

In re: Watts Coordinated Pretrial Proceedings
Ronald Watts

October 7, 2022

Case No. 19-cv-01717

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

In Re: WATTS COORDINATED) Master Docket
PRETRIAL PROCEEDINGS) Case No.

Master Docket
Case No.
19-cv-01717

VIDEOTAPED DEPOSITION OF RONALD WATTS

PHOENIX, ARIZONA

October 7, 2022

Prepared by:
Deborah L. Tucker, RPR
Certified Reporter
Certification No. 50464

**CERTIFIED
TRANSCRIPT**

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1	APPEARANCES (continued)	1 Kallatt Mohammed.
2	For the Defendant Ronald Watts: JOHNSON & BELL, LTD.	2 MS. OLIVIER: Kelly Olivier on behalf of the
3	By: Ahmed A. Kosoko, Esq. 33 West Monroe Street	3 Hale & Monico individual defendant officers.
4	Suite 2700	4 MS. MCGRATH: Megan McGrath on behalf of
5	Chicago, Illinois 60603-5404	5 Defendants Spaargaren and Cadman.
6	(312) 984-0214	6 MS. KLEINHAUS: Theresa Kleinhaus on behalf
	Kosoko@jbltd.com	7 of the Loevy plaintiffs.
7	For the Defendant Kallatt Mohammed: DALEY MOHAN GROBLE, P.C.	8 MR. FLAXMAN: Joel Flaxman for the Flaxman
8	By: Eric S. Palles, Esq. (Via Zoom)	9 plaintiffs. Collin Gill from my office is also present on
9	55 West Monroe	10 Zoom.
10	Suite 1600	11 MS. PAUKSTIS: Elizabeth Paukstis for the
11	Chicago, Illinois 60603	12 Loevy & Loevy Plaintiffs.
12	(312) 422-5370	13 MR. TEPFER: I think that's it.
13	Epalles@daleymohan.com	14 THE VIDEOGRAPHER: Would the court reporter
14	For the Defendant Officers: HALE & MONICO, L.L.C.	15 please swear in the witness.
15	By: Kelly Olivier, Esq. (Via Zoom)	16
16	55 West Jackson Boulevard	17 RONALD WATTS,
17	Suite 337	18 the witness herein, having been first duly sworn by the
18	Chicago, Illinois 60604	19 Certified Reporter, was examined and testified as follows:
19	(312) 341-9646	20
20	Kolivier@halemonico.com	21 EXAMINATION
21	Also resent: Collin Gill	22 BY MR. TEPFER:
22	Christopher Parkinson, Videographer	23 Q. Good morning, Mr. Watts. How are you?
23		24 A. Fine. Yourself? Good morning to you.
24		25 Q. Good morning. Have you reviewed anything prior
25		
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1	THE VIDEOGRAPHER: We are on record. The	1 to this deposition?
2	time on the video monitor is 9:12 a.m.	2 MR. KOSOKO: Object to the form of the
3	Here begins Volume 1, Media Number 1 in the	3 question.
4	deposition of Ronald Watts in the matter of Watts	4 BY MR. TEPFER:
5	Coordinated Pretrial Proceedings, in the United States	5 Q. Have you reviewed any documents prior to this
6	District Court for the Northern District of Illinois,	6 deposition?
7	Eastern Division, Case Number 19-cv-01717. Today's date	7 A. I spoke with my attorney, yes.
8	is October 7th, 2022.	8 Q. Okay. During the course of any -- At any point
9	Our court reporter is Deborah Tucker. My	9 did you review any documents?
10	name is Christopher Parkinson, certified legal	10 A. Yes.
11	videographer. We both represent Coash & Coash.	11 Q. Okay. What did you review?
12	This video deposition is taking place at	12 A. I think it was interrogatories.
13	Coash & Coash, located at 1802 North Seventh Street,	13 Q. Okay. Do you remember which ones?
14	Phoenix, Arizona, 85006.	14 A. Not at all.
15	Counsel, please identify yourselves and	15 Q. Okay.
16	state whom you represent.	16 A. There was so many.
17	MR. TEPFER: Good morning. My name's Josh	17 Q. Okay. So you reviewed a number of
18	Tepfer and I represent the Loevy & Loevy Plaintiffs.	18 interrogatories?
19	MR. RAUSCHER: Scott Rauscher, also for the	19 A. Yeah.
20	Loevy & Loevy Plaintiffs.	20 Q. Were these interrogatories you had already
21	MR. KOSOKO: Good morning everyone. Ahmed	21 answered?
22	Kosoko on behalf of Ronald Watts.	22 A. Some, yes.
23	MR. MICHALIK: Paul Michalik on behalf of	23 Q. Were there some that you hadn't already answered?
24	Defendant City of Chicago and Municipal defendants.	24 A. Yes.
25	MR. PALLE: Eric Palles on behalf of	25 Q. Okay. Did you review anything else?

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1 A. Not to my knowledge, no. 2 Q. Okay. No police reports? 3 A. No. 4 Q. Do you have an understanding of what are the 5 topics of today's deposition? 6 A. When you say the "topics," clarify. I mean, what 7 do you -- 8 Q. Do you have an understanding of the specific 9 cases that we're talking about during today's deposition? 10 A. Specific cases? I have an idea of some of the 11 cases, yes. 12 Q. Okay. Which ones? 13 A. The cases that I remember right offhand is, like, 14 the Ben Baker case. 15 Q. Okay. 16 A. Ben Baker, Clarissa Glenn, I think. 17 Q. Okay. 18 A. There's so many, I don't remember the people. 19 That's -- those -- that's the one I remember off the top 20 of my head. 21 Q. Okay. Those are the two cases you remember off 22 the top of your head -- 23 A. Yeah. 24 Q. -- that we're covering today? 25 A. Yes.	1 they have some -- some trauma issues, so I go to therapy 2 appointments. So, I'm pretty busy. That's how I spend my 3 time. 4 BY MR. TEPFER: 5 Q. How do you support yourself and your foster 6 children? 7 A. How do I support myself? 8 Q. Yes. 9 A. I support myself from savings I had. I support 10 myself -- I did okay as an officer. I had a little money 11 that they didn't steal from me through lawyer fees. And 12 I -- I'm given a stipend for my adopted children for -- to 13 take care of them. And I also have a beautiful wife 14 that's gainfully employed and contributes to my 15 well-being. 16 Q. Okay. How long have you been married? 17 A. Oh, six years in April. 18 Q. Okay. You said you have some money from your 19 time as a police officer that -- 20 A. Yeah. 21 Q. -- "they" didn't steal from you. Who were you 22 referring to as "they"? 23 A. The system, the FBI, that caused me to have to 24 obtain an attorney off of funds that I had saved. 25 So . . .
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1 Q. Okay. Did you review a transcript of your prior 2 deposition from February? 3 A. No. 4 Q. Okay. Is anything changed as far as your work, 5 your employment, since the February deposition? 6 A. No. 7 Q. "No"? 8 A. No. 9 Q. Okay. 10 A. Was I -- I don't remember if I told you guys I 11 was employed, but I wasn't. 12 Q. Why, are you currently employed? 13 A. No. 14 Q. Okay. How do you spend your time then? 15 MR. KOSOKO: Object to the -- 16 (Court reporter clarification.) 17 BY MR. TEPFER: 18 Q. How do you spend your time? 19 MR. KOSOKO: Object to the form of the 20 question. 21 THE WITNESS: Well, I'm a therapeutic foster 22 dad. And I just adopted a brother and sister, a 23 nine-year-old and a fifteen-year-old. So, I spend my time 24 going to PTA meetings, dropping kids off at school, going 25 to doctors' appointments, dental appointments. My kids,	1 Q. Okay. So, you're referring to the FBI stole 2 money from you? 3 A. I -- I feel it, yeah. That's my wording on it. 4 Maybe some would disagree, but that's my wording on it. 5 Q. Okay. How much money did they steal from you? 6 A. I paid the attorney \$50,000. 7 Q. Okay. Anyone else you're referring to besides 8 the FBI? 9 A. No. 10 Q. Okay. And is it -- I'm sorry. Go ahead. 11 A. That's who caused me this situation. 12 Q. What situation? 13 A. This situation. 14 Q. What's "this" mean? 15 A. The reason I'm sitting here. 16 Q. What's the reason you're sitting here? 17 A. This deposition. 18 Q. So, is there anything else you mean by -- beyond 19 "this deposition"? 20 A. No. 21 Q. So, are you referring to your wrongful conviction 22 from the federal case? 23 A. I stated -- I'm not saying anything about a 24 federal case. I said the FBI. 25 Q. Okay.

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1 A. So, I'm not speaking of a case. I'm speaking of 2 the FBI. 3 Q. Okay. And the FBI -- 4 A. Caused me to spend funds that I had saved. 5 Q. Defending yourself against their allegations? 6 A. Correct. 7 Q. Okay. And those allegations led to your wrongful 8 conviction, correct? 9 A. Correct. 10 Q. Okay. Have you made any efforts to undo your 11 wrongful conviction since the last deposition? 12 A. Yes. 13 Q. Okay. What have you done? 14 A. I've read documents. I have not obtained a legal 15 counsel, but on my own I reviewed the pages that were 16 given to me by my previous attorney. 17 Q. Who are you referring to? 18 A. Excuse me? 19 Q. What previous attorney are you referring to? 20 A. Glasco, my previous attorney that handled the 21 case. 22 Q. The criminal case? 23 A. Yes. 24 Q. Okay. So you sought and received your -- his 25 file?	1 Q. And that is since February, correct? 2 A. No. 3 MR. KOSOKO: Hang on. 4 THE WITNESS: Since February I've done -- 5 MR. KOSOKO: I'm also going to, just for the 6 record, issue an objection to the extent that you're 7 asking him to go into communications with either his 8 attorney or other attorneys. 9 BY MR. TEPFER: 10 Q. I'm not asking you to go into any communications 11 you've had with other attorneys. Okay? 12 A. Okay. 13 Q. Okay. Can you answer my question? 14 A. So, I've done nothing since February as far as 15 looking over those old documents. 16 Q. Okay. So -- And my question is, what efforts 17 have you made to undo your wrongful conviction since 18 February? 19 A. Oh. Nothing, not that I . . . 20 Q. Do you have any recordings that you received 21 from -- strike that. 22 Do you have any FBI recordings? 23 A. No. 24 Q. You didn't receive any of that from your prior 25 attorney?
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1 A. No. 2 Q. Okay. When did you receive the documents from 3 Mr. Glasco that you reviewed since February? 4 A. Right after the case. I've had those documents 5 since 2013. 6 Q. Okay. 7 A. The same documents. 8 Q. So, after the deposition in February, that caused 9 you to look at the file that you had and review documents? 10 A. That had nothing to do with it. 11 MR. KOSOKO: Hang on. 12 Object to the form of the question; assuming 13 it's a file. If you want to flush out -- 14 BY MR. TEPFER: 15 Q. Okay. Oh, since the deposition in February of 16 this year, you have reviewed your prior materials you 17 received from Mr. Glasco; is that correct? 18 A. No. You asked me what have I done since then. 19 So I probably done that in 2016 or '17, yeah. 20 Q. Okay. So, what I asked you was what efforts 21 you've made to undo your wrongful conviction since the 22 last deposition. 23 A. So, I answered you that I went over those 24 materials. That's my effort. You asked me what I've 25 done.	1 A. That's between me and my attorney, I would think, 2 right? 3 Q. I'm not asking for communications. I'm asking if 4 you received any documents from anyone -- 5 A. No. 6 Q. -- that included -- 7 A. No. 8 Q. -- the FBI recordings? 9 A. No. No. 10 Q. So you have no FBI recordings related to your -- 11 A. No. 12 Q. -- FBI inves- -- 13 (Simultaneous speakers. Court reporter 14 request clarification.) 15 BY MR. TEPFER: 16 Q. -- related to the FIB investigation into your 17 police work? 18 A. No. 19 Q. Do you intend to take any actions to undo your 20 wrongful conviction? 21 A. Yes. 22 Q. What do you intend to do? 23 MR. KOSOKO: I'll object to the extent that 24 it will cause him to answer communications he's had with 25 either his attorney or another attorney.

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1 BY MR. TEPFER:	1 without an attorney present who's going to represent me in
2 Q. Without going into any communications you've had	2 that matter.
3 with your attorney, what do you intend to do?	3 Q. Okay. Do you have an attorney?
4 A. Fiercely -- fiercely defend myself against those	4 A. No.
5 allegations that was brought against me.	5 Q. Are you seeking one?
6 Q. Okay. Do you intend to file a petition in	6 A. No.
7 federal court?	7 Q. Are you going to seek to vacate your conviction?
8 MR. KOSOKO: Objection to the extent that it	8 A. Possibly.
9 causes him to relay communications he's had with either	9 Q. Okay. Have you had -- Let's just start since
10 his attorney or another attorney.	10 2015, have you at any time communicated with the FBI?
11 BY MR. TEPFER:	11 A. No.
12 Q. You can understand any question I ask during the	12 Q. Have you at any time communicated with the Cook
13 entirety of this dep, I'm not asking you to reveal any	13 County State's Attorney's Office?
14 communication --	14 A. No.
15 A. Fiercely --	15 Q. Have you at any time communicated with any member
16 Q. -- with your attorney.	16 of the Conviction Integrity Unit of the Cook County
17 You need to let me finish, please.	17 State's Attorney's Office?
18 A. Okay.	18 A. No.
19 Q. To return, any communications with your -- any	19 Q. Have you received any requests, as far as you
20 attorney you've ever had. Do you understand that?	20 know, to speak with the Conviction Integrity Unit of the
21 A. Yes.	21 Cook County State's Attorney's Office?
22 Q. Okay. So, what do you intend to do? Do you --	22 A. No.
23 Go ahead.	23 Q. Have you received any requests to speak to the
24 A. Fiercely defend myself.	24 FBI?
25 Q. Okay. Do you intend to file a petition in	25 A. No.
Page 19	Page 21
1 federal court?	1 Q. Have you received any requests -- oh, have you
2 A. Not at this time.	2 spoke -- strike that.
3 Q. So, what do you mean by officially defend	3 Have you spoken to the Civilian -- any
4 yourself?	4 member of the Civilian Office of Police Accountability?
5 A. "Fiercely." I mean with vigor and righteousness.	5 A. No.
6 Q. What do you mean?	6 Q. As far as you know, have you received any request
7 A. With vigor and righteousness.	7 to speak to any member of the Civilian Office of Police
8 Q. What -- what actions, specific actions, do you	8 Accountability?
9 intend to take with vigor and righteousness?	9 MR. KOSOKO: I'm going to object as it -- he
10 A. Defending myself.	10 would necessarily have to include discussions he's had
11 Q. Okay. What specific acts, specific acts, do you	11 with me.
12 intend to take to defend yourself?	12 So, do not answer that question.
13 A. I --	13 BY MR. TEPFER:
14 MR. KOSOKO: Hang on. Hang on.	14 Q. I'm not sure I understand. Do you know whether
15 I don't know if he's going to be able to	15 or not you've received any communications from the
16 answer that question without relaying discussions he'd had	16 Civilian Office of Police Accountability? I'm not asking
17 with either his attorney or other attorneys, so I'm going	17 him to reveal any discussions you've had with your
18 to instruct him not to answer that. We can come back.	18 attorney.
19 BY MR. TEPFER:	19 MR. KOSOKO: He would have to relay
20 Q. Can you answer that question without relaying	20 conversations he's had with me to answer that question.
21 conversations you've had with your current or former	21 BY MR. TEPFER:
22 attorneys?	22 Q. Are you refusing to answer that question based on
23 A. If you -- If you're asking me what am I going to	23 your attorney's advice?
24 do, my answer is going to be to vigorously defend myself.	24 A. Yes.
25 I'm not going to get into how or what I'm going to do	25 MR. TEPFER: I'm going to mark this as

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1 Exhibit 18. 2 For everyone on Zoom and in here, we're just 3 going to continue the exhibits from where we left off last 4 time. Okay? This is Exhibit 18. 5 (Deposition Exhibit 18 was marked for 6 identification.) 7 BY MR. TEPFER: 8 Q. This is a 33-page document. I'm not asking you 9 to read to whole thing, but have you ever seen this 10 document before? 11 MR. MICHALIK: Excuse me. Josh, can you 12 identify -- 13 MR. TEPFER: I'm sorry, of course. I 14 apologize, Paul. It's PLAINTIFFS' JOINT 68062 to 094. 15 It's the COPA report. 16 MR. KOSOKO: Do you have another copy with 17 you? I can -- mean I have one -- 18 MR. TEPFER: I only brought one copy. 19 MR. KOSOKO: That's okay. 20 MR. TEPFER: I'm sorry. 21 MR. KOSOKO: Give me a second to -- I'll get 22 it. 23 MR. PALLE: What number exhibit is this for 24 today? 25 MR. TEPFER: 18.	1 dealing with for that? 2 A. Approximately 2001 to 2012. 3 Q. Okay. And it's roughly 2001 to 2005 public 4 housing, correct? 5 A. Yes. 6 Q. And then the remainder of the time was just in 7 District 2 generally? 8 A. Assigned to the Ida B. Wells Housing -- 9 Development. 10 Q. Okay. 11 (Court reporter clarification.) 12 THE WITNESS: Ida B. Wells Housing 13 Development. 14 BY MR. TEPFER: 15 Q. So, during the course of your time as a tactical 16 sergeant, how frequently would you leave the office? 17 MR. KOSOKO: Object to the form of the 18 question. 19 But go ahead and answer. 20 THE WITNESS: It -- it would depend on the 21 day, what events that occurred that day. Some days I 22 would not leave the office. Some days I would be able to 23 leave the office for a majority of the shift. It all 24 depends. 25 BY MR. TEPFER:
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1 MR. PALLE: Eric Palles, by the way, 2 Ms. Reporter. 3 BY MR. TEPFER: 4 Q. You really don't have to read the whole thing. I 5 just want to know if you're familiar with the document at 6 all, if you've ever seen it. 7 A. I haven't seen this document, no. 8 Q. Okay. 9 MR. KOSOKO: Can you give me the Bates on 10 that again, Josh? 11 MR. TEPFER: Sure. 68062 to 90. 12 MR. KOSOKO: So, that's the recently 13 released COPA report? 14 MR. TEPFER: Correct. 15 MR. KOSOKO: All right. 16 BY MR. TEPFER: 17 Q. Okay. You can put that to the side. 18 A. Excuse me? 19 Q. You can put that to the side. 20 All right. All right. I want to talk to 21 you about -- I want to focus a lot of my questions on your 22 career as a tactical supervisor, supervisor of a tactical 23 team, public housing in District 2. Okay? 24 A. Yes. 25 Q. And what was the time period, again, that we're	1 Q. Okay. What -- what kind of factors would it 2 depend on? 3 A. The activity in the locations, the activity and 4 manpower that was needed throughout the District at large, 5 what assignments was actually given to me at that 6 particular time by the tactical lieutenant or district 7 commander. So, it was a variety of things that could 8 occur that would -- that would affect whether I actually 9 stayed in the office or went out to the field. 10 Q. All right. Were you a desk sergeant? 11 A. I was never a desk sergeant. 12 Q. Okay. So you never had the title desk sergeant? 13 A. No. 14 Q. You were a tactical sergeant? 15 A. I was a tactical sergeant. I was a public 16 housing tactical sergeant. 17 Q. Can you describe to me the differences in duties, 18 if you know, between a desk sergeant and a tactical 19 sergeant? 20 A. Well, first off, I'll start with the tactical 21 sergeant. My duties as a tactical sergeant would be to 22 supervise an eight- to ten-man tactical unit that was 23 assigned to a specific area to suppress the gang and drug 24 and gun activities in a specific location. 25 The location I was assigned to was the Ida

