

EXHIBIT F

CONFIDENTIAL – Subject to Protective Order Entered in Case Nos. 16 C 8940 and 19 C 1717

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BEN BAKER and CLARISSA GLENN,)
Plaintiffs,)
v.) Case No. 16 CV 8940
CITY OF CHICAGO, et al.,) Judge Franklin U. Valderrama
Defendants.) Magistrate Judge Sheila M. Finnegan
) (This case is part of In re: Watts
) Coordinated Pretrial Proceedings. Master
) Docket Case No. 19 C 1717)

**CITY'S SECOND AMENDED ANSWER TO PLAINTIFF CLARISSA GLENN'S JUNE
7, 2017 INTERROGATORIES TO DEFENDANT CITY OF CHICAGO**

Defendant, the City of Chicago, ("City"), by its attorney, Terrence M. Burns of Reiter Burns LLP, for its second amended answer to Plaintiff Clarissa Glenn's June 7, 2017 Interrogatories to Defendant City of Chicago, states as follows:

1. Did the Chicago Police Department participate in, direct, and/or support a federal investigation of criminal activity by Ronald Watts in any way? If so, (a) describe all steps that any agent of Chicago Police Department took to participate in, direct, and/or support the federal investigation, (b) provide approximate dates for each such step, and (c) identify the individuals involved in each step.

ANSWER: The City objects to this interrogatory as vague, ambiguous, overly broad, unduly burdensome, and premature. To fully and completely respond, the interrogatory as drafted would require the City’s attorneys to depose and/or interview dozens of law enforcement officials from the U.S. Attorney’s Office (“USAO”), the Federal Bureau of Investigation (“FBI”), the Bureau of Alcohol, Tobacco and Firearms (“ATF”), the Drug Enforcement Administration (“DEA”), the High Intensity Drug Trafficking Areas program (“HIDTA”), the Cook County State’s Attorney’s Office (“CCSAO”), retired and current personnel from the Chicago Police Department (“CPD”), confidential informants, and potentially others. In essence, the interrogatory (improperly and impossibly) asks the City to describe the contents of the information that might be learned in discovery from dozens of people who have been disclosed by the parties prior to their depositions proceeding and/or individuals referenced in documents produced in this case, some of whose names have been redacted. The City further objects as there is information responsive to this interrogatory which the federal government (the “Government”) has declined to disclose at this time, which the Government has instructed the City not to disclose, and/or which information the Government has redacted in response to prior production of documents made to plaintiff’s

CONFIDENTIAL – Subject to Protective Orders Entered in Case Nos. 16 C 8940 and 19 C 1717

attorneys and subpoena in this case. The information the Government redacted and/or declined as of this time to produce, if available, may be included in this interrogatory response. In addition, the City objects to the extent the interrogatory seeks attorney client privileged information and/or work product. Subject to and without waiving these objections, and with the express understanding that this interrogatory is premature and is impossible to respond to as drafted, the answer is yes, and the City provides the following preliminary information. The City also references any additional documents in the Government's possession which contain information responsive to this inquiry, the documents cited below, certain documents (including handwritten notes) produced by Shannon Spalding in a prior lawsuit to the extent related to investigative activities taken during the subject investigation, and depositions expected to proceed in this case, as well as any trial testimony. As drafted, however, the interrogatory is improper, and the City reserves the right to object to the use of this interrogatory at later stages of this proceeding.

DATE	DESCRIPTION
1/19/94	Ronald Watts joins the Chicago Police Department ("CPD").
4/20/99	Ronald Watts purchases \$10,100 in chips from Empress Casino as learned later after the investigation began in September 2004. (See FBI 337, which is a 12/6/05 report memorializing the result of a FinCEN search by FBI Investigative Analyst Michael Pach).
7/11/04	Plaintiff Ben Baker was arrested, allegedly by Defendants Jones, Mohammed, and Watts. The arrest report indicates arresting officers were Alvin Jones and K. Young. The listed address is 527 E. Browning (at the Ida B. Wells housing complex). According to plaintiff in his complaint, he accuses the arresting officers of planting drugs in a mailbox. The complaint alleges Baker's motion to suppress was granted mid-trial, and the State dismissed the case following the Court's ruling barring the drugs recovered that were attributed to Baker.
7/21/04	<p>Letter from Ron Hensley to the CPD, complaining about Watts's handling of an incident in which a police car struck and damaged his van. Watts purportedly came to the scene to investigate the incident, and referred Mr. Hensley to a Patrick Noonan who would take care of the damage. According to Hensley, he filed a complaint with OPS or IAD regarding the incident. (See BAKER GLENN 010863).</p> <p>Noonan was an area drug dealer who, according to the CPD's Organized Crime Division Narcotic and Gang Investigation Section's investigation of drug dealing at the Ida B. Wells buildings (known as "Sin City") supplied illegal drugs to a drug operation operated by Wilbert "Big Shorty" Moore at Ida B. Wells. The Sin City operation was initiated in January 2005 in response to an increase in gang violence in the Ida B. Wells Housing Development extension buildings, as well as a continuous flow of narcotic sales complaints received from the residents of the area. These complaints stated that members of the Gangster Disciples Street Gang had taken over most of the lobbies of the Ida B. Wells extension buildings in order to conduct the sale of narcotics. It was an</p>

CONFIDENTIAL – Subject to Protective Orders Entered in Case Nos. 16 C 8940 and 19 C 1717

	<p>area that was encompassed by schools, parks, and churches. Residents complained that gang members would sell and use narcotics in their presence and the presence of their children. The residents no longer felt safe entering or exiting their buildings, in that they were fearful their families could fall victim to the gang violence that was normally present each day. During the initial stages of Sin City, it was learned that Moore and his organization were planning a major takeover of all five of the active extension buildings. This takeover stemmed from the arrests of a major competitor, Willie Gaddy, and an adversary named Roderick Smith (aka Cha Chi). With Gaddy and Smith out of the way, Moore created a well-managed and organized structure, with two lieutenants responsible for collecting the money and delivering the narcotics to the buildings, and each building was controlled by at least two building managers who would keep each building running smooth and profitable. Each building usually had the same pack workers and security personnel working every day. In order to keep all the locations profitable, each building had different “Line” names and packaging for the heroin and crack cocaine being sold there. Although the narcotics were the same, this strategy created an illusion to customers that each building sold a different quality of narcotics, resulting in the capture of a large portion of the open-air drug market in the area and control over the competition in the extension buildings. As a result, Operation Sin City I-V was pursued at the buildings: (I) 574 E. 36th; (II) 575 E. Browning; (III) 559 E. Browning; (IV) 540 E. 36th; and (V) 527 E. Browning.</p> <p>According to a Chicago HIDTA Investigative Support Center chart, Roy “Shock” Bennett was a Lieutenant working under Moore who controlled money, and Harry Seals controlled narcotics. Harold Owens was the Building Manager at 574 E. 36th, Allan Jackson and Brian Ford were the Building Managers at 575 E. Browning, Valentino Welbourn was the Building Manager at 559 E. Browning, Jovan Towers was the Building Manager at 540 E. 36th, and Tolorn Fumbanks, Ben Baker, and Elgin Moore were the Building Managers at 527 E. Browning. In addition to many CPD personnel identified in Sin City related documents produced in discovery, ASA Kevin Hughes, Kelly A. Freeman of HIDTA, and Eric Phillipson of DEA/HIDTA are identified as involved. (CITY-BG-028596-98, 028602).</p>
9/16/04	<p>An FBI report dated October 18, 2004 reflects a 9/16/04 conversation between two individuals whose names are redacted, and states that “This conversation was recorded as a consensually monitored conversation by Chicago Police Department (CPD). A copy of this recording is entered into evidence on 11/03/2004 as exhibit 1D-2.”</p>
9/17/04	<p>Memorandum by Calvin Holliday of the Internal Affairs Division, Confidential Investigations Section (“CIS”), initiating Complaint Register #300778, to the Commanding Officer of CIS, Lt. Juan Rivera. The memo also references a confidential number (259476). According to the memo, Holliday was made aware of unknown Public Housing Unit officers taking money from drug dealers to allow them to sell their product. The information was obtained from Sgt. Henry Harris of HIDTA. Holliday, Lt. Juan Rivera, and Sgt. Kenneth Bigg</p>

CONFIDENTIAL – Subject to Protective Orders Entered in Case Nos. 16 C 8940 and 19 C 1717

	<p>met with a confidential informant who indicated officers approached him and requested payment for him to continue selling drugs in the area. The CI claimed one of the officers had shot at him in 2003 because he ran away from the officer (subsequent memos suggest this CI was Willie Gaddy: CITY-BG-023849-51). The CI also said this conduct was ongoing and many larger drug dealers were paying tax money to the officers. (See BAKER GLENN 010946).</p> <p>There is a CLEAR Data Warehouse printout from September 20, 2004 of an arrest of Gaddy dated February 6, 2004 indicating Gaddy's address as 5020 S. Spaulding.</p>
9/20/04	<p>ATF six-page memo submitted by Special Agent, Chicago II (Firearms Trafficking) Field Office to the Special Agent in Charge of the Chicago Field Division regarding a post-arrest interview of a CI who supplied information that the 574 E. 36th building was run by Watts, and that dealers had to pay Watts to sell their narcotics out of the building. The majority of this memorandum is redacted; this response will be supplemented if and when this ATF memo is produced unredacted. (See BAKER GLENN 002086-92).</p> <p>See also description of meeting on this date in the entry below.</p>
9/21/04	<p>Holliday memo in CR #300778 to Lt. Rivera. (See BAKER GLENN 010844; ATF-Baker38.2)). The memo details a meeting on September 20, 2004, between IAD (Calvin Holiday, Lt. Juan Rivera, Sgt. Ken Bigg), the United States Attorney's Office (AUSA Mark Prosperi, Gayle Littleton, David Hoffman), the FBI Daria Ringo, Jim McNally), the DEA (Scott Masumoto), ATF (Susan Bray, Billy Warren) and Sgt. Henry Harris of the HIDTA . Per the memo, "It was determined this would be a federally prosecuted investigation. The Cooperating Individual is to be prosecuted in federal court and the United States Attorney's office believe they should be in control of everything that results from his cooperation."</p> <p>See also Complaint Against Department Member form regarding the confidential investigation referred to above, received from Officer M. Skipper and registered with Agent Diane Wolfe. (See BAKER GLENN 010941).</p> <p>An FBI report also reflects that "On 09/21/2004, FBI Chicago received information of an ongoing joint investigation conducted by [IAD, DEA and ATF]. The investigation involved alleged criminal activity of ... Watts." (FBI 331). This FBI report states that "An ATF source alleged that, in the past, Watts attempted to extort him for bribe payments." Making these bribe payments to Watts would permit source to continue his drug trafficking activity in the Ida B. Wells housing project. ATF source also stated that Watts was currently receiving payments from other individuals involved in drug trafficking in the Ida B. Wells housing project." <i>Id.</i> The "Investigative Strategy" reflected by this report states that "FBI Chicago will supervise ATF source in conducting consensually monitored telephone recordings. Information gathered during</p>

CONFIDENTIAL – Subject to Protective Orders Entered in Case Nos. 16 C 8940 and 19 C 1717

	these conversations will be used to corroborate Watts's involvement in receiving payments in exchange for allowing drug trafficking activity in the Ida B. Wells housing project." <i>Id.</i> As stated above, later documents indicate the source was Mr. Gaddy.
9/22/04	Ron Hensley letter to Calvin Holliday, in which Hensley indicates his nephew, Quincy Campbell, told him that Watts was forcing Patrick Noonan, a drug dealer, to pay him off to continue to sell drugs at Ida B. Wells. Hensley states that he was aware of others at Wells who could vouch for Watts's behavior. (See BAKER GLENN 010861).
9/24/04	FBI 302 Report reflecting information from an informant (believed to be William Gaddy) during an interview at the Dirksen Building on September 21, 2004 that drug dealers at the Ida B. Wells housing complex were paying off Watts to continue to sell drugs there. The informant (a GD who has hustled, or sold drugs, as his only means of support) was being held at the Oak Lawn police department and was as of that time "operating as a cooperating witness of the ATF in an on-going collaborative investigation along with [IAD and DEA]." The report states that Watts has eight CPD officers who report to him, and also mentions Mohammed, Mackintosh (phonetic) and Sanez (phonetic) by name. It states that Watts received weekly payments from drug dealers, typically in the amount of \$5,000. (See FBI 326; BAKER GLENN 002103-04). The report also states: "Watts gets IBW drug dealers to pay him to work (sell drugs) in the housing project. If the payments are made to Watts, he will in turn allow the drug dealers to continue to sell drugs. The amount that each drug dealer pays Watts is determined by Watts." The informant stated that Moore and Patrick Mooney (believed to be Patrick Noonan) use Watts' cell phone to contact him to make arrangements for "bribe payments." Andre Simmons, another drug dealer who is completing his parole in Atlanta, also made payments to Watts. <i>Id.</i>
9/27/04	Memorandum from Holliday to Lt. Rivera (signed by R.B.; Sgt. Ray Broderdorff worked at IAD at the time) regarding Quincy Campbell as a possible informant. This memo reflects the information provided to Holliday by Ron Hensley. (See BAKER GLENN 010877; see also 010860-10911 regarding investigation of Hensley's claim).
9/27/04	FBI Report drafted by Agent Matthew J. Kern and approved by Thomas Kneir, Joseph Ways, and James McNally, reflecting a request for approval to open an investigation of Watts following a meeting with an AUSA. The report refers to an "ongoing" joint investigation" involving IAD, DEA and ATF involving alleged criminal activity of Watts, and that "information regarding this allegation was offered and continues to be provided by an ATF source" whose name was redacted (believed to be Gaddy).. The report states that "information collected that relates to drug violations will be investigated by DEA. Information collected that relates to gun violations will be investigated by ATF. Information collected that relates to police corruption will be investigated by

CONFIDENTIAL – Subject to Protective Orders Entered in Case Nos. 16 C 8940 and 19 C 1717

	<p>CPD-IAD and FBI. To date, information provided by the ATF source has resulted in the successful recovery of firearms.” According to the report, the source “stated that Watts was currently receiving payments from other individuals involved in drug trafficking in the Ida B. Wells housing development.” The report also states that AUSA Littleton “has related that the above described matter has prosecutorial potential if further evidence of criminal activity is uncovered.” The AUSA would seek prosecution under 18 U.S.C. Sec. 872. An “Investigative Strategy” is also detailed stating as follows:</p> <p>“Initial course of investigative action will include a thorough review of CPD-IAD, DEA and ATF investigative files related to Watts. Additionally, agents will conduct financial and property record searches of the captioned officer and associates, as well as review telephone records of Wells. Furthermore, agents will supervise source in conducting consensual telephone recordings. Information gathered during these conversations will be used to corroborate Watts’ involvement in receiving payments in exchange for the allowance of continued drug trafficking activity in the Ida B. Wells housing project.” (See FBI 326; BAKER GLENN 002106-07).</p>
10/05/04	<p>An October 14, 2004 FBI report reflects that a redacted source “participated in a consensual recorded telephone conversation with” CPD “Officer John P. Dolan.” The content of the call is redacted. (FBI 327).</p>
10/09-10/04	<p>Agent Kern report relating to the Watts investigation dated October 18, 2002 reflecting that “CPD officers working on the above captioned case escorted [redacted source] to a meeting with Wilbur Moore (aka “Big Shorty”) at the Ida B. Wells housing project. [Source] told CPD officers that he and Moore were supposed to meet to talk about drug dealing. Moore did not show up for the meeting. It was later learned that Moore was not in town.” (FBI 328). Agent Kern’s report reflected that ATF agents intended to use the source to facilitate a purchase of firearms on October 14, 2004, but it did not occur as planned and would be attempted again. Agent Kern’s report also states that AUSA Littleton “notified reporting agent that CPD officers involved in the [Watts case] were going to attempt another meeting between [Source] and Moore during the week of October 18, 2004. If this drug deal takes place, CPD plans to arrest [Source] and Moore, separate them, then proposition Moore to cooperate with the government. This cooperation will include Moore’s assistance in the investigation of CPD Sergeant Ronald Watts.” <i>Id.</i></p>
10/15/04	<p>FBI Report concerning the strategy to attempt to corroborate Watts’s involvement in receiving payoffs from drug dealers. The proposed strategy is redacted from the report. An AUSA was monitoring the investigation. (See BAKER GLENN 002108). The federal file number is 194D-CG-122761.</p>
10/28/04	<p>FBI report referencing the submission of “opening LHM.” (See BAKER GLENN 002841-42). The report states “<u>CRIMINAL INVESTIGATIVE AT WASHINGTON, DC</u> Read and clear.”</p>

CONFIDENTIAL – Subject to Protective Orders Entered in Case Nos. 16 C 8940 and 19 C 1717

11/01/04	FBI report on the topic of submission of opening LHM. (See BAKER GLENN 002839).
12/06/04	FBI report to update case assignment from WC-2 to WC-3. “As writer was transferred from WC-2 to WC-3 effective 11/29/2004, it is requested that case assignment for the above referenced case be updated accordingly.” (See BAKER GLENN 002843).
3/09/05	<p>Memorandum from Calvin Holliday regarding a proposed integrity check under CR #300778. The allegation was that Watts and Mohammed were taxing drug dealers (taking money) to allow them to remain in business. The goal of the integrity check operation was to give the accused members an opportunity to prove or disprove the allegations against them. It was alleged the officers took money from drug dealers who wished to work in their area. Those who did not cooperate were arrested. The memo reflects an undercover operation to be conducted in full view of a surveillance team.</p> <p>The objective of the operation was to provide an undercover officer with a large sum of money, placing him in an undercover vehicle, in the area of the accused officers work assignment. He would have the appearance of a working drug dealer and was prepared to have an evasive conversation to arouse suspicion upon being approached. The proposed operation would involve approximately 10 persons in addition to the undercover officer. The memo was approved by Lt. Rivera (with the initials of Sgt. R.B.). (See BAKER GLENN 010856-59).</p>
3/23/05	Plaintiff Baker was arrested at 527 E. Browning by Officers Nichols and Leano. According to police reports, the arresting officers were instructed to go to the location by Sgt. Watts. Baker was charged with possession of 15.3 grams of heroin and 13.9 grams of cocaine. According to the plaintiff's complaint in this lawsuit, Officers Nichols, Gonzalez, Jones, and Watts testified against Baker at the 2006 criminal trial resulting from these charges before Judge Toomin, which resulted in Baker's conviction.
4/06/05	Armed standoff at Portillo's Restaurant on Ontario Street involving armed drug dealers from Ida B. Wells, including William “Big Shorty” Moore, William Gaddy, Leonard “Fuzz” Gipson, Allen Jackson, Gabe, and Arnold Council described in ATF Agent Bray's memo below. (See BAKER GLENN 004151-59).
4/07/05	ATF Special Agent Susan Bray conducted an interview of Wilbert “Big Shorty” Moore regarding his knowledge of drug dealing and gun trafficking at the IBW. Present during Bray's interview were DEA Special Agent William Warren, CPD Sgt. Joseph Gorman, CPD Sgt. Tony Di Cristofano, and CPD Gang Specialist Alonso Harris. It was conducted at Homan Square. The extensive report contains 62 separate paragraphs. Moore was read his Miranda rights and was told that any cooperation and information provided by Moore would be brought to the attention of the AUSA's office. Among other things,

CONFIDENTIAL – Subject to Protective Orders Entered in Case Nos. 16 C 8940 and 19 C 1717

according to Moore, he was a member of the GDs, and had been selling heroin and cocaine on a daily basis at IBW for 15-20 years. Moore admitted that he controlled the “574” building, that he sold heroin there, but that things had become “too hot” at the building so he temporarily ceased trafficking heroin out of “574.” Moore said it became too hot after the shooting between him and Roderic Smith (aka Cha-Chi) that occurred in September 2004. Moore moved to Atlanta as a result and began working at a Harold’s Chicken owned by his friend Andre Simmons (aka “Dre.”) Moore said he invested \$15,000 in the restaurant.

