

EXHIBIT 8



**Transcript of the Deposition of
Jon Shane, Ph.D.**

Case: Alvin Waddy v. City of Chicago; et al.
Taken On: August 29, 2023

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23
24

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15 Mr. Daniel Neville (Paralegal)
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19 * * * * *

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1 BY MR. NOLAND:

2 Q. Did you ever work -- What's the internal
3 affairs division or bureau called at Newark?

4 A. Internal Affairs.

5 Q. Did you ever work in Internal Affairs at the
6 Newark Police Department?

7 A. I never worked in the Internal Affairs
8 Division, no.

9 Q. You know, I didn't ask this: Have you been at
10 a police officer at any other locality?

11 A. No.

12 Q. So did you ever -- did you ever investigate a
13 police officer for corruption?

14 A. No, not that I can think of off the top of my
15 head. When you say, corruption, can you be a little bit
16 more narrow? What do you define as corruption?

17 Q. You don't understand corruption as a police
18 officer?

19 A. Well, you know, we get into these debates all
20 the time about the extent to which the word, corruption,
21 might apply? Is it -- Is it unethical behavior? Is it
22 unethical behavior and criminal behavior? Is it a -- a
23 rule violation? So when I hear the word, corruption, I
24 often think of something criminal. But other people

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1 have different definitions of how -- what they mean by
2 corruption.

3 **Q. What's your definition of corruption?**

4 A. I personally define it as something unlawful.

5 **Q. All right. So then does your answer stand**
6 **that you didn't -- you did not ever investigate a police**
7 **officer for any unlawful conduct?**

8 A. No, not that I can think of.

9 **Q. So I think I read somewhere else that -- were**
10 **you involved in some investigations of officer-involved**
11 **shootings?**

12 A. Well, when we were in the homicide division,
13 the answer is yes, we would conduct a criminal element
14 of the investigation. Internal Affairs would conduct
15 the administrative element.

16 **Q. And other than that experience, do you have**
17 **any other experience conducting investigations of any**
18 **type of misconduct by a police officer?**

19 MS. KLEINHAUS: Objection to form.

20 You can answer.

21 BY MR. NOLAND:

22 **Q. Whether -- Whether it's a rule -- you know, a**
23 **rule violation, et cetera.**

24 A. Yes, as -- as a sergeant, lieutenant, and

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1 captain, I conducted investigations and/or supervised
2 investigations of others who were investigating those
3 matters.

4 Q. Got it. So would the Internal Affairs
5 Division at Newark give -- send out to the units certain
6 complaints of rule violations to the unit to investigate
7 themselves?

8 A. Yes, they would do that.

9 Q. And you are aware that that's done in Chicago
10 as well from time to time?

11 A. Yes, yes.

12 Q. Is there anything wrong with that particular
13 practice, in general?

14 MS. KLEINHAUS: Objection to form, vague and
15 ambiguous.

16 You can answer.

17 BY THE WITNESS:

18 A. Generally, no.

19 Q. So in that capacity as a sergeant or a
20 lieutenant, did you investigate from time to time
21 allegations of rule violations by your subordinates?

22 A. Yes.

23 Q. And what types of rule violations did you
24 investigate in that capacity?

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1 A. Tardiness, care of property, officers that
2 were alleged to have been inside of what we would call
3 corruption-prone locations like a bar or something like
4 that. I'm sure there were -- I'm sure there were other
5 rule violations. I mean, those are some of the things
6 that I can think of off the top of my head.

7 **Q. And were there any other -- other than rule**
8 **violations, were there -- was there any type of other**
9 **allegation of misconduct against a police officer under**
10 **your command that you were involved in investigating?**

11 MS. KLEINHAUS: Objection to form.

12 You can answer.

13 BY THE WITNESS:

14 A. Nothing -- Nothing criminal.

15 **Q. So -- And, yeah, I appreciate that**
16 **clarification. So I know you didn't investigate**
17 **criminal allegations against a police officer. You did**
18 **investigate from time to time rule violations and would**
19 **be involved in officer-involved shootings from the**
20 **homicide investigation perspective. Was there any other**
21 **type of allegation against a police officer that you**
22 **were ever involved in investigating?**

23 MS. KLEINHAUS: Objection to form.

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1 BY MR. NOLAND:

2 Q. At Newark.

3 A. There -- There probably are things. I mean, I
4 would have to sit here and think through, you know, my
5 career at length. But there were certainly policy
6 violations. There were certainly misc- -- When I say
7 misconduct, I'm talking about rule violations. I
8 just -- I don't want to give you the impression when I
9 say the word, misconduct, that I'm talking about the New
10 Jersey statute official misconduct, which is criminal
11 statute. I don't mean it that way.

12 Q. Yeah, I get it. It sounds like you generally
13 would -- I mean, a rule violation would be a policy or
14 procedure that a police officer may have violated. Like
15 you articulated some of the examples, tardiness, not
16 showing up to court, uniform violations, things of
17 that -- going to a bar, things of that nature?

18 A. Yes, that's right.

19 Q. Going back to your time when you were on that
20 plain clothes team, anticrime team, did you -- did you
21 complete arrest reports?

22 A. Yes.

23 Q. About how many arrests did you participate in
24 completing during that time frame?