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<p>1 B. Wells Housing Development. And so as a tactical 2 sergeant we were plain clothes, which meant that we would 3 dress according to the environment and where we could move 4 freely about to watch the activity, the illegal activity, 5 in the area.</p> <p>6 Also, we traveled in unmarked vehicles 7 without the logo of the Chicago Police Department on them. 8 That way we could get into areas that probably marked 9 vehicles couldn't get into without being observed.</p> <p>10 We were to communicate with certain 11 individuals in an area to receive information about the 12 illegal activities, drug trade, gun trade, gang activity, 13 as a -- as the TAC team.</p> <p>14 We were responsible for the -- We weren't 15 assigned just, like, a beat unit, just a specific beat. 16 As a TAC team, we were assigned to the area. So, we're 17 assigned to an area, but we have to maintain -- maintain 18 and observe the illegal activities of that specific area.</p> <p>19 Also as a tactical sergeant, what I would 20 do, once a tactical team would make an arrest, as a 21 tactical sergeant my duties would be to review all 22 reports, to check reports for probable cause, grammar -- 23 grammar, information that's needed in a -- to make sure 24 the document is properly completed by the arresting 25 officer.</p>	<p>1 Q. Okay. When was he a TAC sergeant? 2 A. I -- I know he was a TAC sergeant when I was 3 sergeant. In the early 2000s, I believe. 4 Q. Was he a desk sergeant ever? 5 A. I -- 6 Q. You don't know? 7 A. I don't know. 8 Q. All right. Let's talk a little bit about the 9 aspect of a tactical sergeant's job, your job in reviewing 10 reports for probable cause. Okay? 11 A. Yes. 12 Q. All right. So, what type of -- well, strike 13 that.</p> <p>14 There were times where you were reviewing 15 reports for arrests that you did not actually witness, 16 correct?</p> <p>17 A. Absolutely. 18 Q. Would that be the majority of time? 19 A. Majority, yes. Majority of the time, yes. 20 Q. Okay. Actually, you know what, I'm going to go 21 ahead and show you what I have marked -- we'll mark it as 22 Exhibit 19 and 20. Okay? 23 A. Sure. 24 Q. The first one is Exhibit 19. It's CITY-BG -- I 25 think it's cut off, but I think it's 52330 to 331. And</p>
<p>1 After -- Also, once those documents are 2 completed, as a tactical sergeant I would make sure -- my 3 official duties were to make sure any inventories were 4 completed and deposited in its proper location. And also 5 to attend meetings, community meetings as a tactical 6 sergeant to receive information from community leaders or 7 residents in that community of what was actually occurring 8 in those communities.</p> <p>9 So, the difference with the desk sergeant 10 duties would be that the desk sergeant would maintain the 11 district activity as far as the desk is concerned. He 12 would have a crew to -- to submit all the paperwork that 13 was submitted from the tactical teams or any B cars, any 14 arrests, monitor the phones.</p> <p>15 The desk sergeant would make sure -- the 16 lock-up, he was responsible for the lock-up, those type of 17 things, the building, the security of the building. 18 So . . .</p> <p>19 Q. The police building?</p> <p>20 A. The police building, yes, the desk sergeant, 21 whatever.</p> <p>22 Q. Do you know someone named Sergeant Kaughman?</p> <p>23 A. Yes.</p> <p>24 Q. Was he a desk sergeant or a tactical sergeant?</p> <p>25 A. Sergeant Kaughman was a TAC sergeant at one time.</p>	<p>1 it's the vice case report of the April 3rd, 2004 arrest of 2 Shaun James, Taurus Smith, and Timothy Conner. Okay? 3 A. Okay. 4 Q. And then Exhibit 20 is going to be DO-JOINT 38936 5 to 37, and it's the vice case report of the arrest of 6 Shaun James, Trevor Trotter, Van Smith, and others on 7 August 18th, 2007. Okay? So they both involve Shaun 8 James' arrest. Okay? 9 A. Okay.</p> <p>10 MR. KOSOKO: Can I just take a look at the 11 Bates on those real quick just for my notes?</p> <p>12 MR. TEPFER: Yeah.</p> <p>13 (Deposition Exhibit 19 and Exhibit 20 were 14 marked for identification.)</p> <p>15 BY MR. TEPFER:</p> <p>16 Q. Okay. We may talk about the Shaun James and 17 Taurus Smith cases later, but I'm actually using these 18 just as, sort of as templates of a vice case report. Do 19 you understand what I mean? Just to -- as examples of 20 what you're reviewing when you're reviewing probable 21 cause. Okay?</p> <p>22 A. Okay.</p> <p>23 MR. KOSOKO: Does he need to look at both at 24 the same time or can he do this --</p> <p>25 MR. TEPFER: Yeah, I think it would kind of</p>

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<p>1 help, but I'll point him to specific things.</p> <p>2 MR. KOSOKO: Okay.</p> <p>3 BY MR. TEPFER:</p> <p>4 Q. Okay. So, let's look at Exhibit 19, for example.</p> <p>5 And in Box 12 it lists a number of victims, complainants.</p> <p>6 Do you see that?</p> <p>7 A. Yes.</p> <p>8 Q. And you're among the individuals who are listed</p> <p>9 there, correct?</p> <p>10 A. Okay. Yes.</p> <p>11 Q. And then if you look at Exhibit 20, that's the</p> <p>12 August 18th, 2007, the same box, there's some -- some of</p> <p>13 the same names, members of your team, but you're not among</p> <p>14 the individuals in Box 12. Do you see that?</p> <p>15 A. Yes.</p> <p>16 Q. What is the -- Is there any significance, to you,</p> <p>17 of that; meaning whether or not you were on the scene for</p> <p>18 these arrests?</p> <p>19 A. No.</p> <p>20 Q. Okay. What -- What -- Why not? What does it</p> <p>21 mean -- what does -- why would you be on -- well, first of</p> <p>22 all, strike that.</p> <p>23 You don't recall either of these arrests,</p> <p>24 correct?</p> <p>25 A. Looking at the documents, I recall. I refer to</p>	<p>1 Q. All right. And if you go to the end of both of</p> <p>2 those two exhibits it has your signature on each of them,</p> <p>3 right?</p> <p>4 A. Yes.</p> <p>5 Q. All right.</p> <p>6 A. The first one. I didn't quite check the -- yes.</p> <p>7 Q. All right. And you swore those under oath,</p> <p>8 correct?</p> <p>9 A. Correct.</p> <p>10 Q. All right. And so if you look at Page 1 of the</p> <p>11 Taurus Smith one, for example, in the middle, the bold is</p> <p>12 your answers, correct?</p> <p>13 A. Correct.</p> <p>14 Q. And it says, "Without waiving said objections, at</p> <p>15 this time, Watts has no independent recollection of</p> <p>16 specific interactions with Taurus Smith"; is that correct?</p> <p>17 A. On which? Which document are you referring to?</p> <p>18 Q. I think it's 22.</p> <p>19 A. 22. Okay. You say -- Defendant Watts' Answers</p> <p>20 to Plaintiff Taurus Smith, October 28th?</p> <p>21 Q. Yeah. After you go to the answer for the first</p> <p>22 question --</p> <p>23 A. Okay.</p> <p>24 Q. -- the third line, third line down in the bold</p> <p>25 starting with, "Without waiving said objections, at this</p>
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<p>1 the documents. And my signature's on them. So, if I go</p> <p>2 through the documents I'm sure it would jog my memory.</p> <p>3 Q. Okay. Well, I'm going to show you what I'll mark</p> <p>4 as Exhibit 21. Okay?</p> <p>5 A. Um-hum.</p> <p>6 Q. And this is Defendant Ronald Watts' Answers to</p> <p>7 Plaintiff Shaun James' October 28, 2019 Interrogatories to</p> <p>8 Defendant Ronald Watts. Okay?</p> <p>9 A. Um-hum.</p> <p>10 Q. And I'm going to --</p> <p>11 A. What was that date again?</p> <p>12 MR. RAUSCHER: It's the 28th.</p> <p>13 MR. TEPFER: Oh, October 28th, 2019</p> <p>14 interrogatories. And it's -- for some reason, it has my</p> <p>15 hotel receipts stapled to it. We'll skip that.</p> <p>16 And it's signed -- well, here. Here's --</p> <p>17 what number is that? 21? And then at the same time I'm</p> <p>18 going to give you Exhibit 22, which is Defendant Ronald</p> <p>19 Watts' Answers to Plaintiff Taurus Smith's October 28th,</p> <p>20 2019 Interrogatories to Defendant Ronald Watts.</p> <p>21 A. Um-hum.</p> <p>22 Q. Okay?</p> <p>23 (Deposition Exhibit 21 and Exhibit 22 were</p> <p>24 marked for identification.)</p> <p>25 BY MR. TEPFER:</p>	<p>1 time, Watts has no independent recollection of specific</p> <p>2 interactions with Taurus Smith." That's what it says,</p> <p>3 right?</p> <p>4 A. Yes.</p> <p>5 Q. All right. So when you signed this under oath,</p> <p>6 you had no recollection of any interactions with Taurus</p> <p>7 Smith, correct?</p> <p>8 MR. KOSOKO: Object to the form of the</p> <p>9 question.</p> <p>10 BY MR. TEPFER:</p> <p>11 Q. Is that correct?</p> <p>12 A. That's correct. It's here.</p> <p>13 Q. All right. And then on para- -- in the next page</p> <p>14 of that same exhibit, Exhibit 22, you answered Question</p> <p>15 Number 2 -- You there? -- by saying "Without waiving said</p> <p>16 objections, at this time, Watts has no independent</p> <p>17 recollection of the specifics of the events of April 3rd,</p> <p>18 2004." Do you see that?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. Do you, at this time, have any</p> <p>21 recollection of the specific events of April 3rd, 2004?</p> <p>22 A. April -- referring to the documents, what's in</p> <p>23 the documents, yes.</p> <p>24 Q. Okay. So now -- When you're -- And you're</p> <p>25 pointing to the document. Are you talking -- pointing to</p>

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<p>1 the --</p> <p>2 A. April 3rd.</p> <p>3 Q. -- the vice case report, I think Exhibit 19?</p> <p>4 A. Yes, sir.</p> <p>5 Q. Okay. So, now you've reviewed this document and</p> <p>6 now you have an independent --</p> <p>7 A. I have not quite read through the documents. I</p> <p>8 will if you need me to. Okay.</p> <p>9 Q. Do you remember it?</p> <p>10 A. Yes, I recall.</p> <p>11 Q. Okay. Were you there?</p> <p>12 A. I was probably there, yes. I was probably there.</p> <p>13 Q. Why are you saying you were probably there? It</p> <p>14 looks like you're looking at a document when you're making</p> <p>15 a determination that you were probably there; is that</p> <p>16 correct?</p> <p>17 A. Yeah, because I -- I -- my signature's on the</p> <p>18 document, and I -- I remember, now, the arrest, but</p> <p>19 whether I was there or not, I -- I can't recall.</p> <p>20 Q. Okay.</p> <p>21 A. I still don't know if I was there, actually</p> <p>22 there.</p> <p>23 Q. So, what is the significance of your signature</p> <p>24 being on the document as to whether or not you were there?</p> <p>25 A. Excuse me? Repeat that.</p>	<p>1 looking at the number of arrestees, I would have had as</p> <p>2 much manpower as possible.</p> <p>3 So, I probably would have been there. So,</p> <p>4 I'm going to -- There's nothing here that would say I'm</p> <p>5 there outside of my name being on the -- in that box.</p> <p>6 But I'm going to say I was probably there</p> <p>7 because of the number of arrests and number of people</p> <p>8 taken, and I would have wanted to be -- I would have</p> <p>9 wanted to be there as an extra part of the security team.</p> <p>10 Q. Okay. So, your name is in Box 12, correct?</p> <p>11 A. Correct.</p> <p>12 Q. Is there any scenario where your name would be in</p> <p>13 Box 12 when you were not at the scene of an arrest?</p> <p>14 MR. KOSOKO: Object to the form of the</p> <p>15 question, and foundation.</p> <p>16 THE WITNESS: Unless -- unless an officer</p> <p>17 just -- sometimes they get into a routine because we're a</p> <p>18 team. We're a tactical team. And usually when we do</p> <p>19 missions, again, if I'm -- if we do a mission, so what we</p> <p>20 do if we going to do a mission, we'll put all the</p> <p>21 bodies -- we'll try to put all the bodies that was</p> <p>22 involved in a mission in that, that they were there --</p> <p>23 BY MR. TEPFER:</p> <p>24 Q. Right.</p> <p>25 A. -- or a part -- or a complaint. And because it</p>
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<p>1 Q. Well, what is the significance of your signature</p> <p>2 being on the document pertaining to whether or not you</p> <p>3 were there for this arrest?</p> <p>4 MR. KOSOKO: That's -- I'm going to object</p> <p>5 to the form of the question. I think we're not answering</p> <p>6 the same questions here.</p> <p>7 BY MR. TEPFER:</p> <p>8 Q. Do you understand the question?</p> <p>9 A. If you're saying -- My signature on a document</p> <p>10 has nothing to do with whether I was there or not, if</p> <p>11 that's what you're asking. If you're referring to the</p> <p>12 fact that because I'm in Box 12, does that mean I was</p> <p>13 there and so, therefore, my signature means I was there,</p> <p>14 then, no.</p> <p>15 Q. Okay. I was just trying to understand because</p> <p>16 you said "I was probably there." And I asked you -- and</p> <p>17 maybe I misunderstood. And I asked you why do you think</p> <p>18 you were probably there. And one of the things you said</p> <p>19 was that your signature was on the document. Did I</p> <p>20 misunderstand that?</p> <p>21 A. Yeah. Maybe -- maybe not. Maybe I -- I did say</p> <p>22 that. But the reason, one of the reasons I said I was</p> <p>23 there, because I look at the number of arrests, of</p> <p>24 arrestees, and it looks like it was probably a --</p> <p>25 something that I had probably had information on. And</p>	<p>1 could be a possibility that one of the officers saw</p> <p>2 something that another officer didn't see, or detained</p> <p>3 someone that another -- that type of thing. So, it was a</p> <p>4 mission.</p> <p>5 So, again, because of the number of arrests,</p> <p>6 number of -- I would probably be there as a added part of</p> <p>7 the security force.</p> <p>8 Q. Okay. And then Box 12 -- or, I'm sorry, it's</p> <p>9 actually Box 18 -- 12 is Victim's/Complainant's name. So,</p> <p>10 I was misspeaking. We're looking -- I'm looking at -- ah,</p> <p>11 my eyes are so bad -- Box 18. Okay? Is that where you're</p> <p>12 looking?</p> <p>13 A. Box 18?</p> <p>14 MR. KOSOKO: Box 18 of Exhibit 19?</p> <p>15 MR. TEPFER: Yes.</p> <p>16 MR. KOSOKO: Okay. Just focus on 19 only</p> <p>17 right now, Sarge.</p> <p>18 THE WITNESS: Okay.</p> <p>19 BY MR. TEPFER:</p> <p>20 Q. It's right under 12.</p> <p>21 A. Under 12? That's 19 I see right up under 12. I</p> <p>22 don't know --</p> <p>23 Q. Go two lines up where it says 19. It says 18 --</p> <p>24 A. Okay.</p> <p>25 Q. -- right?</p>

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<p>1 A. Okay. Yes.</p> <p>2 Q. And then there's three choices. It says</p> <p>3 "Discovered, Witnessed" or "Reported Offense," correct?</p> <p>4 A. Yes.</p> <p>5 Q. And in your version, Exhibit 19, there's an X on</p> <p>6 Number 2, "Witnessed", correct?</p> <p>7 A. Yes.</p> <p>8 Q. And then there's a bunch of names. It says,</p> <p>9 "P.O. Young, P.O. Ridgeall, P.O. Mohammed, Sergeant Watts,</p> <p>10 P.O. Bolton, P.O. Gonzalez, P.O. Rodriguez" in Box 18,</p> <p>11 correct?</p> <p>12 A. Correct.</p> <p>13 Q. Okay. So, those are all individuals who</p> <p>14 witnessed some aspects of the arrest, correct?</p> <p>15 A. Some aspect of the mission.</p> <p>16 Q. Some aspect of the mission?</p> <p>17 A. Not a specific arrest.</p> <p>18 Q. Okay. So, what -- can you define mission for me?</p> <p>19 A. Sure. A mission would be -- we've -- we've</p> <p>20 gained information that narcotic activity is occurring at</p> <p>21 a specific location. And individuals -- we probably had</p> <p>22 some information on descriptions of who, what, who was</p> <p>23 doing what.</p> <p>24 And what happened, we would relocate. We</p> <p>25 would get together, relocate to that area. And we would,</p>	<p>1 THE WITNESS: Yes, because during this --</p> <p>2 these missions, the missions -- a mission -- a officer, a</p> <p>3 particular officer or unit could come up with their own</p> <p>4 mission from the information that was given them, probably</p> <p>5 from the lieutenant, probably another supervisor, probably</p> <p>6 another marked unit. So, they don't have to find me and</p> <p>7 say, "Hey, Sarge, we going to deliver the" -- "come up</p> <p>8 with this mission." No.</p> <p>9 They'll go and investigate and they'll</p> <p>10 develop their own -- it will work itself up to probably a</p> <p>11 mission. Now they'll come to me and say, "Hey, Sarge, we</p> <p>12 looked at this and we're going to need help and we're</p> <p>13 going down here because we have this information."</p> <p>14 So, yes, they would probably work on a</p> <p>15 mission that I wasn't aware of at the time. But, you</p> <p>16 know, I would -- they would have to eventually make me</p> <p>17 aware of it because they would have the arrests and I</p> <p>18 would be the one to approve reports.</p> <p>19 BY MR. TEPFER:</p> <p>20 Q. Right, exactly. So this report wouldn't be</p> <p>21 filled out until there was an arrest, right?</p> <p>22 A. Correct.</p> <p>23 Q. And by the time there was an arrest you would</p> <p>24 have had at least some knowledge of the mission, correct?</p> <p>25 A. Yes. When they completed the documents. If I</p>
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<p>1 as we would say, we would hit that area. We would come in</p> <p>2 and we would jump out and try to detain all that was</p> <p>3 there. It was a open air drug market, so, you know, you</p> <p>4 try to detain all that you could.</p> <p>5 And that would be the mission, to suppress</p> <p>6 the -- suppress the drug activities and arrest all that</p> <p>7 were illegally involved in the drug activity.</p> <p>8 Q. Okay. And you were the supervising sergeant of</p> <p>9 all of these individuals who are listed in Box 18, right?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. Is there any scenario while you were the</p> <p>12 supervising sergeant where the individuals who were</p> <p>13 conducting a mission, could they -- who were under your</p> <p>14 supervision at that time and it was a mission you didn't</p> <p>15 know about?</p> <p>16 MR. KOSOKO: Object to the form of the</p> <p>17 question.</p> <p>18 BY MR. TEPFER:</p> <p>19 Q. Is there any scenario where you wouldn't know</p> <p>20 about a mission that your supervisees were working on</p> <p>21 during -- while you were on -- on duty?</p> <p>22 MR. KOSOKO: Objection to the form.</p> <p>23 You're -- you necessarily got to speculate, Josh. If he</p> <p>24 doesn't know, he doesn't know.</p> <p>25 But go ahead and answer.</p>	<p>1 wasn't there, I would rely upon the documents.</p> <p>2 Q. Right.</p> <p>3 A. And even if I was there, I would still rely upon</p> <p>4 the documents, because the arresting officer probably saw</p> <p>5 something that I didn't see. So I have to rely on the</p> <p>6 documents that the arresting officer presented to me.</p> <p>7 Q. And you're talking about relying on it and making</p> <p>8 your determination of whether or not there's probable</p> <p>9 cause, correct?</p> <p>10 A. For probable cause and everything I described</p> <p>11 earlier. That's it properly, the -- it's properly filled</p> <p>12 out, the forms are properly probably filled out. So, yes.</p> <p>13 Yeah.</p> <p>14 Q. Okay. And if you weren't -- Let's say there was</p> <p>15 a scenario where you were not present at the scene at any</p> <p>16 point during the mission.</p> <p>17 A. Um-hum.</p> <p>18 Q. Okay. Would you expect that your name would be</p> <p>19 in Box 18?</p> <p>20 A. Probably so.</p> <p>21 Q. You would?</p> <p>22 A. Yeah, because -- just because I'm not there</p> <p>23 doesn't mean I wasn't a part of the mission.</p> <p>24 Q. Okay.</p> <p>25 A. Because, again, maybe the officer developed the</p>