Moore returned to Chicago when Patrick Noon (aka “PT”) asked him to come back to Chicago to show him how to mix the heroin and help run the heroin distribution operation. Noon paid for Moore’s airline ticket. Moore said that Tywann Broughton, Roy Bennett, Harry “Dog” Seals, Harold Owens, and himself run the heroin line known as “Renegade” out of the 574 building. Moore said the cocaine line was known as “7-11.” Moore said he sold about \$10,000 of heroin per day out of 574 and the profit was divided among the five of them. Moore said he and Dog mixed the heroin, Shock distributed the heroin, and Tywann collected the money. Moore said one source of supply for the heroin was Antoinette Rojas; Patty Rojas, Antoinette’s sister, previously supplied him heroin since 1999. The Rojas sisters were Columbian.

Moore went on to provide additional information about the drug trade and those involved at IBW. Among other things, Moore also said one of his heroin suppliers was Patrick Noon. Moore also said that Little J-J (aka Killer) had a line in the 540 building. Moore said Little J-J was involved in a shooting with Gaddy on March 23, 2005. Moore said Little J-J followed Gaddy who was with “Gabe” (Gabriel Bush who had a line at the 559 building) and “Fuzz” (Leonard Gipson), Gaddy shot at Little J-J, and Little J-J shot back. Gabe worked for Gaddy and had been involved in numerous shootings, and had recently been shot by “Ta.” Bobby Coleman also worked for Gaddy, and both of them caught a case on February 6, 2004 for PCS. (¶31). Moore said Gabriel Bush had recently been shooting at him. (¶46).

Moore said that on April 6, 2005 he met Gaddy at Portillo’s on Ontario Street. Moore said Gaddy was with Gabe and Leonard Gipson (“Fuzz”). Moore said he was with Allen Jackson, and both had guns. Arnold Council also was present and had a gun. (¶50).

Moore said Allen Jackson (aka “Allen”) and Brian Ford (aka “B-Lo”) work for “Stank” controlling the 575 building. Brian Ford went to Patrick Noon sometimes to get narcotics. (¶40). Moore said there are two firearms at the 574 building, and different people take them home each night. He had a Glock 9mm semi-automatic pistol. Allen Jackson had a Smith & Wesson .40 caliber semi-automatic pistol. (¶43). Moore said most of the firearms are purchased from “hypes.”

CONFIDENTIAL – Subject to Protective Orders Entered in Case Nos. 16 C 8940 and 19 C 1717

	<p>In paragraph 41, Moore says “Ben” was selling in the “527 building.” It is believed Ben is plaintiff Baker, who was arrested twice for selling drugs at the 527 E. Browning building, and who was a building manager of the 527 E. Browning building per the Sin City operation. Ben purportedly worked for an individual known as “Bird,” a Black Gangster Disciple. Moore contacted Bird on his cell phone.</p> <p>Paragraphs 53-58 of the report refer to Watts and his conduct in taking payments from drug dealers. Moore said he paid Watts \$7,000. Moore said Roy “Shock” Bennett also paid Watts. Moore said that Watts became upset with him after Moore told someone that Shock had paid Watts. According to Moore, Police Officer Al Jones was said to work on Watts’s team, and also allegedly took payments. According to Moore, Watts, Jones, and “Kenny” never let the white officers on the team know what was going on. Moore also mentioned that Mohammed was on Watts’s team, but was no longer a member.</p> <p>Moore heard that Willie Gaddy also was paying Watts, and that Watts once shot at Gaddy who was running away from him after he refused to pay. Moore indicated that Watts had a gambling problem, and frequented the Horseshoe Casino. Moore claimed to have paid Watts \$7,000 on one occasion, and referenced another payment of two rifles and \$10,000 on another occasion through Shock.</p> <p>Moore said that he would pay Watts when Watts caught him or one of his workers with something, referring to a firearm or narcotics. Moore also told of an incident in which Watts took 40 bags of weed from “Chingey” and then sold it to Shock. In addition, Moore said once he was with Patrick Noonier after Noonier had bought a new black Lincoln Navigator. Moore said Watts pulled over Noonier and Moore in the Navigator and when Watts saw Noonier, Watts said “oh it’s you Pat” and let them go immediately. Moore said Noonier and Watts grew up together.</p> <p>Moore also mentioned the name Kimberly Brown, including that he put a car in her name. (See BAKER GLENN 004151-59).</p>
5/03/05	Meeting with Wilbert Moore, Calvin Holliday, CPD Internal Affairs, Matt Kern, FBI, Justin Williams, DEA/HIDTA regarding targets relating to Williams case and Sgt. Watts and P.O. Al Jones. (ATF-Baker 41.2).
5/04/05	Sissy from ATF faxed Agent Bray’s memo to IAD Agent Holliday. Shock’s CLEAR Data Warehouse photo from an arrest on 8/14/02 was pulled on May 4, 2005 as well, and includes handwritten notes as follows: “Per Big Shorty,” among other things.
5/05/05	Attorney Matthew Mahoney sent a letter to ASA John Mahoney, in which he identified Watts as a “dirty” officer who needed to be caught. Attorney

CONFIDENTIAL – Subject to Protective Orders Entered in Case Nos. 16 C 8940 and 19 C 1717

	Mahoney referenced individuals in the area of 527 E. Browning who claimed to be victims of Watts. (See BAKER GLENN 010074).
5/11/05	Memorandum from Sgt. Maureen Kennedy of IAD to Debra Kirby, Assistant Deputy Superintendent of IAD. The memo indicates David Navarro of the SAO called to inform IAD that he was approached by a complainant who alleged Sgt. Watts had been shaking down drug dealers for money. (See BAKER GLENN 010850).
5/24/05	Memos indicating that Calvin Holliday, in CR #300778, was requesting photographs of Watts, Kenneth Young, Alvin Jones, Brian Bolton, Robert Gonzalez, Doug Nichols, Manuel Leano, Elsworth Smith, and Miguel Cabrales for a photo lineup. The photo lineup was to be viewed by an informant who was unable to enter the police facility. (See BAKER GLENN 010833).
5/05	Meeting of IAD Agent Calvin Holliday, ASA David Navarro, Sgt. Ray Broderdorff, Sgt. Kenneth Bigg, Ben Baker, Baker's wife, and Baker's lawyer Matthew Mahoney at 2650 S. California. The meeting is summarized in the June 28, 2005 memo of Agent Holliday, discussed below.
5/24/05	Agent Holliday requested photographs of 002 nd District Tactical Team "D." (PL JOINT 000163-64).
6/28/05	<p>Memorandum from Calvin Holliday in CR #300778; signed by Sgt. Keith Calloway, Acting Commanding Officer of CIS. In the two-page memorandum, Holliday referenced a meeting in May 2005 at 26th and California with ASA Navarro, Attorney Matt Mahoney, "gang member and drug dealer" Ben Baker, Baker's wife, and Sergeants Ray Broderdorff and Kenneth Bigg. During the interview, Baker claimed Watts wanted a payoff for Baker to stay in business and Baker resisted. As a result, Watts put a case on Baker. Baker indicated during the meeting that he agreed to work as a CI. Baker also told of Watts's shooting at Gaddy.</p> <p>As of the date of the memo, Holliday had not heard anything back from Baker or his attorney regarding their cooperation.</p> <p>Holliday noted that Baker's allegations against Watts were essentially the same as told by two other known drug dealers, Gaddy and Wilbert Moore. According to Holliday, the three men had no knowledge that the others were talking to law enforcement. Gaddy had been brought in by HIDTA and made available to other CPD units. Holliday wrote that Gaddy was never able to assist Holliday because he was being worked by the Narcotic and Gang Investigations Section of CPD.</p> <p>Holliday's memo referenced the prior interview with Gaddy, and also described the interview on April 7, 2005, of Wilbert Moore by ATF Agent Susan Bray. Moore told the agents of Watts taking money from drug dealers at the Ida B.</p>

CONFIDENTIAL – Subject to Protective Orders Entered in Case Nos. 16 C 8940 and 19 C 1717

	<p>Wells housing project to allow them to remain in business. Moore also mentioned that Watts shot at Gaddy for not paying him. Moore mentioned Officer Mohammed, but did not accuse him of taking money. However, Moore was unable to assist Holliday in his investigation. Moore was identified by an officer who worked for Sgt. Watts on his tactical team, who was detailed to NAGIS. This officer told Watts of Moore's cooperation. Moore said that when he was at Ida B. Wells, Watts would see him and not speak. Moore said that if he were with other people, Watts would make the others get out of the car and go through them, but Moore had to remain in the car and wouldn't be searched. Holliday indicated he spoke with Moore separate from the interview Moore gave to ATF Agent Wray and others.</p> <p>In the final paragraph, Holliday notes that Watts, Alvin Jones, and Mohammed were previously assigned to Public Housing South, which had since been deactivated. The three then went to the 2nd District. When Holliday spoke with Cmdr. Walter Green of the 2nd District, Green said he was under the impression it would be prudent to assign Watts to work with a tactical team as he was knowledgeable of the area. (See BAKER GLENN 010947-48).</p>
7/26/05	<p>Watts's CR history is printed. (See BAKER GLENN 010945-46).</p> <p>In addition, on an unidentified date, Sgt. Louis Velez of IAD viewed in CLEAR background information on Watts, including that he was appointed to CPD on January 19, 1994, with a handwritten note he was in "Beat 264" and an identification of Watts's day off group. (See BAKER GLENN 010942-43).</p>
7/27/05	<p>Illinois State Police report (Suspicious Activity Report) from Empress Casino in Hammond regarding Watts provided to IAD Agent Holliday by CIA II Richard Lingley of the ISP and referencing CR#300778. (See BAKER GLENN 010912-35). Per the Description, "Police Agent Calvin Holliday ... requested a Fin/CEN/Gateway inquiry regarding an investigation of a drug or narcotic investigation and internal investigation (Case #300778). "Reason of Interest: Criminal Act." BAKER GLENN 010923 is a diagram referencing a July 13, 2005 criminal incident, with Watts identified in the middle of the page, and personal information of Watts identified. Sgt. Ray Broderdorf of IAD is identified as the approving supervisor of Holliday's FinCEN request. BAKER GLENN 010925. (BAKER GLENN 010935 references an arrest of Ronald Watts for "obstruct police interference on 11/18/84.</p>
8/11/05	<p>Memo from Calvin Holliday in CR #300778. It was brought to Holliday's attention by Sgt. Keith Calloway that Watts was reporting a theft from his residence of cash and other items in a total amount of over \$17,000. The alleged offender was Lelissa Jackson, the alleged girlfriend of Sgt. Watts. Because the loss was peculiar, Holliday attempted to find Ms. Jackson, and Sgt. Bigg requested her photo. (See BAKER GLENN 023974-81, consisting of</p>

CONFIDENTIAL – Subject to Protective Orders Entered in Case Nos. 16 C 8940 and 19 C 1717

	Holliday's memo and the police reports relating to the incident). The memo appears to be signed by Sgt. Ray Broderdorf.
9/12/05	Det. Kathleen Chigaros exceptionally cleared closed the theft investigation listing Watts as the victim because Watts refused to prosecute the alleged offender. (See RD#HL538608).
9/28/05	In a half sheet entry by Judge Toomin in Case 05 CR 8982, he indicated Defendant Ben Baker's attorney wanted to subpoena IAD. According to the entry, "ASA Navarro knows of this." Judge Toomin then entered an order directing IAD to deliver to Judge Toomin for an <i>in-camera</i> inspection its files and information on Police Officers Watts, Jones, Gonzalez, and Nichols.
10/04/05	Attorney Matt Mahoney issued a subpoena to Debra Kirby, Assistant Deputy Superintendent, Internal Affairs Division, for records, notes, and all other information pertaining to Officers Watts, Jones, Gonzalez, and Nichols "per the attached court order."
10/14/05	Sgt. Kenneth Bigg of IAD pulled information from CLEAR regarding Baker, including his CLEAR Data Warehouse arrest printout from October 12, 2005, his arrest report, and name check.
10/17/05	A "CL Report" (CL #050448) referencing ASA Dave Navarro and source Matthew Mahoney. (BAKER GLENN 009959). According to the report, Mahoney contacted the SAO stating that over the past one and a half years, he represented several clients in narcotics cases, all of whom independently stated they had been victimized by Sgt. Watts in a similar fashion. Watts is a 2 nd District sergeant with the CPD who regularly patrols the 527 E. Browning building. Victim One (identified as Ben Baker) claims that as a result of his failure to pay Watts, he was arrested three times and charged with felonies. "Witness One" was deemed credible and corroborated Baker's claims "to a large extent." According to Baker, several other victims had lodged complaints with OPS about Watts. Baker's 10/12/05 arrest report is also printed by Sgt. Kenneth Bigg. (BAKER GLENN 010973-78). Wilbert "Big Shorty" Moore's criminal history report is also printed by Sgt. Kenneth Bigg. (BAKER GLENN 010958-64).
10/21/05	Agent Holliday attempted to reinterview William Gaddy at the MCC in Chicago where Gaddy was awaiting sentencing. Gaddy refused to be interviewed. (CITY-BG-023850). Holliday previously interviewed Gaddy on 9/17/04 as referenced above.
10/24/05	Clarissa Glenn initiates CR #309282 regarding an incident on August 20, 2005, in which she alleged two male black casually dressed officers entered and searched her residence without a warrant or permission. Glenn also alleged that on October 23, 2005 an officer gave her a threatening message of bodily harm

CONFIDENTIAL – Subject to Protective Orders Entered in Case Nos. 16 C 8940 and 19 C 1717

	<p>or arrest for no reason. Assigned to Lt. Kenneth Mann in the second district. Lt. Mann unsuccessfully attempted to have Glenn contact him, and he requested the CR be classified as unfounded due to lack of cooperation as of November 3, 2005.</p> <p>The file also contains a handwritten letter from Glenn (CITY-BG-012918-19) in which she re-contacts IAD, likely in or around August 2006, acknowledges her previous lack of cooperation with investigators because of her fear of Officers Watts and Alvin Jones, references her subsequent arrest after her previous complaint was made, says she moved as of June 6, and asked that her case be re-opened. In a memo dated September 5, 2006, Debra Kirby directed that CR #309282 be reopened and assigned to CIS.</p> <p>(See entries of 1/21/10 and 6/15/10, <i>infra</i>, regarding incorporation of this investigation into CL # 1015941).</p>
10/28/05	<p>Clarissa Glenn initiates CR #309359. Also assigned to Lt. Kenneth Mann. (It appears he jointly investigated this CR along with CR #309282.) Glenn accused Watts of searching her apartment without a warrant or her permission on a previous date, and then continuing to harass her and on 10/28, threaten to take her to jail. The investigator attempted to have Glenn contact him, but to no avail, and he eventually requested the CR be classified as unfounded due to lack of cooperation.</p>
10/31/05	<p>Judge Toomin's court sends a fax to Lt. Clark of the CPD attaching Attorney Mahoney's subpoena and Judge Toomin's court order of September 28, 2005, requesting IAD records for Watts, Jones, Gonzalez, and Nichols. According to a half sheet entry of the same date, ASA Navarro spoke on the record regarding the IAD subpoena, and the IAD file would be delivered on October 31.</p> <p>Also on this date, Holliday took a statement from Ben Baker in courtroom #400 at 2650 S. California. Baker said he was constantly being framed by Watts for PCS, that he has known Watts as the police for four years, that Watts offered to help Baker with a 2003 case if Baker paid Watts \$1,000 during a telephone conversation, and that Baker had seen Watts and other police officers running a narcotics sales operation. (CITY-BG-023849-51).</p>
12/06/05	<p>See FBI 337, which is a 12/6/05 report memorializing the result of a FinCEN search by FBI Investigative Analyst Michael Pach. The report details that Watts purchased \$10,100 of chips on April 20, 1999 at Empress Casino in Hammond. It also states that "FinCEN generated no other transaction activity for" Watts.</p> <p>FBI 302 report, redacted, indicating information was obtained through research conducted by an FBI Investigative Analyst on 10/4/05 regarding Watts. (BAKER GLENN 002844).</p>

