

1 to go.

2 State, call your next.

3 MR. GILLIAM: State calls Javier  
4 Zamora.

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

7 THE COURT: Come up, sir. Please  
8 raise your right hand.

9 *(Witness sworn.)*

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

12 MR. GILLIAM: Thank you, Judge.

13 **JAVIER ZAMORA,**

14 having been first duly sworn, testified as follows:

15 **DIRECT EXAMINATION**

16 **BY MR. GILLIAM:**

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

19 A. I am Detention Officer Javier Zamora.

20 Q. How long have you been a detention  
21 officer?

22 A. Since December 17th, 2012.

23 Q. And what is your current job assignment  
24 as a detention officer?

25 A. To work wherever they place me as a

1 rover, J pod, which is a lockdown -- wherever they  
2 place me.

3 Q. I'm going to direct your attention now  
4 to Sunday, March 2nd of 2014. Did you have an  
5 incident with an inmate named Weylin Allford?

6 A. I did.

7 Q. And do you see Mr. Allford in the  
8 courtroom today?

9 A. I do.

10 Q. Will you identify him by where he's  
11 sitting and an article of clothing he's wearing?

12 A. He's wearing a brown long-sleeved shirt,  
13 button-down, right next to his Defense attorney.

14 MR. GILLIAM: Your Honor, may the  
15 record reflect the witness identified the defendant?

16 THE COURT: It will so reflect.

17 Q. (By Mr. Gilliam) What was the nature of  
18 the incident you had with Weylin Allford, the  
19 defendant, back on March 2nd of 2014?

20 A. He threatened me about 6:00 a.m. due to  
21 the nature that he did not receive a newspaper.  
22 Normally whenever I worked in J pod, which was the  
23 housing location where he was assigned to, each  
24 side -- it was one and two side -- would get a  
25 newspaper, three newspapers per side, whoever hit

1 the cell block, which is the intercom button, and  
2 they would request it at the time. He did not hit  
3 the button whenever I arrived. So...

4 Q. So the defendant was upset that he  
5 didn't get a newspaper. You say that he threatened  
6 you. How did he threaten you?

7 A. He threatened me by saying that he was  
8 going to douse my ass with urine -- that's what he  
9 was doing at the time -- and that he was going to  
10 beat my ass whenever he got the opportunity.

11 Q. And did he make any other threats to you  
12 that day?

13 A. I do not recall.

14 Q. And after he makes those threats, what  
15 do you do?

16 A. I notified the sergeant, the floor  
17 sergeant, which was Sergeant Weiss, and I do an  
18 incident report. I informed him that I was writing  
19 him up for threatening staff, and I offered him an  
20 opportunity to write a statement on his behalf.

21 Q. And did he write a statement that you're  
22 aware of?

23 A. He didn't.

24 MR. GILLIAM: Pass the witness,  
25 Your Honor.

1 THE COURT: All right. Defense?

2 CROSS-EXAMINATION

3 BY MR. SCOTT:

4 Q. So newspapers are given to inmates on a  
5 daily basis. Is that what you're telling us?

6 A. Yes, sir.

7 Q. So the first guy that, what did you say,  
8 hit a button --

9 A. The intercom button.

10 Q. Yeah.

11 A. Their cell.

12 Q. Hits the intercom button, he gets the  
13 paper, right? Is that the way it works?

14 A. Correct. Correct.

15 Q. So does -- as a matter of fact, does the  
16 defendant, to your knowledge, sit right there until  
17 you come in so he can hit the button or not and get  
18 his newspaper?

19 A. At the time, whenever I used to work J  
20 pod, that lockdown, that certain lockdown, I would  
21 arrive at 6:00 o'clock -- at 6:00 a.m. Normally I  
22 would have a couple of lights lit up. It was a  
23 board and it showed each individual's cell. I would  
24 have certain lights on which were the first people  
25 that would hit the button at the time that I had

1 arrived. At times they were already lit. At times  
2 they weren't.

3 So the first -- whenever I would arrive  
4 and I saw the first one -- the first two or three  
5 light up, I would hit the button to speak to them.  
6 I would let them know that they were going to get a  
7 newspaper since that's what they always requested  
8 first thing in the morning.

9 Q. Okay. So on this particular -- do you  
10 buy the newspaper or are they furnished?

11 A. They are furnished by Harris County.

12 Q. So Harris County gives the people the  
13 newspaper and then the first ones to hit their  
14 little light switch gets the newspapers for that  
15 day, right?

16 A. Correct.

17 Q. Is there a rule that they have to share  
18 their newspaper with others or is it theirs forever  
19 and ever then?

20 A. There's no such rule.

21 Q. Pardon me?

22 A. There's no rule.

23 Q. Okay. So if one guy wants to hoard his  
24 newspaper so he can cover up his windows and his  
25 light and all that kind of stuff -- that's -- it's

1 not given to him for that purpose -- but that's what  
2 he can do if he wants to, right?

3 A. Correct. But like you said, it's not  
4 for that purpose.

5 Q. Right. It's to read and be current on  
6 what's going on in the world, I'm sure.

7 MR. SCOTT: Pass the witness.

8 THE COURT: State?

9 MR. GILLIAM: Nothing further, Your  
10 Honor.

11 THE COURT: All right. May this  
12 witness be excused?

13 MR. GILLIAM: Yes, Your Honor.

14 MR. SCOTT: Yes, Your Honor, he  
15 can.

16 THE COURT: You're free to go.  
17 Thank you.

18 THE WITNESS: Thank you.

19 THE COURT: State, call your next.

20 MR. GILLIAM: State calls Rolando  
21 Delgado.

22 THE COURT: Come on up, Deputy.

23 THE BAILIFF: Your Honor, this  
24 witness has not been sworn.

25 THE COURT: Come up, sir. Please

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.