Q Do you know when that changed?

23 **A I have an amendment to that master**
24 **lease.**

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1 Q Okay. And this appears to be an
2 amendment to the master lease, and it's between
3 Woodlawn Community Development Corporation and
4 Lincoln South Central with Woodlawn shown as
5 the owner stating that it was -- it had
6 acquired the commercial strip mall on East 63rd
7 Street, and it was essentially extending the
8 lease agreement between Lincoln South Central
9 and the now owner, Woodlawn; is that your
10 understanding of this document?

11 A Yes.

12 Q And it states that the rent to be
13 paid under the master lease with -- between
14 Lincoln South Central and Woodlawn would be
15 \$7,000 per month effective November 1st, 2016,
16 correct?

17 A Uh-huh, yes.

18 Q And this master lease amendment goes
19 through October 31st, 2026, correct?

20 A Yes.

21 Q And I know that it looks like that's
22 your signature on behalf of Lincoln South
23 Central; is that correct?

24 A Yes.

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1 Q And whose signature is that on behalf
2 of Woodlawn?

3 A You can see plainly they're both my
4 signatures.

5 Q I'm just -- I'm not saying it's not.
6 They're a little bit different. It looks like
7 it was also Leon, but I couldn't see a "Jr."
8 written for the printed name, so I just wanted
9 to make sure.

10 Okay. All right. Do you have any
11 other documents that you brought today
12 regarding Lincoln South Central and the East
13 63rd property?

14 A Yes.

15 Q Okay. I assume these are going to be
16 leases?

17 A Yes.

18 Q With tenants at the properties,
19 correct?

20 A Yes.

21 Q And these would be leases between
22 Lincoln South Central and the tenants, correct?

23 A Yes (tendered).

24 Q The first one is a lease with House

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1 of Africa. Now, this is an unsigned lease?

2 **A Yes. I got what I could, Counsel.**

3 Q Okay.

4 **A Don't --**

5 Q Just hang on, Doctor. Just let me
6 finish my question.

7 **A All right.**

8 Q Do you have -- Is there a signed
9 lease somewhere?

10 **A I'm sure there is, but I will have to
11 find it.**

12 Q And you haven't found that yet?

13 **A No.**

14 Q This lease with House of Africa is
15 from November 1st of 2016 through October 31st,
16 2019, correct?

17 **A Yes.**

18 Q And they are to pay --

19 **A Well, I'm not reading it, so.**

20 Q Oh, okay. Did you keep a copy or no?

21 **A Yeah, I did.**

22 Q Because if not, I have a copy. I
23 actually have a copy of this one.

24 **A No, I just -- I was going on to do**

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1 **something else. Okay.**

2 Q I figure it's easiest to just take
3 these one at a time.

4 **A I got it. I have it.**

5 Q So this is a lease you see in
6 Paragraph 1-A that has the lease term as
7 November 1st, 2016 through October 31st, 2019,
8 correct?

9 **A Yes.**

10 Q And did House of Africa actually move
11 into the space November 1st, 2016?

12 **A I'm not sure. I think.**

13 Q And are they still there?

14 **A Yes.**

15 Q And have they been paying rent to
16 Lincoln South Central?

17 **A I cannot say exactly what -- I'm not
18 prepared to deal with the collection of the
19 rent at this particular point because I don't
20 have the records. I have no bookkeeper, so I
21 don't know exactly what's been going on.**

22 Q Who collects the rent from the
23 tenants on the East 63rd Street property on
24 behalf of Lincoln South Central Real Estate?

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1 **A** It may have been me. It may have
2 been one of my staff members. I mean, it could
3 have been any number. And, in particular,
4 between 2016 and 2018, being mindful that, in
5 2017, I was subject to open heart surgery and I
6 had been sick for a long time. So I had to
7 have help from volunteers, and that's why the
8 rent collection would be somewhat erratic.

9 **Q** So you don't know -- As you sit here
10 now, you don't know if House of Africa is
11 current on their rent?

12 **A** Not for sure.

13 **Q** Okay. They have paid at times,
14 though?

15 **A** Yes. I'm pretty sure they have.

16 **Q** And it's possible they're even
17 current?

18 **A** It's possible.

19 **Q** I'm going to -- Before we get to your
20 next one, I have a copy here, which -- I'll
21 deal with I guess marking your documents I
22 think at the end, but I will mark this as
23 Exhibit 2.

24

1 (WHEREUPON, Finney Exhibit
2 No. 2 was marked for
3 identification.)

4 BY MR. DAN:

5 Q This is a lease that I have a copy of
6 with House of Africa and Lincoln South Central.
7 Now, this one has different dates, though.
8 This one is made effective May 1st, 2013. The
9 one you handed me was March 1st, 2014 and it
10 has an earlier term.

11 Do you know if the one you gave me is
12 the correct one and mine is an earlier draft or
13 do you not know?

14 A Oh, I believe -- Counsel, I believe
15 that the House of Africa lease that was between
16 May 1, 2013 through April 30th, 2016 is an
17 earlier iteration of the lease. So they're not
18 in conflict.

19 Q So then this second -- the one you
20 handed me today would actually be essentially a
21 renewal lease? It starts November 1st, 2016.

22 A Yeah, it looks as though -- Wait a
23 minute. I see. So you have got a gap there
24 between April 30th, 2016 and November. So

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1 **you've got six months unaccounted for -- five**
2 **months.**

3 Q But you believe then that they have
4 been there for both of these leases. So the
5 one I have is actually --

6 A **I believe so.**

7 Q This is actually a prior iteration,
8 and so they've actually signed two leases while
9 at the space, to your knowledge?

10 A **Yes.**

11 Q Okay. Okay. Why don't we go to the
12 next one that you brought.

13 A **I'm confused right now. Do I keep --**

14 Q The one that I marked as Exhibit 2
15 you are welcome to keep. Every exhibit I have,
16 I give you a copy of. So you can keep it or
17 not keep it.

18 THE WITNESS: He didn't give you --

19 MR. OTTENHEIMER, III: Yes.

20 THE WITNESS: He gave it to you?

21 MR. OTTENHEIMER, III: Yes.

22 BY THE WITNESS:

23 A **House of Africa?**

24

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1 BY MR. DAN:

2 Q We can -- Let's move on to the next
3 one after House of Africa. You can put that
4 one to the side. Okay, whose next?

5 A **Woodlawn Dental Gallery.**

6 Q Okay. Which I also have a copy of
7 that, although, I'm guessing, I may have an
8 earlier lease; but we'll find out.

9 A **(Tendered.)**

10 Q No. I have the exact same one.
11 Okay. Although yours is signed. Let me see if
12 mine is. No, I have a signed copy also.

13 Okay. So what I will do then is I'll
14 mark this one as Exhibit 3.

15 (WHEREUPON, Finney Exhibit
16 No. 3 was marked for
17 identification.)

18 BY MR. DAN:

19 Q I believe -- You can take a look at
20 this. It appears to be the same document that
21 you just handed me. They both appear to be
22 between Lincoln South Central and Woodlawn
23 Dental Gallery and the term of the lease,
24 August 1st, 2012 through July 31st, 2015, and

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1 then it also has extension periods that run
2 through, it looks like, July 31st, 2021. And
3 these appear to be the same -- exact same
4 documents. And looking at the signatures on
5 the last page, signed by Dr. Finney and Ogbanna
6 Bowden it looks like, those appear to be the
7 same. So I think we have the same document
8 here.

9 **A Yes.**

10 Q Woodlawn Dental Gallery, have they
11 been a tenent at the property since August of
12 2012?

13 **A I believe so.**

14 Q And they are still there now?

15 **A Yes.**

16 Q Do you know if they are current on
17 their rent?

18 **A I don't know.**

19 Q Do you know if they have paid rent
20 over time?

21 **A Yes.**

22 Q But you're just not aware of their
23 current status?

24 **A Yes.**

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1 Q Okay. All right. Let's move on to
2 the next one that you brought.

3 A I want to get this stuff straightened
4 out. The next one would be A Child's Place.
5 Do you have that one?

6 Q I do. Although I don't know if it's
7 the same one. A Child's Place one that I have
8 is not signed.

9 A Nor is this one.

10 Q Okay. Well, I will give you my copy,
11 and I will take your copy, if I can; and we can
12 compare them.

13 (WHEREUPON, Finney Exhibit
14 No. 4 was marked for
15 identification.)

16 BY MR. DAN:

17 Q What I have marked as Exhibit 4 and
18 gave you is a lease between Lincoln South
19 Central and A Child's Place that looks like
20 it's from the term of August 1st, 2013 through
21 July 31st, 2016. Is your copy the same?

22 A I don't know.

23 Q Well, here --

24 A I got it.

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1 Q Well, I just want to make sure that
2 we have got the same documents here.

3 A Yes.

4 Q And then it has extensions up through
5 July 31st, 2019, correct?

6 A Yes.

7 Q And on this one, is A Child's Place --
8 Did they move in on or about August 31st, 2013,
9 to your knowledge?

10 A I'm assuming so, but I can't say for
11 sure.

12 Q Are they still there now?

13 A Yes.

14 Q Do you know if they are current on
15 their rent?

16 A I do not know.

17 Q But do you know that they have paid
18 rent at times?

19 A Yes, I do know.

20 Q Let's move on to the next one.

21 A Family Friend.

22 Q Okay. Friend or Friend Family?

23 A Friend Family.

24 Q Friend Family Health Center, Inc.,

1 right? This one --

2 THE WITNESS: Counsel, do you need
3 any copies of these?

4 MR. CHRISTOPOULOS: I don't.

5 MR. DAN: Bruce?

6 MR. SCALAMBRINO: Yes.

7 THE WITNESS: I'll make sure you get
8 a copy.

9 MR. SCALAMBRINO: I have got them all
10 so far.

11 BY MR. DAN:

12 Q Okay. And what is the date on the
13 Friend Family lease?

14 A **March 4th, 2016 --**

15 Q Okay.

16 A **-- through February 28, 2019.**

17 Q And with extensions --

18 A **Renewals of March 1 through 2019 all**
19 **the way through -- Yeah. So we have got two**
20 **extensions here.**

21 Q And the last one would expire
22 February 28, 2026, correct?

23 A **Right.**

24 Q And I will put this in as Exhibit 5.

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1 (WHEREUPON, Finney Exhibit
2 No. 5 was marked for
3 identification.)