CONFIDENTIAL – Subject to Protective Orders Entered in Case Nos. 16 C 8940 and 19 C 1717

12/11/05	Plaintiff Baker and Plaintiff Glenn are arrested by Officers Jones and Mohammed. They claim Sgt. Watts planted drugs in their car. They were charged with felony possession of heroin. (Both Baker and Glenn entered guilty pleas on September 18, 2006 in 06 CR 810).
1/19/06	Wilbert “Big Shorty” Moore is killed. Hobos gang members Arnold Council and Paris Poe were subsequently indicted for Moore’s murder.
1/20/06	FBI Report “to provide an update of case developments” relative to the Watts investigation. The reporting agent was contacted by the CCSAO regarding an investigation of Sgt. Watts and that Moore’s name surfaced during that investigation. The memo references a rumor on the street that when Wilbur Moore’s body was discovered, “he was wearing a wire (recording device) and that Moore had been cooperating with federal law enforcement. Reporting Agent [Kern] advised Navarro that Moore was not a Cooperating Witness (CW) for the [FBI] and that Moore had not made any recordings for the FBI.”(FBI 338).
2/10/06	FBI redacted report regarding status of Watts investigation. The report indicates that the investigation was initiated in September 2004, and states that the FBI received information of an ongoing joint investigation conducted by IAD, DEA and ATF involving alleged criminal activity by Watts. “An ATF source alleged that, in the past, Watts attempted to extort him for bribe payments to permit him to continue his drug trafficking activity. The ATF source also stated that Watts was currently receiving bribe payments from another individual involved in drug trafficking in the Ida B. Wells housing development, Wilbur Moore.” Shortly after the investigation was initiated in 2004, the unit that Watts was assigned to, which covered the Ida B. Wells housing project, was disbanded and Watts was transferred to another area. “During the course of the investigation, allegations against Watts were never able to be substantiated or collaborated (sic).” The redacted memo states that “In December of 2005, a query of [FinCen] was conducted for Watts. The results of this query were negative.” The report also states that on January 20, 2006, the CCSAO related that it had been investigating Watts and that Moore’s name surfaced during the course of the Watts investigation. The investigative status was presented to AUSA Gayle Littleton, who advised that she would decline prosecution because of the parallel state prosecution and because the case lacked federal prosecutive merit. (FBI 339; BAKER GLENN 002110-11). Another FBI report from this date references the “submission of closing LHM.” (BAKER GLENN 002848).

CONFIDENTIAL – Subject to Protective Orders Entered in Case Nos. 16 C 8940 and 19 C 1717

4/21/06	A half sheet entry by Judge Toomin (05 CR 8982) states, “Contact Dave Navarro – is there an IAD investigation still?”
4/24/06	Half sheet entry by Judge Toomin. Per Navarro, it was okay for the judge to distribute the IAD records to the parties. “No surprises.” (BAKER GLENN 010672)
5/23/06	Baker’s bench trial begins in 05 CR 8982. In a subsequent affidavit, Attorney Mahoney acknowledged that Judge Toomin had released the IAD materials to criminal defense counsel prior to the trial beginning.
5/24/06	ADS Lee Epplen prepared a report under RD#HM369142 for a bribery investigation, involving Watts. The indictment was initially witnessed by Officer Alvin Jones and eventually by Sgt. Tony Brown, #916. In essence the allegation was that Roy “Shock” Bennett (a drug dealer operating at IBW referenced above), offered \$800 as a bribe to Watts through a third party named Charlene Campbell of 575 E. Browning. The witnesses to the incident were Charlene Campbell, Watts, and Officer Jones. Per the reports, upon recognition of an attempted bribe, Watts summoned 002 nd District Tactical Sgt. Tony Brown to the scene to serve as a witness. The incident was reported, the suspect money was inventoried, and proper notifications were made. (CITY-BG-023849-51)(See also To/From Report from ADS Lee Epplen to First Deputy Supt. Dana Starks which indicates further that ADS Epplen was contacted by Captain Edward Griffin of the 2 nd District regarding the possible bribery investigation. ADS Epplen’s report indicates he contacted Area One Detective Division for a bribery investigation (assigned to Det. James Dowling), as well as Lt. Keith Calloway of IAD, who responded to the 2 nd District where he was briefed on the circumstances of the incident and investigation. (CITY-BG-023992-024000)
6/09/06	Baker is found guilty in a bench trial of two counts of possession of a controlled substance. He is sentenced on July 7, 2006, to two 18-year terms. (Judge Toomin reportedly cut Baker’s sentence to 14 years a few weeks later.)
8/30/06	After IAD received Clarissa Glenn’s letter (CITY-BG-012918-19), it looks for the prior complaint and pulls other materials. (CITY-BG-012920-26).
9/05/06	In a memo dated September 5, 2006, Debra Kirby directed that CR #309282 be reopened and assigned to CIS to be investigated with the ongoing criminal investigation. (CITY-BG-012917).
09/14/06	Sgt. Joe Barnes of CIS is assigned the reopened Clarissa Glenn CR#309282. (CITY-BG-012927). Among other things, Sgt. Barnes pulls background materials pertaining to Glenn, Arthur Kirksey, Ben Baker, Roy “Shock” Bennett, and photos of Watts, Mohammed, Jones and Young. (CITY-BG-023940-63, 023982-91).
10/11/06	Roy “Shock” Bennett’s criminal history report reviewed and printed. (BAKER GLENN 023959-63).

CONFIDENTIAL – Subject to Protective Orders Entered in Case Nos. 16 C 8940 and 19 C 1717

	Also, photos of Watts, Mohammed, Alvin Jones, and Kenneth Young printed. (CITY-BG-023936-39)
11/16/06	<p>According to an FBI report dated February 8, 2007, “In November of 2006, new allegations against Watts were brought to the Chicago FBI by CPD IAD Sergeant Joe Barnes. Sergeant Barnes had been contacted by a complainant that detailed specific information regarding drug-related law enforcement corruption involving Watts. Specifically, the complainant made an introduction to a second complainant that had recently been extorted by Watts. On two occasions within the last two months, the second complainant had been robbed of \$830.00 and \$4,255.00, respectively, by Watts.” (FBI 347-48).</p> <p>FBI special agent Matthew Kern and IAD Sgt. Joe Barnes interviewed, upon information and belief, Clarissa Glenn. Glenn stated she has lived at her current address since June 9, 2006, and had previously lived with Ben Baker at IBW. Glenn stated she began hearing rumors that Watts was corrupt in 2004.</p> <p>Glenn stated that her husband Ben Baker, although on probation, began selling heroin and cocaine at IBW in 2004. Glenn said the first time she came into contact with Watts was in the Summer 2004, when Watts came to her apartment and asked for Baker. Watts allegedly said: “I heard that you were the only ones over here eating,” which meant making a profit from the drug trade. Glenn said Baker was arrested in March 2005 in a stairwell at IBW, claimed he didn’t possess the drugs, but admitted he had a large quantity of money.</p> <p>Glenn also discussed a “mailbox” case, which she said occurred in 2005. Glenn said Watts’s informant Charlie Haynes, a drug user, came to the apartment after the “mailbox case” and said Watts wanted Baker to call Watts, and that Watts wanted “lunch,” meaning \$1,000.</p> <p>Glenn also discussed an incident where Baker was arrested by ATF in the Fall 2005, although the report indicates the actual arresting officers were from CPD Special Operations. Glenn said Watts came on the scene and attempted to intervene, which resulted in a pushing altercation between Watts and another officer.</p> <p>Glenn also described her arrest along with Baker in December 2005 by Alvin Jones (who she called AJ) and Watts. Glenn claimed the heroin the officers claimed they found was planted. (FBI000263-65).</p>
11/21/06	FBI Agent Matthew Kern and Sgt. Joe Barnes interviewed an individual (name redacted) who asserted that Watts extorted money from him on two occasions, once in the amount of \$830 and once in the amount of \$4,255. Watts allegedly threatened to plant heroin on this person. With respect to the alleged theft of \$4,255, the interviewee stated the money was inventoried because Watts was with officers he didn’t usually work with. The individual also stated that Watts

CONFIDENTIAL – Subject to Protective Orders Entered in Case Nos. 16 C 8940 and 19 C 1717

	had arrested him three times before. He also said Watts had some type of relationship with a woman named Osborne, one of the building managers at IBW. The report further states: “Watts maintained possession of narcotics so that he could use the narcotics as leverage to extort people,” and that “Watts displayed the same personality characteristics and mannerisms as someone that used narcotics.” ((FBI000261-2).
12/20/06	The U.S. Attorney’s Office was advised of new information regarding Watts and “advised that this case was prosecutable if additional evidence could be developed.” (See BAKER GLENN 002112-14).
2006 (unk date)	Sgt. Joe E. Barnes prepared an Application for a pen register to be presented to a Judge of the Circuit Court of Cook County on telephone number 773/848/4761, as well as gathering other information on that phone number, relative to Watts. (CITY-BG-023841-48)
1/18/07	<p>FBI report authored by Agent Kern, reporting the interview of November 16, 2006, and further requesting that an investigation be reopened of Sgt. Watts based on the new allegations. The memo requests “SAC authority to re-open a public corruption investigation that was closed in February 2006.” (BAKER GLENN 002112-14; FBI 343-45). The report states that in 2004, the complainant began hearing rumors circulating throughout IBW that Watts was corrupt and that he, along with other members of his team, used their positions as police officers to extort individuals at IBW. The redacted memo further states that Watts was aware of narcotics activities and knew a person (whose name is redacted) was making money dealing narcotics. At the end of the three page memo, it states that on December 20, 2006 an AUSA was advised of the new information recently developed and the AUSA “advised that this case was prosecutable if additional evidence could be developed.” <i>Id.</i> The initial investigative strategy is redacted as is the assigned FBI agent.</p> <p>The investigation was reopened by the FBI on January 18, 2007 “based on information received from several witnesses and confidential sources (CSs) regarding drug-related law enforcement corruption in Chicago.” (BAKER GLENN 002120-21). An FBI report reflects that the “captioned investigation is the priority police corruption case on squad WC-3. The Chicago Division is committed to fully support this Title III investigation to its logical conclusion.” <i>Id.</i></p> <p>Agent Kern’s report also discusses an interview with a second complainant who he and IAD Sgt. Barnes interviewed on November 21, 2006. This person said he paid Watts to allow him to continue selling drugs and at one point Watts pulled a bundle of heroin out of his pocket and said, “You going back” to jail. (FBI 345). Watts did not arrest him when he paid \$830. On another occasion, the second complainant stated Watts inventoried \$4,225 he recovered from the second complainant discussed in the report, when Watts was patrolling with team members he did not recognize. “The second complainant also stated that it</p>

CONFIDENTIAL – Subject to Protective Orders Entered in Case Nos. 16 C 8940 and 19 C 1717

	<p>was common for Watts to keep narcotics on his person while on duty. The second complainant knew that Watts maintained possession of narcotics so that Watts could use the narcotics as leverage to extort people.” <i>Id.</i></p> <p>AUSA Littleton reopened the investigation. As for the Initial Investigative Strategy, it will “be to use available resources to identify all Police Officers involved in the alleged corrupt activities.” The report also discusses checking FinCEN and also using a Source to “potentially record conversations with Watts.” The report also notes that the CPD “has access to an apartment unit on the 23rd floor of an apartment building directly adjacent to Ida B. Wells. This unit will be utilized to facilitate and coordinate surveillance activities at Ida B. Wells.” <i>Id.</i></p> <p>Johnnie (aka Blood) Tolliver was interviewed by Agent Kern and IAD Sgt. Kenneth Bigg. Tolliver said he sold the drug line called “Pay Back” at IBW for “Big Ant.” Big Ant paid Tolliver \$500 per day, and the Pay Back drug line made about \$17,000 per day. Tolliver learned that Big Ant paid Watts \$3,000 twice a week to sell drugs.</p> <p>Tolliver said he was beaten in January 2007 by four men in an abandoned building at East 38th Street and S. Vernon for snitching. Tolliver said he had been arrested by unidentified members of Watts’s team for a small amount of heroin, and he supplied information on where the money and drugs were located. Tolliver learned Watts recovered the \$15,000 and 18 bundles of heroin. Tolliver said he went to Provident Hospital due to the beating, at which time two CPD detectives told him not to press charges as Watts would take care of him. Tolliver added that Watts used drugs himself, and would meet drug dealers at the Sunrise convenient store on 39th Street. (FBI000257-260).</p>
2/07/07	<p>FBI memo “to advise FBIHQ of anticipated Title III coverage in captioned investigation.” The memo states that the AUSA assigned “concurs with the proposed utilization of a Title III wiretap.” (BAKER GLENN 002120-21).</p> <p>An FBI memo also requests the opening of sub-files regarding the Watts investigation, including as a repository for 302 reports, Grand Jury Subpoenas, and Grand Jury materials. (BAKER GLENN 002853).</p>
2/08/07	<p>FBI report reflecting the investigative strategy to investigate Watts. . An AUSA signed off on the plan, advising that the case was prosecutable if additional evidence could be developed. The memo provides some history of the investigation as well. It states that “new allegations against Watts were brought to the Chicago FBI by CPD IAD...” (FBI 347-48; BAKER GLENN 002115-16).</p>

CONFIDENTIAL – Subject to Protective Orders Entered in Case Nos. 16 C 8940 and 19 C 1717

	Another FBI report from this date references the submission of an opening Letterhead Memorandum (LHM) in the above captioned case.” (BAKER GLENN 002856).
5/29/07	DEA memo referencing DEA Group 43 currently working a high-profile gang investigation involving members of the GDs that is distributing large amounts of heroin and cocaine on a daily basis from IBW. The remainder of the memo is redacted. (BAKER GLENN 002082).
5/30/07	FBI memo regarding Watts stating that due to the transfer of an Agent Kern, that it is requested that the case be reassigned to an agent currently assigned to WC-3. (FBI 350; BAKER GLENN 002857).
6/01/07	DEA memo to the Deputy Chief Inspector Office of Professional Responsibility from the Special Agent in Charge of the Chicago Field Office referencing the May 29, 2007 memo by the Group Supervisor, which reflects that the FBI Public Corruption Unit has been notified as well as an AUSA and IAD. (BAKER GLENN 002081).
6/07/07	<p>FBI memo documenting meeting with five members of the U.S. Attorney's Office and two Sergeants from IAD at 219 S. Dearborn and the FBI, and the DEA. The purpose of the meeting was to discuss information the DEA developed regarding Watts. The following people were present: Agent Ken Samuel; SSA Peter Cullen; AUSAs Sonny Pasquale, Tom Shakeshaft, Joe Alesia, John Lausch, and Brion Netols; two DEA personnel; IAD Sgt. Tom Chester. (FBI 351-52; BAKER GLENN 002080). The memo references the DEA's investigation, with the assistance of a CW, of the sale of heroin and crack at IBW. The report states that “the CW has observed and overheard CPD officer KALLATT MOHAMMED make telephone calls to drug dealers in order to warn them that they should clean up because the police are coming down. The CW has also seen captioned subject with CPD officers MOHAMMED and MONICA LOUIS, who is known on the street as “COCO”, telling drug dealers the area is clear (of legitimate police) and that they can set up security. Shortly after security is set up, captioned subject and MOHAMMED proceed to search guys and steal their money. The CW advised that it is common knowledge that captioned subject protects “SCOTT’s” heroin line and that captioned subject allows anyone to sell drugs in return for weekly cash payments.</p> <p>“SA Warren advised that on the days captioned subject shakes down and extorts drug dealers, captioned subject wears Starter jerseys in order to blend in. On days he's working with legitimate police officers conducting legitimate police business, captioned subject wears mainstream clothing.”</p> <p>The report discusses using Patrick Noonan to get to Watts, as Watts is paying Noonan, and they are childhood friends.</p>

CONFIDENTIAL – Subject to Protective Orders Entered in Case Nos. 16 C 8940 and 19 C 1717