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<p>1 mission and then eventually, like I said, "Hey, Sarge, 2 we're going to need more than just the Adam car to go down 3 there and arrest these" -- "these people." 4 So, I'm aware of the mission now. So, now 5 when they go down there, yeah, I know. And not only am I 6 aware of it, I have to make others aware of it. Maybe the 7 district commander, maybe the -- who's ever operating 8 the -- the patty wagon that day, "Hey, I need this unit to 9 stand by because we're going to have multiple arrestees." 10 So -- And they're aware of it also. And 11 they're a part of the mission, but they're -- it's not 12 necessary that you include them in every report because 13 they're a part of the mission. 14 It's not necessary that you include the 15 sergeant, the supervising sergeant, in every report 16 because of the mission, because the supervising sergeant 17 is just going to sign the documents for probable cause and 18 make sure every -- all the documents are complete. The 19 supervising sergeant is not going to show up in court, is 20 not going to testify. 21 So, it's -- What you're saying is, you're 22 referring to -- to those boxes. I'm going to say those 23 boxes are just to say who helped out. We can -- we can 24 put it like that. 25 Because a lot of times, if you refer to this</p>	<p>1 the -- all those things in his report. I witnessed that 2 everything was filled out properly so when we submitted 3 it, it wouldn't be -- it would have all the -- the right 4 answers, so to speak, to move forward. 5 Q. Okay. And what's the difference in what you just 6 described in approve -- in Box 50 where it has your 7 approval signature on the document, correct? 8 MR. KOSOKO: Hang on. 9 I'm going to object again to the form of the 10 question. It's a foundation. You're asking him to figure 11 out what someone else does when they fill out their 12 reports. 13 MR. TEPFER: It's a poor question. I'm 14 going to strike it. 15 BY MR. TEPFER: 16 Q. You see Exhibit 50 -- Exhibit 19 and Box 50, 17 correct? 18 A. Yes. 19 Q. And that's your signature, right? 20 A. Yes. 21 Q. All right. And it says the date. And then the 22 Box 49 has got the date and the time that you signed it? 23 A. Yes. 24 Q. Okay. So, you just described what your name in 25 Box 18 could mean in some scenarios; that you witnessed</p>
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<p>1 document, you can go to the end of the documents and you 2 might find a lot of officers, a lot more officers, that 3 were -- couldn't be fit in that Box 12 or 18. And they'll 4 be, you know, typed in the report at the end of the 5 document, just officers that was on the scene or officers 6 that showed up later on the scene. You know, it could 7 have been that. Maybe I showed up later on the scene. It 8 could have been a variety of things. 9 Q. And I understand we don't -- you don't -- My 10 understanding is you don't remember specifically whether 11 you were at the scene or not on this report, correct -- 12 A. Correct. 13 Q. -- Exhibit 19? 14 A. Correct. 15 Q. Okay. So, it does, in Exhibit 19, under 18, have 16 the box checked "Witnessed", right? 17 A. Yes. 18 Q. Okay. So, how is it that if you were never at 19 the scene and not involved in the arrest, how would it be 20 that you witnessed the event? 21 A. It's not that I witnessed the event. I think 22 what you're missing is that when it says "witnessed," I 23 witnessed the report as a supervising sergeant. I 24 witnessed the validity of the proper document. I 25 witnessed that the officer had probable cause and had</p>	<p>1 the probable cause or you oversaw the documents and it was 2 done correctly, correct? 3 A. Correct. 4 Q. So, I'm asking, what is, then, the significance 5 of the signature in Exhibit -- in Box 50, then? 6 A. That those things were done. 7 Q. Okay. So, what is the difference between signing 8 your name in Box 50 saying that those things were done 9 versus having your name listed in Box 18 that those things 10 were done? 11 MR. KOSOKO: Object to the form of the 12 question. Calls for a speculative response. 13 Go ahead. Go ahead, Sarge. Try to explain 14 it. 15 THE WITNESS: Because, again, sometimes I 16 probably showed up on the scene. And it's not that I -- 17 You have to -- When it said witness, what did I witness? 18 Did I witness when I showed up on the scene that they were 19 being loaded in the patty wagon? 20 I could have -- In that aspect, I have -- 21 you have to ask me what did I witness specifically. Was 22 it -- I -- I know I didn't witness the actual, physical 23 arrest, no. I -- I probably witnessed a lot of things. I 24 witnessed the safety of the officers. I witnessed the 25 safety of the arrestees. Because I'm the supervisor on</p>

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<p>1 the scene. So, there's a lot of things that I witness, 2 I'm a witness to, I can testify to.</p> <p>3 BY MR. TEPFER:</p> <p>4 Q. Okay. And you're just a supervisor on the scene. 5 So, that's sort of where I started. That's what I'm 6 trying to nail down.</p> <p>7 So, you just used the word "witnessed" a 8 lot. So your name in Box 18 signifies you witnessed 9 something, correct?</p> <p>10 A. Possibly, yes. That's what I just told you. I 11 witnessed the validity of their report, the probable cause 12 being met in the report. That's what I witnessed.</p> <p>13 Q. Okay. I'm really not understanding that.</p> <p>14 A. Okay.</p> <p>15 Q. My under- --</p> <p>16 A. I -- I'm sorry. I mean, it's -- I -- I -- I 17 don't know what I can say to make you understand.</p> <p>18 Q. Okay. So, I understand that -- What I understood 19 your testimony to be is, in Box 50 when you sign it --</p> <p>20 A. Um-hum.</p> <p>21 Q. -- you're assert- -- you're signing, you're 22 witnessing the validity of the reports and the probable 23 cause in the reports; is that generally accurate?</p> <p>24 A. That's correct.</p> <p>25 Q. Okay. Now, is there anything else that your</p>	<p>1 A. That is correct.</p> <p>2 Q. Okay.</p> <p>3 A. The only read -- The only way I would not be the 4 approving sergeant is if I made the arrest. If I was the 5 arresting officer, I would have another supervisor approve 6 the case report, the arrest report, and all of those 7 things. I can't clerk my own arrest report, you know, if 8 I'm doing the report, no.</p> <p>9 Q. Sure. Is there any times when you were a 10 tactical sergeant where you made your own -- where you 11 made arrests and you had to get approval?</p> <p>12 A. Very seldom.</p> <p>13 Q. Very seldom?</p> <p>14 A. Yeah. I was a supervising sergeant.</p> <p>15 Q. Yeah.</p> <p>16 A. I supervised arrests.</p> <p>17 Q. Okay. So, as you sit here today --</p> <p>18 A. I'm -- That's why in these cases where I'm being 19 sued, I don't understand why I'm being sued, because I'm 20 the approving supervisor.</p> <p>21 The arrests made of these people were made 22 by the arresting officers who would go into court and to 23 testify to why they arrested these people. They would be 24 sworn in, go to grand jury, whatever the situation is. It 25 would really and truly have nothing to do with me except</p>
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<p>1 signature in Box 50 signifies beyond what I just 2 described?</p> <p>3 A. My signature in Box 50 is stating that I am the 4 supervisor approving the report that is being submitted by 5 the officer, maintaining the proper probable cause and -- 6 and grammar and spelling, and that the document is filled 7 out correctly. That's what my signature in Box 50 states.</p> <p>8 Approval.</p> <p>9 Q. Perfect. So, your signature on Box 50 has zero 10 to do with whether or not you ever left the Department 11 that day, witnessed any aspect of anything to do with the 12 arrestees who are listed on the report; is that correct?</p> <p>13 A. Correct.</p> <p>14 Q. Okay. So, you would sign this report if you 15 witnessed the entirety of the criminal act and were 16 actively involved in the mission at the scene and you -- 17 everything in the report was correct, you would sign this 18 report in Box 50, correct?</p> <p>19 A. If I was the approving supervisor, yes.</p> <p>20 Q. Sure. And you would, similarly, sign Box 50 in a 21 scenario where you sent your supervisees, your patrol, 22 your tactical team officers, on a mission and they made an 23 arrest and then you reviewed their report, and the grammar 24 was great and there was clearly probable cause and you 25 would sign off on that, right?</p>	<p>1 approving the probable cause and the validity and the 2 proper, you know, filling out of the documents.</p> <p>3 Q. Okay. So, during the course of your time as a 4 tactical sergeant during the scope of the period we're 5 talking about, 2001 to 2012, would you say less than -- 6 fewer than five times you were a reporting or arresting 7 officer on one of these vice case reports?</p> <p>8 A. I really can't recall because, you know, I was 9 out in the field. And as a supervising sergeant, you 10 still out there. You're actively in the field. If you 11 see something, you going to take action. And you see it, 12 and then you can testify to it. I'm going to make the 13 arrest.</p> <p>14 So, if you ask me five, ten, I don't know. 15 I'd have to -- I'd actually have to look at my history of 16 arrests and see, you know.</p> <p>17 Q. Sure. It was very rare, you said?</p> <p>18 A. Okay. I was pretty aggressive. If I saw it, I 19 took action. So, I couldn't give you a number. Rare to 20 you might be 10. Rare to me might be 15 to 20.</p> <p>21 Q. Okay.</p> <p>22 A. It all depends. Over almost a 20-year -- or, a 23 11-year period as a supervisor, so I don't know what you 24 think rare is.</p> <p>25 Q. I don't want your answer to what I think, I just</p>

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<p>1 want to know what it would be. So, it would be more than 2 five to you?</p> <p>3 A. I would say more than five.</p> <p>4 Q. Okay. So, 15 to 20 at least?</p> <p>5 A. I would say more than five.</p> <p>6 Q. Okay. But would you say more than 15 or 20?</p> <p>7 A. I'd say more than five. I can't recall if it was 8 15 or 20.</p> <p>9 Q. Okay. Fair enough. All right. So, I do -- So, 10 we -- I think we've settled on what Box 50 means. I'm 11 still having a little trouble understanding what Box 18 12 means on this report, so why don't we try and do it this 13 way.</p> <p>14 A. There's a -- I probably can clarify that for you. 15 There's a document that you can refer to that gives you an 16 explanation on what each of those boxes mean when you fill 17 it out.</p> <p>18 Q. And what's that document?</p> <p>19 A. Oh, I had to go to the sergeant's academy for 20 that, so . . .</p> <p>21 Q. It's a training document --</p> <p>22 A. Yeah.</p> <p>23 Q. -- you received?</p> <p>24 A. Yeah. It tells you -- it tells you what each one 25 of these boxes means.</p>	<p>1 remember what it specifically told you?</p> <p>2 A. Not specifically, no.</p> <p>3 Q. Okay. Okay. So what I'm trying to understand, 4 though, is -- and I want to try to do it this way now.</p> <p>5 With Box -- I want to look at Exhibit 22 and -- not 22, 20 6 also, Exhibit 20. Okay?</p> <p>7 A. Um-hum.</p> <p>8 Q. And I want you to look at Box 18 for that. Okay?</p> <p>9 And in that one, you were also -- you also signed --</p> <p>10 A. Um-hum.</p> <p>11 Q. -- in Box 50, but your name is not listed as 12 someone who witnessed in Box 18. Okay?</p> <p>13 A. Um-hum.</p> <p>14 Q. Okay. So, I guess I'm just trying to understand. 15 I think this is sort of where we started. Does the fact 16 that your name is in Box 18 of Exhibit 19, versus not 17 being in Box 18 for Exhibit 20, does it in any way signify 18 to you that it is more likely that at some point you were 19 at the scene --</p> <p>20 A. It has no relevance.</p> <p>21 Q. -- in 2004?</p> <p>22 A. It has nothing to do about whether I was on 23 the scene or I arrived on the scene later, or if I was 24 there. Those boxes has nothing to do with that.</p> <p>25 Q. I'm not asking whether it has anything to do with</p>
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<p>1 Q. Okay. And do you remember what it tells you that 2 Box 18 means?</p> <p>3 A. Nah. I've been gone for a while. I would have 4 to refer to it.</p> <p>5 Q. Okay. Do you remember the name of the document 6 that -- or, the training document?</p> <p>7 A. Probably the guide for vice case reporting.</p> <p>8 Q. And do you remember receiving -- what did you 9 recall it, sergeant training?</p> <p>10 A. Of course, yes. Not only in sergeant training, 11 but as a -- as an officer also. It's -- it's -- because 12 the officers have to fill out this document also.</p> <p>13 Q. Okay.</p> <p>14 A. So, any police officer should have had that 15 training.</p> <p>16 Q. Okay. And so you remember receiving training on 17 when, who, and what -- who should be listed in Box 18 and 18 under what circumstances?</p> <p>19 MR. KOSOKO: Object to the form of the 20 question.</p> <p>21 BY MR. TEPFER:</p> <p>22 Q. You can answer.</p> <p>23 A. It would -- it would -- it would probably tell 24 you that. Yeah, it would probably tell you that.</p> <p>25 Q. Okay. But as you sit here today, you don't</p>	<p>1 whether you were there to witness the arrest or arrived 2 later or transported someone. I'm asking, does it have 3 any significance to the fact of whether or not you left 4 District 2 that day even.</p> <p>5 A. No. I would say, no, it -- no.</p> <p>6 Q. So, is there any significance whatsoever in 7 having your name there at all on Box 18?</p> <p>8 MR. KOSOKO: I'm going to object to the form 9 of the question again. It calls for a speculative 10 response, and foundation. You're asking him to figure out 11 how that officer fills out his reports.</p> <p>12 THE WITNESS: Yeah, because you -- you would 13 find some of these where, okay, the officer included me 14 because I witnessed the report. Some officers probably 15 filled it out because I witnesses the report. And my name 16 and my signature in Box 49 -- 48 and 50 states that I 17 witnessed the report. I approved the report.</p> <p>18 So, some officers probably, in their mind, 19 I -- I guess I wouldn't know what they were thinking. 20 "Sarge witnessed the report so I'm going to put him down 21 as a witness."</p> <p>22 And over here, this officer probably said, 23 "Well, I'm not going to put Sarge down as a witness 24 because he probably" -- "he didn't witness anything." I 25 don't know. I can't say why an officer would or would not</p>

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<p>1 put me in that box.</p> <p>2 BY MR. TEPFER:</p> <p>3 Q. Great point. But you signed both of these</p> <p>4 reports, right?</p> <p>5 A. Yes.</p> <p>6 Q. Okay. So, when you signed the reports reviewing</p> <p>7 for them, you put no sig- -- If you -- Would you sign a</p> <p>8 report where you actually never left the office that day</p> <p>9 that listed you as a witness in Box 18? No problem doing</p> <p>10 that, right?</p> <p>11 A. Right.</p> <p>12 Q. Okay. And you have no problem doing that if you</p> <p>13 did witness the event in Box 18, right?</p> <p>14 A. No.</p> <p>15 Q. "No"?</p> <p>16 A. NO.</p> <p>17 Q. Okay.</p> <p>18 A. So, I'm -- I'm witnessing. I'm approving the</p> <p>19 information that's before me from the arresting officer,</p> <p>20 the vice case report.</p> <p>21 Q. So, would there have been any scenarios where you</p> <p>22 reviewed a vice case report and you wouldn't sign it, you</p> <p>23 wouldn't approve probable cause?</p> <p>24 A. Yes.</p> <p>25 Q. Tell me about that. Tell me about some of the</p>	<p>1 all the case reports that I've signed. And not just for</p> <p>2 these particular officers. Are you talking about these</p> <p>3 particular officers? I've had other TAC teams? I've --</p> <p>4 I've clerked reports for -- for patrol officers.</p> <p>5 So, when I say not frequently, I mean I -- I</p> <p>6 probably could go through, you know, during the course of</p> <p>7 a week at work I could go through 150 vice case reports</p> <p>8 for the District, and probably maybe two or three without</p> <p>9 probable cause.</p> <p>10 Q. Okay.</p> <p>11 A. Yeah.</p> <p>12 Q. And that -- Are you referring -- And let it --</p> <p>13 That's a good point. Let's focus on this team that you</p> <p>14 supervised from 2001 to 2012.</p> <p>15 Would you say two to three in a hundred --</p> <p>16 out of a hundred and 50, as you said?</p> <p>17 A. Over a 10-year period probably a little more,</p> <p>18 less than, again, five. Less than 15.</p> <p>19 Q. During the entire course of the decade --</p> <p>20 A. That I can -- that I would recall, yes.</p> <p>21 Q. Okay. So only five to ten times --</p> <p>22 A. Yes 82.</p> <p>23 Q. -- during the entire course of your District 2</p> <p>24 supervision did you read a --</p> <p>25 A. Of this -- of this team, yes.</p>
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<p>1 circumstances where you wouldn't.</p> <p>2 A. There was no probable cause. If I read it and I,</p> <p>3 as a supervisor and according to the statutes of -- of the</p> <p>4 law, of the crime that the subject was being charged with,</p> <p>5 and the elements of the crime wasn't there and sufficient</p> <p>6 probable cause wasn't there, I couldn't approve that.</p> <p>7 Q. Okay. So, it would be based upon -- So, you</p> <p>8 would review the narrative of what was written by the</p> <p>9 officer, correct?</p> <p>10 A. Correct.</p> <p>11 Q. And if they wrote something up and said, "Hey,</p> <p>12 I'm looking at this, doesn't" -- "nothing illegal</p> <p>13 happened" --</p> <p>14 A. Right.</p> <p>15 Q. -- then you wouldn't sign it?</p> <p>16 A. I wouldn't sign it.</p> <p>17 Q. And that happened -- Did that happen frequently</p> <p>18 during the course of your career?</p> <p>19 A. Oh, no, not frequently. In my opinion, I had --</p> <p>20 they were good officers and they -- the officers were out</p> <p>21 there doing their job. It happened, of course it</p> <p>22 happened, but not frequently, no.</p> <p>23 Q. Okay. So that was -- when you say not</p> <p>24 frequently, what does that mean to you?</p> <p>25 A. When I say not frequently, now I'm talking about</p>	<p>1 Q. -- of this team did you read a vice case report</p> <p>2 and say, "Hey, there's no crime here"?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. And then you let the person go, correct,</p> <p>5 the arrestee?</p> <p>6 A. No.</p> <p>7 Q. "No"?</p> <p>8 A. No.</p> <p>9 Q. Oh, what happens then?</p> <p>10 A. No. There's a process. Just because the officer</p> <p>11 doesn't have probable cause, he still completes all the</p> <p>12 documents. I still sign off on everything. And I would,</p> <p>13 as a sergeant, I would write "No probable cause," and I</p> <p>14 would submit it forward to the desk sergeant, who submits</p> <p>15 it to the -- to the watch commander. And the watch</p> <p>16 commander would release without charge. I can't release</p> <p>17 them without charge. Once he's arrested, he's arrested.</p> <p>18 Q. Got it. So, was there any scenario ever where</p> <p>19 the watch commander, or anyone above you, overruled you</p> <p>20 and said that there was probable cause, if you recall?</p> <p>21 A. I don't recall.</p> <p>22 Q. Okay. All right. And they said -- You said</p> <p>23 there's some other -- Well, I think you're saying there's</p> <p>24 some other scenarios where you might not sign the report</p> <p>25 at least right away if there was, like, grammar problems,</p>