4 BY MR. DAN:

5 Q You can see my copy has the same
6 terms and appears to be, I believe, the same
7 lease. This one is, again, signed this time by
8 Dr. Leon Finney and Verneda Bachus,
9 B-a-c-h-u-s. And Friend Family Health Center,
10 have they been a tenent since roughly March of
11 2016?

12 A I believe so.

13 Q And are they still there?

14 A Yes.

15 Q I assume you cannot say right now if
16 they are current on their rent?

17 A Right.

18 Q But they have paid rent over time,
19 correct?

20 A Yes.

21 Q Okay. What's next?

22 A Sedgewicks --

23 Q Okay. That one, I do not have. And
24 before we are done, I will make copies of these

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1 for anyone who needs them.

2 This appears to be a lease between
3 Lincoln South Central and Sedgewicks for a term
4 of November 1st, 2016 through October 31st,
5 2019, and it is unsigned. Do you know if there
6 is a signed lease for this one?

7 **A I'm pretty sure there is.**

8 Q What is Sedgewicks? What kind of a
9 business?

10 **A It's a beauty hair salon.**

11 Q And have they been there since
12 roughly November of 2016?

13 **A Yes.**

14 Q And are they still there currently?

15 **A Yes.**

16 Q And have they paid rent over time?

17 **A Yes.**

18 Q And I assume you do not know if they
19 are current, correct?

20 **A I do not know.**

21 Q So what we have is we have -- Do you
22 have any other documents that you brought
23 today?

24 **A I don't think so.**

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1 Q Okay. So we have a lease from
2 Sedgewicks, a lease from Woodlawn Dental
3 Gallery, a lease from House of Africa, a lease
4 from Friend Family Health Center, a lease from
5 A Child's Place Academy. So we have five
6 leases here.

7 Are there -- Are you aware of any
8 other leases at the property at 1500 to 1528
9 East 63rd?

10 A Yes, and I couldn't get it. That's
11 Leon's at 1528 East 63rd Street.

12 Q And that would be the one that's
13 owned by --

14 A Cheryl Brown.

15 Q Thank you. And do you know --

16 A I have no idea of the terms.

17 Q They do have a signed lease, though?

18 A Yes. I will get it.

19 Q Okay. And do you know if they have
20 paid rent over time?

21 A No. I do not know.

22 Q You don't know if they've ever paid
23 rent?

24 A I do not know.

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1 Q How long have they been at that
2 space?

3 A About nine months, I think.

4 Q Okay.

5 A Maybe ten.

6 Q Okay. So sometime in early 2018?

7 A (Indicating.)

8 Q Is that a yes?

9 A Yes.

10 Q That would be, it looks like, six
11 different parties that have leases there. Do
12 you know how many units there are at that
13 location?

14 A There are, I think, ten.

15 Q Are there spaces that are not leased?

16 A Yes.

17 Q How many?

18 A Four.

19 Q Four?

20 A Yes.

21 Q Okay. All right. I'm going to show
22 you a document, which I am going to mark as
23 Exhibit 6.

24

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1 (WHEREUPON, Finney Exhibit
2 No. 6 was marked for
3 identification.)

4 BY MR. DAN:

5 Q This is a spreadsheet that I received
6 regarding -- at the top it says: Woodlawn
7 Commercial Strip, and it looks like it's dated
8 October 3rd, 2016; do you see that?

9 A Uh-huh.

10 Q Is that a yes?

11 A Yes.

12 Q I will keep doing that if you say
13 "uh-huh."

14 A I'm sorry.

15 Q So it's not a problem. I just have
16 to make a clean record.

17 A I'm sorry.

18 Q You'll see that it lists a number of
19 different tenants under unit type, first one
20 being Woodlawn Dental, which we have gone over
21 their lease, correct?

22 A Uh-huh.

23 Q Is that a yes?

24 A Yes.

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1 Q We have got Sedgewicks. We went over
2 their lease. House of Africa, we went over
3 their lease. Then you see Dance Studio, which
4 seems to show under Lease Expiration 8/13 to
5 7/15. Was there formerly a dance studio at
6 that location?

7 A Yes.

8 Q Is that dance studio there anymore?

9 A No.

10 Q And is their space now vacant?

11 A Yes.

12 Q Then you have a chiropractor. Was
13 there a chiropractor there?

14 A Yes.

15 Q And is that chiropractor moved out?

16 A Yes.

17 Q Their lease terminated or ended. Is
18 that space now vacant?

19 A Yes.

20 Q And then we have got A Child's Place,
21 which we went over their lease. Friends
22 Clinic, we went over their lease. Now, it
23 shows Leon's here with a lease expiration. It
24 shows a date 12/1/16 through '19. Now, you

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1 stated a moment ago that Leon's has been there
2 for, roughly, maybe nine to ten months.

3 Did they originally sign a lease and
4 not move in or do you know why --

5 **A I would question the accuracy of**
6 **that.**

7 Q Do you know when that lease with
8 Leon's was negotiated?

9 **A It would have been sometime in late**
10 **2017, yeah.**

11 Q And then it shows one more vacancy.
12 Where Leon's currently is, was there a tenant
13 there before Leon's?

14 **A Hadn't been one in -- No.**

15 Q So that had been vacant for quite
16 sometime?

17 **A Long time.**

18 Q Okay. And I haven't gone through
19 these leases. Are these leases triple net? Do
20 you know what a triple-net lease is?

21 **A I'm not sure.**

22 Q Well, generally, that the tenant
23 would pay not only rent but also taxes and
24 maintenance for the property.

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1 **A No.**

2 **Q Well --**

3 **A They pay their own maintenance on the**
4 **inside of their property. We have to --**
5 **Lincoln has to maintain the mechanical systems,**
6 **which would be the roof, which would be the**
7 **primary electrical supply, which would be the**
8 **primary plumbing supply and they are to pay the**
9 **taxes, yes.**

10 **Q So they do pay the taxes; and as I**
11 **flip through these leases, it looks like each**
12 **one does have taxes?**

13 **A Could I say this, counsel?**

14 **Q Sure.**

15 **A They are obliged to pay the taxes.**

16 **Q Okay. They may or may not?**

17 **A Yes.**

18 **Q Does Lincoln ever bill for the**
19 **maintenance on the property?**

20 **A No.**

21 **Q And does Lincoln bill them for the**
22 **taxes?**

23 **A Yes.**

24 **Q Do you know if some of the tenants**

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1 were delinquent in those payments?

2 **A Yes.**

3 **Q Who is delinquent?**

4 **A I don't know. You said do I know if**
5 **some of them are delinquent in the taxes.**

6 **Q And you said yes.**

7 **A I said -- Let me look at this. You**
8 **switched from current to delinquent.**

9 **Q Yes. Just with --**

10 **A You have to remember now I'm an**
11 **80-year-old guy. If you set a pattern, then we**
12 **need to try to keep it.**

13 **Q I'll rephrase my question.**

14 **A All right.**

15 **Q You stated they are obligated to pay**
16 **the taxes, which --**

17 **A The point is I do not know if they**
18 **are current.**

19 **Q Okay. That's fine. I was asking if**
20 **you knew any tax payments have not been made.**

21 **A Yes, but, Counsel, let's follow it.**
22 **You asked about -- consistently about current**
23 **rent. Then you decided to switch the**
24 **conversation to ask if they -- whether we got**

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1 the taxes delinquent. So I'm thinking that
2 you're going to ask me are they current in the
3 tax payment. You follow me? So, again, just
4 remember that I'm not 50-something. I'm 80
5 years old, right, trying to do the best I can
6 to respond to your questions, all right? So
7 that's just it. So I don't know if they're
8 current.

9 Q Okay. That's all I'm trying to get
10 at, Doctor.

11 A All right. But I don't want the
12 record to show that somehow or another I tried
13 to mislead you deliberately.

14 Q I'm not suggesting you were. I --

15 A And you --

16 Q If I could finish, Doctor.

17 A I'm sorry.

18 Q That's why I was rephrasing the
19 question because your answer to me didn't seem
20 correct to my question, and that's why I was
21 rephrasing it.

22 So I will ask -- I'll ask this again.
23 Are you aware, specifically aware, that people
24 have not paid their taxes?

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1 **A I'm sorry?**

2 Q I understand that you may not be
3 aware if they are current. Are you
4 specifically aware of tenants who have not paid
5 the taxes?

6 **A I am -- I'm not prepared to answer**
7 **that now, but I can at some point.**

8 Q Okay. So you'll check on the tax
9 issue, but you're not aware if they have paid
10 them or not. I'm sorry. I have -- I'm going
11 to mark this as Exhibit 7.

12 (WHEREUPON, Finney Exhibit
13 No. 7 was marked for
14 identification.)

15 BY MR. DAN:

16 Q This is a lease that we didn't go
17 over. That's marked as Exhibit 7. This is a
18 lease between Lincoln South Central and
19 Dr. Solomon Liburd, L-i-b-u-r-d. Have you ever
20 seen this document?

