

1 raise your right hand.

2 (Witness sworn.)

3 THE COURT: Have a seat, please.

4 **ROLANDO DELGADO,**

5 having been first duly sworn, testified as follows:

6 **DIRECT EXAMINATION**

7 **BY MR. GILLIAM:**

8 Q. Will you please introduce yourself to  
9 us?

10 A. I am Deputy Rolando Delgado.

11 Q. And how long have you been a deputy?

12 A. I've been a deputy since November.

13 Q. Okay. And before you were a deputy with  
14 Harris County Sheriff's Office, what did you do?

15 A. I was a detention officer at the jail.

16 Q. How long were you a detention officer at  
17 the jail?

18 A. I had been a detention officer since --  
19 a full-time detention officer since December 15,  
20 2012.

21 Q. And I'm going to direct your attention  
22 back to July 11th, 2014. On that Friday, did you  
23 come into contact with an inmate named Weylin  
24 Allford?

25 A. Yes.

1           Q.    And do you see Mr. Allford in the  
2 courtroom today?

3           A.    Yes.

4           Q.    And will you identify him by where he's  
5 sitting and what he's wearing?

6           A.    He's sitting right there (indicating),  
7 and he's wearing a striped T-shirt.

8                   MR. GILLIAM:   Your Honor, may the  
9 record reflect the witness identified the defendant?

10                   THE COURT:    It will so reflect.

11           Q.    (By Mr. Gilliam)   What was the nature of  
12 your contact with the defendant that day?

13           A.    I had to escort him down to the clinic  
14 because he was complaining about chest pains.

15           Q.    And did the defendant make any comments  
16 while you were trying to escort him down to the  
17 clinic?

18           A.    While I took him down to the clinic, no.

19           Q.    Okay.   What happened once y'all actually  
20 got to the clinic?

21           A.    He got his vital signs checked out by  
22 Nurse Flores and she said they checked out fine and  
23 he refused to come back up.

24           Q.    So once he refuses to come back up, what  
25 do you do?

1           A.    I have to -- have to escort him back and  
2 I have to make him go back upstairs.

3           Q.    Does he say anything while you're trying  
4 to escort him back upstairs?

5           A.    Yes.  First, he used a whole bunch of  
6 profanity towards the nurse; and then when I tried  
7 to escort him back, he told me not to touch him.

8           Q.    So you said he used a whole bunch of  
9 profanity.  Will you go ahead and tell us, if you  
10 remember, what he was saying to the nurse?

11          A.    He said, "You ain't no real doctor,  
12 Bitch.  Get me a real doctor."

13          Q.    And after you're -- while you're  
14 escorting him back to his cell, I assume, what is he  
15 saying to you?

16          A.    When I tried to escort him and I grabbed  
17 him by the arm, he said, "Bitch, don't touch me."

18          Q.    Okay.  And after he said, "Bitch, don't  
19 touch me," what happens next?

20          A.    Other detention officers heard the  
21 commotion and they helped me escort him back up to  
22 his cell.

23          Q.    And once you get him back to his cell,  
24 is he saying anything to you?

25          A.    He said, "Fuck you, Delgado.  I'm going

1 to smoke your ass when I get out of here."

2 Q. And did you take that threat seriously?

3 A. Yes.

4 Q. Did he make any other threats to you?

5 A. When I read him -- I told him he was  
6 going to be written up for threatening staff, he  
7 said, "Next time y'all got to get me out of this  
8 cell, I'm going to fuck you up."

9 Q. And when you write these reports, are  
10 the inmates offered an opportunity to write a  
11 statement in rebuttal?

12 A. Yes.

13 Q. Did you offer the defendant that  
14 opportunity to write a statement in rebuttal?

15 A. Yes.

16 Q. What did he say when you offered him  
17 that chance?

18 A. He said, "Fuck you, Bitch."

19 MR. GILLIAM: Pass the witness.

20 THE COURT: Defense?

21 MR. SCOTT: Yes, Your Honor.

22 **CROSS-EXAMINATION**

23 **BY MR. SCOTT:**

24 Q. In other words, Officer Delgado, he  
25 refused to sign or make a statement about what had

1 occurred, correct?

2 A. He refused.

3 Q. Yes, sir. And in relation to the nurse  
4 that you were talking about, it was a nurse and not  
5 a doctor. Is that accurate or not?

6 A. It was a nurse.

7 Q. All right. In relation to the chest  
8 pains, were you aware of the manner and means he had  
9 been injured that time that required him to go to  
10 the clinic about the chest pains?

11 A. No, sir, I just take him down.

12 Q. All right. So anything that might have  
13 injured him to that extent, you were not there when  
14 that happened, correct?

15 A. No, sir.

16 Q. All right.

17 MR. SCOTT: I'll pass the witness.

18 THE COURT: State?

19 MR. GILLIAM: Nothing further, Your  
20 Honor.

21 THE COURT: May this witness be  
22 excused?

23 MR. SCOTT: Yes, Your Honor.

24 MR. GILLIAM: Yes, Your Honor.

25 THE COURT: You're free to go.

1 State, call your next.

2 MR. GILLIAM: State calls Marvin  
3 Perkins.

4 THE COURT: All right.

5 THE BAILIFF: Your Honor, this  
6 witness has not been sworn.

7 THE COURT: Come up, sir.

8 Raise your right hand.

9 *(Witness sworn.)*

10 THE COURT: Have a seat, please.  
11 You may proceed.

12 **MARVIN PERKINS,**  
13 having been first duly sworn, testified as follows:

14 **DIRECT EXAMINATION**

15 **BY MR. GILLIAM:**

16 Q. Will you please introduce yourself to  
17 us?

18 A. Detention Officer Marvin Perkins.

19 Q. And, Mr. Perkins, how long have you been  
20 a detention officer over there at the jail?

21 A. Approximately a year and ten months.

22 Q. And I'm going to take you back to July  
23 23rd of 2014. Did you have an incident with an  
24 inmate over there named Weylin Allford?

25 A. Yes, sir.