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1 or something like that, right?	1 course of your --
2 A. I told them go back and, you know, "That doesn't	2 A. Not that I recall.
3 sound right. What does that mean?" I didn't understand	3 Q. Okay. So that is, like, a hypothetical scenario,
4 it so I asked them to explain it more.	4 but you don't recall that ever happening?
5 Q. Okay. So -- And then they would come back with a	5 A. It was -- it was an answer to the question that
6 different report?	6 you submitted to me. Was it -- you consider it was a hy-
7 A. They would -- they would add the	7 -- I was telling you how it could possibly be. So, yes,
8 information needed for them to have the probable cause in	8 hypothetically.
9 the report. Or even if sometimes maybe they overlooked a	9 Q. As part of your approval process in signing
10 couple of boxes and I sent it back.	10 Exhibit -- or, Box 50, do you ever look at who's listed in
11 So, whatever the deficiency was in the	11 Box 18?
12 report, I would send them away. They would correct it and	12 A. I would occasionally, yeah. Yeah, I would
13 come back.	13 because -- not just Box 18. I start at Box 1. And so,
14 Q. Okay. Were you assessing the reliability of the	14 yes, I'm looking at Box 18, 19, 24, all the way. I'm
15 information in the narrative?	15 approving it. Because sometimes an officer could possibly
16 A. No, not assessing the li- -- no. That's not my	16 just put his name in there. And if I'm looking at it,
17 job as a supervisor. My -- my supervisory duty was to	17 I'll say, "Hey, were you in the car by yourself?" You
18 make sure that there were probable cause, that the	18 know, I could ask him that question.
19 document was completed correctly, and it was able to go	19 "Ah, sorry, I forgot to put my partner in
20 forward. That's for the state's attorney, the lawyers,	20 there." Anything, so . . .
21 and all that stuff. I -- that was above my pay grade.	21 Q. Sure. So, you're reading -- Before you signed
22 Q. Okay. So, you never, like, read something and	22 these, you're reading them really thoroughly, right?
23 you're, like, "This" -- "I understand the words, but this	23 A. I would say I did. I think I did a thorough job,
24 doesn't make any sense and seems totally unreliable. I'm	24 yes.
25 not signing this"?	25 Q. How long would you take to read the average vice
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1 A. Not totally unreliable. If the probable was	1 case report before you signed off?
2 there, just because it don't make sense to me, I'm looking	2 A. It all depends. Some are short. This was a
3 for probable cause.	3 pretty long one here. I mean, all this, a lot happened.
4 A lot of documents you read probably don't	4 It all depends on how much happened, you know.
5 make sense to you, but that don't mean that the officer	5 I think I read pretty well, so sometimes it
6 didn't see what he saw. The officer, you know, he saw	6 take me two minutes, five minutes, ten minutes. And
7 what he saw. It probably don't make sense to me. But if	7 sometimes I have to read it again if I don't understand
8 the probable cause was established, I signed the document.	8 it.
9 And then it would go forth. And then once I signed it and	9 Q. Sure. And, obviously, there were times when you
10 it would go forth, remember, it goes to the desk sergeant,	10 were signing off on reports of arrests that you witnessed
11 who sends it over to the watch commander. And the watch	11 some significant aspect of, correct?
12 commander has to approve also.	12 MR. KOSOKO: Object to the form of the
13 I'm not the final say-so on whether this guy	13 question.
14 is arrested. Again -- again, the watch commander, he	14 THE WITNESS: There's a possibility that I
15 reads it. And if he determines -- I might have signed it	15 could sign off on something that I witnessed. And -- and
16 thinking it was probable cause in my mind, but then the	16 maybe they put me in there and, you know, maybe they
17 watch commander might read it and call me up, "Hey, Sarge,	17 didn't. I don't know.
18 come here." And he might disagree. He outranks me.	18 BY MR. TEPFER:
19 He -- he decides to release the guy without charges.	19 Q. No, I understand that.
20 Well, okay. "Okay, Lieutenant." That's	20 A. Or they would -- if -- And to your question, if I
21 what I say because that's the way it is.	21 witnessed something and it was significant enough to
22 Q. Did that happen in the course of your career?	22 establish the probable cause, I'm sure the officer would
23 A. No. Until you asked me about it, so I'm telling	23 probably include that in his -- in the document in the
24 you how it could possibly go.	24 narrative itself saying, you know, Sergeant Watts, blah,
25 Q. I'm asking, did that ever happen during the	25 blase along, what I witnessed, or -- if it was

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<p>1 significant. You know what I mean?</p> <p>2 Q. Sure.</p> <p>3 A. So, yeah.</p> <p>4 Q. But I guess what -- I'm asking a different</p> <p>5 question.</p> <p>6 If you witnessed an aspect of the arrest and</p> <p>7 you were reviewing this vice case report and something in</p> <p>8 the vice case report conflicted with what you witnessed,</p> <p>9 would you sign off on the report?</p> <p>10 A. No. If it was -- if it conflicted with what I</p> <p>11 witnessed, no, I wouldn't sign it.</p> <p>12 Q. You'd go back and talk to your guy?</p> <p>13 A. I'd talk to the officer, you know. And if he</p> <p>14 said -- he might have an explanation for what I witnessed.</p> <p>15 I probably didn't witness what he -- everything he saw.</p> <p>16 So, it's -- it's -- when you -- when you out there and you</p> <p>17 dealing with this, with these people, it's not just cut</p> <p>18 and dry. You -- you probably see 10 things, you know, and</p> <p>19 you can only remember three of the ten that happened, you</p> <p>20 know.</p> <p>21 So, he probably saw something that I didn't</p> <p>22 see. So, I can't judge him on every little aspect that he</p> <p>23 put in his narrative. That's not fair to him. He's out</p> <p>24 there doing the job, risking his safety, you know, and all</p> <p>25 that good stuff. And then I come in and I want to nitpick</p>	<p>1 Q. And you've -- And they earned your trust,</p> <p>2 right?</p> <p>3 A. Absolutely.</p> <p>4 Q. I mean, you already testified that these were</p> <p>5 good -- these were good teams, right?</p> <p>6 A. I would -- I would say they were, yes, very good</p> <p>7 teams.</p> <p>8 Q. And since you're not witnessing every aspect of</p> <p>9 it, you have to rely on what they say they saw, right?</p> <p>10 A. Same as any approving supervisor on the Chicago</p> <p>11 Police Department. You think just because -- you're</p> <p>12 saying tactical as if, you know, it's just with tactical</p> <p>13 police officers. No. That's over the whole Department.</p> <p>14 You think the -- the -- the beat sergeant is</p> <p>15 out there watching his guys make a traffic stop? He has</p> <p>16 to approve -- he has to approve his guys' arrest re- --</p> <p>17 too. So, he has to trust his guys who haven't been on the</p> <p>18 job three years, who hasn't had to go through what these</p> <p>19 guys went through to get on the tactical team.</p> <p>20 So, the same thing that this sergeant has to</p> <p>21 do for his guys, I have to do for my guys.</p> <p>22 Q. Great. So, you're doing the exact same thing any</p> <p>23 sergeant would do in the Chicago Police Department who's</p> <p>24 doing their job correctly?</p> <p>25 A. I'm doing the duties of a supervising sergeant on</p>
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<p>1 about something that he saw that -- because I didn't see</p> <p>2 it? No.</p> <p>3 Q. I mean, you're trusting your team, right?</p> <p>4 A. You're trusting the officer. You're trusting the</p> <p>5 officer's ability to be out there. And he's not a -- he's</p> <p>6 not a rookie officer, you know.</p> <p>7 These -- these tactical officers that are on</p> <p>8 these teams -- to be a tactical officer you have to have</p> <p>9 at least three years on the Department. They wouldn't</p> <p>10 even allow you to be a TAC -- on a TAC team. So -- and</p> <p>11 then they -- and before you assigned to a TAC team they</p> <p>12 actually go through your arrest record, how many arrests</p> <p>13 you made, what kind of court activity do you have, and how</p> <p>14 did these officers testify in court, how many -- you know,</p> <p>15 that type of thing.</p> <p>16 So, you -- you know that these are, what we</p> <p>17 like to say, is seasoned officers, officers that are</p> <p>18 mature. They know how to write case reports. They -- You</p> <p>19 know, you trust that they know how to write case reports</p> <p>20 because they're tactical officers. And you assume that</p> <p>21 they, you know, that they've had that training.</p> <p>22 And they were chosen not by the sergeant to</p> <p>23 be on the TAC team, but they were chosen by the district</p> <p>24 commander, the -- the tactical lieutenant. And they have</p> <p>25 a meeting before they assign these people to TAC teams.</p>	<p>1 the Chicago Police Department.</p> <p>2 And if you were to go over some of these</p> <p>3 documents for another officer, whether he's a TAC officer</p> <p>4 or a -- whether he's just a regular patrolman, he probably</p> <p>5 would put his sergeant in the -- in that box, too. It all</p> <p>6 depends on the officer, basically. I mean, I . . .</p> <p>7 Q. So, you were -- So, just to be very clear, I</p> <p>8 think we're pretty clear at this point --</p> <p>9 A. Um-hum.</p> <p>10 Q. -- whether or not your name is in Box 18 has no</p> <p>11 significance whether or not you would approve a report?</p> <p>12 A. Right.</p> <p>13 Q. Okay.</p> <p>14 A. I would say.</p> <p>15 Q. All right. But there certainly would -- and I</p> <p>16 just want to get back to this a little bit.</p> <p>17 A. Um-hum.</p> <p>18 Q. And you answered, totally reasonably, that</p> <p>19 certainly your officers may have viewed -- when you were</p> <p>20 at the scene may have viewed things differently or at</p> <p>21 different times than you did, correct?</p> <p>22 A. Um-hum.</p> <p>23 Q. But, certainly, if you viewed something in the</p> <p>24 narrative that was not consistent with something that you</p> <p>25 saw, you might go back to them and say, before you sign</p>

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<p>1 the report, "Hey, I saw this a little differently. Can we 2 talk about this?" Correct?</p> <p>3 MR. KOSOKO: Object to the form of the 4 question.</p> <p>5 Go ahead and explain, Sarge.</p> <p>6 THE WITNESS: I, as a supervising sergeant, 7 would never go back to an officer and tell him I saw 8 something so I need you to change this. In his narrative 9 I would say, "Hey, add this and put me down as a witness 10 that I saw this."</p> <p>11 BY MR. TEPFER:</p> <p>12 Q. Got it. Okay. Got it. And if he wrote down 13 something in his narrative report that you saw something 14 and that was inaccurate, before you signed the report you 15 would ask him to change that, right?</p> <p>16 MR. KOSOKO: Object to the form of the 17 question.</p> <p>18 MS. OLIVIER: Object to the form. 19 Kelly Olivier. 20 (Court Reporter clarification on speaker.) 21 MR. KOSOKO: That's Kelly Olivier. 22 And I'm making the same objection she's 23 making. 24 THE WITNESS: You want to repeat that 25 question?</p>	<p>1 Everyone was objecting. It's totally fine. 2 BY MR. TEPFER:</p> <p>3 Q. What's an event number?</p> <p>4 A. An event number is just -- it's an event number 5 that the Department uses to just keep up with the -- with 6 each event and arrest in an event or --</p> <p>7 Q. Okay. What's the difference between an event 8 number -- I'm looking at Exhibit 19.</p> <p>9 A. Um-hum.</p> <p>10 Q. Number 40 says Event Number 10314. Do you see 11 that?</p> <p>12 A. 10314, yeah.</p> <p>13 Q. Okay. That's obviously very different than the 14 RD Number HK279970, right?</p> <p>15 A. Right.</p> <p>16 Q. Okay. What's -- I've seen some reports that have 17 event numbers and some that --</p> <p>18 A. All reports should have event numbers. 19 Q. All reports should event numbers?</p> <p>20 A. All reports should have event numbers. 21 Q. Okay. And if they don't?</p> <p>22 A. There's an event number for it. 23 Q. Okay. 24 A. The officer just didn't, for whatever reason, put 25 it there. But there's an event number for any --</p>
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<p>1 BY MR. TEPFER:</p> <p>2 Q. Yeah. I'm not sure why it's an objectionable 3 question, but I'll try again.</p> <p>4 A. No, could you repeat it?</p> <p>5 Q. Yeah, no, I'm happy to. I'm not trying to -- I'm 6 not trying to be unclear.</p> <p>7 I'm saying if, in -- if, in the narrative 8 portion of the report that was in front of you --</p> <p>9 A. Um-hum.</p> <p>10 Q. -- it describes something that the officer 11 thought you perceived, thought you witnessed, and then you 12 read it and you're, like, "No, no, that's not what I 13 saw" --</p> <p>14 MR. KOSOKO: Okay. Fine.</p> <p>15 BY MR. TEPFER:</p> <p>16 Q. -- would you -- you wouldn't sign that report 17 before that description was changed, correct?</p> <p>18 A. No. That's when I would pull the officer to the 19 side and say, "Hey, you said that I saw this. I didn't 20 see that." So, now -- no, I wouldn't sign it until -- and 21 he -- and then -- no, I would not sign it because he's 22 stating something I saw that I'm saying I didn't see.</p> <p>23 Q. Got it. Great.</p> <p>24 MR. KOSOKO: Sorry, Josh. I thought --</p> <p>25 MR. TEPFER: No, I obviously wasn't clear.</p>	<p>1 Q. Okay. 2 A. It's the event. 3 Q. Okay. And what is -- if -- would you sign a 4 report that didn't have an event number listed? 5 A. If I didn't see an event number, I would ask, 6 "Where's the event number?" And if it -- if I signed a 7 report without an event number, it was -- it was a mistake 8 on my part. I should have never signed a report without 9 an event number. 10 Q. Okay. 11 A. Because an event number should be the first thing 12 there, as in these reports I'm looking at. 13 Q. Okay. And can you explain -- Well, why don't you 14 explain to me -- what's the difference between an event 15 number and an RD number then? 16 A. Because you can have -- An RD number is just for 17 that specific event. And also -- well, a lot of times 18 it's just for the Department use. I -- I don't know why 19 the Department does that. Maybe it's they use the event 20 number for other things when it's -- the -- check. 21 The event number is established when you 22 call in to get an RD number. There's always an event 23 number given. 24 Q. Okay. So, when you call in to get an RD number, 25 you're given both an RD and an event number at the same</p>

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1 time? 2 A. Yes. 3 Q. Okay. 4 A. And a lot of times, you know, even the 5 dispatcher, they forget to give you the event number. And 6 you just have to call them and say, "Hey, what's the event 7 number for RD Henry Nancy 4536829?" 8 So, there's always going to be an event 9 number. And a lot of times you'll have, in a report you 10 might have an event number associated with another event 11 number and another RD number. It's just . . . 12 Q. Okay. The RD -- Does the RD number reflect the 13 entire investigation? Is that correct? That's a bad 14 question. All right. Just strike that. 15 What's an incident number? 16 A. It's the incident. It's the -- it's the same. 17 There's a incident -- From my recollection -- recollec -- 18 What I recall is that the incident number is 19 just something that the Department went to to keep track 20 of, I guess to better keep track of RD numbers and event 21 numbers, if you ask me. Because if you -- It's a -- It's 22 a way of getting the reports. Because you can have -- you 23 cannot have an RD number, but you have an event number and 24 you can come up with the RD number, and vice versa. 25 Q. I'm not understanding.	1 Q. -- the August 7 -- the August 2000 -- Exhibit 20, 2 do you? 3 A. Nope, neither do I. 4 Q. Okay. So, am I safe to assume that it's not -- 5 it's less of a problem that you didn't -- that you signed 6 off to a report -- 7 A. Oh, yeah. 8 Q. -- on Exhibit 20 without an incident number 9 included? 10 A. Yeah, I'd say so. 11 Q. That's not an oversight? 12 A. No. 13 Q. Okay. 14 A. The event number would definitely be an 15 oversight. 16 Q. Okay. And who -- You kept referring to calling 17 in an RD number. When is an R- -- for an RD number. 18 When is an R- -- who -- when is an RD number called in 19 for? 20 A. For arrests, for generating any police report, 21 you call in and you get a RD number. 22 Q. Okay. So, who calls in? The arresting officer? 23 A. The arresting officer. 24 Q. Okay. 25 A. You can do it over the radio, by phone.
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1 A. Say you needed a RD number for something and you 2 don't have the RD number, but you have the event number. 3 You can call the dispatcher and give them the event number 4 and they can tell you what the RD number is. 5 Q. Okay. 6 A. And vice versa. If you had the RD number and you 7 need the event number, they can tell you. 8 Q. Okay. But as far as you know, is there any 9 Department difference between the event number and the RD 10 number? 11 A. I'm sure there is, but I -- 12 Q. You just don't know what it is? 13 A. No. 14 Q. Okay. What about the incident number? 15 A. Same. I just know that we were -- that's part of 16 the procedure, is to document -- a part of the document is 17 to have those items included: the RD number, the event 18 number and the incident number. 19 And I -- I don't think the Department 20 actually went to too many of the incident number being 21 recorded in the vice case report. I just don't recall as 22 to why. It's been a while since I've had that. 23 Q. Okay. Because, like, I mean, I don't see an 24 incident number on -- 25 A. Yeah.	1 Q. All right. So, like, after -- I got this guy in 2 cuffs, I just -- I'm arresting him and I'm bringing him 3 back to the station, I need an RD number? 4 A. You need an RD number. 5 Q. And they call in. Okay. 6 A. You need a RD number for -- and you give them the 7 code for USPCS, or whatever the code is that you're using. 8 Q. Okay. Is there -- I think we've established that 9 there were some days where you would be on the scene with 10 your officers -- 11 A. Um-hum. 12 Q. -- and on missions, and other days where you were 13 doing other things, right? 14 A. Yes. 15 Q. Okay. Including days where you never left the 16 District, most likely, right? 17 A. Right. 18 Q. Is there any paperwork that would reflect which 19 days you left the District and which days you did not? 20 A. Paperwork? 21 Q. Yeah. Like, if you went out to the scene that 22 day for a mission to assist in any -- in any way, would 23 there be any documentation that you had to fill out? 24 A. No, not that I'm aware of. 25 Q. Okay. If you used a police vehicle to get to the