21 **A That's the chiropractor, I think.**

22 Q Okay. So this is a chiropractor --
23 This may be the chiropractor that we went over
24 on Exhibit 6 and, in fact, that shows a lease

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1 date of 9/15 through August 17 and this is a
2 September 15th through August 17 lease. It has
3 renewal terms, but you said that he is no
4 longer -- the chiropractor is no longer there.
5 So this would be the chiropractor lease that we
6 were talking about, correct?

7 **A Yes.**

8 Q This is not a signed lease. Do you
9 know if you have a signed copy?

10 **A I don't know, but I'll check.**

11 Q And you believe that Dr. Liburd left
12 at the end of the initial term in August of '17
13 or do you know?

14 **A I don't know. I don't know exactly
15 when he left.**

16 Q Do you recall when Woodlawn took over
17 ownership of the property on East 63rd Street?

18 **A I believe it was either 2013 or 2014.**

19 Q And I will get to the exact date in a
20 moment, but the master lease amendment that you
21 gave us, it appears that it states that they
22 took -- that Woodlawn acquired it February 14,
23 2013. And then it was after that that you
24 signed the master -- that Lincoln signed the

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1 master lease with them. So that would seem to
2 indicate that it's early 2013.

3 Do you know who -- how Woodlawn came
4 to be the owner of that property?

5 **A Yes.**

6 Q And how was that?

7 **A It was donated to it.**

8 Q By who?

9 **A By the new owner.**

10 Q When you say "the new owner," what do
11 you mean, the new owner?

12 **A I can't name the entity that became**
13 **the owner of -- that donated it, but it did**
14 **donate, the new owner. The -- I got to simply**
15 **say no right at this particular point.**

16 Q When you say "the new owner," are you
17 saying the party that took over from the land
18 trust that owned it? Did the land trust
19 transfer it to someone else, and that party
20 transferred it to Woodlawn?

21 **A I believe so.**

22 Q And while you don't know the name of
23 that party, do you know if I told you it was a
24 corporation, do you know the principal of that

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1 corporation who donated it or no?

2 **A You got the name?**

3 Q Well, I'm asking if you know first,
4 and then I'll show you what I have got and see
5 if that refreshes any recollection.

6 **A The person that I believe is the head**
7 **of the corporate entity that now owned -- that**
8 **donated it would have been the principal of**
9 **East Lake, and East Lake is currently operating**
10 **the building to the -- yeah, so that's the best**
11 **I could give you.**

12 Q East Lake owns a property adjacent to --

13 **A Yeah, yeah.**

14 Q Okay. And do you know who that party
15 is who owns East Lake?

16 **A I know that East Lake is a**
17 **corporation.**

18 Q Okay.

19 **A And I would think that it's not a**
20 **sole proprietorship.**

21 Q Do you know the name Elzie
22 Higginbottom?

23 **A Yes, I do.**

24 Q And who is Elzie Higginbottom?

1 **A** **Elzie Higginbottom is the CEO of East**
2 **Lake. He is the CEO.**

3 **Q** **CEO of East Lake?**

4 **A** **Yes.**

5 **Q** **And do you believe that it was his**
6 **entity that --**

7 **A** **I don't know that. I mean, if you,**
8 **Counsel, do any research on him, he has a**
9 **number of entities. I don't know which one**
10 **owns what.**

11 **Q** **That's fine. Have you ever seen the**
12 **deed for the property at East 63rd Street?**

13 (WHEREUPON, Mr. David
14 Herzog entered the
15 deposition proceedings.)

16 BY MR. DAN:

17 **Q** **Have you ever seen the deed**
18 **transferring the property to Woodlawn, the East**
19 **63rd?**

20 **A** **I don't believe so; and if I did, I**
21 **doubt if I paid attention to it.**

22 (WHEREUPON, Finney Exhibit
23 No. 8 was marked for
24 identification.)

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1 BY MR. DAN:

2 Q Well, I will mark this as Exhibit 8
3 and you can take a look at that and tell me if
4 you have ever signed this document.

5 A Well, I don't see my signature on it.

6 Q Is -- Your signature isn't on it.
7 I'm just asking if you have ever seen this,
8 though, if you recall?

9 A Yeah, Counsel, my point is this: I'm
10 going to say for the 15th time: I'm 80 years
11 old, and you're asking me for details, if I see
12 something or whatever. I cannot remember all
13 of this.

14 MR. OTTENHEIMER, III: If you can't
15 remember, just say you don't remember,
16 period.

17 BY THE WITNESS:

18 A At some particular point, it's like
19 agitating, all right? I cannot remember all of
20 this.

21 MR. OTTENHEIMER, III: Leon, if for
22 any reason, you don't know the answer --

23 BY THE WITNESS:

24 A I don't know the answer.

1 **MR. OTTENHEIMER, III: That's all you**
2 **need to say, period.**

3 BY THE WITNESS:

4 **A I don't know the answer.**

5 **MR. OTTENHEIMER, III: Okay.**

6 BY MR. DAN:

7 Q This is a Special Warranty Deed, and
8 the corporation that transferred the property
9 to Woodlawn Development -- Woodlawn Community
10 Development Corporation was Elm Ventures, LLC
11 and it's signed on the second page as:
12 Grantor, Elm Ventures, LLC, apparently signed
13 by Elzie Higginbottom.

14 So do you believe it was this entity
15 that Mr. Higginbottom is involved with that
16 donated the property to Woodlawn, if you know?

17 **A I don't know.**

18 Q Does Woodlawn have an office on the
19 East 63rd property?

20 **A Did have one.**

21 Q They don't anymore?

22 **A No.**

23 Q Do you know when they stopped having
24 that office there?

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1 **A Sometime in 2016, '17.**

2 Q And did they pay rent to Lincoln
3 South Central?

4 **A I don't remember.**

5 Q Do you know if they had a lease with
6 Lincoln South Central?

7 **A I don't have a lease. I don't know.**

8 Q Did you have or have you ever had any
9 interest in Elm Ventures, LLC, you personally?

10 **A No.**

11 Q Do you know why Mr. Higgenbottom's
12 company, Elm Ventures, LLC, donated that
13 property to Woodlawn?

14 **A No.**

15 Q Do you know if they received anything
16 in return for donating that property?

17 **A No.**

18 Q No, you don't know? Or, no, they
19 didn't receive anything?

20 **A You asked me if I knew. The question
21 was a simple yes-or-no question.**

22 Q Doctor, I'm not trying to fight with
23 you here. I'm asking questions. I'm trying to
24 clarify what was asked and answered, okay? I

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1 understand -- Please hear me out, sir. I
2 understand you may or may not want to be here.
3 You've mentioned that you're 80s old --

4 **A Don't put words into my mouth because**
5 **I don't want the court reporter to have that in**
6 **there, too.**

7 Q Okay. We're going to take a break
8 for a couple of minutes here, okay, Doctor? I
9 am asking questions, which you know --

10 **A And I answered you --**

11 Q Doctor, can I please finish my
12 statement?

13 **A Can I finish? You're going to**
14 **respect me.**

15 Q All right. We're taking a break.
16 (WHEREUPON, a short
17 break was had.)

18 BY MR. DAN:

19 Q Do you -- Are you aware if Woodlawn
20 paid any rent to Lincoln South Central when it
21 leased a spot at the 63rd Street premises?

22 **A No, I'm not.**

23 Q Has Lincoln South Central been paying
24 its lease payments to Woodlawn under the master

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1 lease?

2 **A I do not know.**

3 Q Who handles writing any checks on
4 behalf of Lincoln?

5 **A I do.**

6 Q And are you the only signor on the
7 Lincoln Bank account?

8 **A Yes.**

9 Q Do you know if Lincoln has ever made
10 payments under the master lease to Woodlawn?

11 **A Yes, but -- No, I don't know. I**
12 **don't know.**

13 Q Is there anyone else who might know
14 if Lincoln has ever made payments to Woodlawn?

15 **A I do not know.**

16 Q Previously, you gave to me two
17 documents that you brought. One was the
18 amendment to the master lease, and one was the
19 lease. The amendment to master lease, is that
20 an amendment to this lease? Is that what this
21 is amending?

22 **A To the best -- I don't know.**

23 Q Because this -- Obviously when it
24 says -- This says "Amendment to Master Lease"

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1 and this just says "Lease" on it, and I haven't
2 reviewed it to see if this is even referring to
3 the same document or not. And I don't know. I
4 was just asking if you knew that, and that's
5 why.

6 I believe you previously testified
7 that at times you have had other people collect
8 rent from the tenants at East 63rd for Lincoln;
9 and at times, you said it was volunteers. You
10 may have testified that even some people from
11 Woodlawn may have collected that, correct?

12 **A Yes.**

13 Q Thank you. Do you know if Amy
14 Mohammed ever collected rent from the tenants
15 for -- at 63rd Street for Lincoln?

16 **A Yes.**

17 Q Do you know if she ever did any other
18 work for Lincoln regarding the 63rd Street
19 property?

20 **A No.**

21 Q And, again, that's, no, you don't
22 know or, no, she didn't?

23 **A No. I do not know.**

24 Q Thank you. Did -- Who was involved

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1 with the day-to-day operations of Lincoln?

2 **A Me.**

3 Q Anyone else?

4 **A Contractors, maintenance personnel.**

5 Q And those are the ones you testified
6 before that they're not employees but
7 occasionally do work and you pay them?