	Sgt. Barnes' idea of putting secret cameras in the emergency exit sign at the 527 building, and Agent Warren's concurrence to put cameras in all five buildings, was disagreed with by ASA Netols who "questioned the value of the cameras insofar as captioned subject and other corrupt officers probably collect money in places other than the lobbies." (FBI 351-52).
6/25/07	Automated Arrest data for Activity Records Program printed for the following officers: Bolton; Gonzalez; Jones; Leano; Lewis; Mohammed; Nichols Jr., Smith Jr., Watts, Young Jr. (CITY-BG-023905-06). At some unidentified date the complaint history of Mohammed and Watts was also checked and printed. (CITY-BG-023909-19).
6/26/07	Handwritten Notes of Debra Kirby regarding the investigation of Watts, etc. dated June 26, 2007, reflecting meeting with Cullen, Samuel, Shakeshaft, Brown, Barnes, Chester, Maher, Todd, Lausch, and others. (CITY-BG-023902-04). Kirby's notes reference several different matters being told to her regarding the investigation, including the following: the murder of "Big Shorty" Moore discussed above (which the notes indicate ASA Dave Navarro is investigating); Bernard Brown (who is the subject of an FBI 302 report in 2009 described below); Owens, whose mother is Vera Owens, and who is "sick of shake down" and is talking to CPD; Allen Jackson; Matt Camden, who the notes indicate got transferred from the team because he didn't want to get arrested; Dwayne Holmes is referenced; Roy "Shock" Bennett is referenced; possible investigation strategies are referenced (such as GPS, I-Pass relative to the casinos; Tax Returns, surveillance. The notes also state that "GD/BG war is a barrier." <i>Id.</i> (See also CITY-BG-023839-40).
6/29/07	FBI Investigative Analyst Pat Chambers query of Watts, Mohammed, Jones, Smith, Bolton, Gonzales, Lamonica Lewis, reported on 7/11/07 as reflected below. (FBI000255-56). Lewis cashed or deposited three large amounts of money of \$12,000, \$14,000, and \$23,000 in 2003 and 2004.
7/11/07	FBI 302 report regarding a June 29, 2007 Investigative Analyst query of any financial activity identifiable with Watts and Mohammed. (BAKER GLENN 002810-11).
7/23/07	FBI printout relative to 7/11/07 Investigative Analyst query. (BAKER GLENN 002858).
8/14/07	Grand Jury subpoenas issued by U.S. Attorney's Office. (BAKER GLENN 002753-62).
9/05/07	Meeting of Agent Smith, AUSAs Joseph Alesia, Thomas Shakeshaft, Jon Lausch, DEA agent, Sgt. Chester and Sgt. Barnes. Agent Smith provided that the FBI interviewed two Chicago police officers, believed to be Shannon Spalding and Daniel Echeverria, who offered to utilize a cooperating witness familiar with the area Watts patrols to identify the pattern of drug deals and shakedowns conducted by Watts. The police officers requested that they

CONFIDENTIAL – Subject to Protective Orders Entered in Case Nos. 16 C 8940 and 19 C 1717

	<p>receive a transfer to another district prior to assisting the FBI. “IAD was informed of this matter and was in the process of assessing the appropriate method of transferring the CPOs without indicating their cooperation with IAD or the FBI.” (FBI 357-58).</p> <p>DEA stated they have made several buys of crack into Gerald Scott, aka Cool, who they are targeting as well as his close associate Roy Bennett, aka Shock. The DEA’s cooperating witness saw Scott buy 1KG of powder cocaine from Marvin (lnu). Bennett is a drug dealer who paid Watts for protection. DEA and FBI sources have provided information that Watts sold drugs to Bennett and others in Bennett’s “tower.” <i>Id.</i></p> <p>AUSA Shakeshaft informed the FBI that ATF provided an additional cooperating witness familiar with the drug trade at the IBW, who had witnessed Watts demand \$1,000 of a drug dealer to continue to deal. “AUSA Shakeshaft provided the information to DEA prior to informing the FBI. As a result the DEA has opened the cooperating witness for purpose of their target in the IDA B. Wells project. DEA has agreed to allow the FBI access to the cooperating witness to debrief him on his encounters with Watts.” <i>Id.</i></p> <p>IAD Sgt. Barnes received a call regarding the potential cooperation of Johnnie Tolliver and Jamar Lewis. Watts recently approached them and demanded a \$3,000 payment for them to sell drugs, which they intended to pay. Barnes asked to talk to Tolliver and Lewis before they met with Watts, but hadn’t heard from them. Agent “Smith was not informed of the potential meeting until September 5, 2007. Sergeant Barnes agreed to provide SA Patrick Smith with any future updates prior to any scheduled meetings.” <i>Id.</i></p> <p>It was requested that Agent Smith be reassigned the case agent with Agent Samuel as co-case agent. <i>Id.</i></p>
9/10/07	FBI memo providing case update, referencing a reassignment of the case agent.
9/13/07	FBI memo dated 2/22/08 references that an anonymous correspondence was forwarded from the AUSA’s office on 9/13/07 regarding drug dealing being done by Chicago Police officers. (BAKER GLENN 002139). The memo referenced previously received anonymous communications. <i>Id.</i>
9/27/07	FBI Agent Patrick Smith and Sgt. Joe Barnes interviewed Clarissa Glenn (aka Clarissa Baker). Glenn stated she was in contact with Jamar “Tweek” Lewis and Art Kirksey, who later reports indicate had taken over management of the drug trade at 527 E. Browning from Ben Baker. (FBI000250-52). Per Glenn, both Tweek and Art had been approached by Mohammed who was seeking a bribe payment. Glenn stated that over Labor Day weekend 2007 Art paid Mohammed \$2,500. <i>Id.</i>
10/02/07	FBI Agent Patrick Smith and Sgt. Joe Barnes interviewed Jamar “Tweek” Lewis. Tweek stated that Watts and Mohammed had approached him and his boys for payments related to their drug trade, and he would sometimes pay

CONFIDENTIAL – Subject to Protective Orders Entered in Case Nos. 16 C 8940 and 19 C 1717

	Mohammed. (FBI000253-54). Tweek agreed to assist the investigation for one or two “pops” (by which he meant undercover operations), but did not want to work with the FBI on a long term basis because of gang repercussions. <i>Id.</i>
10/24/07	<p>FBI Agent Patrick Smith interviewed, upon information and belief, Clarissa Glenn. Glenn said she had contacted Tweek on October 23, 2007. Tweek said he was not present at IBW due to a gang war, and also that Art Kirksey told Tweek he was no longer paying Mohammed (which Tweek doubted). Per Glenn, Tweek claimed Art was distracted because his brother was recently arrested for a drug charge after serving 10 years on a gun charge.</p> <p>Tweek also told Glenn that he was concerned Watts was connected to the shooting of Patrick Noonan in the head. Glenn knew Noonan from the drug trade at IBW. Per Glenn, Noonan survived the shooting but remained hospitalized. (FBI000247-48).</p>
10/26/07	<p>FBI memo regarding the status of the investigation of Watts, Mohammed, and “others yet unknown.” According to the memo, “several leads have developed which target Watts and Mohammed’s crimes” in the course of the investigation. The memo also notes that the Ida B. Wells projects became the subject of a gang war between the Black Gangster Disciples and the Vice Lords. (BAKER GLENN 002859).</p> <p>Agent Smith memo of this date states in part as follows: Jamar Lewis “claimed that when he began making more money from his drug trade, Watts and Mohammed consistently attempted to secure \$5,000 from him. Mohammed made the requests approximately once a week. Based on the above information, Lewis agreed to engage in an undercover scenario targeting Mohammed.” (FBI 359-60). Subsequently, the IBW became the subject of a gang war between the GDs and the Vice Lords. Patrick Noonan was shot. “Lewis informed Baker that he believed he was a target in this gang war.” … “Lewis attempted to continue to pursue the undercover operation by enlisting the assistance of Jamie Tolliver, a.k.a. “Art.” Tolliver has been “approached by Mohammed in the same capacity as Lewis and is considered Lewis’ second-in-command.” Agent Smith is requesting an extension to pay the bribe to November 14, 2007. <i>Id.</i> The memo also indicates the funds authorized for “FY 2004” was \$100,000 and \$95,000 was remaining after this \$5,000 request. <i>Id.</i></p>
10/30/07	<p>FBI memo to provide a case update. The memo indicates that on October 24, 2007 an AUSA provided the agent a September 9, 2004 Report of Investigation ATF, and a September 9, 2004 Report of Investigation DEA, in response to an interview with a person whose name is redacted. The two 9/9/04 reports indicate that Watts “runs” the 574 building at IBW, and takes a percentage of drug money from the people selling drugs in the building. (BAKER GLENN 002084-88; see also FBI 361-62).</p> <p>FBI Agent Patrick Smith interviewed, upon information and belief, Clarissa Glenn, who had again contacted Tweek to determine if bribe payments had been made to Watts and Mohammed. Tweek said the drug line he was running</p>

CONFIDENTIAL – Subject to Protective Orders Entered in Case Nos. 16 C 8940 and 19 C 1717

	<p>had been disrupted since the Chicago Housing Authority closed several of the IBW buildings. Art was trying to sell for Tweek out of another building, but was running into problems from other drug dealers. Tweek did not think Art had paid Mohammed since September 2007.</p> <p>Upon information and belief since it is redacted, Glenn added that Ben Baker, who was incarcerated on a drug charge, was requesting that Tweek cooperate with the FBI. Glenn believed that Tweek, and Art, respected Baker's request. (FBI000249).</p>
11/01/07	<p>FBI Agent Patrick Smith interviewed, upon information and belief, Clarissa Glenn, who had once again contacted Tweek. Tweek told Glenn he had learned that Art Kirksey had been paying Mohammed approximately \$1,000 every two weeks without Tweek's knowledge. Glenn said that Tweek told her that Art had been "territorial since he discovered that Benjamin Baker was the individual requesting Art and Tweek's help. Tweek believe Art was concerned Benjamin Baker would use his cooperation to get out of jail early. [Glenn] explained that Benjamin Baker ran the drug line that Tweek and Art run prior to his incarceration [Glenn] believes that Art was concerned Benjamin Baker would take over Art's "line" if he was released from jail." (FBI000250).</p> <p>Art continued to pay Mohammed and Watts because of a dispute with other drug dealers in the building where Art was running a drug line. On October 31, 2007, Art was severely beaten during a confrontation with other drug dealers, and was upset that Watts, who was present, failed to protect him. Tweek wanted to stay on the drug site himself but had been told by a CPD officer he was on a list to be indicted. Glenn explained that her earlier statement that Tweek was avoiding IBW due to a gang war was a "misunderstanding." <i>Id.</i></p>
11/02/07	<p>FBI memo reflecting contact made with a DEA case agent by an FBI agent regarding the Watts investigation, and referencing an investigation of the DEA. Much of the memo is redacted, but the memo indicates that the FBI agent informed the DEA that the FBI was pursuing an individual known to pay Watts for a possible undercover scenario, and that this individual was told to keep away from the IBW projects because he was on a "list" of people targeted to be indicted. Bennett is named. (BAKER GLENN 002093-94; see also FBI000250). Agent Smith also informed DEA of the use of Jamar Lewis. (FBI 379-80). After the discussion, AUSA Shakeshaft called Agent Smith to advise that DEA was concerned regarding the FBI "use of a drug dealer in the Ida B. Wells project." Agent Smith informed Sgt. Barnes and informed him of the meeting. "Barnes informed the FBI that DEA scheduled a meeting on Friday, November 2, 2007 to discuss the Title III wire. The FBI received no notification of this meeting." <i>Id.</i></p> <p>FBI Agent Patrick Smith interview of, upon information and belief, Clarissa Glenn, who met with Tweek on November 1, 2007. Tweek told Glenn his last meeting with Watts was several weeks ago, when he and Art Kirksey were arrested by Alvin Jones and brought to the police station. Tweek said he spoke</p>

CONFIDENTIAL – Subject to Protective Orders Entered in Case Nos. 16 C 8940 and 19 C 1717

	<p>to Watts at the station, and was released on a misdemeanor drug charge later that day. Tweek told Glenn that Watts was part of a motorcycle club involving many of his co-workers. Tweek identified Coco as a CPD female police officers who was engaging in the same “pay for protection” as Watts. Tweek told Glenn Watts believed a white female police officer assigned to his team had been put there by Internal Affairs. (FBI000246).</p>
11/05/07	<p>Grand Jury subpoena issued by U.S. Attorney’s Office. (BAKER GLENN 002763).</p>
11/06/07	<p>FBI memo to provide synopsis of USAO, IAD, DEA, ATF and FBI status meeting regarding Watts investigation and reflecting a meeting with said agencies on the same date (including AUSAs Lausch, Alesia, Shakeshaft, ATF Agent Susan Bray, DEA (redacted), Deputy Chief Kirby, Sgts. Chester, Barnes, and Richard Maher. The unredacted portion of the memo states that within one to two weeks, DEA expects to begin monitoring under a Title III order on a drug dealer at IBW. (FBI 381-82; BAKER GLENN 002095). The memo also mentions that “M. Smith works of Teiwan Broughton, an upper echelon drug dealer. Broughton was mentioned in previous interviews with ATF and DEA as a close associate of Watts.” <i>Id.</i></p> <p>“Surveillance of any activity in the Ida B. Wells projects will be handled by a task force of CPD officers identified by CPD IAD. The administrative duties for the initial line will be maintained by DEA.”</p> <p>“The FBI is pursuing a potential bribe payment through Jamar Lewis, aka “Tweek,” a known drug dealer in the Ida B. Wells projects. DEA expressed some concern that Lewis presented a potential to leak information to Watts or an individual associated with Watts. USAO explained that the risk of affecting the drug case was minimal and the potential evidence derived from using Lewis outweighed the risk.”</p> <p>“The FBI assured the DEA that Lewis was compartmentalized and received only minimal information related to Watts. Lewis will only be used for a payment that would be made in his normal course of business. Following that payment, the FBI expects to hold this evidence until the completion of the drug and corruption case in whole.” <i>Id.</i></p>
11/06/07	<p>Debra Kirby notes of meeting regarding Watts investigation identifying Barnes, Alesia, Lausch, Maher, Calloway, Pat Collins, Chester, 5 others, and that ATF, DEA, FBI, and AUSA all present. (CITY-BG-023833-36). Among other things, the notes reference Baker, Clarissa, Tweek and Art and discusses potential strategy (including wires, etc.). The notes also indicate that Gaddy was the initial link to Watts three years before. The notes also state “\$ to Mohammed (do we have this)”. <i>Id.</i></p>

CONFIDENTIAL – Subject to Protective Orders Entered in Case Nos. 16 C 8940 and 19 C 1717

11/07/07	FBI memo regarding providing photos of subjects Watts and Mohammed. (BAKER GLENN 002874-78).
11/13/07	FBI Agents Patrick Smith and Timothy Keese interview of Art Kirksey in the presence of Clarissa Baker (aka Clarissa Glenn) in the agent's car while parked at a CITGO gas station on Martin Luther King, Jr. drive off of 56 th Street. Tweek was present for the first 10 minutes of the interview. Art described making payments to Mohammed, and one payment of \$1,000 to Watts. Art signed forms authoring the use of a recording device on his person and phone. Art gave Mohammed cell phone as 773-220-7889. (FBI000244-45).
11/14/07	FBI memo intended to document something relative to the investigation; the entire narrative is redacted. (BAKER GLENN 002860).
11/16/07	FBI Agent Patrick Smith report indicating Art Kirksey was arrested that day or the night before, per, upon information and belief, Clarissa Glenn (FBI000243).
11/19/07	Upon information and belief, Clarissa Glenn told Agent Patrick Smith that Art Kirksey called her to advise that Mohammed had contacted him to set up a meeting. (FBI000242).
11/30/07	FBI Agents Patrick Smith and Julie Anderson interviewed Art Kirksey in the presence of his attorney Matthew Mahoney. Art had recently been arrested for possession of two firearms and 73 grams of crack and/or cocaine, subsequent to his agreement to work with the investigation of Watts and Mohammed. Art explained how he sometimes tried to delay payments to Mohammed, that he would contact Mohammed on his cell phone, and the last few times they met it was near 76 th Street and Wentworth Drive, outside of IBW. Art claimed that in addition to Mohammed, Coco (later identified as Officer Lamonica Lewis) extorted payments from him and other drug dealers. (FBI000240-41).
12/03/07	Letter from U.S. Attorney's Office indicating to an unidentified entity that your names have been disclosed to Judge Holderman as a person who has been and will be given access to materials obtained through the powers of a Federal Grand Jury inquiring into possible Federal crimes, that the Grand Jury investigation is criminal and that Grand Jury proceedings are secret, and that the unauthorized disclosure of Grand Jury matters is punishable by contempt proceedings. The letter also states that "Grand Jury matters include the identities of witnesses, their testimony and the nature and content of documents and physical evidence obtained through the Grand Jury investigation," and that "No Grand Jury material may be disclosed or used for any civil or administrative purpose or for any purpose other than for the Grand Jury investigation, except by order of the Court." Grand Jury subpoenas issued by U.S. Attorney's Office. (BAKER GLENN 002767).
12/09/07	FBI Agent Patrick Smith interview of Richard Hale in the presence of his attorney Michael Schmiege. Hale said he has seen Watts in the Harold Ickes housing development before and that Watts was rumored to run a drug line there. Hale heard Watts took money and drugs off of various dealers to allow them to sell drugs. Hale was shown a photo array: he identified Watts,

CONFIDENTIAL – Subject to Protective Orders Entered in Case Nos. 16 C 8940 and 19 C 1717

	Mohammed, and Elsworth Smith, Jr. as officers who would plant drugs on individuals to support an arrest. Hale asserted that Mohammed would beat people too. Hale did not recognize Jones, Bolton, or Leano; Hale recognized Lamonica Lewis and Nichols but did not accuse them of misconduct, and Hale said he knew Gonzalez and that he did not believe Gonzalez engaged in illegal activity. (FBI000077-88).
12/11/07	Mohammed was paid \$1,000 by a CI working for the FBI. (CITY-BG-023858). FBI Agent Patrick Smith reported of the specifics of this event, including that the CI, believed to be Art Kirksey, wore a wire, and that Coco was patrolling with Mohammed at the time the money was tendered, but stayed in the police car when Mohammed entered the car with Art. (FBI000218-227).
12/18/07	Mohammed was paid \$700 by a CI working for the FBI at a Popeye's Restaurant off of 75 th Street. (CITY-BG-023858). See also FBI Agent Patrick Smith's report of this event at FBI000231-237.
12/19/07	FBI memo regarding request for assignment of co-case agent to Agent Julie Anderson. The memo states in part: "The above titled case is investigating allegations of corruption by Chicago Police sergeant Ronald Watts and his partner Kallatt Mohammed. Sources have alleged that Watts and Mohammed are extorting payments from drug dealers in the Ida B. Wells Housing Projects in exchange for allowing the drug trade to continue." (FBI 386; BAKER GLENN 002862).
1/04/08	Mohammed was paid \$1,000 by a CI working for the FBI. (CITY-BG-023858).
1/21/08	Mohammed was paid \$1,000 by a CI working for the FBI. (CITY-BG-023858). See also FBI Agents Patrick Smith and Julie Anderson's report regarding this event. Although redacted, the CI is believed to be Art Kirksey (FBI000228-29). An FBI memo dated 1/21/08 states: "Several bribe payments have been made to Mohammed on a biweekly basis in exchange for Mohammed and Watts' protection." (BAKER GLENN 002865).
1/22/08	Agent Julie Anderson memo regarding planned surveillance on movements of Watts as well as coverage of a possible controlled bribe payment. (FBI 387-90).
1/26/08	FBI Agents Patrick Smith and Julie Anderson interviewed Jamar "Tweek" Lewis, who advised that his girlfriend told him that Mohammed was attempting to speak with him. Tweek thought he was contacted because Watts learned Tweek was involved in some recent criminal activity, which he refused to disclose to the agents. Tweek was provided with a recording device to attach to his phone, although he refused to tell the agents his phone number. Tweek called Mohammed, and then Watts at 773-848-4761. Watts informed Tweek that a police officer was looking for him and told Tweek to meet with the officer. Tweek asked Watts if some "paper" could make it go away, and Watts said that was between him and the other officer. (FBI000230).