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<p style="text-align: right;">Page 74</p> <p>1 scene would there be a record of that?</p> <p>2 A. No. I was assigned a vehicle. When I come in 3 for my tour, I would get a vehicle. Nobody monitors, you 4 know, if I -- where I go back and forth, no.</p> <p>5 Q. Okay. So, every day you came in for your shift 6 you would get a vehicle assigned to you that day?</p> <p>7 A. No. I would have -- I had my vehicle assigned to 8 me. I would use the same vehicle every day.</p> <p>9 Q. Okay. I get it. And if -- So, you just -- And 10 you didn't have to tell anyone -- If you were -- If you 11 needed it that day, you used it? If you didn't need it 12 that day, you didn't use it?</p> <p>13 A. Correct.</p> <p>14 Q. Okay. Is there -- Is there any way to 15 establish -- You know, we've been talking about you -- I 16 think you said you probably or you weren't sure whether 17 you were out for their -- for -- for the incident in the 18 Exhibit 19, for example. Is there any way that you can 19 think of that we can figure it out, whether you left 20 District 2 that day?</p> <p>21 A. No. I don't -- I don't know. I couldn't tell 22 you how you could figure out something that I don't even 23 know the answer to.</p> <p>24 Q. Sure. Fair enough. Not me, but just anyone 25 could figure out.</p>	<p style="text-align: right;">Page 76</p> <p>1 mission somewhere else and I -- I -- I might need to go 2 somewhere else on sergeant duties and I would need my 3 vehicle. Yeah.</p> <p>4 Q. Okay. Did you ever ride with any of the A, B, C 5 or D Team cars?</p> <p>6 A. Yes.</p> <p>7 Q. Frequently?</p> <p>8 A. Yeah, I --</p> <p>9 MR. KOSOKO: Object to the form of the 10 question.</p> <p>11 THE WITNESS: If I was out in the field, 12 yes, I -- instead of me taking a vehicle out and being 13 alone in a vehicle, I would just jump in with one of the 14 guys, you know, in my mind at the time, you know, for 15 safety and, you know, safety in numbers. You know, as 16 opposed to the sergeant by himself, you got, you know, 17 three men. Sometimes somebody, you know, wasn't there and 18 you had one guy, you know, in with two other guys. So, 19 I'd grab him and, "Hey, we'll be a two-man unit."</p> <p>20 So, it all depends. It was -- it wasn't a 21 set thing. It was according to the, you know, the day.</p> <p>22 BY MR. TEPFER:</p> <p>23 Q. And sometimes you would -- would you ever grab 24 one of your guys and say, "Hey, I'll drive and you come in 25 my car"?</p>
<p style="text-align: right;">Page 75</p> <p>1 A. I can't have anyone figure out something that I 2 don't know the answer to.</p> <p>3 Q. Fair. Did you drive -- When you were a tactical 4 sergeant did you usually drive your own car?</p> <p>5 A. Yes.</p> <p>6 Q. Did your -- Each member of your team had partners 7 on various days, right?</p> <p>8 A. Yeah. 264 Adam --</p> <p>9 (Court reporter clarification.)</p> <p>10 THE WITNESS: 264 Adam, Boy, Charlie, David.</p> <p>11 BY MR. TEPFER:</p> <p>12 Q. Okay. So, A, B, C and D, right?</p> <p>13 A. Yes.</p> <p>14 Q. And the A Team had one car?</p> <p>15 A. Yes.</p> <p>16 Q. B Team, a second car --</p> <p>17 A. That were assigned to them, correct.</p> <p>18 Q. -- et cetera?</p> <p>19 So, if you needed a car that day you would 20 not have -- would not use any of those four cars, you'd 21 use your own, a separate car?</p> <p>22 A. No, I use my car. I had my own, a vehicle 23 assigned to me.</p> <p>24 Q. Okay.</p> <p>25 A. Because, again, they could -- they could have a</p>	<p style="text-align: right;">Page 77</p> <p>1 A. Sometimes, yeah. That's a possibility, because 2 he probably -- you know, he probably was younger and I 3 might have -- I had some information that somebody had to 4 chase somebody, you know, and it wasn't going to be the 5 sarge.</p> <p>6 Q. All right. We've talked about this open air drug 7 market. You talked about it last February, too, right?</p> <p>8 A. I believe so, yes.</p> <p>9 Q. Okay. And by that, is it fair to say that there 10 was drug dealing going on in the areas that you were 11 patrolling -- I'm sorry, the areas that you were 12 overseeing daily?</p> <p>13 A. Yes; every day.</p> <p>14 Q. Okay. Just out in the open, that's what you mean 15 by open air drug market?</p> <p>16 A. Out in the open.</p> <p>17 Q. All right. How would you make a determination 18 if -- well, strike that.</p> <p>19 You would also send your team out on 20 missions, right?</p> <p>21 A. Correct.</p> <p>22 Q. Okay. How would you make a determination on what 23 the specific mission you sent them out for that day?</p> <p>24 A. The information that I received from the -- from 25 the TAC lieutenant, or if the watch commander could call</p>

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<p>1 me and say, "Hey, Sarge, we got a problem down here." Or 2 the district commander probably called me in the office 3 and said, "Hey, Sarge, I got a location that I'm getting 4 calls from the community," or the alderman, or anybody, so 5 that it would vary to how or why we would relocate to 6 certain areas.</p> <p>7 Q. Okay. So you might get information from some 8 citizens, you're saying?</p> <p>9 A. Absolutely.</p> <p>10 Q. Okay. And then your lieutenant was, like, "Well, 11 let's address this. It sounds bad there"?</p> <p>12 A. Absolutely, yeah.</p> <p>13 Q. Okay. What if you had no specific information in 14 that, what would be the -- would there be missions that 15 day?</p> <p>16 A. Possibly. It all depends. If we -- if nobody 17 called, we -- daily -- some days, if nobody called, we had 18 a -- I would monitor cameras. That's something I would do 19 in the office. I would monitor cameras.</p> <p>20 It's a open air drug -- you see guys out 21 there selling drugs. So, I would see what the units were 22 doing, Adam, Boy, Charlie, David, whatever. "Hey, what 23 are you guys doing? I need you guys to relocate to this 24 location. Looks like they're out there working."</p> <p>25 Q. You'd get information somehow that they were out</p>	<p>1 Q. And that was part of your duties as a tactical 2 sergeant to monitors those cameras while you were on 3 shift?</p> <p>4 MR. KOSOKO: Object to the form of the 5 question.</p> <p>6 THE WITNESS: It was not part of my dut- -- 7 I thought, for me, it helped me to do the job that I was 8 assigned to do that day. It helped me. It wasn't like 9 that was something that was in my duties where you come 10 in, you monitor the cameras. No. It was -- it was one of 11 the tools that I used.</p> <p>12 BY MR. TEPFER:</p> <p>13 Q. It was a resource?</p> <p>14 A. Absolutely. It was one of the tools that I used.</p> <p>15 MR. TEPFER: All right. We've been going, 16 like, and hour and a half. Can we take a little break?</p> <p>17 MR. KOSOKO: Sure. Sounds good.</p> <p>18 THE VIDEOGRAPHER: We are off the record. 19 The time on the video monitor is 10:41 a.m.</p> <p>20 (Recess taken from 10:41 a.m. to 10:54 a.m.)</p> <p>21 THE VIDEOGRAPHER: We are on the record. 22 The time on the video monitor is 10:54 a.m.</p> <p>23 BY MR. TEPFER:</p> <p>24 Q. Okay. I just have a couple final questions in 25 this area and then we'll move on to some other stuff.</p>
<p style="text-align: center;">Page 79</p> <p>1 there working and you talked --</p> <p>2 A. From the cameras. You can look at it.</p> <p>3 Q. Where would you -- Where could you see it from 4 the cameras? From the -- from the station?</p> <p>5 A. Yeah.</p> <p>6 Q. Oh, okay. So there was police cameras set up 7 that you would monitor during your shift?</p> <p>8 A. Yes.</p> <p>9 Q. Okay.</p> <p>10 A. They were directly on the public housing. I 11 mean, it was supposed to deter crime, those cameras.</p> <p>12 Q. Okay. When were those cameras set up?</p> <p>13 A. Shhh, those cameras were set up, I think, late 14 '90s, maybe. I don't recall. But they were there all of 15 2000s, I know.</p> <p>16 Q. Okay. So they were CPD -- they were cameras that 17 would just, like, do a direct line to the police station 18 where you could view what was going on live, correct?</p> <p>19 A. Live, yeah. You had to log in. You had to log 20 in. There were cameras up on the pole. And there were 21 probably three or four different cameras down in the 22 Ida B. Wells location. And you just have to go to each 23 camera and you could -- those cameras -- those cameras 24 was pretty good back then. You could actually zoom in 25 and . . .</p>	<p style="text-align: center;">Page 81</p> <p>1 I think in Exhibit 19, one of the things you 2 said at one point was the number of arrestees indicated to 3 you that you may have been there, you didn't commit by any 4 means, but that you may have been there; is that correct?</p> <p>5 A. Could have been, yeah. Maybe, yeah.</p> <p>6 Q. Okay. What is the number of arrestees -- what 7 number -- is there a number that it's like a cut-off that 8 would suggest to you that you would be out there versus 9 not being out there?</p> <p>10 A. There's no number. I -- I was -- I looked at it 11 and I gave that answer because of officer safety. I 12 would -- me, as a sergeant of the police, and I got my 13 team out there and they're -- it's -- it's eight guys on 14 my team and they're arresting, what -- what -- how many 15 guys? They have 10. 10 here. And I'm sitting up in the 16 office? I don't -- I didn't lead like that --</p> <p>17 Q. Okay.</p> <p>18 A. -- you know. So, if nothing else, for officer 19 safety. I -- "Hey, call me." They know, call me, you 20 know, I'd be that extra, you know, security there. Call 21 in another unit, or whatever, so . . .</p> <p>22 Q. Ten's a lot, right?</p> <p>23 A. Ten's a lot.</p> <p>24 Q. Ten is a lot, right? Yeah.</p> <p>25 I mean, would five arrestees, if they called</p>

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<p>1 in five arrestees, would that also suggest to you --</p> <p>2 A. One -- one could be a lot if it's a guy who could</p> <p>3 possibly, you know, he -- it all depends on the -- on the</p> <p>4 person you're arresting.</p> <p>5 Q. Sure.</p> <p>6 A. One could be a lot. He could have a gun. He</p> <p>7 could have, you know, a knife. He -- he could be on a</p> <p>8 substance and he's acting crazy. So, you know, it all</p> <p>9 depends.</p> <p>10 Q. Sure. So, if they called in and said, Hey,</p> <p>11 Sarge, we just arrested one guy and he's acting crazy and</p> <p>12 he had a knife," that might -- you might want -- you --</p> <p>13 knowing yourself, you would probably want to go out there,</p> <p>14 right?</p> <p>15 A. If they're calling me, I know I don't have to go</p> <p>16 out there.</p> <p>17 Q. Oh, okay.</p> <p>18 A. If they're calling me. They're just calling me</p> <p>19 saying, "Hey, Sarge, we're arresting one guy and he had</p> <p>20 a" -- "he has a knife."</p> <p>21 You figure the -- these are sea- -- again,</p> <p>22 these are seasoned officers. They've done what they</p> <p>23 needed to do. They've probably called the ambulance</p> <p>24 already for this guy. They probably subdued this guy or,</p> <p>25 you know, for one guy.</p>	<p>1 lieutenant, you know. So . . .</p> <p>2 Q. Okay. But I'm just understanding, one of the</p> <p>3 things that I'm pretty sure you testified to, but correct</p> <p>4 me if I'm wrong, one of the things that indicated to you</p> <p>5 that you may have been present for some aspect of this</p> <p>6 arrest on Exhibit 19 is that there -- how many arrestees</p> <p>7 there were?</p> <p>8 A. I looked at the number, and I said looking at the</p> <p>9 number, I said, me, I'd want to be there. So, yeah, I</p> <p>10 would want to be there again.</p> <p>11 Q. Okay. Fair enough. You'd want to be there?</p> <p>12 A. Yeah.</p> <p>13 Q. If you were looking at a report and it had five</p> <p>14 arrestees, would you want to be there?</p> <p>15 A. Possibly, yeah. It all depends on where they're</p> <p>16 at and who they're dealing with. Because you got to</p> <p>17 remember, you know, we're assigned to Ida B. Wells Housing</p> <p>18 Development. Nine times out of ten, eight times out of</p> <p>19 ten, we're going to know the person we're dealing with.</p> <p>20 Some are violent offenders and some have been caught with,</p> <p>21 you know, weapons. And it all depends, so . . .</p> <p>22 Q. So your officers usually knew the people that</p> <p>23 they were arresting?</p> <p>24 A. Some, I'm sure they knew because they had</p> <p>25 arrested them many times before in the same -- in the same</p>
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<p>1 But, you know, and then if -- you know, if</p> <p>2 they needed help, I'm sure they'd get on the radio and</p> <p>3 call help. They know how to call for help.</p> <p>4 And they just wouldn't call me to come down</p> <p>5 there if they needed help with a guy with a knife, no.</p> <p>6 They'd call for help. They going to call everybody.</p> <p>7 Q. Okay. But if they -- If you heard on the radio</p> <p>8 or they called you and said, "We got 10 guys," that's a</p> <p>9 lot and you'd probably want to go out there?</p> <p>10 A. I probably -- yeah, I'd go.</p> <p>11 Q. Okay. So, putting aside any other special</p> <p>12 circumstances other than just the number, if they called</p> <p>13 you and said, "We got five guys," do you think you'd want</p> <p>14 to go out there?</p> <p>15 A. It all depends. It all depends where they at and</p> <p>16 what's the crowd like out there. I know it's a judgment</p> <p>17 call, so --</p> <p>18 Q. Sure.</p> <p>19 A. You know, being -- it's a judgment. It all</p> <p>20 depends on what I'm doing. You know, "Can you guys" --</p> <p>21 "You guys got it under control?" You know, I mean,</p> <p>22 because, again, these are seasoned guys. "You guys need</p> <p>23 another unit down there?"</p> <p>24 If I couldn't -- If I couldn't go, I'd send</p> <p>25 another unit. I'll send another sergeant. I'll send a</p>	<p>1 location. Some of them are repeat offenders. And, yeah,</p> <p>2 they come back down there in the open air drug market to</p> <p>3 sell the -- sell drugs.</p> <p>4 Q. Right. I think you said "usually" before, right?</p> <p>5 They usually would know them?</p> <p>6 A. If they were from that area, the area that we</p> <p>7 patrolled and they had contact with them before, they</p> <p>8 would know them, yeah, because they had previous contact.</p> <p>9 So, you know, you can say -- you know, I</p> <p>10 don't know what you're looking for when you say usually,</p> <p>11 because I said usually.</p> <p>12 Well, usually, yeah, because we work -- you</p> <p>13 know, we work six days with two days off. So, usually,</p> <p>14 you know, you, as the police, you observing of the area,</p> <p>15 you observing of the people who are involved with this</p> <p>16 illegal activity. So, you going to know them.</p> <p>17 Q. Yeah. You were an aggressive --</p> <p>18 A. It's your job.</p> <p>19 Q. You were an aggressive team?</p> <p>20 A. It's your job to get to know them.</p> <p>21 Q. Right. So it's your job to get to know the</p> <p>22 individuals in the community, right?</p> <p>23 A. Yeah, absolutely.</p> <p>24 Q. And you testified that you were an aggressive</p> <p>25 tactical sergeant, right?</p>

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<p>1 A. I would like --</p> <p>2 MR. KOSOKO: Object to the form.</p> <p>3 Go ahead, Sarge.</p> <p>4 THE WITNESS: I would like to think so.</p> <p>5 BY MR. TEPFER:</p> <p>6 Q. Okay. I mean aggressive in weeding out drug and</p> <p>7 gang and gun crime, correct?</p> <p>8 A. Yes. That was my job, and I took pride in what I</p> <p>9 did. And so, yes, I didn't -- I didn't sit back at the</p> <p>10 office all the time and just tell them, "You go here and</p> <p>11 you go there."</p> <p>12 A lot of times I would go because it would</p> <p>13 give me that hands-on also what's happening in the</p> <p>14 location, not just from me hearing it from the lieutenant,</p> <p>15 or whoever I got the information from, and sending guys</p> <p>16 down there. If I was going down there, I could scout out</p> <p>17 the location and I could get a feel for what's happening</p> <p>18 down there. Possibly I could talk to somebody.</p> <p>19 A lot of times people will approach you.</p> <p>20 They don't want to talk to the officer on the scene,</p> <p>21 they'll say, "I want to talk to the sarge." For whatever</p> <p>22 reason, you know, they feel that they want to give me the</p> <p>23 information, you know.</p> <p>24 So, it was -- it was a -- it all depends.</p> <p>25 Nothing was just etched in stone. It wasn't the same</p>	<p>1 wouldn't go a lot of -- on a lot of occasion.</p> <p>2 So, I didn't, you know, I didn't have to</p> <p>3 browbeat them, no. They would -- they were good at what</p> <p>4 they did.</p> <p>5 BY MR. TEPFER:</p> <p>6 Q. And that's what I mean. So they were doing --</p> <p>7 They were aggressively patrolling, right?</p> <p>8 A. They were good at --</p> <p>9 MR. KOSOKO: Object to the form of the</p> <p>10 question.</p> <p>11 THE WITNESS: They were good at what they</p> <p>12 did.</p> <p>13 BY MR. TEPFER:</p> <p>14 Q. Okay.</p> <p>15 A. Just like when I was in the military. Those guys</p> <p>16 were damn good at what they did.</p> <p>17 Q. Okay. And what they did is weed out drug crime</p> <p>18 and gang crime and gun crime, right?</p> <p>19 MR. KOSOKO: Object to the form of the</p> <p>20 question.</p> <p>21 THE WITNESS: If they observed it, if they</p> <p>22 had the information, they used that information to make</p> <p>23 the arrest to aggressively fight the crime that was in the</p> <p>24 area in which we were assigned to. That's what those</p> <p>25 officers did.</p>
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<p>1 thing every day. You know, things change. If it rained,</p> <p>2 we had to approach another way. If it snowed, we had to</p> <p>3 approach another way, you know. If -- it all depends.</p> <p>4 So, to say, you know, one thing for sure,</p> <p>5 no, sometimes I was there, yes. Sometimes I wasn't.</p> <p>6 Sometimes I was on my way.</p> <p>7 Q. Sure. But you actively encouraged your</p> <p>8 supervisees, your officers you supervised, to aggressively</p> <p>9 weed out drugs and guns and gang violence in the areas</p> <p>10 they oversaw, correct?</p> <p>11 MR. KOSOKO: Object to the form of the</p> <p>12 question.</p> <p>13 THE WITNESS: I don't -- I didn't have to do</p> <p>14 that because, again, these were seasoned, veteran officers</p> <p>15 who had chose to be on a tactical team who knew what being</p> <p>16 on a tactical team consist of. So I didn't have to</p> <p>17 browbeat them about go and do this. They knew what was</p> <p>18 expected.</p> <p>19 They knew that they were in a high crime</p> <p>20 area. They knew what their duties were in that high</p> <p>21 crime, open air drug market. So, I didn't have to</p> <p>22 aggressively, every day browbeat them, no. They -- Those</p> <p>23 were good, solid police officers who knew what they were</p> <p>24 there to do, who took the risk, who did their job</p> <p>25 faithfully, you know, who went when other officers</p>	<p>1 BY MR. TEPFER:</p> <p>2 Q. What kind of car did you have?</p> <p>3 MR. KOSOKO: Object to the form of the</p> <p>4 question and foundation.</p> <p>5 BY MR. TEPFER:</p> <p>6 Q. Well, let me strike that then. I'll ask a better</p> <p>7 question.</p> <p>8 Did you -- You said that you had -- I</p> <p>9 believe you testified that you had the same car while you</p> <p>10 were a tactical supervisor; is that correct?</p> <p>11 A. Oh, yeah.</p> <p>12 Q. The same car every day?</p> <p>13 A. It was the sergeant's car.</p> <p>14 Q. The sergeant car?</p> <p>15 A. So, it was the sergeant's car. So, it wasn't</p> <p>16 just I used that car. Whatever sergeant was on duty on</p> <p>17 that particular shift used that vehicle. It was the</p> <p>18 sergeant's vehicle.</p> <p>19 Q. And what kind of car was it?</p> <p>20 A. Oh, shoot. I think they were using -- were they</p> <p>21 using Crown Vics then? I -- I really can't recall what.</p> <p>22 I think they were -- I'm pretty sure they were Chevys,</p> <p>23 though.</p> <p>24 Q. Do you remember what color?</p> <p>25 A. I think mine was gray.</p>