8 **A Yes.**

9 Q Where does Lincoln South Central have
10 its bank account or bank accounts?

11 **A Illinois Service Federal.**

12 Q And where is that located?

13 **A 46th -- Oh, and it's now GN.**

14 Q G-e-n?

15 **A No. GN.**

16 Q GN?

17 **A Uh-huh.**

18 Q They took over Illinois Service
19 Federal at some point?

20 **A Yes.**

21 Q Is it GN Savings Bank? GN federal?
22 Do you know?

23 **A I really don't know. I don't know.**

24 Q And where are they located?

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1 **A Same address, 46th and Martin Luther**
2 **King Drive.**

3 **Q Other than paying the maintenance**
4 **people, the contractors, what other payments**
5 **does Lincoln pay regarding the 63rd Street**
6 **property, if anything?**

7 **A You said maintenance. We -- and**
8 **maintenance includes roofing. It includes**
9 **sidewalks. I'm not clear. I just need to get**
10 **some work done. I mean, I need to look at what**
11 **we have done and what we haven't done, and I'm**
12 **just not clear.**

13 **Q Does Lincoln pay the taxes on the**
14 **property?**

15 **A Not directly, but yes.**

16 **Q Can you explain that, please?**

17 **A The taxes, as you know about, per the**
18 **lease, the taxes were put into a -- that we**
19 **collect, "we," meaning Lincoln, are deposited**
20 **in an account under the Woodlawn Community**
21 **Development Corporation's federal tax ID**
22 **number.**

23 **Q And where is that account?**

24 **A It used to be Illinois Service**

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1 **Federal, GN.**

2 Q And I understand it's under
3 Woodlawn's tax ID number. Is the name on the
4 account then Woodlawn?

5 **A Yes.**

6 Q So the money that Lincoln collects
7 from taxes, deposits into the Woodlawn account
8 and then Woodlawn would actually pay the real
9 estate taxes; is that correct?

10 **A Yes.**

11 Q Do you know if Lincoln has made
12 deposits into that account regularly?

13 **A Yes.**

14 Q Does it make deposits monthly?

15 **A Not every month. I can't say
16 monthly. That would be -- but I don't know.**

17 Q Do you know if it puts enough into
18 the account to pay the tax bill in full?

19 **A No.**

20 Q No, you don't know? Or, no, it does
21 not?

22 **A No, I do not know.**

23 Q Do you know if Woodlawn ever received
24 a -- Since Woodlawn is a not-for-profit, do you

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1 know if they ever received either a reduction
2 or an elimination of property taxes for any of
3 its properties?

4 **A I'm sorry? Now, you moved from 63rd**
5 **Street to now generally?**

6 Q Generally, which would include 63rd
7 and any other properties owned by Woodlawn.

8 Are you aware that since it is a
9 not-for-profit, if it has ever done anything to
10 receive any kind of property tax relief as a
11 not-for-profit?

12 **A Yes.**

13 Q Did it do that on the 63rd Street
14 property?

15 **A I don't think so, no, because it**
16 **would be in the lease.**

17 Q In the master lease?

18 **A The point is that you just read, I**
19 **think, that the tenants are supposed to pay for**
20 **the taxes.**

21 Q Right. I understand that. Right
22 now, I'm not talking about the tenants, though.

23 **A Yeah, but you're mixing apples and**
24 **oranges, as I see it, because I have already**

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1 testified that there is a tax escrow account at
2 Illinois Service Federal, right?

3 Q Right.

4 A And that would cover the 1500 to 1528
5 East 63rd Street.

6 Q Right. And I'm asking a different
7 question, sir.

8 I'm asking, if you know, if Woodlawn
9 on either the 63rd Street or any of the other
10 properties it owns has sought any sort of
11 property tax relief by virtue of its
12 not-for-profit status?

13 A And my answer then, again, is yes.

14 Q What have they sought tax relief
15 from?

16 A I have no -- I can't remember all of
17 those. We got too much out there. I don't
18 know.

19 Q So it --

20 A I do not know.

21 Q So would it be on a number of
22 properties?

23 A I'm not going to speculate, Counsel.

24 MR. OTTENHEIMER, III: Yes or no.

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1 BY MR. DAN:

2 Q Is that a -- Do you -- Forget it. Do
3 you know if Woodlawn ever sought any property
4 or tax relief on the 63rd Street property?

5 A No, I do not.

6 Q At the Section 341 meeting of
7 creditors in the bankruptcy case, there were a
8 couple of board members, the in-house attorney
9 for Woodlawn, Dr. Nixon and the comptroller
10 were -- I think Ray Jackson, I believe, is his
11 name -- were all there testifying on behalf of
12 the debtor.

13 One of the questions that was asked
14 is if they knew if Lincoln South Central had
15 ever paid rent to the debtor under the master
16 lease, and their answer was, no, they weren't
17 aware of any payments ever being made.

18 Do you have any idea why they may
19 testify that way?

20 A No, but I can check. I don't know.
21 No.

22 Q Okay. Do you know who at Woodlawn,
23 if anyone, would know if any payments were made
24 by Lincoln South Central to Woodlawn?

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1 **A No.**

2 Q Are you involved with the development
3 where a -- a limited partnership development
4 named South Park Plaza, LP?

5 **A Yes.**

6 Q And what is South Park Plaza Limited
7 Partnership?

8 **A It's a development that is owned by a
9 limited liability corporation, and it is a
10 sponsor of the development of 134 rental
11 apartments at that -- Yes.**

12 Q And where is it located?

13 **A 26th and Dr. Martin Luther King
14 Drive, Dr. Martin Luther King, Jr. Drive.**

15 Q Do you know if Woodlawn has an
16 ownership interest in that limited partnership?

17 **A Yes.**

18 Q Do you know what that ownership
19 interest is?

20 **A But I don't know what it looks like.**

21 Q Do you know what percentage it is?

22 **A I believe it's less than 5. Probably
23 2 percent.**

24 Q Do you personally have any ownership

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1 interest in South Park Plaza Limited
2 Partnership?

3 **A No.**

4 Q Do you personally have any interest,
5 ownership interest, in any entity that's
6 involved in the South Park Plaza Development?

7 **A No, not that I know of. I don't know**
8 **of any others.**

9 Q I'm sorry. You said not that I know
10 of. I didn't hear the last part.

11 **A Not that I know of. I don't know of**
12 **any others, and I don't know any.**

13 Q Are you aware of notes that existed
14 from South Park Plaza Limited Partnership to
15 the debtor?

16 **A To the who?**

17 Q To Woodlawn.

18 **A Yes.**

19 Q Do you know how much those notes
20 were?

21 **A No.**

22 Q And do you know -- If I were to tell
23 you that those notes were roughly \$2.3 million,
24 would that sound correct?

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1 **A I have no idea.**

2 **Q Were you involved at all in those**
3 **promissory notes in any way on behalf of either**
4 **South Park Plaza, on behalf of the debtor or**
5 **any other party?**

6 **A The answer to your question is yes**
7 **and no.**

8 **Q Okay.**

9 **A South Park Plaza was built, I**
10 **believe, in 2005 or '6. That's 13 years ago,**
11 **12 years ago. So I'm not presently aware of**
12 **the structure of the deal at that time. So I**
13 **would -- My memory is just not 20/20 on that.**

14 **Q What was your involvement in that**
15 **development generally?**

16 **MR. OTTENHEIMER, III: Are you**
17 **talking about personally or --**

18 **MR. DAN: In any capacity whatsoever.**

19 **BY THE WITNESS:**

20 **A As the CEO of the Woodlawn Community**
21 **Development Corporation, it would have been my**
22 **task to work with the development team in order**
23 **to put together the financing and the operation**
24 **of the development; but in those instances, I**

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1 would have been working with the development
2 team, lawyers, architects, contracts, lenders,
3 state, city.

4 BY MR. DAN:

5 Q Did Woodlawn provide any funding for
6 the property?

7 A I have -- I cannot remember that,
8 Counsel. I don't know.

9 Q Are you aware of, at some point, the
10 promissory notes that were executed in favor of
11 Woodlawn by South Park Plaza, LP being forgiven
12 and Woodlawn saying they don't have to be paid
13 back?

14 A Yes.

15 Q Do you know how it came about that
16 those were forgiven?

17 A There are lawyers that are competent
18 that could answer that question, but I'm not
19 competent to answer that question.

20 Q Okay. So you don't know then?

21 A No. What I know is that I know that
22 there are attorneys that know the answer to
23 that question, but I do not know it because I'm
24 not an expert at the law in that area.

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1 Q Who are those attorneys?

2 A Those attorneys, I think, would be
3 out of the law firm of Miner and Barnhill.

4 Q Miner and Barhill?

5 A Yes. M-i-n-e-r --

6 MR. OTTENHEIMER, III: Barnhill,
7 B-a-r-n.

8 BY THE WITNESS:

9 A And Barnhill, B-a-r-n-h-i-l-l.

10 BY MR. DAN:

11 Q And did they -- Do you know if they
12 represented South Park Plaza, LP, Woodlawn or
13 some other party?

14 A They would be representing -- They
15 would know the answer to the questions you
16 posed, and thereby would have -- the reason I
17 know is because they were working with the
18 Woodlawn Community Development Corporation.
19 The person that you want to talk to there, his
20 name is William Micelli.

21 Q Micelli?

22 A M-i-c-e-l-l-i.

23 Q Did Mr. Micelli and Miner and
24 Barnhill, do you know if they represented

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1 Woodlawn or if they represented South Park
2 Plaza?