CONFIDENTIAL – Subject to Protective Orders Entered in Case Nos. 16 C 8940 and 19 C 1717

2/04/08	FBI memo stating that the “investigation is expected to expand to Title III monitoring in the near future which would require analytical assistance.” (BAKER GLENN 002863-64). The memo therefore requests that a lead (Patricia Chambers) be assigned to IA to provide analytical assistance in the matter. (FBI 391-92).
2/05/08	FBI memo requesting a pre-Title III search of ELSUR (electronic surveillance) indices. (BAKER GLENN 002451).
2/07/08	FBI Agent Smith memo describing the synopsis of the overall investigation, that the investigation is a priority within the Chicago Field Office, and including a proposal for wire taps (approved by an AUSA). Among other things, the synopsis recaps the background of the case and mentions drug dealers CS1 And CS2 getting extorted by Watts and that “Failure to pay the extortion was met with threats to “place a case” on the dealers. The memo states that “Based on the information from CS1 and CS2 as well as Pen Data analysis and witness interviews, it is believed that RONALD WATTS and KALLATT MOHAMMED have conspired to extort payments from drug dealers.” The memo also has a section titled “CHARACTERIZATION OF THE INTERCEPTEES/VIOLATORS and lists Mohammed, Watts, Lamonica Lewis, and Brian Bolton. (FBI 394-97; BAKER GLENN 002866-69). Agent Smith wrote another memo this date to request “SAC concurrence” …” Among other things, this memo references IAD’s involvement and that DEA is “working a parallel investigation targeting narcotics dealers” at IBW. (FBI 398-401)
2/11/08	FBI memo requesting search of the FBI’s ELSUR Records System in the “Details” for all records. (BAKER GLENN 002152-53).
2/13/08	FBI memo to provide the results of the Pre-Title III ELSUR checks of the FBI. (BAKER GLENN 002154-57).
2/14/08	FBI memo to provide copies of documentation authorizing the use of a Title III wiretap in the Watts investigation. (BAKER GLENN 002164).
2/15/08	FBI memo from the ELSUR Operations Unit. (BAKER GLENN 002135).
2/20/08	FBI memo to provide the results of the Pre-Title III ELSUR checks of the FBI. (BAKER GLENN 002159-62).
2/22/08	FBI memo indicating that “the above phone was intercepted in pen register coverage....” (BAKER GLENN 002139). The results of the pen register were analyzed. (BAKER GLENN 002187).

CONFIDENTIAL – Subject to Protective Orders Entered in Case Nos. 16 C 8940 and 19 C 1717

2/26/08	FBI memo requesting an additional search of the FBI's ELSUR Records System in the "Details" for all records, including a request of outside agencies. (BAKER GLENN 002165-67).
2/27/08	FBI memo to provide the results of the Pre-Title III ELSUR checks of the FBI. (BAKER GLENN 002175-77).
3/03/08	FBI memo to provide the results of additional Pre-Title III ELSUR checks of the FBI. (BAKER GLENN 002179-83). Another memo from Agent Smith refers to Arnold Council's arrest for the murder of Wilbur Big Shorty Moore. Arnold Council was a member of the Hobos street gang. (FBI 405). "Interviews of witnesses at the Ida B. Wells housing complex place Ronald Watts at the scene of the murder shortly after Moore's body was discovered." <i>Id.</i>
3/04/08	FBI memo referencing that the Northern District of Illinois authorized a Title III wiretap. (BAKER GLENN 002170).
3/06/08	FBI memo to provide the results of additional Pre-Title III ELSUR checks of the FBI. (BAKER GLENN 002171-73).
3/17/08	IAD memo from Sgt. Thomas Chester to Chief Tina Skahill regarding Updates on Federal Cases referencing, among other cases, the investigation of Watts and Mohammed, and stating that "The FBI has made three controlled payments into Mohammed and are attempting to get payments into Watts. At present the FBI along with IAD are working on two wires, one on Watts and one on Mohammed." (CITY-BG-024099).
3/18/08	FBI Agent Smith memo approved by Peter Cullen providing a summary of the investigation. (FBI 450-55; BAKER GLENN 002221-26). Among other things, the memo indicates that Watts is the target of the investigation along with Mohammed who was also accused of participating in the extortion scheme. The memo states that Mohammed, Lewis, Alvin Jones, and Brian Bolton "have been accused of participating in the extortion scheme." The memo states that Watts was considered a "high level target due to his position as a ranking officer in the Chicago Police Department and the suspected influence he has had on developing an atmosphere of corruption within the ranks he is charged with supervising." <i>Id.</i> The memo discusses a source in 2004 who Agent Kern determined provided inconsistent statements "regarding the manner of the extortion which prevented using" the source in future attempts. Relative to the cooperation of Big Shorty, the memo indicates that Agent Kern "discovered that a task force officer assigned to ATF revealed the cooperation of Moore to an individual later believed to be associated with Watts." The memo references an interview with an individual in 2006 who claimed that Watts manufactured a case against him when he would not pay Watts an extortion payment. The memo also states that the FBI agent

CONFIDENTIAL – Subject to Protective Orders Entered in Case Nos. 16 C 8940 and 19 C 1717

	<p>interviewed another individual with the assistance of an IAD officer. The memo also indicates two FBI case agent transfers while the case was pending, and that the FBI agent coordinated an attempt to work with DEA in a parallel drug investigation targeting the same drug dealers allegedly paying extortion payments to Watts. The memo goes on to reference the recording of certain payments, and that “An examination of the recordings revealed [redacted in FBI memo] Watts as an active and knowing participant in the extortion of the drug payments.” <i>Id.</i> at 2223. The memo states: “In February 2008, DEA informed the FBI that they were no longer interested in Broughton, but were targeting Allen Jackson, a separate drug dealer in the Wells complex. Jackson was also implicated in the payment of bribes to Watts.” In addition, the memo references contacts with the CCSAO. <i>Id.</i> Other topics of the memo included the participation of “CPD Undercover Police Officers” in the investigation, and states that “the CPD IAD agreed to use their influence to effect the transfer” of CPD personnel. <i>Id.</i> at 1225. The memo concludes with a section discussing Investigative Strategy, including tasking CPD officers to assist. <i>Id.</i> at 2226. (See FBI 450-55).</p> <p>Another FBI memo indicates that the discs for the designated period of Title III wiretaps was sealed in the presence of Judge Holderman. (BAKER GLENN 002185).</p>
3/24/08	<p>FBI Agent Patrick Smith interview of an unidentified female. It was reported that Art Kirksey remains in Cook County Jail on a hold by the CCSAO, but that Kirksey believes he could still approach Watts if he were released. Per the report, Tweek has stayed away from IBW since Art was arrested. A street level dealer working with Art by the name of Eldridge was identified as a person who was no longer working at IBW. A street level dealer named Jelly Roll was also mentioned. Jelly Roll is believed to be Eric Brown, per reports. (FBI000216, 268).</p>
04/02/08	<p>FBI memo to request another search of the FBI’s ELSUR database. (BAKER GLENN 002192).</p> <p>FBI memo memorializing the request to continue the Title III, which was authorized by the AUSA. (BAKER GLENN 002880-81).</p>
4/03/08	<p>FBI Agents Julie Anderson and Patrick Smith interviewed Ben Baker at the Western Illinois Correctional Center. (FBI000206-209). Baker claimed he was falsely arrested by Watts and his team members on the three occasions he raises in his current civil complaint. Baker stated that Watts puts many “trespass” cases on people who are paying him. Baker provided the name Charles Lawrence as a source for Watts. He also identified “Gatt” who he knew to pay Watts, and he named Ant (aka Jelly Roll) as a drug dealer whose sister was “hooked up with Gatt.” Baker said Lamonica “Coco” Lewis was not around when Watts extorted him. Baker named the following officers as involved in criminal activity: Watts, Jones, Nichols, Young, Gonzalez, Bolton, and a Latino or Filipino officer. Baker said another police officer known as “Bob Marley”</p>

CONFIDENTIAL – Subject to Protective Orders Entered in Case Nos. 16 C 8940 and 19 C 1717

	was Watts's competition, and that Bob Marley had recently arrested Stacy. <i>Id.</i> Per FBI000191, Bob Marley is Officer Robert Stegmiller.
4/04/08	FBI Agent Smith interviewed an unidentified female, who referenced the Stateway Boys gang of drug dealers active at IBW and the Harold Ickes development. The female also said K-Dog of the Stateway Boys had an illegal relationship with Watts. She also reported that Stacy, Art's girlfriend, was recently arrested. (FBI000212).
4/07/08	FBI Agent Smith interviewed an unidentified female, who again discussed the arrest of Stacy Graham, Art Kirksey's girlfriend. (FBI000213-14). The female said Stacy Graham was a drug dealer and was arrested with 200 grams of drugs, that Graham paid off Watts in the past, that Graham was present for Mohammed's December 11, 2008 payment to Mohammed, that Watts and/or Mohammed had talked to Graham since her arrest and indicated they would not show up for her arraignment. The female also reported that Jamar "Tweek" Lewis was arrested by Officer "Bob Marley" on April 4, 2008 for shooting a person at IBW. <i>Id.</i>
4/08/08	FBI memo stating that the Court authorized the Title III wiretaps. (BAKER GLENN 002192).
4/09/08	FBI memo to provide the results of Pre-Title III ELSUR checks. (BAKER GLENN 002196). Judge Sporkin of the District Court of Columbia is reported to have authorized Title III wiretaps. (BAKER GLENN 002198).
4/14/08	FBI memo regarding interview with a source with three FBI agents and an IAD Sergeant. (BAKER GLENN 00002812). FBI Agent Patrick Smith interviewed an unidentified female, who discussed speaking with Jamar "Tweek" Lewis, who told her Watts also protected a drug line at the Harold Ickes development. (FBI000215). An unidentified subject known as "B-Low" (possibly Brian Ford) was selling the "line" of drugs. Also on this date, IAD Sgt. Joe Barnes contacted OPS and determined that on April 12, 2008 a complaint register was opened against Watts for illegally searching apartment 301 at 575 E. Browning and physically abusing a minor. (FBI000210). The alleged victims of the CR were Lee Rainey and Deangelo Campbell. (CITY-BG-017609-752). FBI Agent Patrick Smith and IAD Sgt. Barnes interview of a CI. The CI identifies drug dealers he thinks are paying off Watts, but the names of those drug dealers are redacted. (FBI000201-205)
4/16/08	FBI memo regarding an interview with an individual who provided information. (BAKER GLENN 002817-18).

CONFIDENTIAL – Subject to Protective Orders Entered in Case Nos. 16 C 8940 and 19 C 1717

4/21/08	FBI Agents Chris Straub and James Roache interview of a CI, who stated that Watts and his crew locked up a “worker” (meaning drug dealer) of Zach behind a Catholic school at 41st Street, but then let the drug dealer go because Zach paid Watts \$1,500. (FBI000211).
3/08-4/08	60 Day Title III conducted. “Information obtained not sufficient to bring charges against Watts/Mohammed or any other individuals.”
4/28/08	Proffer of Stacy Graham to AUSA Tom Shakeshaft, FBI Agents Julie Anderson and Patrick Smith, in the presence of attorney Matt Mahoney. (See reference to Stacy Graham’s recent arrest above). Graham stated she was present for two payments Mohammed made to her boyfriend Art Kirksey. She said Watts and Coco were in a police vehicle next to the vehicle where the money was exchanged, and she believes Watts and Coco knew of the illegal activity. Graham stated Alvin Jones has never been present for a payment, but that Jones knows what is going on because she heard him say “don’t put his name on that shit,” on prior occasions. Graham said Watts harassed Brian Ford (aka B-Low) to make payments. She also said Officer Robert Stegmiller (aka Officer Bob Marley) was engaged in illegal activity separate from Watts. (FBI000189-95).
4/29/08	FBI memo of interview with an individual who provided information relative to Watts’s alleged misconduct. (BAKER GLENN 002813-16). The source identified Anthony Mays as a drug dealer at IBW affiliated with the Stateway gang. (FBI000197-99).
5/2/08	Agent Smith report to inform squad of the loss/destruction of unidentified equipment. (FBI 460-63).
5/07/08	Memo referencing a spreadsheet relating to the disk that is to be sealed. (BAKER GLENN 002675).
5/08/08	FBI Agent Smith memo providing a synopsis of overall investigation. Among other things, the memo states that several drug dealers hold money for the subjects of the investigation and that “Agents have determined that the criminal activity the subjects are involved in occurs while the subjects are on a ‘day’ shift. The subjects have recently been transferred to a scheduled ‘night’ shift and are expected to be on this shift for the next 15 to 20 days.” (FBI464-66; BAKER GLENN 002885-86).
5/16/08	FBI Agents Patrick Smith and Karen Kelly interviewed a CI, who described a conversation with Mohammed in the presence of Watts, concerning Art Kirksey. Mohammed reportedly said the IBW was closing in a few weeks. The CI said the majority of the drug dealers at IBW were going to the Harold Ickes development or to 178 th Street to sell drugs. (FBI000180-81).
5/20/08	Agent Anderson reports summarizing CHS calls, and an authorization form to listen to calls of Mohammed, Watts, and Officer Bob Stegmiller. (FBI 473-77).

CONFIDENTIAL – Subject to Protective Orders Entered in Case Nos. 16 C 8940 and 19 C 1717

5/22/08	Mohammed was paid \$500 by a CI working for the FBI. (CITY-BG-023858). See FBI Agents Julie Anderson and Patrick Smith report of interview regarding same. (FBI000129-30).
5/20/08	FBI Agent Julie Anderson and Patrick Smith interviewed, upon information and belief, Clarissa Glenn regarding her conversation with Lynette Ewing. Ewing reportedly said that Watts put a case on her son and tried to extort money from him. The female reportedly said that Watts put a case on her husband, and that if Watts went to jail, her husband's case would go away. Ewing said she was working with "Todd," not "Pat." (FBI000182-83).
6/02/08	FBI memo requesting additional ELSUR search. (BAKER GLENN 002690-92).
6/03/08	FBI Agents Patrick Smith and Karen Kelly interviewed, upon information and belief, Stacy Graham, who stated that Jamar "Tweak" Lewis is angry with Art Kirksey because Tweak believed Kirksey identified Tweak as a drug dealer to the CPD. Graham was provided a recording device and spoke to Mohammed. (FBI000131). Report of FBI Agent Patrick Smith indicating a source met with "Johnny Earl." (FBI000196).
6/05/08	Mohammed was paid \$500 by a CI working for the FBI. (CITY-BG-023858). See FBI000184 regarding this payment which was paid, upon information and belief, by Stacy Graham. <i>Id.</i> FBI Agent Patrick Smith report indicating one of his CIs called to discuss she was attacked by a woman and her mother (whose names are redacted). Smith declined to pick-up the CI from IBW because it would potentially compromise her role as a CI. (FBI000185).
6/09/08	FBI memo pertaining to the Watts investigation. According to the memo, Watts supervised 9 to 10 officers at any given time at the Ida B. Wells complex, including Officer Mohammed, a tactical officer "regularly paired with Watts during patrols." This memo provides the following: "Mohammed identified Watts as the individual directing the requests for payment;" agents previously attempted to target Watts' extortion activities, but "agents were unable to provide a direct link to Watts;" "agents believe Watts is wary of internal and external investigations into his activity and will not deal directly with an individual he does not have a history of discussing illegal activities with." (BAKER GLENN 002890-92).
6/12/08	FBI memo to provide the results of pre-Title III ELSUR checks. (BAKER GLENN 002693-97).
6/26/08	FBI memo to provide the results of pre-Title III ELSUR checks. (BAKER GLENN 002702-04).