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<p>1 Q. Did you have the same car the entire time you 2 were at District 2 as a sergeant?</p> <p>3 A. No. We got -- we got in new cars one year. I 4 don't remember what -- recall the year they changed over, 5 but I did get a new car.</p> <p>6 Q. Was it also a Crown Victoria?</p> <p>7 A. I just remember it was a Chevy. I don't remember 8 what else.</p> <p>9 Q. Was it also gray?</p> <p>10 A. That was the gray one. The one before, I think, 11 was tan or something, or blue, light blue.</p> <p>12 Q. Okay.</p> <p>13 A. It was the sergeant's car.</p> <p>14 Q. Okay. These were unmarked vehicles?</p> <p>15 A. Unmarked vehicles. I think the blue car -- 16 actually, the blue car was the nicer one, and the 17 lieutenant took that one.</p> <p>18 Q. Okay. I have a couple more questions about the 19 RD numbers. Can you -- Were you -- If you were going out 20 on a mission could you get an RD number before you went 21 out on the mission?</p> <p>22 A. Yes.</p> <p>23 Q. Okay.</p> <p>24 A. Yes.</p> <p>25 Q. So, before there were any arrests or --</p>	<p>1 A. You would get an event number also, yes.</p> <p>2 Q. An event. And you would still submit a report 3 with the event number?</p> <p>4 A. I would still submit a report, an information 5 report.</p> <p>6 Q. An infor- -- What's an information report?</p> <p>7 A. The report I would submit.</p> <p>8 Q. It's titled "Information Report"?</p> <p>9 A. It's titled "Information Report." I would submit 10 that report stating that I acquired this RD number for 11 mission number whatever.</p> <p>12 Q. Okay. Was that a frequent occurrence?</p> <p>13 A. No. Because if we did a mission, we went down 14 there to do a mission. And in an open air drug market, 15 you're going to arrest somebody because they're selling 16 drugs.</p> <p>17 Q. Okay.</p> <p>18 A. So, it was -- If we were doing a mission, we were 19 doing a mission for a reason.</p> <p>20 Q. And meaning that you were almost always 21 successful in your missions?</p> <p>22 A. Yeah, I would say so.</p> <p>23 Q. Can you remember one time at any time, as you sit 24 here today, where you went out on a mission and it didn't 25 result in an arrest of anyone?</p>
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<p>1 A. Before there was any arrests.</p> <p>2 Q. Okay. Could you get multiple RD numbers before 3 you went out on a mission if there were multiple missions?</p> <p>4 A. If you're going to have -- if you decided to do 5 multiple missions and you wanted to do different RD 6 numbers, yeah, you could get them. But for each RD number 7 that you got, if you were going to do a mission and there 8 was no arrest because you -- like you asked the question 9 do I get the RD number before I go out, yeah. And then if 10 there's no arrest, I have to do a -- I still have to 11 generate a report for that specific RD number.</p> <p>12 Q. Okay.</p> <p>13 A. And event number.</p> <p>14 Q. Okay. And if there's -- So, if there's no 15 arrest, there still may be an RD number?</p> <p>16 A. According to the way you asked the question, if I 17 had a mission --</p> <p>18 Q. Correct.</p> <p>19 A. -- and I got an RD number and I went down and 20 there were no arrests, it was still an RD number. There 21 was still a report that I would submit.</p> <p>22 Q. Got it.</p> <p>23 A. And I would submit that report.</p> <p>24 Q. Is that the same for an event number? Could you 25 get an event --</p>	<p>1 A. I remember a time, yeah. It was a -- it was a 2 time that we -- I don't know what was happening in the 3 area, but we -- we did a mission and there were no drug 4 arrests. There was probably no drug arrest, but it was -- 5 it was probably, like, trespassing, or something like 6 that, because people were down there actively, you know, 7 looking for drugs. And they were -- so -- down there for 8 illegal activity. So . . .</p> <p>9 Q. Would you review, go through the same process for 10 trespassing arrests as far as reviewing the reports that 11 we talked about before you signed off on them?</p> <p>12 A. Absolutely.</p> <p>13 Q. Okay.</p> <p>14 A. But you wouldn't have the same reports.</p> <p>15 Q. Sure. Okay. What would be the report?</p> <p>16 A. It would be a general offense case report instead 17 of a vice case report.</p> <p>18 Q. Okay. But you'd still go through it and 19 determine whether there was probable cause for that 20 trespassing?</p> <p>21 A. Absolutely, yes.</p> <p>22 Q. If there was an individual that you knew who was 23 arrested for trespassing and you knew that they actually 24 lived in that location would you approve that general 25 offense case report?</p>

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<p>1 A. You can't trespass someone on their own -- If 2 they live there, you can't trespass them. So that's 3 not -- no probable cause there. So, no, I would not 4 approve that, yeah.</p> <p>5 Q. Okay. Did that ever happen in your career?</p> <p>6 A. What?</p> <p>7 Q. Where you didn't approve a trespassing arrest 8 because you knew the person lived there?</p> <p>9 A. Yes, I'm pretty sure I did.</p> <p>10 Q. How frequently?</p> <p>11 A. I don't know how frequently, but I'm pretty sure 12 that occurred, because we don't always know when somebody 13 move down to their location.</p> <p>14 A lot of -- a lot of those guys who came 15 down and were a part of that open air drug market, they 16 didn't live there at first, and then they probably, 17 subsequent they had a girlfriend or a aunt or somebody 18 that they moved in with. For whatever reason, they had an 19 I.D. change and they actually live there now. So, things 20 change, like I said, on a day-to-day basis.</p> <p>21 Q. Can you look at Exhibit 18 again? It's that COPA 22 report.</p> <p>23 MR. KOSOKO: This right here. Sorry.</p> <p>24 BY MR. TEPFER:</p> <p>25 Q. I'm going to go to Page 20 of the report. It's</p>	<p>1 THE VIDEOGRAPHER: We are on the record. 2 Time on the video monitor is 11:10 a.m. 3 BY MR. TEPFER: 4 Q. Okay. We're just going to move on. 5 All right. We're going to talk about Ben 6 Baker and Clarissa Glenn, who you mentioned you knew was 7 going to come up today, correct? 8 A. I said that was probably -- because that's who 9 I'm being sued by, so -- 10 Q. Okay. Well, you're being sued by other people, 11 too. 12 A. Yeah, but I -- I just remember them because 13 they're top notch in my opinion, top notch sleaze balls. 14 In my opinion. 15 Q. Okay. Why is Clarissa Glenn a top notch sleaze 16 ball? 17 A. They were heavily involved in the drug activity 18 in Ida B. Wells Housing Development and they made life 19 miserable for the residents of 527 East Browning on a 20 day-to-day basis. 21 They were heavily involved. They were the 22 source of the narcotics. So, that's why, in my opinion 23 being a law enforcement officer at the time. And my 24 duties were to suppress the drug activity in that 25 location, knowing what they were doing. That's my opinion</p>
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<p>1 PLAINTIFF JOINT 68081. And Footnote 101. It's the first 2 footnote on that page.</p> <p>3 A. Okay.</p> <p>4 Q. Okay. Do you see the second line? It says -- 5 or, I'm sorry, the third sentence. It says "COPA 6 attempted, but was unable to subpoena Watts, who now 7 resides out of state, to obtain testimony." Do you see 8 that?</p> <p>9 A. Um-hum.</p> <p>10 Q. Were you aware that COPA attempted to subpoena 11 you?</p> <p>12 MR. KOSOKO: Object to -- object to the 13 question, as it will cause him to relay attorney/client 14 conversations.</p> <p>15 So, do not answer that question.</p> <p>16 MR. TEPFER: What? Yeah, can you clarify? 17 I'm not asking --</p> <p>18 MR. KOSOKO: We can go off -- we can go off 19 the record and I'll explain what happened. Okay?</p> <p>20 MR. TEPFER: Sure.</p> <p>21 MR. KOSOKO: Can we go off the record for a 22 second?</p> <p>23 THE VIDEOGRAPHER: We are off the record. 24 The time on the video monitor is 11:10 a.m. 25 (Discussion off the record.)</p>	<p>1 of them as . . . 2 Q. What information are you relying on that Clarissa 3 Glenn was heavily involved in the source of narcotics? 4 A. She was arrested on a narcotics charge. Her -- 5 Ben Baker, who's a known drug dealer, resided with her. 6 Q. Anything else? 7 A. Neighborhood, people that use drugs, the drugs 8 addicts, where they got it from. 9 Q. I'm sorry, so what you do mean by neighborhood, 10 that people in the neighborhood told you this? 11 A. Yeah. 12 Q. Who? 13 A. Different people. 14 Q. Names, please. 15 A. I don't recall. 16 Q. You don't recall a single name of anyone who told 17 you that Clarissa Glenn was actively involved in 18 narcotics? 19 A. No. 20 Q. Did you know the people at the time? 21 A. Excuse me? 22 Q. Did you know the people when -- did you just -- 23 have you just forgotten or did you actually know these 24 individuals at the time? 25 A. Some were just residents who spoke that they</p>

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<p>1 knew. Others were, like I said, they were drug users 2 themselves. And if you caught them, they tell -- they'd 3 give out certain information openly and freely. So, yeah. 4 Q. Okay. 5 A. It was -- 6 Q. What specific information did these unknown 7 people give to you? 8 A. That Ben Baker, Clarissa Glenn, who lived with 9 Clarissa Glenn, they were involved in the narcotics at 10 that particular location, 527 East Browning. 11 Q. What do you mean involved in narcotics? 12 A. Selling narcotics. 13 Q. Okay. And they specifically told you Clarissa 14 Glenn was involved in selling narcotics? 15 A. Clarissa Glenn and Ben Baker, who resided with 16 Clarissa Glenn, yes. 17 Q. I understand that Ben Baker and Clarissa Glenn 18 resides together. I'm asking, did anyone specifically 19 tell you that Clarissa Glenn was involved in narcotics 20 trafficking? 21 A. Yes. 22 Q. And you don't remember who? 23 A. I don't recall who exactly, but it was more than 24 five people. 25 Q. When did they tell you this?</p>	<p>1 MR. KOSOKO: This -- this -- you just handed 2 him Lionel White. 3 MR. TEPFER: Sorry. 4 MR. KOSOKO: So, let me see that. 5 I figured this would come up. My assistant 6 should've e-mail amended answers. We will not be taking 7 the Five on any of these questions, so feel free to ask 8 about them. 9 And if we could -- if you want to go off the 10 record, we could maybe get the updated one. But you can 11 ask every single question. 12 MR. TEPFER: Okay. 13 (Court reporter clarification.) 14 MR. KOSOKO: You can ask any and we'll 15 answer. 16 MR. RAUSCHER: Do you want to send -- 17 MR. KOSOKO: She should have. Let me -- let 18 me -- 19 MR. RAUSCHER: I think she did today. I saw 20 some corrections. Maybe we can just send them to be 21 printed here. 22 MR. KOSOKO: Can I see that for a second? 23 MR. TEPFER: Sure. 24 MR. KOSOKO: Can we go off the record so 25 we're not burning time?</p>
<p style="text-align: center;">Page 99</p> <p>1 A. During the time I was patrolling that area. 2 Q. Was it before or after Clarissa Glenn's arrest? 3 A. What date was her arrest? I don't recall that 4 date so I couldn't just -- but I'm sure it was before and 5 after. 6 Q. So, some of the five people told you before and 7 some told you after? 8 A. More than five. After, yes. 9 Q. Do you intend to answer questions about your 10 arrests of Ben Baker and -- or, about the arrests of Ben 11 Baker and Clarissa Glenn today? 12 A. I'm -- I mean, I'm willing to answer whatever 13 questions you have for me, sir. 14 Q. Okay. Great. So, I want to show you what's 15 marked as Exhibit 24. 16 MR. RAUSCHER: 23. 17 MR. TEPFER: I'm sorry, 23. 18 (Deposition Exhibit 23 was marked for 19 identification.) 20 BY MR. TEPFER: 21 Q. This is Defendant Ronald Watts' Answers to 22 Plaintiff's Ben Baker's January 23rd, 2017 Additional 23 Interrogatories to Defendant Ronald Watts. 24 MR. KOSOKO: You said Lionel White? 25 MR. TEPFER: No. It's Ben Baker.</p>	<p style="text-align: center;">Page 101</p> <p>1 MR. TEPFER: Yeah. 2 THE VIDEOGRAPHER: We are off the record. 3 The time on the video monitor is 11:16 a.m. This ends 4 Media 1. 5 (Discussion off the record.) 6 THE VIDEOGRAPHER: We are on the record. 7 The time on the video monitor is 11:17 a.m. This begins 8 Media 2. 9 BY MR. TEPFER: 10 Q. Okay. Do you recognize this document? 11 A. Yes. 12 Q. Okay. And is that your signature on Page 5 of 13 that document? 14 A. There's no number on it, but it is my signature 15 at the back, yeah. 16 Q. Okay. Now, the first question was, "Have you 17 ever solicited a bribe from Ben Baker, either directly or 18 through another person?" 19 And your answer to this says, "On the advice 20 of Counsel, Defendant has been advised to assert and 21 invoke, and hereby does assert and invoke, his privilege 22 against self-incrimination and the protections guaranteed 23 by the Fifth Amendment of the United States"; is that 24 correct? 25 A. That was that answer. Today my answer is no.</p>

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<p>1 Q. And why is your answer different today than it 2 was when you signed this in -- whenever you signed it?</p> <p>3 MR. KOSOKO: I'm going to object as it 4 necessarily involves him delineating advice of counsel.</p> <p>5 If you want to rephrase the question some way, that's 6 fine, but . . .</p> <p>7 BY MR. TEPFER:</p> <p>8 Q. Why did you think that answering this question 9 would put you in jeopardy of self incrimination when you 10 signed this document?</p> <p>11 MR. KOSOKO: I'm going to object to that 12 question as it would necessarily involve the advice that 13 he received from Kevin Pacini, his then attorney.</p> <p>14 BY MR. TEPFER:</p> <p>15 Q. Is there a reason that you answered that 16 question, putting aside any discussions you had with your 17 attorney, why did you answer that question that way?</p> <p>18 A. Under the advice of my attorney.</p> <p>19 Q. Would the answer have -- When you signed this 20 doc- -- when you signed this interrogatory, would 21 answering of that question run the risk of 22 self-incrimination?</p> <p>23 A. No.</p> <p>24 Q. So, the -- So, your sworn declaration that it 25 would was false?</p>	<p>1 the Fifth came to be false.</p> <p>2 You can try to answer it without going into 3 any discussions you had with Kevin or the team before I 4 was involved in the case, Sarge. Go ahead.</p> <p>5 THE WITNESS: At the time -- at the time I 6 answered these, I was under duress. I didn't have all the 7 information that I have now. I am much more clear on 8 those questions at this particular time and can answer 9 those questions directly and truthfully.</p> <p>10 BY MR. TEPFER:</p> <p>11 Q. What information do you have now that you didn't 12 have then when you answered these questions?</p> <p>13 MR. KOSOKO: Don't answer that question, 14 Sarge. It involves delineation of attorney/client 15 privilege.</p> <p>16 He's being advised differently now, Josh. I 17 don't know what to tell you.</p> <p>18 MR. TEPFER: Well, he just testified that he 19 had information when he answered this that he didn't have 20 now. I want to know what that information is.</p> <p>21 BY MR. TEPFER:</p> <p>22 Q. Besides anything --</p> <p>23 MR. KOSOKO: The advice from counsel, 24 Josh --</p> <p>25 BY MR. TEPFER:</p>
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<p>1 A. Under the advice of --</p> <p>2 MR. KOSOKO: Hang on. Hang on. Hang on. 3 You know what, the -- you're asking about, 4 clearly, advice he got from counsel. It's delineated in 5 that interrogatory. We've given an amended answer. His 6 answer is a unequivocal no. So, if you want to ask him 7 why Kevin Pacini -- Kevin Pacini had him taking Five to 8 questions about stuff like Big Shorty and stuff, he can't 9 answer that, clearly.</p> <p>10 BY MR. TEPFER:</p> <p>11 Q. Are you following the advice of your counsel and 12 not answering any questions about why -- why you took the 13 Fifth in this interrogatory?</p> <p>14 A. I did answer it. I took the Fifth under the 15 advice of my attorney --</p> <p>16 Q. Okay.</p> <p>17 A. -- at the time.</p> <p>18 Q. Okay. Are you following your attorney's advice 19 and not answering any questions about whether or not, at 20 the time -- whether or not this assertion of the Fifth was 21 false?</p> <p>22 A. I --</p> <p>23 MR. KOSOKO: Sarge, hang on for a second. 24 Let me -- let me --</p> <p>25 I don't -- I don't even know assertion of</p>	<p>1 Q. Besides anything that -- Is there anything 2 besides advice from counsel -- Is there any other 3 additional information besides advice from counsel that 4 you have now?</p> <p>5 A. No. My -- my counsel.</p> <p>6 Q. Okay. That's it? That's the only difference in 7 information, your advice from counsel?</p> <p>8 A. My -- Yes.</p> <p>9 Q. What -- How were you under duress when you 10 asserted the Fifth previously?</p> <p>11 A. I was under arrest -- under duress --</p> <p>12 MR. KOSOKO: Do not delineate any 13 conversations that you had with the team at that time. Go 14 ahead.</p> <p>15 THE WITNESS: At the time, I -- I was in a 16 bad place. And, mentally, I had, if you look at the time, 17 I had been accused and -- of a crime that -- that I -- I 18 plead out to. I had did some time in a federal prison.</p> <p>19 I was still going through some mental -- 20 mental changes, as far as where my -- where my life would 21 be after the events that had occurred after being on the 22 Chicago Police Department for 18 years of my adult life, 23 never being arrested, never being involved in any criminal 24 activity, and all of a sudden I'm being involved in some 25 activities that, really -- I was involved in some</p>