3 **A I do not know that. But if you call**
4 **them, I'm sure just as you've called the**
5 **people, they'll be able to give you the answer**
6 **to the question.**

7 **Q Okay. Are you aware of the Jackson**
8 **Parkside Partners Limited Partnership?**

9 **A Yes.**

10 **Q And is that a limited partnership**
11 **that developed a property?**

12 **A Yes.**

13 **Q And where is that property?**

14 **A 6040 South Harper in the general area**
15 **around that particular building.**

16 **Q And what property did they develop?**

17 **A What property?**

18 **Q Yes. I understand you're saying**
19 **where. I'm saying -- Like you said South Park**
20 **Plaza Developed 134 rental apartments.**

21 **A So you want to know how many units**
22 **were developed. You want me to give you the**
23 **description of it?**

24 **Q Yes, please.**

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1 **A** **It's a 216 rental apartment complex**
2 **that has -- Yeah.**

3 **Q** **Is this --**

4 **A** **Low to moderate income and lower**
5 **income families.**

6 **Q** **And do you know if Woodlawn owns --**
7 **has an ownership interest in Jackson Parkside**
8 **Partners, LP?**

9 **A** **I think that if it is, it's very**
10 **small, and I think it, again, would be**
11 **somewhere around 2 percent.**

12 **Q** **Do you personally own any ownership**
13 **interest in either Jackson Parkside Partners or**
14 **any other parties involved in that development?**

15 **A** **No.**

16 **Q** **Were you involved as -- You testified**
17 **before that you were involved in the**
18 **development of the South Park Plaza as CEO of**
19 **Woodlawn. Were you also involved in the**
20 **development of Jackson Parkside Partners?**

21 **A** **Yes. That would have been in 1972.**

22 **Q** **And are you aware that there were**
23 **notes from Jackson Parkside Partners, LP to**
24 **Woodlawn?**

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1 **A Yes.**

2 Q Do you know how much those notes
3 were?

4 **A No.**

5 Q And if I told you they were roughly
6 5 and a half million dollars, does that sound
7 correct or do you not know?

8 **A I don't know; but, again, Bill**
9 **Micelli of Miner and Barnhill could answer that**
10 **directly.**

11 Q And are you aware that those -- that
12 the notes from Jackson Parkside Partners to
13 Woodlawn were also forgiven?

14 **A I do not -- I believe so but, again,**
15 **I'm not a tax attorney, and I don't really**
16 **understand all of the ins and outs of that, but**
17 **Bill Micelli will be able to answer the**
18 **questions.**

19 Q Do you know if Woodlawn gave any
20 money to Jackson Parkside Partners Limited
21 Partnership for the development of that
22 property?

23 **A I do not recall.**

24 Q Are you aware of Anchor House?

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1 **A Yes.**

2 **Q And what is Anchor House, LP?**

3 **A It is a -- To the best of my**
4 **knowledge, it is a sponsor of that development.**
5 **It's 115 low income apartment complexes**
6 **basically for people who are 100 percent poor.**

7 **Q Is that a senior citizen residence or**
8 **is it for any age?**

9 **A No. It's 100 percent low income.**
10 **It's really 100 percent Section 8.**

11 **Q And does Woodlawn manage the property**
12 **for Anchor House?**

13 **A I'm sorry?**

14 **Q Does Woodlawn manage the Anchor House**
15 **property?**

16 **A Yes.**

17 **Q Does Woodlawn have any ownership**
18 **interest in that property or the corporations**
19 **that own the property?**

20 **A Yes.**

21 **Q How much does Woodlawn own?**

22 **A I think -- I'm not sure. I don't**
23 **want to speculate.**

24 **Q Do you know if its --**

1 **A I don't want to speculate.**

2 **Q Thank you. Do you know if it is more**
3 **than the amount than it owns in the Jackson**
4 **Parkside Partners and South Park Plaza**
5 **Developments?**

6 **A Counsel, I already said I do not like**
7 **to speculate.**

8 **MR. OTTENHEIMER, III: Either you**
9 **know or you don't know.**

10 **BY THE WITNESS:**

11 **A I don't know.**

12 **BY MR. DAN:**

13 **Q Thank you. Do you personally have**
14 **any ownership interest in the property or the**
15 **companies that own the property where the**
16 **Anchor House development is?**

17 **A No.**

18 **Q Do you know who it is that owns**
19 **Anchor House, LP?**

20 **A To the best of my knowledge, it would**
21 **be the Woodlawn -- I don't know. See, I don't**
22 **know how to deal with -- how it's structured.**
23 **So, again, Bill Micelli would probably be able**
24 **to answer that.**

1 Q Did you have a position with Anchor
2 House Limited Partnership?

3 A I'm pretty sure that I would be
4 the -- I would be one of the officers in the
5 partnership.

6 Q Who is Georgette Reynolds?

7 A Georgette Reynolds is the attorney
8 for the -- in-house attorney for the Woodlawn
9 Community Development Corporation.

10 Q Does she do anything on behalf of
11 Anchor House also?

12 A Oh, I suppose she does. I don't know
13 for sure.

14 Q Do you know who Racine Anchor
15 Corporation is?

16 A That's one of the entities that was
17 associated with Anchor House.

18 Q So they have some sort of
19 relationship or ownership or something with
20 Anchor House, LP, correct?

21 A Yes. And, Counsel, that is precisely
22 why I said I don't want to speculate because I
23 don't know how that whole thing is structured.

24 Q And I understand that, Doctor. And

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1 I'm trying to get at what it is you do know.

2 **A Not much on that one.**

3 Q Fine. Do you have any interest in
4 Racine Anchor Corporation?

5 **A No. When you say "interest," you
6 mean personal interest?**

7 Q Personally, yes.

8 **A Yes.**

9 Q Do you know if Woodlawn has any
10 ownership interest in Racine Anchor
11 Corporation?

12 **A I believe so, but I do not know. And
13 again, I...**

14 Q Have you worked on behalf of Anchor
15 House to try to either refinance or renegotiate
16 amounts due on Anchor House loans?

17 **A Refinance, yes.**

18 **(WHEREUPON, Finney Exhibit
19 No. 9 was marked for
20 identification.)**

21 BY MR. DAN:

22 Q I'm going to show you what I am
23 marking as Exhibit 9. Let me ask if you recall
24 having seen that letter?

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1 **A Uh-huh, yes.**

2 Q And that is your signature on that
3 letter, correct?

4 **A Yes.**

5 Q And this is attempting to essentially
6 get a forbearance from the Illinois Housing
7 Development Authority, correct?

8 **A I didn't read "forbearance" into
9 this.**

10 Q Okay.

11 **A Let me see where it says
12 "forbearance."**

13 Q If you look in the second paragraph,
14 about five lines down or four lines, it says,
15 "We, therefore, request a forbearance of the
16 mortgage payments;" do you see that?

17 **A The second -- Oh, yeah, yeah. I see
18 it, yes.**

19 Q I apologize. The last page of that
20 exhibit you can tear that off. That is not
21 part of that letter.

22 This letter that's signed by you
23 doesn't have a title. It just says,
24 "Sincerely, Leon D. Finney, Jr.;" do you see

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1 that?

2 **A Yes.**

3 Q Did you have a title at Anchor House?

4 **A I don't know.**

5 Q Did Anchor House receive -- Do you
6 know if Anchor House received a forbearance
7 regarding the payments to Illinois Housing
8 Development Authority?

9 **A No.**

10 Q No, you don't know? Or, no, they did
11 not?

12 **A They did not.**

13 Q And were they able to refinance that
14 amount that was owed?

15 **A To the best of my knowledge, Counsel,
16 they did not award a forbearance and the -- We
17 have gradually been able to reduce the
18 outstanding mortgage delinquency over a period
19 of time.**

20 Q So just additional payments on top of
21 the mortgage payments have been paid towards
22 the delinquency?

23 **A Right.**

24 Q But it's the same loan that's still

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1 in effect, correct?

2 **A Yes.**

3 Q Where did the additional funds come
4 from to pay down the delinquency?

5 **A I believe that it was from the**
6 **operations.**

7 Q Did any money come from anywhere else
8 that you're aware of?

9 **A Not aware. I'm not aware of it.**

10 Q Did Woodlawn give any money to Anchor
11 House to pay down the delinquency?

12 **A I don't know.**

13 Q Are you aware of the IRS filing a
14 claim -- Strike that.

15 Are you aware of the IRS filing a
16 lien against Woodlawn prior to the filing of
17 the bankruptcy case?

18 **A What was the amount of the lien and**
19 **when was it?**

20 Q I believe the amount is somewhere in
21 the neighborhood of a million eight, and it
22 would have been done at some point in 2018.

23 **A I am aware of a lien that was filed**
24 **by IRS at less than a million eight.**

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1 Q What is the lien that you're aware of
2 that was filed by --

3 A **A million four.**

4 Q Do you know what that was for?

5 A **Yes.**

6 Q And what is that?

7 A **Failure to fully fund the trust fund.**

8 Q For --

9 A **Two quarters.**

10 Q And that's for taxes regarding
11 employment taxes, correct?

12 A **Yes. That's what a trust fund is.**

13 Q I understand. Do you recall -- Do
14 you know what two quarters it is for?

15 A **Not really, but I know that they
16 occurred in 2017 in -- Well...**

17 Q I'm sorry. I wasn't sure if you were
18 finished.

19 A **That's it.**

20 Q Okay. The payroll at Woodlawn in
21 2015, do you know who did the payroll for
22 Woodlawn?

23 A **In two thousand -- when?**

24 Q 2015.

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1 **A** **I believe that was Infinity, I**
2 **believe.**

3 **Q** **At some point, was it ADP prior to it**
4 **being Infinity, if you're aware?**

5 **A** **Yes, but I would say this, Counsel:**
6 **My memory is not 100 percent, but we have been**
7 **with ADP and several payroll entities. So I**
8 **won't say -- but, yes, I can say that there**
9 **have been times that we would have been with**
10 **ADP, and I'm not exactly sure -- I know that**
11 **we're with ADP now.**

12 **Q** **At some point, a decision was made to**
13 **move from -- Woodlawn's payroll from ADP to**
14 **Infinity, correct?**

15 **A** **Yes.**

16 **Q** **Who made that decision?**

17 **A** **I did.**

18 **Q** **And what was the reason for moving**
19 **from ADP to Infinity?**

20 **A** **Because workers' compensation**
21 **insurance was -- our insurance premiums were**
22 **unmanageable; and so when we moved to Infinity,**
23 **we moved to Infinity so as to be able to have**
24 **our workers' compensation insurance managed.**

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1 Q Is there some type of pool agreement
2 through Infinity that lowered the rate?