CONFIDENTIAL – Subject to Protective Orders Entered in Case Nos. 16 C 8940 and 19 C 1717

7/09/08	FBI memo regarding the beginning of another Title III wiretap relative to the Watts investigation. (BAKER GLENN 002701).
7/16/08	FBI Agents Patrick Smith and Julie Anderson met with a confidential human source (“CHS”) who was equipped with a body recorder and directed to contact Charlie LNU. The body of this report is redacted FBI000176-77).
7/17/08	On this date, Watts and members of his team, as well as other police officers, executed a search warrant at 10125 S. Van Vlissingen Road where in excess of \$31,000 had been located pursuant to an undercover operation. (FBI000139). Items inventoried included 2 gift cards, a scale, 65 phone cards, baggies, rubber bands, a black bag, and \$25,000, but several thousand dollars was not inventoried. The video of the search was interrupted by a search into the area containing the covert recording devices. The audio remained active for several minutes further until the recording was deactivated by the officers. <i>Id.</i> Later, the agents confirmed with Chase Bank, where CPD makes certain deposits, that the inventoried money was the money from the stash house. (FBI000166-67; see also FBI 491, 545).
7/22/08	Sealing of Title III audio and visual recordings. (BAKER GLENN 002713).
7/25/08	FBI Agents Julie Anderson and Patrick Smith interviewed a CI who came with his attorney. The CI made multiple statements regarding drug dealers paying Watts, and mentioned the names Moye (a heroin dealer at IBW who sold the “Obama line”), Kamane “Insane” Fears (a heroin dealer at IBW who worked with Moye), K-Dog (a heroin dealer at IBW who worked with Moye, and Lemo (heroin dealer at IBW). B-Low (Brian Ford who was involved in managing the 575 building) was also mentioned. Among other things, the CI stated that Watts “attacked” a clean-up man on July 18, 2008. When the police approach a building, it is the job of the clean-up man to yell “clean-up,” which notifies the drug dealers to conceal their drugs in a soda bottle or in an incinerator chute. The CI mentioned Donny LNU as a clean-up man as well. The CI claimed Watts on one occasion had taken drugs from clean-up man Donny and planted them on Moye. The CI also stated that Moye had Anthony Mays and John LNU watching the building where he sold drugs. The CI also stated that Watts received an extortion payment from Kamane Fears in exchange for pressuring a witness from filing assault charges against Fears. Specifically, Fears had assaulted Wayne LNU by hitting him in the face after Wayne drove his car into Fears’ car. Per the CI, Wayne needed surgery to insert a plate into his head due to Fears’ assault. Watts arranged a meeting with Fears, Wayne, and Moye, at which time Fears paid Wayne about \$3,000 to resolve the dispute as well as about \$1,200-\$1,500 to Watts. Another person mentioned by the CI as paying Mohammed and/or Watts was “Shock.” Also, the CI said Watts used various drug dealers as sources to find out who the other drug dealers at IBW were. One such person was Charlie Miller. (FBI000168-171).

CONFIDENTIAL – Subject to Protective Orders Entered in Case Nos. 16 C 8940 and 19 C 1717

7/08	IAD memo from Sgt. Thomas Chester to Chief Tina Skahill of IAD relative to CL#309820/300778 referring to FBI Agent Patrick Smith, AUSA Tom Shakeshaft, and IAD Sgt. Joe Barnes in connection with an investigation of department members Watts and Mohammed. The allegation in the memo is that the accused are alleged to be running a drug operation in the IBW, and that Watts and members of his team are shaking down drug dealers in the IBW demanding a street tax and they are also selling dope that they steal from the dealers. An update provided in the memo was that the FBI set up an apartment with money and fake drugs, and that Watts did a John Doe warrant on a house. “Drugs and five thousand dollars not inventoried.” (CITY-BG-024101).
7/25/08	FBI Agents Julie Anderson and Patrick Smith interviewed a CI, who they equipped with electronic equipment. The CI spoke with Mohammed about Watts, as well as Charlie Miller, identified in the report as Watts’s “right hand man.” (FBI000178-79).
8/06/08	FBI Agents Julie Anderson and Patrick Smith interviewed a CI at Cook County Jail in the presence of his attorney, who claimed he had paid Watts and Mohammed extortion payments to sell drugs. The CI identified Watts, Mohammed, Nichols, Jones, Elsworth Smith (who he claimed planted drugs on him), Bolton, Lamonica Lewis, Leano, and Gonzalez. The CI said Big Shorty and Shock paid Watts. The CI said he had offered Watts \$400-\$500, but Watts arrested him anyway. The CI claimed that the drugs Watts planted on him were not from his “Obama line” of drugs, which is contained in purple packaging; Watts was planting drugs from the “USDA line,” which are packaged in black. The CI provided other information contained in the report. The CI said Watts put a “rape case” on Mister Lucky Pearson. (FBI000150-165).
8/12/08	FBI memo to provide the late submission of valuable evidence. (BAKER GLENN 002895).
8/21/08	FBI memo to provide an EC documenting the late submission of evidence (disks) on this date. (BAKER GLENN 002708).
9/09/08	FBI memo to document the receipt of a transcript of testimony from Michael Schmiege. (FBI [bates stamp not legible]; BAKER GLENN 002898).
9/10/08	FBI memo to document the receipt of a transcript and arrest history from a person/entity whose name is redacted. (BAKER GLENN 002899)
10/02/08	FBI memo referencing a review of the file and monitoring by case agents of Title III wire. (BAKER GLENN 002717)
10/06/08	FBI memos referencing a review of the file revealing certain redacted information and a review of the Title III wire. (BAKER GLENN 002718, 2720)

CONFIDENTIAL – Subject to Protective Orders Entered in Case Nos. 16 C 8940 and 19 C 1717

10/16/08	FBI memo referencing the documentation of certain information that is redacted. (BAKER GLENN 002721).
12/04/08	FBI Agent Patrick Smith interviewed a CI, who stated he was aware that Big Shorty, Art Kirksey, Ben Baker, Tweet (aka Tweak) paid Watts or were approached by Watts to pay. (FBI000051-62). Other unidentified individuals were present for the interview. <i>Id.</i>
12/05/08	FBI 302 report regarding interview of a source by FBI agents along with Chicago Police Officers supplying information on Watts, which states, among other redacted information, that Watts was a “gangster who grew up in the Wells complex” and that “it was well known that drug dealers paid Watts to continue to work in the Wells complex.” (BAKER GLENN 002819-20).
12/29/08	FBI memo to document the late submission of evidence and further referencing intercepts of calls. (BAKER GLENN 002716)
Undated	Per a memo that does not identify when this determination was made, there were “potential administrative issues with the previous evidence.” (CITY-BG-023858).
1/09	IAD memo from Sgt. Thomas Chester to Chief Tina Skahill of IAD referencing FBI Agent Patrick Smith, AUSA Tom Shakeshaft, and IAD Sgt. Joe Barnes in connection with CL#309820/300778 and indicating that “the case has been on hold due to Watts being on the Medical for his IOD.” (CITY-BG-024103).
1/08/09	FBI memo changing the title of the investigation from Watts to “Operation Brass Tax” to reflect that the investigation has implicated subjects beyond the named individual and to reflect “the expanding nature of the investigation.” (FBI 678; BAKER GLENN 002900).
1/23/09	FBI memo regarding review of Title III wire. (BAKER GLENN 002722). An additional memo this date references the notification of “HQ of anticipated Title III.” (BAKER GLENN 002722).
1/26/09	FBI memo documenting the submission of FD-699 reports, including a reference that the submitted checklists are “absent several 10 day reports which were completed by AUSAs.” (BAKER GLENN 002901).
2/11/09	FBI memo to document aspect of investigating and referencing a Title III wiretap. (BAKER GLENN 002680).
2/23/09	FBI memo requesting an extension on an aspect of the matter on February 10, 2009. (BAKER GLENN 002902).
2/29/09	FBI memo advising FBIHQ of anticipated Title III. (BAKER GLENN 002724-25).

CONFIDENTIAL – Subject to Protective Orders Entered in Case Nos. 16 C 8940 and 19 C 1717

3/24/09	<p>FBI 302 indicating that drug dealers were using the Amber Inn Hotel at 3901 S. Michigan Avenue as a spot to meet and exchange drugs. David Holmes was a drug dealer using the Amber Inn. (FBI000063)</p>
	<p>FBI Agents Patrick Smith and Julie Anderson, with Officers Shannon Spalding and Daniel Echeverria, interviewed Daniel Hopkins (aka Chewy). Hopkins said he is homeless, and spent time living in the corridors of the IBW. Hopkins described the role of the clean-up people at IBW. In April 2008 he recalled being approached by Mohammed with a baseball bat, who was with Tanisha (aka Little-T), a drug dealer who provided Watts and Mohammed with information on who was selling drugs. Mohammed asked for the key to the incinerator, which Hopkins did not provide as he said it was not on his person. Tanisha told Mohammed that Hopkins clothes were on the 7th floor, so they went to the 7th floor and recovered the key to the incinerator in Hopkins' clothing. Hopkins knew Mohammed wanted the key because criminals hid guns and drugs in the incinerator area when the clean-up people warned them the police were present. Drugs were found, but not guns. In May 2008, Hopkins said he was "cleaning" the hallways with his girlfriend, Donetta Watts (who is not a relation to Ronald Watts). Hopkins claimed that he was approached by four police officers (three white and one black), at which point he denied seeing several males run away. Hopkins was arrested and brought to the police station, at which point the black officer asked Watts "How much?" Hopkins claimed that other offices were in the vicinity during this conversation. Hopkins also stated he was arrested with Felicia LNU, a homeless female.</p>
	<p>Hopkins said he saw Watts accept extortion payments from drug dealers at IBW. He said Watts would take drugs from the "workers" (who sold the drugs to customers) and take them to the "head man" or "drug line manager." Watts would then extort the head line manager to pay a bribe (i.e., "bond out now") or go to jail. Hopkins also said Watts sold drugs through a drug dealer known as "Ra-Ra."</p>
	<p>Hopkins said Kamane Fears (aka "Shorty") paid Watts until the Winter 2008. When he refused at that time to pay because, according to Hopkins, Watts was "greedy," Fears was murdered, and Hopkins suspected Watts. Hopkins claimed he spoke to a witness to the shooting ("Linda") who identified Watts as the shooter. Hopkins claimed Fears' brother hit Watts with an automobile.</p>
	<p>Hopkins identified "T-Dog" as the head runner for the Obama drug line. Hopkins said Watts extorted T-Dog. (FBI000044-49).</p>
4/16/09	<p>FBI 302 regarding an interview of an individual stating, among other redacted things, that "Watts has been seen in the Second District extorting payments from drug dealers and drug users," and that "Watts will take sums as low as \$40 to allow a drug dealer or drug user avoid arrest." (BAKER GLENN</p>

CONFIDENTIAL – Subject to Protective Orders Entered in Case Nos. 16 C 8940 and 19 C 1717

	002822). Per the report, Watts lost contact with several of the drug dealers who paid him when IBW closed. (FBI0000042).
4/22/09	Agent Smith report stating, though mainly redacted, “Richard Hale is a drug dealer who was recently arrested on drug possession.” (FBI 682).
4/24/09	FBI Agent Patrick Smith interview of a CI mentioning, among other things, K-Dog.
6/01/09 and 6/03/09	IAD received and provided documentation/information to the FBI regarding allegations of police corruption regarding the investigation. (BAKER GLENN 002911, 2129).
6/04/09	FBI memo reflecting that IAD provided a criminal history report of a complainant to the FBI. It appears the complainant provided information to IAD regarding allegations of corruption on June 1, 2009, and IAD provided the criminal history of the complainant to the FBI on June 3, 2009. (See BAKER GLENN 002911).
8/07/09	<p>FBI Special Agent Patrick Smith interviewed Bernard Brown; Chicago police officers Spalding and Echeverria were present for the interview, which occurred at 2111 W. Roosevelt Road. According to Brown, Watts was a former street gang member and part of the Goon Squad before becoming a police officer. Based on information provided to Brown by other dealers, Watts extorted and robbed drug dealers. In 2000, Watts was running a drug line in the Ida B. Wells buildings using Big Shorty (Wilbert Moore). According to Brown, the Hobos street gang stole money from Watts’s drug line in or around 2000, and Big Shorty told Watts about the robbery. As a result, Watts targeted the Hobos for arrests. Because the Hobos believed Big Shorty had told Watts of the Hobos’ involvement in the robbery, the Hobos murdered Big Shorty. Watts continued to target drug dealers, directing them to pay him off or go to jail. Watts purportedly worked for a white sergeant with a “box” haircut. Watts also used dealers and drug users to support his requests for search warrants.</p> <p>Brown provided the names “Jim Dog,” “Piggy,” “Little Johnny,” “Don Don,” Jamal Smith (aka “MB”), and Jarvis Perkins as drug dealers who, directly or indirectly, provided Brown with information about Watts.</p> <p>Per Brown, “Watts continued to extort and/or steal money from drug dealers after Big Shorty’s death. Watts used his sources to find out who was making money off of drug sales. Watts then targeted the drug dealers his sources identified for arrests. Watts offered the drug dealers the option to pay Watts a portion of their drug profits or to go to jail. Brown knew that “Ghost Face,” “Gambino,” and “Zeke” paid Watts to remain out of jail.</p> <p>Brown was shown a series of photographs of police officers; Brown was reported of either not knowing several of the officers and/or was not reported as accusing the following officers of misconduct that he may have recognized: 1-</p>

CONFIDENTIAL – Subject to Protective Orders Entered in Case Nos. 16 C 8940 and 19 C 1717

	<p>4, and 6-9. Brown identified the officer in photo 5 who arrested an associate of Brown's, and also knew the officer from his involvement in accepting guns from targets to allow them to leave without being arrested. Brown explained that Watts and his team would arrest certain targets and offer to let them leave if they could provide a gun. The target would direct a friend or worker to put the gun in a trash can or other location. The officer in photo 5 would go to this location and pick up the gun. The target would be allowed to leave or would receive a lesser charge after the gun was retrieved. Brown said he was involved in providing a gun for the arrest of Kadmil Barney. Barney was arrested with 60 bags of drugs while in the IBW; Barney called Brown and told Brown that Officer Rodriguez, on Watts's team, arrested Barney and wanted Barney to provide an AK47 to reduce Barney's charges to a misdemeanor. Brown did not have an AK47 but did provide an SAS. Barney was allowed to leave the station on a misdemeanor after the SAS was recovered.</p> <p>(BAKER GLENN 001092-1106)(the document is also bates-stamped SPALDING 000008-22).</p>
8/14/09	Date of FBI 302 report of interview of Bernard Brown. <i>Id.</i>
9/15/09	FBI 302 summarizing surveillance on September 1, 2009 by TFOs of drug transactions, which they brought to the attention of Watts at the Second District, who called over Jones and Smith and instructed them to follow up on the information. The TFOs later observed Mohammed and Watts detain a subject in the area of 55 th and Wabash, then place a subject in the vehicle and drive south out of their view. The TFOs called Officer Jones to inform him the subject was standing at 55 th and State, and Jones and Smith went to the location, made contact with the individual, and arrested him. At the station the TFOs asked Jones and Smith what they recovered from the person, and Jones replied "only weed." The report states that "TFO's noticed that the demeanor of Jones changed, he appeared to be reluctant to interact with TFO's at this point." (FBI 727-28).
9/16/09	TFO and Sgt. Tom Chester assigned CR#309282. (CITY-BG-12927).
11/16/09	FBI 302 reporting on an interview of more than one person on November 13, 2009, though the report is redacted. (FBI 734).
1/21/10	Sgt. Thomas Chester of IAD/CIS memo to Chief Juan Rivera regarding CR #300778. According to the memo, Chester was reassigned the investigation due to the nature of the case and the involvement of FBI. The investigation was being worked in conjunction with the FBI and IAD. The investigation was still ongoing and the FBI was still involved in investigating the allegation along with other allegations. There was a total of 3 open complaint register numbers, all alleging misconduct and illegal acts. Accordingly, Chester requested that the three numbers be combined and maintained into one number, Complaint Register #1015941, as the allegations were similar in nature and involved similar complainants. Chester requested that the files of CR #300778 and CR

CONFIDENTIAL – Subject to Protective Orders Entered in Case Nos. 16 C 8940 and 19 C 1717