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<p>1 activities that I just didn't agree with. And for the 2 benefit of me at that particular time and point, that -- 3 that was the best option for me at the time.</p> <p>4 BY MR. TEPFER:</p> <p>5 Q. What activities were you involved in that you 6 didn't agree with?</p> <p>7 A. Pleading to some charges that -- that activity.</p> <p>8 Q. When did you plead to the charges?</p> <p>9 A. I would have to look at the record.</p> <p>10 Q. In 2013, right?</p> <p>11 A. Yeah, it was in 2013. So, you know, it's a time 12 that I'm not really proud of. I don't go back to that 13 date because it was a bad time in my life and I don't 14 revisit that often.</p> <p>15 Q. Okay. And when did you get out of prison?</p> <p>16 A. I was speaking.</p> <p>17 Q. Sorry. Go ahead.</p> <p>18 A. Thank you, sir.</p> <p>19 So, I don't go back and visit that time.</p> <p>20 And to answer your question, I got out of 21 prison in 2016, I believe. That's another time I don't 22 like to revisit. I moved on and life is good.</p> <p>23 Q. How long was your sentence?</p> <p>24 A. 22 months.</p> <p>25 Q. And didn't you plead in February of 2013? Is</p>	<p>1 A. It has no date on it. You're saying --</p> <p>2 Q. In the bold in the --</p> <p>3 A. Oh, in the bold. Yes, okay. I see it now.</p> <p>4 Q. Okay. You answered these interrogatories after 5 we submitted them, correct?</p> <p>6 A. Yes.</p> <p>7 Q. And that was several years after you were done 8 with prison, correct?</p> <p>9 A. Several years?</p> <p>10 Q. Yeah.</p> <p>11 A. I got out of prison in 2016.</p> <p>12 Q. You got out of prison in 2016? What month?</p> <p>13 A. That's what you just said.</p> <p>14 Q. I didn't say that.</p> <p>15 A. You knew everything else.</p> <p>16 Q. When did you get out of prison, sir?</p> <p>17 A. 2016, sir.</p> <p>18 Q. Okay. So you served 22 months. And you were 19 convicted in 2013?</p> <p>20 A. Yes.</p> <p>21 Q. All right. How does that get you to 2016?</p> <p>22 A. Because I didn't report until -- I didn't have to 23 report until sometime maybe months later --</p> <p>24 Q. Okay.</p> <p>25 A. So . . .</p>
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<p>1 that right?</p> <p>2 A. I don't recall.</p> <p>3 Q. These interrogatories, I don't have the date 4 that you answered them, but they were submitted on 5 January 23rd, 2017, correct?</p> <p>6 A. I -- I have no clue because they're not dated for 7 me either.</p> <p>8 Q. All right. Well, it's dated at the top that said 9 we submitted them on January 23rd, 2017, right?</p> <p>10 A. At the top?</p> <p>11 MR. KOSOKO: We're walking dangerously close 12 to attorney/client privilege. Even the document speaks 13 for itself. It says "on his advice of counsel." So I 14 don't know how we're going to -- We're flirting 15 dangerously close to trying to get him to waive that.</p> <p>16 He's told you that he took Five because an 17 attorney told him to take Five. I don't know what else we 18 need to go through about that. Now he's not taking Five, 19 which, that's his right. It's his right.</p> <p>20 MR. TEPFER: And I have every right to ask 21 him why he took Five and now he's not.</p> <p>22 BY MR. TEPFER:</p> <p>23 Q. So, it says -- We submitted these interrogatories 24 on January 23rd, 2017. Is that the title of the document 25 on Page 1?</p>	<p>1 Q. So you had been out of prison for at least a year 2 when you answered these interrogatories?</p> <p>3 A. At least a year, yeah, I would say.</p> <p>4 Q. Okay. So, what is the significance of the guilty 5 plea and your time in prison and why you took the Fifth?</p> <p>6 MR. KOSOKO: Sarge, just don't answer that.</p> <p>7 He answered the questions based on advice of 8 counsel.</p> <p>9 Don't answer.</p> <p>10 If you want to revisit, we can revisit it 11 through a judge.</p> <p>12 MR. TEPFER: I don't understand how that 13 question calls --</p> <p>14 MR. KOSOKO: Do not answer the question.</p> <p>15 MR. TEPFER: -- for an attorney/client 16 privilege.</p> <p>17 MR. KOSOKO: If we want to go to Judge 18 Finnegan and if you want -- and if she says he has to 19 answer it, he'll answer it. He answered the question 20 because an attorney told him to take Five. Now another 21 attorney's telling him not to take Five.</p> <p>22 MR. TEPFER: So you're answering the 23 questions that I'm posing to the witness right now, and 24 that's improper. If you want to make your objection, 25 that's fine. And we can go to Judge Finnegan at some</p>

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<p>1 point if we want to do that. But I'd appreciate it if you 2 don't tell me what your client's answers to the questions 3 are.</p> <p>4 MR. KOSOKO: Fair enough, Josh, but he will 5 not be explaining why he talked to an attorney about it. 6 He's answered that over and over again. It's -- It's -- 7 You're trying to pierce his -- his attorney/client 8 privilege. He was advised to take Five. He took Five. 9 Now he's not.</p> <p>10 BY MR. TEPFER:</p> <p>11 Q. Are you refusing to answer any more questions 12 about this document?</p> <p>13 A. I'm not refusing to answer anything. If you ask 14 me a question, I will answer it to the best of my ability.</p> <p>15 Q. Are you taking your advice and not answering any 16 more questions about this document?</p> <p>17 A. About -- I'll answer -- If you ask me a question, 18 I'll answer it to the best of my ability.</p> <p>19 Q. Okay. I -- okay. I asked you a question.</p> <p>20 A. Okay. What was the question?</p> <p>21 Q. That whether or not -- What significance does 22 your guilty plea and time in prison have -- which you 23 testified to -- why you took the Fifth on questions about 24 this document -- questions in this interrogatory.</p> <p>25 A. Under the --</p>	<p>1 Q. "Did you participate in the conspiracy to kill 2 Wilbert Moore?"</p> <p>3 A. No.</p> <p>4 Q. Do you have any knowledge of a plan to kill 5 Wilbert Moore prior to his death?</p> <p>6 A. No.</p> <p>7 Q. Have you ever given false testimony in a criminal 8 proceeding against Ben Baker?</p> <p>9 A. No.</p> <p>10 Q. Did you plant drugs on Ben Baker on March 23rd, 11 2005?</p> <p>12 A. No.</p> <p>13 Q. Did you plant drugs on Ben Baker and Clarissa 14 Glenn on December 11th, 2005?</p> <p>15 A. No.</p> <p>16 MR. KOSOKO: Can we take a break real quick 17 before the next question?</p> <p>18 MR. TEPFER: Okay.</p> <p>19 THE VIDEOGRAPHER: We are off the record.</p> <p>20 The time on the video monitor is 11:30 a.m.</p> <p>21 (Recess taken from 11:30 a.m. to 11:31 a.m.)</p> <p>22 THE VIDEOGRAPHER: We are on the record.</p> <p>23 The time on the video monitor is 11:31 a.m.</p> <p>24 MR. TEPFER: All right. What's the exhibit 25 we're on? 24? All right. I'm marking Anthony McDaniels'</p>
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<p>1 MR. PALLES: I'll just object to the form.</p> <p>2 THE WITNESS: Under the advice of my 3 previous counsel, I gave this answer. Now I decided, 4 under the advice of my counsel, I'm not going to take the 5 Fifth and I will answer these questions.</p> <p>6 BY MR. TEPFER:</p> <p>7 Q. Okay. And so the answer to the first question, 8 "Have you ever solicited a bribe from Ben Baker, either 9 directly or through another person?" what's the answer to 10 that question?</p> <p>11 A. No.</p> <p>12 Q. The answer to the second question, "Have you ever 13 planted drugs or guns on a civilian, seen another police 14 officer plant drugs or gun on a civilian, and/or directed 15 another police officer to plant drugs or guns on a 16 civilian?" what's the answer to that question?</p> <p>17 A. No.</p> <p>18 Q. And the answer to question "With respect to the 19 killing of Wilbert Moore, aka Big Shorty, which occurred 20 on or around January 19th, 2006, Did you kill Wilbert 21 Moore?"</p> <p>22 A. No.</p> <p>23 Q. "Did you direct or solicit anyone to kill Wilbert 24 Moore?"</p> <p>25 A. No.</p>	<p>1 August 31st, 2021 Interrogatories to Defendant Ronald 2 Watts as Exhibit 24. Okay?</p> <p>3 A. Um-hum.</p> <p>4 (Deposition Exhibit 24 was marked for 5 identification.)</p> <p>6 BY MR. TEPFER:</p> <p>7 Q. All right. Have you seen this document before?</p> <p>8 A. No.</p> <p>9 Q. You've never seen that document before?</p> <p>10 MR. KOSOKO: It's -- it's part of the ones 11 we just submitted.</p> <p>12 BY MR. TEPFER:</p> <p>13 Q. Oh, okay. So you have now answered those --</p> <p>14 A. Yes.</p> <p>15 Q. -- interrogatories?</p> <p>16 A. Yes.</p> <p>17 Q. Okay.</p> <p>18 A. Yeah, okay. Yes.</p> <p>19 Q. Okay.</p> <p>20 A. Anthony McDaniels, okay. Yes.</p> <p>21 Q. Okay. Can you go to Page 2 of that?</p> <p>22 A. Page 2?</p> <p>23 Q. Yeah.</p> <p>24 A. Okay.</p> <p>25 Q. Do you know who Darnell Wilson is?</p>

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1 A. No.	1 Robert Watts.
2 Q. Do you know who George Holliday is?	2 MR. TEPFER: It does.
3 A. No.	3 MR. KOSOKO: That's correct.
4 Q. Do you know who Leslie Coppage is?	4 Let's go off the record for a second so we
5 A. No.	5 don't --
6 Q. Do you know Melvin Jefferson is?	6 MR. TEPFER: Okay.
7 A. No.	7 THE VIDEOGRAPHER: We are off the record.
8 Q. Do you know who Raymond Youngblood is?	8 The time on the video monitor is 11:35 a.m.
9 A. No.	9 (Recess taken from 11:35 a.m. to 11:53 a.m.)
10 Q. Do you know who Ahmad Poole is?	10 THE VIDEOGRAPHER: We are on the record.
11 A. No.	11 The time on the video monitor is 11:53 a.m.
12 Q. Do you know who Lester Perkins is?	12 BY MR. TEPFER:
13 A. No.	13 Q. Okay. Thank you for reviewing that exhibit. Did
14 Q. Do you know who Derrick McNeil is?	14 that refresh your recollection about the June 26th, 2003
15 A. No.	15 double homicide?
16 Q. Do you know who Donald Wilson is?	16 A. Yes, sir, it did.
17 A. No.	17 Q. So, you recall that?
18 Q. Do you remember the June 26th, 2003 shooting of	18 A. Yes, sir.
19 George Holliday, Leslie Coppage, and Melvin Jefferson?	19 Q. What do you recall about it?
20 A. I would have to refer to the documentation. I	20 A. I recall what I just read. On that day there was
21 don't remember it.	21 a call put out of a shooting at an area in the -- at the
22 Q. Do you remember a double murder at the Harold	22 time it was the 22nd District, but they called for all
23 Ickes in June of 2003?	23 tactical teams, public housing tactical teams, which we
24 A. I'd have to refer to documentation. I don't	24 were assigned to public housing in the 2nd District. We
25 remember -- recall a double murder.	25 were relocated to that -- I relocated to that area, along
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1 Q. So, at this point, the answer is "No"?	1 with other officers. I was in my vehicle.
2 A. No.	2 When we got there it was a massive crowd. I
3 Q. Okay. Well, I'll show you --	3 mean, it had been a shooting. It was a massive crowd of
4 What's the exhibit now?	4 people. We were trying to control the crowd and all that
5 (Deposition Exhibit 25 was marked for	5 good stuff.
6 identification.)	6 And at which time there was a guy who came
7 BY MR. TEPFER:	7 up alongside of me and whispered to me that the guys who
8 Q. All right. Here's Exhibit 25. This is PLAINTIFF	8 had was -- were involved were -- had went into the
9 JOINT 68772 through 792. This is a copy of your	9 building behind me at the time. And it was in Apartment
10 testimony --	10 708.
11 A. Okay.	11 Q. Okay. And then you arrested the guys in
12 Q. -- related to that case. I'll give you a few	12 Apartment 708?
13 minutes to read through that to see if it refreshes your	13 A. I did not arrest the guys in Apartment 708.
14 recollection.	14 Q. Who did?
15 A. You sure this is me?	15 A. At the time there was a few things that happened
16 Q. I mean --	16 before I got to the guys, which was, I spoke -- when I
17 A. This is -- This is not me.	17 knocked on the door, I spoke to the leaseholder who was
18 Q. Can I see it?	18 the -- turned out to be the -- I didn't know them; that
19 A. Sure. It says "Robert Watts." I'm Ronald.	19 wasn't my area; I didn't know them -- who was the mother
20 Q. Okay.	20 of the two arrestees from that location, who eventually
21 MR. KOSOKO: Let me -- Let me -- Josh, let	21 were arrested, at which time I had given her the
22 me take a look at it. You want to go off the record real	22 information that I had received that the people involved
23 quick?	23 had ran to that location.
24 MR. TEPFER: No, I'm fine.	24 She was really cooperative. And at the time
25 MR. KOSOKO: All right. So, it does say	25 I -- I asked her would it be okay if I came in. No

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<p>1 problem. She -- at which time I explained to her what 2 happened.</p> <p>3 And I asked her, would she mind if I 4 presented her with a consent to search, which means she 5 would give me permission to search her home. But before 6 we got to that point, I asked her who all was in the 7 location. And she said her sons, which the two -- Darnell 8 and, I think, Donald, at the time. And it turns out there 9 was a small child there also. I remember that after 10 reading this.</p> <p>11 She gave me consent. I had to get a consent 12 to search from -- I think I told an officer to go down to 13 the car and get it. Somehow, I got it.</p> <p>14 She signed it, gave me all the information. 15 We filled it out properly, called it in. I got the number 16 for it.</p> <p>17 And we searched the location, at which time 18 we found a weapon. We found narcotics in that location, 19 at which time we didn't have enough to arrest anyone, at 20 which time I asked the -- the two guys, would they mind 21 going to Area 4. Area 4 would be the detective division 22 who would investigate the shooting, at which time they 23 cooperated and they went to Area 4.</p> <p>24 They -- I didn't put handcuffs on them. I 25 think they went of their own free will, at which time they</p>	<p>1 refreshing your recollection, remember any of the names 2 that I mentioned in this -- I don't know what exhibit it 3 is, the one before that, 24?</p> <p>4 A. No.</p> <p>5 Q. No? Do you know anyone named Muddy?</p> <p>6 A. No.</p> <p>7 Q. Or Muggy?</p> <p>8 A. No.</p> <p>9 Q. Did you --</p> <p>10 A. Wait a minute. Can I just verify something with 11 you?</p> <p>12 Again, that wasn't our area. That was 13 several blocks away from us. That was in the 22nd 14 District. And the reason we went was because when they 15 called over the radio they asked for the public housing 16 tactical teams. So, that's why we relocated to the -- to 17 assist those units. So, I wasn't aware of those guys in 18 that area.</p> <p>19 Q. Were you in uniform that day?</p> <p>20 A. No.</p> <p>21 Q. Were you -- Do you -- What -- Do you know the 22 individual who told you the guys you were looking for were 23 in Apartment whatever the Apartment was?</p> <p>24 A. 708. No.</p> <p>25 Q. Okay.</p>
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<p>1 went to Area 4.</p> <p>2 I stayed behind. I didn't call for an ET at 3 the time, but I did call asking the ETA of the ET because 4 I -- we had been there now for a while. I wanted to know 5 when he would arrive.</p> <p>6 And the purpose of calling an ET was to 7 recover the weapon that was found there. No one would 8 touch it, and that way they could -- you know, the ET 9 would retrieve it and they could dust it for fingerprints, 10 whatever they do, that type of thing.</p> <p>11 I think the narcotics, I did inventory. I'm 12 not sure on that. But I think I did inventory the 13 narcotics and the money that was recovered.</p> <p>14 Outside of that, that was my involvement in 15 that particular case. And later on, I did get subpoenaed 16 to come to court and I testified.</p> <p>17 Q. Okay. So, that is your testimony --</p> <p>18 A. Yes.</p> <p>19 Q. -- not Robert Watts?</p> <p>20 A. Yes. That's not Robert, no.</p> <p>21 And then further reading, I did -- do give 22 my star number and the years I was in the -- in the 2nd 23 District as a sergeant of police, and it's accurate, 24 so . . .</p> <p>25 Q. Okay. Do you now, after reviewing this and</p>	<p>1 A. He was -- all I remember, he was a el- -- I would 2 say a elderly Black guy. He was probably about, at the 3 time, I'm going to say he was maybe in his early fifties, 4 late, late -- late forties, early fifties. I don't know. 5 He looked gray as I'm graying now. He was about gray.</p> <p>6 Q. I'm trying not to take offense because I'm in my 7 late forties, but -- elderly, but I'll move on.</p> <p>8 MR. KOSOKO: Me, too.</p> <p>9 BY MR. TEPFER:</p> <p>10 Q. Did you alert Darnell and Donald Wilson when you 11 asked them if they would voluntarily go to the police 12 station, that this elderly gentleman told you that the 13 people you were looking for were in Apartment 708?</p> <p>14 A. Did I alert them?</p> <p>15 Q. Yes.</p> <p>16 A. I don't believe I -- I don't know what you -- did 17 I just tell them, what you mean by alert?</p> <p>18 Q. Yeah. Did you tell them?</p> <p>19 A. I don't recall if I told them, but I know I told 20 the mother that the reason I was there, because I had 21 information that the people that were involved had 22 relocated to that location. But I don't recall if I 23 specifically told them two, but I know I told her.</p> <p>24 Q. So the elderly man who told you, told you that 25 the people who were involved were at that location?</p>

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1 A. Yes. 2 Q. And are you aware that Darnell Wilson and Donald 3 Wilson were convicted and are serving life in prison? 4 A. Honestly, no, I didn't. It wasn't my case. I 5 didn't follow this case. 6 Q. Okay. So you didn't know that until right now? 7 A. I didn't know that they were serving life in 8 prison until right now. 9 Q. Okay. So you kind of solved that case? 10 MR. KOSOKO: Object to the form of the 11 question. 12 THE WITNESS: I -- I guess I had some 13 involvement in it. I won't say I solved it, you know. I 14 had some, along with the investigation, I'm sure, of the 15 detective division, of the officers who responded, along 16 with myself, I'm sure with a combined effort and diligent 17 police work that the case was solved. 18 BY MR. TEPFER: 19 Q. Do you remember consulting with any of the 20 detectives during the course of the investigation? 21 A. No, I don't. 22 Q. Okay. 23 A. The involvement I had -- and being the police, 24 the involvement I had was really minor. And -- and it was 25 good information that I received from a concerned citizen,	1 A. No. 2 Q. Okay. 3 MR. PALLE: Palles. 4 I'm objecting to this line of questioning. 5 It's apparent, Josh, they were using these coordinated 6 proceedings to hang those -- for all for another wrongful 7 conviction case. And I really think that that's unseemly. 8 That's my objection. It's -- it's unrelated to the 9 subject matter of this litigation. 10 MR. TEPFER: Thank you for your objection. 11 BY MR. TEPFER: 12 Q. Okay. Let's talk about Ben Baker and Clarissa 13 Glenn. 14 MR. KOSOKO: Real quick, can we take another 15 30-second break? I'm sorry. Just real quick. Sorry. 16 THE VIDEOGRAPHER: We are off the record. 17 The time on the video monitor is 12:02 p.m. 18 (Recess taken from 12:02 p.m. to 12:05 p.m.) 19 THE VIDEOGRAPHER: We are on the record. 20 The time on the video monitor is 12:05 p.m. 21 BY MR. TEPFER: 22 Q. Okay. Have you -- You mentioned Clarissa Glenn's 23 arrest, right? 24 A. Yes. 25 Q. For narcotics?
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1 I mean, someone that was there. And he gave me -- and 2 evidently he gave me good information. You're telling me 3 they were convicted, so . . . 4 Q. Did you ask him how he knew that the people who 5 were involved were in Apartment 708? 6 A. No. In that environment you don't ask people 7 questions. Somebody come up to you and giving you some 8 information, you take the information, because he's 9 risking his life -- 10 Q. Did he -- 11 A. -- talking to the police. 12 Q. Did he indicate to you that he witnessed the 13 shooting? 14 A. He -- he told me exactly what I stated in this 15 testimony. He came and whispered to me the people that 16 were involved were in 708 in the building behind me. And 17 it was 2420, at the time, on State Street. 18 Q. Were you aware at the time, or are you aware -- 19 strike that. 20 Are you aware now that there was violence 21 between -- from the people who had transferred from the 22 Prairie Courts Housing Projects to the Harold Ickes 23 Housing Project at that time? 24 A. No. 25 Q. You know nothing about that?	1 A. Yes. 2 Q. Did you witness that event? 3 A. I was there on the scene of that event, yes. 4 Q. Okay. So you witnessed that criminal act? 5 A. I was there on the scene. 6 Q. Were you one of the arresting officers? 7 A. I believe so, yes. 8 Q. Have you ever witnessed Ms. Glenn commit any 9 other criminal acts? 10 A. Not that I recall. 11 Q. Okay. Who was Ms. Glenn with during that 12 criminal act that you witnessed? 13 A. Ben Baker. 14 Q. Okay. Have you ever witnessed Ben Baker commit 15 any other criminal act? 16 A. Not that I recall. 17 Q. Okay. Are you aware that members of your team 18 arrested Ben Baker on other occasions? 19 A. Yes. 20 Q. Okay. Did you -- There's one, sometimes we call 21 it the Mailbox case. There was an arrest in July of 2004. 22 Do you have any recollection of that? 23 A. I -- I remember it. He was arrested by one of -- 24 one of my units back then. When you say the Mailbox case, 25 I guess that's what it was, but, yeah.