3 A Yes.

4 Q Okay.

5 A Infinity -- Yes, that's true.

6 Q Do you know Infinity's full name by
7 any chance?

8 A No.

9 Q When ADP did the payroll, did they
10 also make the federal tax payments on the
11 payroll?

12 A ADP or Infinity?

13 Q ADP.

14 A Yes.

15 Q At any time with Infinity, did
16 Infinity ever make the federal tax withholding
17 payments from payroll?

18 A I believe so.

19 Q At some point, was a decision made to
20 bring those payments in house as opposed to
21 having Infinity make those payments?

22 A Yes.

23 Q And who made that decision?

24 A I made it.

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1 Q And when was that made?

2 A I have no -- I don't have an exact,
3 but it was sometime in 2017.

4 Q Okay.

5 A Late '16 to '17.

6 Q And what was the reason for bringing
7 that in house instead of having Infinity pay
8 it?

9 A My concern was it looked as though we
10 were able to -- We were having severe problems
11 meeting all of our obligations. And so I
12 figured that if we could delay the payments, it
13 would ease the cash flow of WCDC. And that was
14 for one quarter and my assumption -- Well,
15 that's it.

16 Q Did you discuss your decision to
17 bring that in house with anyone at Woodlawn?

18 A No one other than the staff.

19 Q And did you tell the staff before or
20 after the decision was made?

21 A I told them pretty much as I was
22 making the decision.

23 Q And who on the staff did you tell
24 that to?

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1 **A Amy Mohammed.**

2 Q Anyone else?

3 **A I'm not real sure, and I don't want**
4 **to speculate. So I won't.**

5 Q Are you aware of the rules of the IRS
6 as to trust fund payments having to be made
7 regarding payroll?

8 **A Yes, I am.**

9 Q And are you aware that if money is
10 withheld from someone's paycheck, it must be
11 for withholding. You must actually pay it to
12 the IRS and not use it for other purposes?

13 **A Yes, I am.**

14 Q When you stated before that you
15 brought the tax payments in house because of
16 problems meeting obligations and that it would
17 get you more time, was your thought to pay
18 those withholding payments later than when they
19 were due?

20 **A Yes. And let's understand we were**
21 **looking for \$150,000. That was the entire**
22 **delay, and I had no knowledge that the**
23 **withholding trust fund taxes were not -- After**
24 **that first interruption, I had no knowledge**

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1 that they were not being consistently paid.

2 Q What was the \$150,000 for?

3 A That was to pay a -- to pay a
4 creditor.

5 Q Do you know what creditor?

6 A Yes, the Local Initiative Support
7 Corporation, LISC, L-I-S-C.

8 Q And what is Local Initiative Support
9 Coalition?

10 A It is a company that works to help
11 invest in neighborhoods, lower to moderate
12 income neighborhoods, to build homes, build
13 houses, et cetera.

14 Q And why was \$150,000 owed to -- by
15 Woodlawn to Local --

16 A Because we --

17 Q Hang on. Let me finish the question --
18 to Local Initiative Support Coalition?

19 A Because we were in foreclosure, and I
20 wanted to -- I wanted to prevent the seizure of
21 the property.

22 Q Which property was this?

23 A It's at 63rd and Woodlawn.

24 Q Do you have any interest personally

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1 in Local Initiative Support Coalition?

2 **A No.**

3 Q Do you have --

4 **A That is Local Initiative Support**
5 **Corporation, not coalition.**

6 Q Oh, corporation. I apologize. Do
7 you know who does own that corporation?

8 **A It is a not-for-profit charitable**
9 **organization that was started by the Ford**
10 **Foundation.**

11 Q And do you have, or at any time did
12 you have, a position at Local Initiative
13 Support Corporation?

14 **A No.**

15 THE WITNESS: Counsel, I'm going to
16 have to go to the head.

17 MR. OTTENHEIMER, III: Do you want to
18 take a break? That's fine.

19 MR. DAN: That's fine.

20 (WHEREUPON, a short
21 break was had.)

22 BY MR. DAN:

23 Q A moment ago, you said that the Local
24 Initiative Support Corporation had a lien on

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1 the property at 63rd and Woodlawn?

2 **A Yes.**

3 Q That's not the 1500 to 1528 East
4 63rd, right?

5 **A No. That would have been around
6 1100 East 63rd Street.**

7 Q You said that you held back on making
8 the trust fund payments for that \$150,000
9 payment. Do you know why the other quarters'
10 payments were not made?

11 **A No, I do not.**

12 Q When were you first aware that that
13 quarter's payments were not made?

14 **A I was made first aware in the -- I
15 believe it was in April of 2018.**

16 Q Is that when the IRS sent a letter?

17 **A Yes. That was the first letter, yes.**

18 Q And --

19 **A And that was only for one quarter?**

20 Q So the initial letter that the IRS
21 sent was for one quarter?

22 **A Yes.**

23 Q Was that for the one with the
24 \$150,000 or the other quarter?

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1 A I have no idea which one it was, but
2 what I'm saying is that the reason was to --
3 and then we did -- In my judgment, we did pay
4 back the 150 by -- that we had for that
5 quarter, I think, around January of the next
6 year. So -- but I had -- Let me put it this
7 way: I had no idea that more than one quarter
8 was ever interrupted; and my idea, what my
9 thinking was, is that we would be a quarter
10 behind, but we would be always paying.

11 Q Did you discuss that strategy with
12 staff members?

13 A My assumption was that she would pay
14 it. I did not manage that process.

15 Q Who decided -- Strike that. Who had
16 check-signing authority at Woodlawn?

17 A Ray Smith, Andrea Ruffin who is
18 retired, Amy Mohammed and me.

19 Q Is Ray Smith on the board?

20 A I'm sorry?

21 Q Is Ray Smith on the board?

22 A You mispronounced his name. His name
23 is not Ray Jackson. It's Ray Smith.

24 Q I just said Ray Smith.

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1 **A** **No, I said Ray Smith.**

2 **Q** Right.

3 **A** But earlier, you said, back to your
4 **credit committee that Ray Jackson was there,**
5 **and it was really Ray Smith.**

6 **Q** Okay. Well, I think --

7 **A** The record should -- It doesn't
8 **matter.**

9 **Q** I understand.

10 **A** **So Ray Smith was the comptroller.**

11 **Q** Ray Smith was the comptroller?

12 **A** **Yes.**

13 **Q** Is there a Ray Jackson who is on the
14 **board?**

15 **A** **No. There is a Leon Jackson.**

16 **Q** Leon Jackson, okay. Did Leon Jackson
17 **have check-signing authority?**

18 **A** **Yes.**

19 **Q** Did anyone else -- So the
20 **check-signing authority was Leon Jackson, Leon**
21 **Finney, Amy Mohammed, Andrea Ruffin and Ray**
22 **Smith?**

23 **A** **Yes.**

24 **Q** So who decided what bills were being

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1 paid?

2 **A That would have been mainly all of**
3 **the -- Some of it would have been Ray Smith,**
4 **and some of it would have been Andrea Ruffin**
5 **who reported to Amy Mohammed, and some of it**
6 **would have been directly me.**

7 **Q And as far as payments to the IRS,**
8 **who regarding employment taxes, who would have**
9 **decided --**

10 **A That would have been 100 percent --**
11 **For the period we are talking about, that would**
12 **have been 100 percent Amy Mohammed.**

13 **Q Did you ever have any meetings with**
14 **Amy Mohammed regarding the tax delinquency?**

15 **A Unfortunately, no.**

16 **Q Did you ever have any meetings with a**
17 **Kimmy Ellen from an accounting firm regarding**
18 **the tax delinquency?**

19 **A No.**

20 **Q Did they ever -- Amy or Kimmy ever**
21 **meet with you at your home to discuss the**
22 **delinquency?**

23 **A No. Amy, when I was sick -- You got**
24 **to remember now I'm in the hospital. Amy would**

1 often bring papers by for me to sign. I do not
2 recall any instances where she mentioned to me
3 that we had a tax delinquency at the level of
4 a million four. I'm just -- I just -- No.

5 Q Did she ever discuss the tax
6 delinquency at any level?

7 A Not beyond the initial instance when
8 we decided to move from Infinity to WDCD paying
9 taxes in house at one time is about it, and so --
10 I was surprised.

11 Q And what was the discussion you had
12 with her that first time?

13 A I've already said it, Counsel. It's
14 on the record.

15 MR. OTTENHEIMER, III: Go ahead. You
16 can repeat it.

17 THE WITNESS: Huh?

18 MR. OTTENHEIMER, III: You can repeat
19 it again.

20 THE WITNESS: Okay. Sometimes --
21 What I don't want is to get in a thing of
22 saying something different.

23 MR. OTTENHEIMER, III: I understand.

24 BY THE WITNESS:

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1 **A** I simply told her that we were going
2 to move the payment for the taxes in house so
3 that we could delay -- we could manage our cash
4 a bit better so that we could pay \$150,000 to
5 the Local Initiative Support Corporation and
6 that we're just going to be late in filing and
7 paying, not not paying at all.

8 BY MR. DAN:

9 **Q** The money for the taxes, did that
10 actually come in from CHA to pay that?

11 **A** Some of it did.

12 **Q** Where did the rest of it come from?

13 **A** From -- From, I guess, operations,
14 from our management fee.

15 **Q** Okay. And your management fee --

16 **A** Came from CHA as well.

17 **Q** Okay. So beyond the management fee
18 and paying -- Beyond the management fee from
19 CHA, was there any other income for Woodlawn?

20 **A** Not to my memory.