	#309282 be kept with the file and addressed as separate allegations in CR #1015941. (CITY-BG-011616).
2/12/10	FBI memo requesting the assignment of a co-case agent. (BAKER GLENN 002800).
2/22/10	Agent Bryan Butler report requesting a covert vehicle for use in a planned covert operation to catch Watts stealing drug money to proceed between March 1-4, 2010.
3/18/10	FBI 302 report that on March 17, 2010 a memorandum was provided by others involved in the investigation documenting their observations of drug activities in the Second District. The memo also states that the two officers “have significant experience conducting surveillance on illegal narcotics activity and are familiar with many of the drug dealers in the Second District.” (BAKER GLENN 002917-19). The memo indicates that TFO’s observed the level of narcotics activity was minimal while the Targets were off duty, but the narcotics activity was much higher when the Targets were on duty. <i>Id.</i> ; see also FBI 743-44. Photos of Watts and Mohammed are attached to the report.
3/24/10	FBI 302 of Agent Smith reflecting an interaction between a source and Watts while the source was equipped with a recording device. (FBI 755). The report states among other things that Watts had used homeless individuals and drug addicts to provide him information on drug dealers in IBW. Watts also used drug dealers to sell drugs he had in his possession. <i>Id.</i>
3/26/10	Agent Smith FBI 302 summarizing surveillance on March 25, 2010. (FBI 757).
3/31/10	“Money rip” scenario conducted with Watts and Mohammed. A CI, carrying \$11,050 of “drug proceeds,” was stopped by Watts at which time Watts took the \$11,050 from the CI. “This scenario was audio taped however surveillance never observed Watts take the money from the CI. USAO unwilling to prosecute this case without further evidence.” (CITY-BG-023858). See also FBI 000037-39 for a chronological summary of the event, including mentioning Dannie Hopkins and David Holmes as CIs involved in the operation. The agents involved in surveillance included: Julie Anderson, Patrick Smith, Jeremy Ashcroft, Joan Hyde, Timothy Keese, Dana Depooter, Bryan Butler, Keith Hennins, Jeffrey Moore, and Eugene Jackson. See also FBI 745-49 entitled Operations Plan Form which states, among other things, that “Subject is a Sergeant for a team of eight tactical officers.” Subject has worked closely with PO Kallatt Mohammed and PO Alvin Jones in the commission of corrupt activity.”
5/04/10	Memo referencing the acquiring of certain drugs. (BAKER GLENN 002439).
5/05/10	FBI 302 dated May 7, 2010 reflecting a phone call on May 5, 2010 wherein information was learned that a BM2 who was armed ordered a BM1 into his car while on the street, and a second individual may have seen BM2 drive BM1

CONFIDENTIAL – Subject to Protective Orders Entered in Case Nos. 16 C 8940 and 19 C 1717

	from the scene. (BAKER GLENN 002920). Hardy Cheatham, an employee of Best Neon at 6025 S. New England provided the information. (FBI 766).
6/15/10	Memo from Sgt. Paul Farrell, administrative sergeant of CIS, to Chief Juan Rivera, regarding the administrative processing of CR #300778. The memo references Sgt. Chester's request for the administrative closure of CR #300778, and that it would be incorporated within CL #1015941. The memo states in part that the memo of Sgt. Chester "contained detailed information regarding an on-going confidential and criminal investigation. This report, if forwarded to process this administrative closing request, could compromise the on-going investigation as it would be included within the files of CR#309282. In an effort to effectively process this request, the undersigned has redacted sensitive portions of a copy of Sergeant Chester's report." The report was signed and approved by Lt. Samuel Ramirez, Cmdr. Robert Klimas, and Chief Juan Rivera. The memo requests that the report and its attachment be reviewed and forwarded to the Records Section and incorporated within CL #1015941. (CITY-BG-011614-15). An identical memo exists regarding the administrative closure of CR #309282. (CITY-BG-012912-13).
6/22/10	FBI memo to provide an EC documenting the late submission of certain disks. (BAKER GLENN 002922).
6/28/10	Computer printouts reflect that CR #300778 and CR #309282 were closed, effective this date. (CITY-BG-011620; CITY-BG-012925).
7/22/10	Agent Smith memo to document the loss of equipment used in undercover recordings. (FBI 763-64).
9/08/10	FBI memo to document the removal of a Co-Case Agent from the investigation. (BAKER GLENN 002933).
9/21/10	Agent Smith FBI 302 reporting surveillance of 8019 S. Sangamon. (FBI 799).
9/27/10	Form authorizing consensual overhears with Watts, Mohammed and Jones. (FBI 805).
10/4/10	FBI 302 of Agent Smith and Anderson reporting interview of source documenting that young boys who traffic drugs will pay Watts to allow them to sell. (FBI 801). Either Watts or another person will collect the money. <i>Id.</i>
10/7/10	Agent Smith report to document the identification of drug dealers and informants involved with the Second District Tactical Team. (FBI 807-09). The 14 drug dealers/informants names are redacted.
11/19/10	FBI Agent Smith memo regarding requested transfer of Watts investigation. The memo states that Watts was the "main target" of the investigation, and also references Mohammed was implicated in the collection of extortion money for Watts. The memo indicates that based on information developed by special agents, it was determined that Watts's activities included the systematic extortion of drug dealers, theft, the possession and distribution of drugs for money, planting drugs on subjects, and paying informants with drugs. Page 3 of the report indicates that the agent writing the report advised the AUSA of his

CONFIDENTIAL – Subject to Protective Orders Entered in Case Nos. 16 C 8940 and 19 C 1717

	transfer as the case agent, and requested that the case be transferred to WC-2. The report also details the prior case agents' transfer on the matter. (FBI 881-83; BAKER GLENN 002924-26).
12/10/10	Meeting with the USAO and IAD. (BAKER GLENN 002927). The purpose of the meeting was to introduce the new case agent and formulate a strategy for the investigation. (BAKER GLENN 002927).
12/15/10	FBI Agent Michael Ponicki report to document meeting with AUSAs Shakeshaft, Ben Langer and Sgt. Allen Boehmer, and to introduce the writer as the new case agent. Per the report, AUSA Shakeshaft believes there is sufficient evidence to charge Mohammed for accepting bribes and he will review the evidence as to Watts, at which point a decision will be made whether to charge Watts. (FBI 884).
1/21/11	Agent Ponicki report summarizing his efforts to move forward with a CHS, including his contacts with Agent Smith and Williamson regarding same. (FBI 885).
2/11/11	FBI Agent Patrick Smith interview of Officer Shannon Spalding regarding her contact with drug dealer Monk Fears (see references to Kamane Fears above). Monk Fears claimed that Watts continued to take money from drug dealers, including Fears, in the CPD's Second District. Per the report, "Watts would either take the money directly or send Officer Kallett Mohammed to collect the money." The report also states that "Spalding met with Mohammed on a separate occasion. Mohammed claimed that Watts was pursuing a position as a Lieutenant with the CPD." (FBI000036)..
2/18/11	FBI Agent Ponicki memo regarding Watts and referencing the assigned FBI agent and IAD TFO Sgt. The memo indicates the main target was Watts, and another target in the investigation was Mohammed, who had been implicated in the collection of extortion money for Watts. (FBI 887-88). The memo states: the USAO "supports a charge of extortion, but has advised against arresting Mohamed in favor of implicating Watts or another officer on Watts' team to support a RICO charge."
3/08/11	FBI memo dated March 14, 2011 to document a meeting with the USAO, the FBI, and IAD, including AUSAs Shakeshaft, Langer, and Sgt. Boehmer (FBI 890-91). The memo states: "The USAO is of the opinion due to the lack of evidence, and the fact that it has occurred only on one occasion, that it will not be charged at this time. Therefore, it is proposed, that the [redacted] be utilized in a similar scenario, to gather additional evidence and also show a pattern of behavior relating to Watts and Mohammed." The memo also states that "It was also discussed that a complaint be filed on Mohammed.... It was decided that the complaint be filed and the arrest warrant sealed for Mohammed, prior to the aforementioned operational scenario involving Watts. The writer is in the process of gathering all the supporting documentation for the bribe payments

CONFIDENTIAL – Subject to Protective Orders Entered in Case Nos. 16 C 8940 and 19 C 1717

	made to Mohammed, and will be providing copies of all the evidence to the USAO.” <i>Id.</i>
3/14/11	FBI memo requesting that an FBI paralegal specialist be assigned to assist with the investigation to conduct asset forfeiture analysis for Watts. (BAKER GLENN 002932-33).
4/14/11	Agent Ponicki and Sgt. Boehmer met with the DEA to attempt to develop new information on Watts and his team’s alleged illegal activities. Agent Ponicki noted that at one point during the investigation a [name redacted] had provided information to the FBI, which “abruptly ended due to a misunderstanding between [name redacted] and the previous case agent.” (FBI 909-11).
4/25/11	FBI memo to request financial analysis/forensic accountant assistance, which had been discussed on April 22, 2011. The memo states that the main target of the investigation of Watts, and that another target is Mohammed. (BAKER GLENN 002935-38). The criminal histories and vehicle reports had already been gathered per the memo.
5/04/11	FBI Agent Ponicki memo to document meeting with two Chicago Police officers and the IAD Task Force Officer. (BAKER GLENN 002939). In addition, there is an FBI memo to establish the scope of analysis to be performed by the Financial Analyst. The memo indicates Watts and Mohammed are the targets, and that “over the course of 2008 through 2009, Agents conducted several recorded bribe payments to Mohammed. The United States Attorney’s Office (USAO) supports a charge of extortion....” The memo also indicates, to the extent it is not redacted, that “at this time there were no financial records provided to” the Financial Analyst. (BAKER GLENN 002740-41).
5/05/11	IAD memo from Sgt. Thomas Chester to the Commanding Officer of CIS/IAD regarding CR#1015941. The memo references Officers Spalding and Echeverria assisting the FBI with the Watts case and that this is an ongoing investigation. The memo states that the two officers were assisting the FBI with a source of theirs. “The plan is that the FBI is going to try and use the source to make a second payment into Watts. The source did make one payment into Watts. The officers did assist the FBI with surveillance and information gathering as they had many sources in the area where Watts was/is conducting alleged misconduct.” (CITY-BG-023852). The memo further states that “The back up to this plan is that a complaint is being drafted as I write for the second officer involved in this case, Kallat Mohammed, who has all ready taken payments. The back up plan is if the source cannot get into Watts they will pinch Mohammed and try and flip him into Watts.” <i>Id.</i> “The SA involved in this incident believes that by the end of June we will have made the payment or arrested Mohammed. If Mohammed flips this may last longer.

CONFIDENTIAL – Subject to Protective Orders Entered in Case Nos. 16 C 8940 and 19 C 1717

	Also according to the SA the source has now been signed up as a Federal Source.” <i>Id.</i>
5/09/11	FBI memo detailing the issuance of certain grand jury subpoenas. (BAKER GLENN 002940-41).
5/16/11	FBI memo dated May 26, 2011 documents a meeting on this date with the USAO and the Financial Analyst and an investigator. The memo indicates that in 2004 an AUSA was initially assigned to an investigation that targeted Watts, that the referenced AUSA left the USAO in 2008 and supplied all documents relating to the investigation to a different AUSA. The second AUSA, after reviewing the documents, determined that a financial investigation was started, but was not completed. The memo then indicates that two AUSAs are going to take some action in an attempt to better understand their financial status. In addition, the memo indicates that the investigator will review the financial documents and determine what appropriate steps need to be taken to complete the financial investigation, and to then coordinate with the agent and the Financial Analyst. (BAKER GLENN 002942-43; see also FBI 903-06).
7/01/11	FBI memo dated July 11, 2011 to document a telephone conversation this date with an AUSA and to update the case file. The redacted memo references the May 16, 2011 meeting and appears to indicate that certain financial analysis remains to be done. (BAKER GLENN 002944-45).
7/11/11	Agent Ponicki report to document a phone call with AUSA Shakeshaft wherein Ponicki was told, among other things, that the financial review of members of Watts’ team “has not been able to find any substantial wealth that has been accumulated.” (FBI 907-08). The individuals whose financial history was investigated included Officers Samuel Kendrick, Jr., Joseph Avila, Douglas Nichols, Jr., Gina Hurt, James Martin, Cany Murray, Jr., Donald Jones, Jr., Anthony Brown, Elsworth Smith, Jr., Lamonica Lewis, Alvin Jones, and Brian Bolton. (FBI 904-06).
7/13/11	FBI Agent Ponicki memo stating that “Due to the transfer of the writer to FBIHQ, it is requested the case be reassigned to another agent on squad WC-2.” The memo also indicates that the agent had been working on the case since December 2010, and also mentions that an FBI Paralegal Specialist was working on the case in addition to the FBI Financial Analyst. (FBI 909-11; BAKER GLENN 002946-47). The memo states, in part, that the USAO supports an extortion charge against Mohammed, but “elected to delay filing the complaint until further evidence could be obtained implicating Watts.” As for a prior operation, the memo states that “A successful consensual recording of the events was gathered by the CHS, but due to unforeseen circumstances, the surveillance team lost sight of the CHS and Watts. The surveillance team was then unable to corroborate that the payment to Watts had actually taken place.” Agent Ponicki stated that he initially wanted to attempt another scenario, but due to the difficulty surveilling the CHS, and controlling the scenario, he and AUSA Shakeshaft decided “to file extortion charges on

CONFIDENTIAL – Subject to Protective Orders Entered in Case Nos. 16 C 8940 and 19 C 1717

	<p>Mohammed and attempt to obtain his cooperation, against Watts.” The memo further reflects that on April 14, 2011 he and Sgt. Boehmer met with the DEA to attempt to develop new information on Watts and his team’s alleged illegal activities. Agent Ponicki noted that at one point during the investigation a [name redacted] had provided information to the FBI, which “abruptly ended due to a misunderstanding between [name redacted] and the previous case agent.” <i>Id.</i></p> <p>The new case agent assigned was Agent Craig Henderson.</p>
9/6/11	FBI 302 report of TFO Sgt. Allen Boehmer and FBI Agents Raymond Hart and Craig Henderson regarding an interview of Officer Shannon Spalding. (FBI000031-32).
9/16/11	FBI Agent Henderson memo addressing the reassignment of the case to a new agent, and referencing the assignment of Agent Hart and CPD TFO Sergeant Boehmer to be assigned to the co-case agents. (FBI 912-14; BAKER GLENN 002948). The report states in part that Henderson and Boehmer “refined a scenario that they would like to implement” against Watts and his tactical team, mirroring a previous money rip approximately 1/1/2 years ago, but also installing a tracking device in the duffel bag containing the money. <i>Id.</i> AUSA Shakeshaft concurred.
9/20/11	FBI 302 report referencing the issuance of a grand jury subpoena, including a redacted copy of the subpoena. (BAKER GLENN 002768-72).
11/09/11	FBI memo to request the assistance of a vehicle in the investigation. (BAKER GLENN 002950).
11/15/11	FBI report reflecting information provided by a CHS, whose name and information were redacted. (FBI 918
11/17/11	FBI 302 report reflecting that pen register data was emailed. (BAKER GLENN 002796).
11/18/11	A cooperating witness identified in the Affidavit of Special Agent Craig Henderson as CS5 placed a recorded telephone call to Watts. CS5 told Watts, “I got one going on.” Watts responded: “When?” CS5 said that it was going to happen no later than “Monday” [November 21, 2011]. Watts said, “Make sure you call me.” (BAKER GLENN 002245-54).
11/21/11	In an undercover operation, Watts and Mohammed are caught by the FBI stealing money they believed to be drug proceeds, as further described in the Affidavit of Special Agent Craig Henderson. (BAKER GLENN 002245-54; see also FBI000014-16). The report of TFO Sgt. Allen Boehmer and FBI Agents Raymond Hart and Craig Henderson states that the purpose of the “investigative operation was to determine if CPD police officers RONALD WATTS, KALLATT MOHAMMED, ALVIN JONES and others yet unknown, would steal \$5,200 from” a confidential source. (<i>Id.</i>) In an unredacted portion

CONFIDENTIAL – Subject to Protective Orders Entered in Case Nos. 16 C 8940 and 19 C 1717

	<p>of the report, it states that “Present at this meeting were Special Agents Craig Henderson, Raymond B. Hart and Sean MacManus, CPD-IAD Sgts. Allen J. Boehmer and Luce Nieves, CPD-IAD officers Daniel Willis and Mike Carroll, CPD police officers Shannon Spalding and Daniel Echeverria,” and a name that is redacted. (<i>Id.</i>)</p> <p>A report of FBI Agent Ginger Miller states that Special Agents Don Anderson, Phillip Andrew, Lorenzo Benedict, Ginger Miller, Brendan O’Leary, and Stephen O’Reilly were part of a physical surveillance during the operation. (FBI000021-22).</p>
11/28/11	<p>FBI 302 report referencing the issuance of a grand jury subpoena, with a redacted copy of the grand jury subpoena. (BAKER GLENN 002773-80). FBI memo to request search of the FBI’s ELSUR Records System. (BAKER GLENN 002728-30).</p>
11/29/11	<p>FBI email indicating that an agent is in the process of drafting a Title III, and also expects to initiate a consensual Title III. The email also provides some historical information, including that the initial investigation was opened in 2004 and closed in January 2006 because of insufficient corroborating information and a declination from the” USAO, but that the investigation was reopened in November 2006 based upon witness information that Watts had been stealing both drugs and drug proceeds from drug dealers and couriers around IBW, which investigation led to the belief that Watts and Mohammed had stolen drugs and drug proceeds from drug dealers and drug couriers. The email states that in November 2010, the investigation was transferred to Squad WC-2/City Public Corruption Task Force,” and indicates the assignment was thereafter transferred from one agent to another. (BAKER GLENN 002141-42).</p> <p>Also on this date, an FBI 302 report indicates that the case agent conducted a check through the CPD computer system to ascertain the work status of Watts and Mohammed, and indicated that a copy of the CPD records obtained would be placed in the case file. (BAKER GLENN 002824).</p> <p>In addition, an FBI 302 report of TFO Sgt. Allen Boehmer states that a search of CPD’s CLEAR database did not show that the money from the November 21, 2011 was inventoried. (FBI000020).</p> <p>An additional report of FBI Agents Raymond Hart and Craig Henderson states that “SA [name redacted] was aware that the DEA and FBI had previously shared information related to WATTS and MOHAMMED, but was not aware of any pending case specifically targeting them.” (FBI000019).</p>
11/30/11	<p>Letter from Special Agent Robert Grant to U.S. Attorney Patrick Fitzgerald. The redacted letter discusses the continued cooperation by an individual regarding the allegations of corruption in the CPD by Watts and Mohammed</p>