21 **Q** Well, that's a small management fee
22 from Anchor House; is that right?

23 **A** Yeah.

24 **Q** But there's like 3,000, 4,000 a

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1 month?

2 **A Yeah.**

3 **Q Okay.**

4 **A And it would have been a -- Yes.**

5 **(WHEREUPON, Finney Exhibit**
6 **No. 10 was marked for**
7 **identification.)**

8 BY MR. DAN:

9 **Q I'm going to show you what I have**
10 **marked as Exhibit 10.**

11 **Have you ever seen this document**
12 **before, Dr. Finney?**

13 **A What is it dated?**

14 **Q I don't see a date on it. It says at**
15 **the top "2017 941 Tax 6 Month Proposed Payment**
16 **Plan."**

17 **A Uh-huh, yeah.**

18 **Q Do you know if you have seen this**
19 **before?**

20 **A I think that this was prepared by**
21 **Amy, and -- Yeah, I think this was prepared by**
22 **Amy, but I don't recall. I recently saw this**
23 **again.**

24 **Q Just recently?**

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1 **A Yes.**

2 **Q Did you ever discuss this document**
3 **with her?**

4 **A Yes, I think that I told her to -- It**
5 **looked good, but let's hold off and to**
6 **implement it.**

7 **Q Do you recall roughly when that was?**

8 **A I have no idea.**

9 **Q Was it in 2017?**

10 **A I don't know.**

11 **Q 2018?**

12 **A I don't know.**

13 **Q Do you recall if you had --**

14 **A If this is dated 2017 941, which is**
15 **in the upper left-hand corner, it would suggest**
16 **that it was in 2017.**

17 **Q I don't know.**

18 **A My point is I'm looking at this; but**
19 **recently, I was made aware of this.**

20 **Q How were you made aware of this**
21 **recently?**

22 **A Just recently somebody made me aware**
23 **of it. Let's put it that way.**

24 **Q Who was it that made you aware of it?**

1 **A** **I don't remember.**

2 **Q** How recently?

3 **A** **Within the last -- within the last**
4 **maybe four to five weeks.**

5 **Q** Did they forward you this by e-mail?

6 **A** **I'm sorry?**

7 **Q** Did you -- You said you were made
8 aware of this four to five weeks ago. Did
9 someone hand you the document? Did they
10 forward it to you by e-mail? Did they just
11 discuss it?

12 **A** **You know what, it was less than four**
13 **to five months ago -- four to five weeks ago.**
14 **It was two weeks ago. I did a search of all**
15 **the correspondence in my e-mail from Amy**
16 **Mohammed. And when I looked at the -- This was**
17 **in the correspondence from Amy Mohammed.**

18 **Q** Do you recall discussing this with
19 her originally?

20 **A** **Uh-uh.**

21 **Q** That was a no?

22 **A** **Yeah.**

23 **Q** Correct?

24 **A** **What I said was the e-mail**

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1 transaction was the discussion, and she said
2 this was the plan; and I said "looks good per
3 the e-mail. Let's hold off on it, all right?"

4 Q And you don't recall any further
5 discussion after that?

6 A No.

7 Q Just a couple more questions, Doctor.
8 Woodlawn owns a number of properties, correct?

9 A Yes.

10 Q I think the majority of them are
11 vacant lots, correct?

12 A A majority, yes.

13 Q What is it, in fact, that's -- It
14 looks like 12 vacant lots. What is the plan
15 with those vacant lots for Woodlawn?

16 A To redevelop them.

17 Q Where?

18 A It depends on where they are.

19 Q So some --

20 A If they're aggregated around 63rd and
21 Woodlawn, then they would be part of a
22 development plan that we would implement to
23 build single family mixed income housing and
24 that ties back in with the Local Initiative

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1 **Support Corporation.**

2 Q Okay. And what is being done to
3 implement that plan?

4 **A Nothing right now because we're in**
5 **bankruptcy court.**

6 Q How long have those properties around
7 63rd and Woodlawn been owned by the debtor, by
8 Woodlawn?

9 **A For a very long time. More than ten**
10 **years.**

11 Q Has anything ever been done regarding
12 developing that property?

13 **A No. We own more than that. The**
14 **property to the immediate west -- east, we**
15 **built 40 townhomes, 40 homes on 63rd Street,**
16 **and we built those in 2008 and then when -- up**
17 **through 2009, I should say. When the real**
18 **estate bust happened in 2008, it killed our**
19 **home-building effort.**

20 Q Okay. The other vacant lots that are
21 not in that area, is there any plan as far as
22 developing those?

23 **A I would have to look at them lot by**
24 **lot.**

1 Q There are a number of buildings that
2 are owned by Woodlawn also, correct?

3 A Give me the addresses.

4 Q We've already talked about the 1500
5 to 1528 East 63rd Street, and then there's a
6 building at 4112 South King Drive.

7 A Vacant.

8 Q 4108 South King Drive?

9 A That's where the media center is.

10 Q Does the media center pay anything in
11 rent to Woodlawn?

12 A No, it basically is owned by
13 Woodlawn. Woodlawn subsidizes it.

14 Q What is that media center for?

15 A It's to -- It's the community media
16 center, so advance social injustice issues that
17 I spoke to you earlier about, Counsel.

18 Q Is any income raised by the media
19 center?

20 A Very little. It's not enough to meet
21 it's operating costs.

22 Q 1437 to 47 East 65th Street?

23 A That's the old Loretto Academy
24 Catholic high school, girls high school, and

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1 **it's right across the street from Mount Caramel**
2 **boys school. It's vacant.**

3 Q And has anything been done or is
4 anything being done to get a tenant for that
5 property?

6 **A It's -- No.**

7 Q The vacant building at 4112 South
8 King Drive, is anything being done to get a
9 tenant for that building?

10 **A Yes.**

11 Q What has been done?

12 **A Well, we had first to deal with the**
13 **code violations and so -- As a matter of fact,**
14 **Lincoln South Central paid for the carpentry**
15 **and the carpenter's work to get that built up.**

16 Q Has that ever been rented since the
17 debtor owned it?

18 **A Oh, no. That building has been**
19 **vacant almost 20 years.**

20 Q But was anything ever done to try and
21 fix it up and get a tenant?

22 **A We fixed 4108. That's right next**
23 **door to 4112, but we didn't have the resources**
24 **to fix up 4112.**

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1 Q 6537 South Maryland.

2 A 6537 South Maryland, that's not --
3 recently have we been able to find a tenant or
4 a buyer for that building.

5 Q Is there anyone at Woodlawn working
6 on that?

7 A Since I'm not there, no.

8 Q Prior to when you stopped being
9 there, so let's go back to prior to the filing
10 of the bankruptcy. So October 2018 and before,
11 was anyone at Woodlawn working on trying to
12 find tenants for that building?

13 A To my best ability, given my health
14 conditions, I did the best I could, Counsel.
15 And so my point is it fell to me, all right?
16 To make any of that work, it fell to me, which
17 is --

18 THE REPORTER: It fell to me?

19 BY THE WITNESS:

20 A To me, Leon Dorcy Finney, Jr., all
21 right? It fell to me to make that work, all
22 right? And that would be 6537 South Maryland.
23 That would be 1445 to 47 East 65th Street.
24 That would be the vacant parcels on 63rd and

1 Woodlawn between Woodlawn and Greenwood or
2 University. It fell to me. And that was what
3 I kind of struggled with, trying to get it all
4 done. And I worked myself into bad health, and
5 I will end up with a speech. So I will shut
6 up.

7 Q Were you the only person then at
8 Woodlawn involved in trying to lease or sell
9 any of these -- or develop any of these
10 properties?

11 A Yes.

12 Q And what about 6121 South Rhodes?

13 A What about it?

14 Q Is that the same situation, that you
15 were in charge, no one else involved?

16 A That was more managed by the in-house
17 people but, yeah, I'm the CEO. So let's get it
18 clear, Counsel. I'm responsible for the taxes
19 not being paid, and I'm responsible for moving
20 the company forward to make sure that we get
21 something going, all right? I'll say that
22 under oath, all right? And I'm the only one in
23 this room that stands to personally get a hit
24 for 1.8 million dollars from the IRS.

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1 Q Is there anyone else at Woodlawn who
2 was involved in trying to rent the property at
3 6121 South Rhodes?

4 A It probably was somebody from the
5 in house. I don't remember. I don't remember
6 that.

7 Q Do you know who, if anyone, was in
8 charge of attempting to collect the rent
9 because my understanding is I think there might
10 be a couple of tenants on Rhodes; is that
11 correct?

12 A Yes.

13 Q Do you know --

14 A They would bring the rent to the
15 office, if there was any. And the person that
16 they would bring it to was Andrea Ruffin.

17 Q And since --

18 A R-u-f-f-i-n.

19 Q And since she retired, do you know
20 who they would bring it to?

21 A No.

22 Q And was anyone at Woodlawn in charge
23 of --

24 A They may have brought it to Amy or

1 **anybody else that was in the accounting**
2 **department, but I don't know.**

3 Q Was anyone at Woodlawn in charge of
4 notifying the tenants of any delinquencies and
5 trying to collect those delinquencies?

6 **A Not to my knowledge.**

7 Q One last question. You listed out
8 five people who had check-signing authority.
9 You, Leon Jackson, Ray Smith, Andrea Ruffin and
10 Amy Mohammed.

11 Do you know how long all five of
12 those people had check-signing authority or the
13 time frames or no?

14 **A Name them again.**

15 Q Amy Mohammed.

16 **A Less than two years.**

17 Q Did she get signing authority when
18 she started work there?

19 **A I can tell you just generally,**
20 **Counsel. I said less than two years. Go**
21 **ahead.**

22 Q I understand. I'm asking do you know
23 if she got that signing authority at the start
24 of her employment or did it come later?