CONFIDENTIAL – Subject to Protective Orders Entered in Case Nos. 16 C 8940 and 19 C 1717

	<p>and concurrence and support for the proposed application for court authorization to take certain action. The letter states: “The investigation involves allegation of systemic corruption within the Chicago Police Department Second District. It is believed that CPD officers, specifically Sergeant Ronald Watts and police officer Kallatt Mohammed, are involved in the theft of illegal drugs and illegal drug sale’s proceeds from drug dealers in and around the vicinity of” IBW. (BAKER GLENN 002132-34).</p> <p>Also, on this date, an individual was assigned as co-case agent to the investigation. (BAKER GLENN 002951).</p>
12/01/11	<p>FBI 302 report referencing the issuance of a grand jury subpoena, with a redacted copy of the grand jury subpoena. (BAKER GLENN 002781-83).</p> <p>FBI memo to provide the results of Pre-Title III ELSUR checks of the FBI. . (BAKER GLENN 002731-33).</p>
12/04/11	FBI email regarding the SAC concurring with the Title III, indicating that a revised draft would be sent to the AUSAs the next day (Monday morning), and that the document was expected to be sent to OEO the afternoon of Monday, December 5, 2011. (BAKER GLENN 002737).
12/05/11	FBI 302 report regarding contact with the DEA on November 29-30, 2011 to determine if the DEA had a pending case against Watts and Mohammed. The redacted memo reflects that the DEA agent indicated “that the DEA does not have a case specifically targeting Watts, Mohammed....” The report further states that the FBI would apprise the DEA of developments “on the Watts/Mohammed investigation so as not to interfere in the DEA case.” Likewise, the report indicates the reporting FBI agents were told they would be kept apprised of development in the DEA case. (BAKER GLENN 002102).
12/09/11	FBI memo to request SAC authority for an action. This memo refers to the fact that “Watts and Mohammed are accused” of certain misconduct. (BAKER GLENN 002956).
12/22/11	FBI 302 reports referencing the issuance of a grand jury subpoena, with redacted copy of the grand jury subpoena. (BAKER GLENN 002786-92).
1/12/12	Letter from Robert Grant, Special Agent in Charge, to U.S. Attorney Patrick Fitzgerald regarding the investigation, and expressing concurrence and support for the proposed application for court authorization for a redacted subject. (BAKER GLENN 002959-61). For related documents, see also FBI 961-63, 964-66, and others.
1/18/12 and 2/2/12	Additional Operational scenarios. See e.g., FBI 964-66, 984-85, 1000-09, 1010-12, 1158-61, 1035-36, 1038-41, 1030-32, 1075-84, 1085-89. For instance, see report of FBI Agent Raymond Hart discussing another scenario to take place on

CONFIDENTIAL – Subject to Protective Orders Entered in Case Nos. 16 C 8940 and 19 C 1717

	January 5, 2012. (FBI 984-85). Additional documents reflect further discussion of scenarios in January 2012: “This will be a covert operation in which an UCE, with money provided by the FBI, will be detained by CPD officers Ronald Watts, Kallatt Mohammed, and other yet unknown and it is anticipated that the CHS’s money will be stolen by the officers.” (FBI 1000-09). See also FBI 1010-12: “On 1/18/2012, Squad WC-2 will conduct another investigative operation … targeting CPD officers Watts, Mohammed, Jones and others yet unknown....” See also surveillance log FBI 1158-61 dated January 18, 2012. In addition, see FBI 1038-41, FBI 1075-84, and FBI 1085-89 discussing a scenario to take place on February 2, 2012: “On 2/2/12, a third investigative operation will be attempted which will be similar to the 1/18/2012 scenario.”
1/31/12	FBI memo regarding the submission of 1D evidence past the 10 day deadline due to the case agent being involved in other case related duties. (BAKER GLENN 002738).
2/03/12	FBI 302 report of Agents Raymond Hart and Craig Henderson regarding interview of Kallatt Mohammed. (FBI000005-9).
2/06/12	Watts and Mohammed are criminally charged/indicted. (CITY-BG-000249-51; CITY-BG-000281-91).
2/08/12	Mohammed is relieved of his police powers pursuant to the order of Cmdr. Klimas. (CITY-BG-000213).
2/12/12	<p>Watts and Mohammed are arrested. (CITY-BG-000276-80; CITY-BG-000216-20; FBI000319-22). See FBI 1099-1101 discussing a “cascading arrest plan.”</p> <p>See also re FBI 302 report of Agents Raymond Hart and Craig Henderson regarding interview of Kallatt Mohammed in which Mohammed admits to certain criminal activity that he committed with Watts as further described in the report. (FBI000305-13). Among other things, in addition to the November 21, 2011 incident, Mohammed admitted to accepting bribes from drug dealers Art Kirksey and Stacy Graham, as referenced above, and identified an incident at 9623 S. Union. Mohammed “did not believe that Watts was running protection for the Gangster Disciples or any other street gang.” Mohammed said he was not previously tipped off to the investigation. Mohammed denied knowledge of any other police offices or persons who were involved in criminal activity with Watts. Mohammed said that if the drug dealers did not pay bribes to Watts or Mohammed in return for protection of their drug dealing business, they would not do anything to them that was beyond their normal police duties.</p> <p>See also FBI 302 detailing surveillance of Mohammed. (FBI000317-18).</p>
2/13/12	Watts is relieved of his police powers. (CITY-BG-000273).

CONFIDENTIAL – Subject to Protective Orders Entered in Case Nos. 16 C 8940 and 19 C 1717

	<p>See also FBI 302 report of today's date documenting the arrests of Watts and Mohammed, with the participation of IAD. (BAKER GLENN 002589-92).</p> <p>Watts was interviewed on this date. Watts invoked his right to remain silent and right to an attorney. (FBI000314-16).</p> <p>Also on this date, the USAO issued a press release regarding the arrests of Watts and Mohammed which stated in part that "the police department's Internal Affairs Division participated in the investigation." (BAKER GLENN 002259-61). The arrests and charges were announced by Patrick Fitzgerald, Robert Grant, and Superintendent Garry McCarthy. <i>Id.</i></p>
2/14/12	FBI 302 report regarding interview of Watts. (BAKER GLENN 002595-97).
2/15/12	Agent Hart report stating in part: "In determining whether a predicate offense existed, the U.S. Attorney's Office preferred to rely on the more recent investigative activity conducted by WC-2, as opposed to relying on previous investigative activity conducted by WC-3, which occurred prior to November 2010." FBI 1180-
2/21/12	<p>FBI 302 report regarding an interview by FBI Agents Raymond Hart and Craig Henderson with Officer Alvin Jones, who advised that he had no knowledge that Watts nor Mohammed ever took money or drugs from drug dealers. (FBI000299-304). Jones also stated that he "knows of no other tactical team members who have stolen money or drugs from drug dealers." <i>Id.</i> The report also states that "Jones has no knowledge of any wrong doing or criminal activity by any of his tactical team members." Jones described an incident where Charlene Campbell called him to advise that drug dealer Roy "Shock" Bennett had left an envelope for Watts. Jones said that when Campbell called Jones and told him about the envelope, Jones told Watts he better handle it right away and request a supervisor. The report details the investigation that ensued, including referencing an arrest of Shock on November 3, 2006 for this incident (which occurred on May 23, 2006 at about 6:15p.m. at 575 E. Browning, apt. 102 at IBW), although the CCSAO refused to charge Shock for the incident. <i>Id.</i> Jones said he recalled a court case in 2006 where the defense counsel asked Jones if he took drug protection payments, which Jones denied.</p> <p>As to Shock, Jones said Shock routinely gave stolen clothes and liquor to Watts. Once, Watts asked Jones to take some of the clothes to the cleaners, and Jones refused, saying it was "bull shit."</p> <p>Jones was asked about the search warrant on Van Vlissingen Road. Jones said he wrote the search warrant based on information from one of Watts's sources, Charlie Miller. Jones said he found the money in the basement, and because CPD directives require a supervisor be called when money in excess of \$10,000 was found, Watts was summoned to the basement. Jones also said he found electronic equipment in the attic, but did not recover it. Jones said he had a</p>

CONFIDENTIAL – Subject to Protective Orders Entered in Case Nos. 16 C 8940 and 19 C 1717

	feeling that the event might be a set up by federal law enforcement, and noted that the layout of the house was different as that described by Charlie Miller. Jones wrote the case report for the incident, and was provided the amount of money recovered by an asset forfeiture officer, who counted the money twice (it took her an hour to get to the station). Jones thought there was about \$30,000 recovered and personally delivered the money to ERPS. Jones denied taking any of the money, and was unaware that only \$26,000 was found in the inventory. <i>Id.</i>
2/22/12	FBI 302 report authored by FBI Agents Raymond Hart and Craig Henderson regarding an interview with Officer Lamonica “Coco” Lewis who advised that she had no knowledge that Watts or Mohammed ever took money or drugs from drug dealers, but had heard rumors that she didn’t pay attention to. (FBI000295-98). As for the event where Mohammed took money from Art Kirksey, she denied knowledge that it happened, and stated it was not unusual for Mohammed or Watts to go off to the side with gang members to get information from them. Lewis stated she has no knowledge of criminal activity being conducted by Officers Jones, Gonzalez, Bolton, Leano, Nichols, Dorian Smith, or Elsworth Smith. Lewis said that Kenny Young was on the tactical team before her. Darryl Edwards was also a former tactical team member.
2/24/12 (Report typed on 3/1/12)	FBI 302 report authored by FBI Agents Raymond Hart and Craig Henderson regarding an interview with Officer Brian Bolton, who advised that he had no knowledge that Watts nor Mohammed ever took money or drugs from drug dealers. Bolton denied participating in criminal conduct or being aware of misconduct of any other officer. Bolton said no one told him to lie to the FBI. (FBI000290-91). FBI 302 report authored by FBI Agents Raymond Hart and Craig Henderson regarding an interview with Officer Dorian Smith, who advised that he had no knowledge that Watts or Mohammed ever took money or drugs from drug dealers. Dorian Smith denied participating in criminal conduct or being aware of misconduct of any other officer. (FBI000292-94).
2/28/12	FBI 302 report regarding an interview with a police officer, who advised that he had no knowledge that Watts or Mohammed ever took money or drugs from drug dealers. (BAKER GLENN 002618-20).
2/22/12	DISRUPTION OR DISMANTLEMENT OF AN ORGANIZATION report of Agent Raymond Hart. This report states in part that “Members of the Chicago Police Department 2 nd District Tactical team were extorting + stealing money from drug dealers. The offending members were arrested on 2/12/12.” (FBI 1126-29).
3/01/12	FBI 302 report regarding an interview with a police officer, who advised that he had no knowledge that Watts nor Mohammed ever took money or drugs from drug dealers. (BAKER GLENN 002615-17).

CONFIDENTIAL – Subject to Protective Orders Entered in Case Nos. 16 C 8940 and 19 C 1717

3/8/12	FBI 302 report authored by FBI Agents Raymond Hart and TFO Sgt. Al Boehmer regarding an interview of Troy Clark in the presence of his attorney Phillip Turner and ASA Dan Maloney (FBI000284-85). Troy Clark said he saw Mohammed's photo on the news recently. He recognized Mohammed because Mohammed stole \$2,500 from him sometime between 2004 and 2006. Clark also claimed he was aware of other police misconduct, and also stated Alderman William Beavers implied to Clark that he would need to pay a bribe to secure a certain piece of property. <i>Id.</i>
3/19/12	FBI 302 report authored by FBI Agents Raymond Hart and Craig Henderson regarding an interview with IAD Officer Timothy Moragne. (FBI000281-83). Officer Moragne was interviewed because of some phone calls and texts with Mohammed after Mohammed was stripped. Moragne had known Mohammed a long time. Mohammed called him after he was stripped and asked Moragne if he knew if Mohammed was under investigation at IAD. When Moragne told Mohammed he didn't know, Mohammed asked him to look into it. Moragne told Mohammed he would look into it, but never did. Moragne also denied any prior knowledge of misconduct by Watts and Mohammed. <i>Id.</i>
4/04/12	FBI memo indicating an IAD Sgt. Provided documents related to name checks conducted by the CPD to place into the file. (BAKER GLENN 002267). FBI 302 report regarding an interview with a police officer, who advised that he had no knowledge that Watts or Mohammed ever took money or drugs from drug dealers. (BAKER GLENN 002622-24).
4/11/12	FBI 302 report authored by FBI Agents Craig Henderson and TFO Sgt. Al Boehmer regarding an interview of Robert Lindsay. (FBI000277-80). Lindsay claimed Watts falsely arrested him in 2009 along with Jermaine Sims. He also said Watts stole \$3,500 from him. Lindsay said he was a drug dealer at IBW from 1998 until it closed. Lindsay said he never paid Watts. He added he would drop guns in a garbage can for Watts to recover.
5/3/12	Mohammed proffer to AUSA Benjamin Langner and Margaret Schneider, as well as Mohammed's lawyer Jim Graham. Also present were FBI Agents Raymond Hart and Craig Henderson. Mohammed said that his friend, IAD Agent Timothy Moragne, told him to get off of Watts's team at one point. Moragne never disclosed the investigation of Watts and Mohammed to Mohammed. Mohammed discussed the criminal activity he was aware of and participated in. He described interaction with a drug dealer named Jelly Roll, who the agents believed to be Eric Brown. He admitted taking about eight extortion payments from Art Kirksey and Stacy, which he believed were from 2006 to 2008. He said he gave the money to Watts, but that Watts didn't share any of the money. He said Watts would let him take personal leave instead. Mohammed admitted to having telephone conversations with Kirksey regarding the payments, and not arresting Kirksey's associates in return. However, Mohammed said Watts

CONFIDENTIAL – Subject to Protective Orders Entered in Case Nos. 16 C 8940 and 19 C 1717

	<p>would sometimes arrest them anyway. Mohammed admitted to stealing money only one time, on November 21, 2011. Mohammed denied taking any money in connection with the March 2010 incident, stating he had been called by Watts to watch out for the “dumpster guy” that day while he was at a car dealership.</p> <p>Mohammed discussed the execution of the search warrant at the Van Vlissingen Road stash house. After the search, he recalls seeing someone who worked for IAD driving down the street and Jones thought the house was a set up. According to Mohammed, Jones told him “to let Ron (Watts) take it all.” Mohammed said he didn’t know how much money was recovered, but that about one year after the search, Watts told him he got money from the search.</p> <p>Mohammed discussed other activities as well, including that Watts received an insurance settlement from getting hit by a car (though he wasn’t actually hit). Mohammed said the car was driven by a drug dealer who Watts knew, and the car was registered to the drug dealer’s girlfriend Shabooka (ph).</p> <p>Mohammed did not know of any other officers who were engaging in criminal activity with Watts. (FBI000267-76).</p>
8/24/12	Mohammed resigns from the CPD. (CITY-BG-000257-58).
10/26/12	Mohammed pleads guilty before Judge Sharon Coleman. It is a blind plea. Mohammed was sentenced to 18 months in prison. (CITY-BG-000200)
12/10/12, 1/30/13	CHS debriefing reports that are redacted. (FBI 1244-46).
6/05/13	CR #1062684 is initiated against Watts by Sgt. Allen Boehmer of the Bureau of Internal Affairs, Confidential Investigations Section. The complaint was based on Watts’s theft of money on November 21, 2011. The complaint was sustained, and IAD recommended separation from CPD. (CITY-BG-000262-301).
7/15/13	Watts resigns from CPD. (CITY-BG-000299).
7/19/13	Watts pleads guilty before Judge Coleman. It is a blind plea. Watts was sentenced to 22 months in prison. (CITY-BG-000295-96).
3/20/14	Report of Agent Henderson to provide a case update stating in part that both Watts and Mohammed pled guilty, and that “As all subjects have pled guilty, the case will be closed.” (FBI 1272-74).
9/25/14	Report of Agent Henderson reflecting that Operation Brass Tax was being closed “as all investigation has been completed and the evidence has been properly disposed of.” The report stated in part: “This investigation was based on witness information that … Watts and members of his tactical team had been stealing both drugs and drug proceeds from drug dealers and couriers around the former Ida B. Wells public housing project. Through investigation

CONFIDENTIAL – Subject to Protective Orders Entered in Case Nos. 16 C 8940 and 19 C 1717

	and CHS information, it was learned that Watts and CPD police officer Kallatt Mohammed were the officers stealing drugs and drug proceeds from drug dealers and drug couriers. ...In summary, sufficient personnel and financial resources were expended on the investigation. All investigative methods/techniques that were initiated during the investigation have been completed. Furthermore, all leads that have been set have been completed. All logical and reasonable investigation was completed, and all evidence obtained during the investigation has been returned or destroyed in accordance with evidence policy.” (FBI 1279-81).
10/20/15	CR #1077632 is initiated by Sgt. Tim Moore against Mohammed. The CR is based on the theft of money on November 21, 2011. BIA recommends a finding of sustained as well as separation for Mohammed. The file contains a memo dated February 8, 2012, that references Log number 1015941. CR #1077632 is closed October 26, 2015. (CITY-BG-000196-261).

Respectfully submitted,

By: s/ Daniel Noland
 One of the Attorneys for Defendant,
 CITY OF CHICAGO

Terrence M. Burns
 Paul A. Michalik
 Daniel M. Noland
 Elizabeth A. Ekl
 Reiter Burns LLP
 311 S. Wacker Drive, Suite 5200
 Chicago, IL 60606-7407
 (312) 982-0090
 (312) 429-0644 (fax)