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1 **A** **Oh, I think it came later after --**
2 **Yeah.**

3 **Q** **Andrea Ruffin?**

4 **A** **Oh, she has been with us for many,**
5 **many years.**

6 **Q** **And she would sign checks for years?**

7 **A** **She would use the facsimile.**

8 **Q** **What do you mean "the facsimile"?**

9 **A** **Facsimile, stamp (indicating).**

10 **Q** **When I hear "facsimile," I think of a**
11 **fax machine, sir. So -- And whose name is on**
12 **the stamp?**

13 **A** **Leon Jackson, Leon Finney.**

14 **Q** **Ray Smith?**

15 **A** **Same thing.**

16 **Q** **He would use --**

17 **A** **He had been with us for years.**

18 **Q** **So when you say that everyone had**
19 **check-signing authority, was it authority to**
20 **use the stamp for yours or Mr. Jackson's name?**

21 **A** **None of them had the -- could sign a**
22 **check as an individual.**

23 **Q** **Okay.**

24 **A** **They all used the facsimile with**

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1 **Mr. Jackson and Leon Finney on it.**

2 Q And they had authority to choose when
3 to use the stamp or not?

4 A **Within -- I mean, if it was something**
5 **extraordinary, they would call and talk to me.**

6 MR. DAN: Those are all the questions
7 I have. Bruce, do you have any questions?

8 MR. SCALAMBRINO: No.

9 MR. DAN: Do you have any questions?

10 MR. CHRISTOPOULOS: No.

11 MR. DAN: David?

12 MR. HERZOG: I do.

13 C R O S S - E X A M I N A T I O N

14 BY MR. HERZOG:

15 Q Dr. Finney, with respect to the South --
16 to the South Park Plaza, was there something
17 called "surplus fund notes"?

18 A **Yes.**

19 Q And as you sit here today, do you
20 know are those surplus fund notes still in
21 existence?

22 A **Well, here's the challenge --**

23 Q Just if you know.

24 A **I'm just trying to kind of talk as a**

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1 layperson because I don't want to get myself in
2 trouble with lawyers.

3 Q Do you know if the surplus fund notes
4 still exist?

5 A Yeah. It means that if there is a
6 surplus that that surplus should be paid to the
7 investors, all right?

8 Q All right. And there are surplus
9 fund notes payable to Woodlawn, correct?

10 A Yes.

11 Q And those surplus fund notes, as far
12 as you know, are still in existence, correct?

13 A Yes.

14 Q Now, there's something else called a
15 developer's fee.

16 A Yes.

17 Q Can you explain to me what the
18 developer's fee --

19 A That I know a lot more about than --

20 Q All right. So explain to me what the
21 developer's fee is?

22 A So a developer's fee in many
23 instances would occur in the event that we have
24 investors that want to build a -- with us a

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1 135-unit apartment complex. Well, they want to
2 do it in a way as to attract investors. The
3 more the cost is to attract an investor, the
4 more the investor -- the losses the investor
5 can achieve.

6 So some instances, we will do a
7 development and indicate that we have a
8 development fee that's built into the overall
9 financing structure knowing full-well that that
10 development fee will not be paid, but it is
11 used in order to increase the basis of the
12 overall -- the basis of the cost of the overall
13 development so as to attract an investor who
14 can then have more depreciation, passive losses
15 to take over a period of time. The period of
16 time is generally 15 years.

17 Q The partnership agreement for South
18 Side -- I'm sorry -- for South Park Plaza, did
19 that include a development fee for Woodlawn?

20 A Yeah, I think that counsel has
21 already mentioned that it did.

22 Q And at some point in time was there --
23 was this deferred development fee to be paid to
24 Woodlawn?

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1 **A** **Counsel, I have been in this -- this**
2 **side a long time, since 1970. I have yet to**
3 **see, out of over 40 years of working, us to**
4 **collect a nickel on development fee.**

5 **Q** **My question, however, did the general**
6 **partnership -- or did the partnership agreement**
7 **for South Park Plaza provide for the payment or**
8 **the deferred payment of this fee after a period**
9 **of time?**

10 **A** **It might very well. And if the money**
11 **was not there, then we would forgive it.**

12 **Q** **So, in other words, if the fee**
13 **couldn't be paid to Woodlawn, it was donated**
14 **back to the partnership as a noncash**
15 **contribution?**

16 **A** **Yeah. We would have to be -- We**
17 **would be giving it to ourselves. Where are we**
18 **going to get it from?**

19 **Q** **If, in fact, South Side Plaza Limited**
20 **Partnership couldn't pay the fee, who was then**
21 **required to pay the development fee?**

22 **A** **One of the members of the**
23 **partnership.**

24 **Q** **Well, would it be the general partner**

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1 that was required to pay the fee?

2 **A It would be - That would be WCDC the**
3 **way that partnership is structured with NEF,**
4 **National Equity Fund.**

5 Q Well, do you recall who the general
6 partner of South Park Plaza would be?

7 **A What I want to say is WCDC, but I'm**
8 **not sure.**

9 Q Well, at least did WCDC own a
10 substantial portion of the general partnership?

11 **A Yeah.**

12 Q And so if the South Park Plaza
13 couldn't pay the development -- developer's
14 fee, then would it be the responsibility of the
15 general partner?

16 **A Yes.**

17 Q So, in other words, it would be, by
18 and large, if the general partner was mainly
19 composed of WCDC, it would be the general
20 partner that would have to put the money into
21 the limited partnership which, in then turn,
22 would pay it back to WCDC?

23 **A Yes.**

24 Q Would that be the same with --

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1 **A** **And notice that the limited partner**
2 **in this instance was the National Equity Fund.**

3 Q They were the limited partner?

4 **A** **They were the limited partner.**

5 Q Of the South Park Limited
6 Partnership?

7 **A** **Yeah.**

8 Q And would that same be true with
9 respect to the Jackson Parkside Limited
10 Partnership?

11 **A** **Yes.**

12 Q And, again, you would have -- Were
13 the -- Were the surplus fund notes, are those
14 still in existence?

15 **A** **Yes.**

16 Q And as far as you recall, the
17 developer's fee, was that contributed back as a
18 noncash contribution?

19 **A** **Yeah. Yes.**

20 Q With respect to the 1500 East 63rd
21 Street property, Lincoln -- Lincoln South
22 Central established an escrow account for the
23 payment of taxes?

24 **A** **Yes.**

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1 Q Was the escrow account in the name of
2 Lincoln South Central or in the name of WCDC?

3 A It was named in Woodlawn.

4 Q So the monies by Lincoln South
5 Central were deposited into this account for
6 the payment of the real estate taxes?

7 A Yes.

8 MR. HERZOG: I have nothing further.

9 MR. DAN: Very briefly, if you can
10 get me information -- any information
11 regarding rental payments to Lincoln South
12 Central and from Lincoln South Central, any
13 payments to Woodlawn regarding the
14 1500 East 63rd Street, any information
15 regarding those, I would appreciate that.
16 How long do you think that might take?

17 THE WITNESS: I'm going to do the
18 best I can, Counsel. Let me -- I'm trying
19 to -- Maybe David -- I mean, Lester will
20 get back to you and let you know.

21 MR. OTTENHEIMER, III: We'll talk,
22 yeah.

23 MR. DAN: I will reserve my right to
24 redepose regarding any of that information.

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1 MR. OTTENHEIMER, III: Subject to the
2 new documents.

3 MR. DAN: As far as signature?

4 THE WITNESS: As far as what?

5 MR. OTTENHEIMER, III: Leon, you have
6 a choice. You can waive off and say the
7 court reporter took down everything you
8 said that was proper or you can review the
9 transcript to see if there were any
10 mistakes, not mistakes that you want to
11 change but if the court reporter didn't
12 take something down right.

13 THE WITNESS: Are you going to look
14 at it?

15 MR. OTTENHEIMER, III: Yeah. We'll
16 reserve signature.

17 MR. DAN: Okay. Thank you.

18 MR. OTTENHEIMER, III: Thank you.

19

20 FURTHER DEPONENT SAITH NOT....

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

IN RE WOODLAWN COMMUNITY)
DEVELOPMENT CORP.,)
) No. 18-29862
Debtor.) Chapter 11

I, REV. DR. LEON D. FINNEY, JR.,
being first duly sworn, on oath, say that I am
the deponent in the aforesaid deposition, that
I have read the foregoing transcript of my
deposition, consisting of pages 1-122
inclusive, taken at the aforesaid time and
place and that the foregoing is a true and
correct transcript of my testimony so given.

REV. DR. LEON D. FINNEY, JR.

SUBSCRIBED AND SWORN TO
me before this _____ day
of _____, A.D. 2019.

Notary Public

February 12, 2019

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

3 I, Peggy A. Anderson, a Certified
4 Shorthand Reporter in the State of Illinois do
5 hereby certify:

6 That previous to the commencement of
7 the examination of the witness, the witness was
8 duly sworn to testify the whole truth
9 concerning the matters herein;

10 That the foregoing deposition
11 transcript was reported stenographically by me,
12 was thereafter reduced to typewriting under my
13 personal direction, and constitutes a true
14 record of the testimony given and the
15 proceedings had;

16 That the said deposition was taken
17 before me at the time and place specified;

18 That the said deposition was
19 adjourned as stated herein;

20 That I am not a relative or employee
21 or attorney or counsel, nor a relative or
22 employee of such attorney or counsel for any of
23 the parties hereto, nor interested directly or
24 indirectly in the outcome of this action.

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1 IN WITNESS WHEREOF, I do hereunto set
2 my hand this _____ day of _____, 2019.

3
4
5 
6 _____



7 Peggy A. Anderson
8 Certified Shorthand Reporter
9 License No. 084-003813

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