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1 Q. Okay. Were you present for that arrest? 2 A. No, I don't believe so. I would have to look at 3 the documents. I don't believe so. 4 Q. Okay. And then there's another case, and as we 5 call it the Hallway or the Stairway case, in March of 6 2005. Do you remember that case? 7 A. I remember he was arrested by one of my units. 8 Q. Okay. 9 A. But I don't recall the case. Nope. 10 Q. Were you present? Did you witness the criminal 11 act in that case? 12 A. Nope. I don't -- I don't believe so. I wasn't 13 there. 14 Q. Were you at the scene at all? 15 A. I probably came later. Or if someone called me. 16 Like I said, if someone called me later, I -- I would go. 17 But other than that, I -- I don't recall me arresting Ben 18 Baker for narcotics at any particular time except I was a 19 witness. I was a arresting officer on that case with him 20 and Clarissa Glenn. 21 Q. Okay. I'm not asking you to speculate. I'm not 22 asking you what might have done -- 23 A. Yeah. 24 Q. -- or probably have done. Do you recall being 25 present in March 23rd, 2005 at any point on the scene	1 A. I don't recall. 2 Q. It was just a source? 3 A. It was a source. 4 Q. Okay. It was just one source? 5 A. It was probably several. In the community, you 6 get, you know, word on the street, who's -- you know, 7 who's selling dope in what building. 8 Q. What was the word on the street about Ben Baker? 9 A. That Ben Baker was selling dope out of 527 East 10 Browning. 11 Q. Anything else? 12 A. No, not that I recall. I don't -- I don't -- I 13 vaguely remember that Ben was involved in a shooting down 14 there. I don't know if he got shot or he shot someone. 15 And that was one of the -- that was one of the things that 16 was associated with him also when I got the information 17 about him. And I didn't know him. You know, I didn't 18 know him. He's just another guy down there. 19 Q. Did you investigate that shooting? 20 A. No. 21 Q. Did you witness it? 22 A. No. 23 Q. You just learned about it? 24 A. Yes. 25 Q. All right. Was your source Charles Lawrence?
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1 during Ben Baker's arrest? 2 A. No. 3 Q. All right. When did you first meet Ben Baker? 4 A. I don't know. I -- I can't recall at first. 5 I -- I have heard the name in the neighborhood, but I 6 don't recall when I first actually had an encounter with 7 him or met him. 8 Q. Okay. Do you remember when you first heard the 9 name in the neighborhood? 10 A. I can't recall. 11 Q. Was it prior to his Mailbox July 20th, 2004 12 arrest? 13 A. Yes. 14 Q. How long prior? 15 A. I don't -- I can't recall. I just -- Again, that 16 was our area, my area of operation. And I had received 17 information from a source that he was one of the players 18 down there. 19 Q. Who's the source? 20 A. I can't recall at this time. We -- I got 21 information from community members, community leaders, 22 other officers. And it could have been either of those 23 sources. 24 Q. You don't recall whether it was another officer 25 or a community member?	1 A. Who's Charles Lawrence? 2 Q. You don't know who Charles Lawrence is? 3 A. I just asked you who is Charles Lawrence, so, 4 evidently, no. Who is Charles Lawrence? You said my 5 source. I don't know a Charles Lawrence. 6 Q. Okay. So, the answer is "No"? 7 A. No. 8 Q. Okay. What do you remember about the Mailbox 9 case? 10 A. I would have to refer to the documents. 11 Q. So, without referring to the documents, what do 12 you remember about it? 13 A. That Ben Baker got arrested. 14 Q. Anything else? 15 A. I can't recall. If you have the documents, I'll 16 refer. 17 Q. So you don't recall anything else about it 18 besides Ben Baker got arrested? 19 A. I know just he got arrested. I don't remember 20 which unit even arrested him on that particular case, 21 because he -- I mean, you stated he was arrested by my 22 team several times. 23 Q. Do you remember the outcome of that case? 24 A. No. 25 Q. What do you remember about the Hallway

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<p>1 March 23rd, 2005 arrest?</p> <p>2 A. That he was arrested.</p> <p>3 Q. Anything else?</p> <p>4 A. No.</p> <p>5 Q. Was anyone arrested with him, do you remember?</p> <p>6 A. All I remember is he was arrested. That's all I</p> <p>7 can recall. I'll refer to the documents if you have them.</p> <p>8 Q. Do you recall the outcome of that case?</p> <p>9 A. No.</p> <p>10 Q. Do you recall testifying in that case?</p> <p>11 A. No.</p> <p>12 Q. And what do you remember, without looking at</p> <p>13 documents, about the December 11th, 2005 arrest?</p> <p>14 A. That Ben Baker and Clarissa Glenn were arrested</p> <p>15 for narcotics.</p> <p>16 Q. Anything else?</p> <p>17 A. I can refer to the documents.</p> <p>18 Q. Without referring to documents, do you remember</p> <p>19 anything else?</p> <p>20 A. No. That was a long time ago. What was the date</p> <p>21 on that again?</p> <p>22 Q. December 11th, 2005.</p> <p>23 A. Yeah, that's 17, almost 17 years ago.</p> <p>24 Q. So --</p> <p>25 A. No.</p>	<p>1 aggressively fighting the narcotics trade down there. And</p> <p>2 I knew he was one of the participants. And he could not</p> <p>3 talk to me unless he was going to give me some vital</p> <p>4 information that we could use to stop the drug trade</p> <p>5 there.</p> <p>6 If he was -- if he had spoken about one of</p> <p>7 the officers, something that they had did that was</p> <p>8 improper, I would have took a complaint and moved forward</p> <p>9 with a complaint from him. Other than that, I did not</p> <p>10 speak to Ben Baker. And he did not speak to me.</p> <p>11 Q. So, what -- Were you -- Are you testifying that</p> <p>12 you refused to speak to Ben Baker unless it was about a</p> <p>13 complaint of one of your officers?</p> <p>14 A. I'm testifying that I did not talk to Ben Baker</p> <p>15 about anything at any time. Ben Baker and Ron Watts,</p> <p>16 Sergeant Watts at the time, never had a conversation about</p> <p>17 anything. He would not approach me. If he would --</p> <p>18 unless it was about something, about him giving us some</p> <p>19 vital information, which he never did.</p> <p>20 If he had a complaint about an officer, one</p> <p>21 of my officers that arrested him, or he had a conversation</p> <p>22 with, or did something improper in their duties, he could</p> <p>23 have made a complaint to me, which he never did.</p> <p>24 So, Ben Baker and I never had a</p> <p>25 conversation. He never approached me. I never approached</p>
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<p>1 Q. Okay. Do you know who Patrick Frazier is?</p> <p>2 A. No.</p> <p>3 Q. On June 20th, 2004 were you approached by Charles</p> <p>4 Lawrence?</p> <p>5 A. I don't know a Charles Lawrence.</p> <p>6 Q. So, is the answer "No"?</p> <p>7 A. No.</p> <p>8 Q. I'm sorry. On June 20th, 2004 did you ask</p> <p>9 Charles Lawrence --</p> <p>10 A. No.</p> <p>11 Q. -- to tell Ben Baker that you wanted to talk to</p> <p>12 him?</p> <p>13 A. No.</p> <p>14 Q. Did you talk to Ben Baker on June 20th, 2004?</p> <p>15 A. I never had a conversation with Ben Baker. Ben</p> <p>16 Baker could not even talk to me. I was the sergeant of</p> <p>17 264 Tactical Unit. Ben Baker -- I've never spoken with</p> <p>18 Ben Baker.</p> <p>19 Q. Okay.</p> <p>20 A. He -- he -- I wouldn't even allow him to talk to</p> <p>21 me. I wasn't his arresting officer. The only way he</p> <p>22 could talk to me, if he had a complaint about one of my</p> <p>23 officers.</p> <p>24 Ben Baker was a known narcotics dealer down</p> <p>25 in Ida B. Wells, and I wouldn't -- at the time, I was</p>	<p>1 him.</p> <p>2 Q. Okay. I understand your testimony is you've</p> <p>3 never spoken to Ben Baker one-on-one in your entire life;</p> <p>4 is that correct?</p> <p>5 A. In my entire life, correct.</p> <p>6 Q. Okay. Are you testifying that you -- had he</p> <p>7 approached you, you would have refused to talk to him</p> <p>8 unless it was about a complaint of your other officer?</p> <p>9 A. My statement to you was Ben Baker never</p> <p>10 approached me. I never approached him. If he had</p> <p>11 information that could help us with the narcotics trade</p> <p>12 down in the Ida B. Wells Housing Development, which he was</p> <p>13 a vital part of, then I would have -- of course, I would</p> <p>14 have listened to him. Of course I would have received the</p> <p>15 information.</p> <p>16 If he had a complaint against one of my</p> <p>17 officers about something they did inappropriate,</p> <p>18 regardless to the way I felt about Ben Baker and his</p> <p>19 activities, I would have, as a sergeant, received that</p> <p>20 information and properly sent it through the channels that</p> <p>21 it was supposed to go through.</p> <p>22 So, to answer your question, I would have</p> <p>23 listened to Ben Baker being that he was a citizen of</p> <p>24 Chicago and I was a sergeant of police in the City of</p> <p>25 Chicago. Yes, I would have heard him out.</p>

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1 Q. Okay. It just never happened? 2 A. It just never happened. We never crossed -- our 3 paths never crossed like that. 4 Q. Okay. All right. On June 20th, 2004 did Charles 5 Lawrence call you and say, quote, "I have a little bennie 6 right here and he is ready to work it out"? 7 A. No. 8 Q. That never happened? 9 A. No. 10 Q. Do you recall any conversation with anyone, maybe 11 with -- by a nickname who said something like that to you? 12 A. No. 13 Q. Did you respond to Charles Lawrence and say to 14 call on your cell phone? 15 A. No. 16 Q. Did Charles Lawrence then -- Did Charles Lawrence 17 then call you back on your cell phone? 18 A. No. 19 Q. Did you then talk to Ben Baker and you told Ben 20 Baker that it is going to cost a thousand dollars for his 21 case to go away? 22 A. No. 23 Ben Baker's case? Which case? I mean, when 24 you say his case, which case? 25 Q. Well, did you ever tell Ben Baker about any case	1 know, if you had better information and you were really 2 interested in getting to the truth, you would have -- you 3 would present those documents to me. And I -- I don't 4 know a Charles Lawrence. You've asked me that about 16 5 times. 6 Q. Do you -- 7 A. Thank you. 8 Q. Have you been served with a complaint in -- 9 You've read the complaint against you in this case, the 10 federal complaint? 11 A. I'm sure I have. I've seen the document. 12 Q. Okay. Did you -- 13 A. Along with that complaint, sir, did the arrest 14 report for Ben Baker come along with that? Did you 15 provide me with those documents? 16 Q. I'm going to ask you questions the way I want to 17 ask you questions. Okay? 18 A. I was just asking, you know. 19 Q. Have you ever told Ben Baker -- Did you ever tell 20 Ben Baker that if you -- if he gave you -- that if he gave 21 you one thousand dollars that you'd be cool? 22 A. No. 23 Q. Did you -- Did Ben Baker -- Did Ben Baker ask you 24 if he would still be arrested if he gave you a thousand 25 dollars?
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1 that it would cost him a thousand dollars for it to go 2 away? 3 A. If you have a document of the case I could read 4 it. 5 Q. I'm asking generally, Did you ever tell -- 6 A. No. 7 Q. -- Ben Baker or have anyone tell Ben Baker that 8 it would cost him a thousand dollars to get -- make the 9 case go away? 10 A. No. 11 Q. Have you ever done that to anyone in your career? 12 A. No. Ben Baker, if I -- if I recall him being 13 arrested, on one of his cases there was proceeds. Wasn't 14 there proceeds, a large sum of money, in one of his cases? 15 So, if -- I mean, it just doesn't make sense 16 to me. You asking me did I ask him for a thousand dollars 17 when we're inventorying maybe a thousand dollars or more, 18 it just doesn't make sense, your questioning, sir. It -- 19 it doesn't make sense to me. And, frankly, it's, you 20 know, it's -- it's offensive. I mean, you asking me 21 something and you -- you have the documents evidently. 22 And I just -- I just remember that on one of 23 his arrests probably thousands of dollars was inventoried. 24 And you asking me did I ask -- did I call somebody who you 25 keep asking me about that I don't know, I think you -- you	1 A. No. 2 Q. Did you tell Ben Baker, "Do you want the truth or 3 do you want me to BS you?" 4 A. No. 5 Q. Did you then tell Ben Baker, "Well, you'll still 6 have to fight the case but you'll beat it"?. 7 A. No. 8 Q. And that was referring to the case of drugs in 9 the mailbox. Did you tell him that? 10 A. No. 11 Q. Did Ben then hang up on you and you told him -- 12 and he told you you could pick up Charles at 46th and 13 Wabash? 14 A. No. 15 Q. None of this strikes you as familiar? 16 A. It's not familiar. It never happened, sir. 17 Q. Have you ever heard these allegations before? 18 A. Probably in some of the documents that I've read 19 pertaining to this travesty. 20 Q. What travesty? 21 A. This fraud upon the court, this fraud upon the 22 citizens of Chicago and the state of Illinois. 23 Q. What's that fraud? 24 A. These proper arrests. This fraud upon the 25 citizens of the state of Illinois about all these court

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<p>1 cases in which something happened pertaining to Sergeant 2 Ron Watts in the year 2010. You're asking me about 3 something that happened in 2003.</p> <p>4 Q. What happened to you in 2010?</p> <p>5 A. I need to refer to the documents.</p> <p>6 Q. What are you referring to when you said something 7 happened in 2010?</p> <p>8 A. That was when I was -- had a incident with the 9 FBI, in 2010.</p> <p>10 Q. What was that incident?</p> <p>11 A. Allegedly.</p> <p>12 Q. Excuse me? What was that incident with the FBI?</p> <p>13 A. It was a incident upon someone removed some 14 property and supposedly I was a part of it.</p> <p>15 Q. Is -- is that the same case that you're talking 16 about that they pros- -- the federal government prosecuted 17 you for?</p> <p>18 A. Yes. Yes, sir.</p> <p>19 Q. Okay. And that was in 2010, is your memory?</p> <p>20 A. Is my memory, yes, sir.</p> <p>21 Q. Okay. Is part of the fraud that the federal 22 prosecutors prosecuted you for that?</p> <p>23 A. It had nothing to do with this case that you're 24 asking me about with Ben Baker. This fraud upon the 25 citizens of Illinois is what I'm talking about, all these</p>	<p>1 including Clarissa Glenn and Ben Baker. And that's my 2 opinion. And that's from my professional observation of 3 what was happening in a public housing.</p> <p>4 So, yes, I -- these people who are receiving 5 these -- these funds from the state of Illinois because of 6 arrests that were made in 2003, 2004, 2005, because of 7 something -- because Sergeant Watts was charged in 2012 8 has no association whatsoever. You guys know it and I 9 know it. It's a fraud upon the state of Illinois, the 10 people of Illinois, in my opinion, sir.</p> <p>11 Q. Okay. So, all the allegations that are in these 12 lawsuits are lies, correct?</p> <p>13 A. All the allegations in those lawsuits against 14 Sergeant Ron Watts is a lie because Sergeant Ron Watts 15 never arrested anyone.</p> <p>16 So, just like all those arrests, right, 17 there were other sergeants that signed off on vice case 18 reports, arrest reports. They're not here. They're 19 excluded. You know why? Because they performed their 20 supervisory duties just as Sergeant Watts performed his 21 supervisory duties. But because of something that 22 happened seven or eight years later, come on, in my 23 opinion.</p> <p>24 Q. I mean, you understand that Ben Baker is alleging 25 exactly the questions I asked you, correct?</p>
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<p>1 cases that has nothing to do with Ron Watts.</p> <p>2 Ron Watts never arrested Ben Baker. Ron 3 Watts never -- with a mailbox case or a hallway case, Ron 4 Watts never arrested the -- the people that you gave me 5 arrest reports for earlier where I had just clerked the 6 paperwork, I was not the arresting officer. I didn't go 7 to court, I didn't testify, because I never arrested those 8 people.</p> <p>9 Q. Okay. So, my question is different. Is it -- 10 was it fraudulent that the federal government prosecuted 11 you?</p> <p>12 A. In my opinion, yes.</p> <p>13 Q. Okay. And then the fraud is continuing by these 14 false allegations and these lawsuits; is that correct?</p> <p>15 A. In my opinion, yes.</p> <p>16 Q. Well, is it -- I mean, is it a fraud?</p> <p>17 A. Oh, yes, it's a big fraud.</p> <p>18 Q. Okay. Because you --</p> <p>19 A. In my -- in my opinion, it's a big fraud upon the 20 citizens of Illinois when all these cases, these guys, are 21 receiving funds for time that they legitimately served in 22 prison, which was -- because the true victims are the 23 people that was living in those -- in Ida B. Wells who 24 were -- daily their life was altered because of the 25 illegal activity drug selling of these particular people,</p>	<p>1 A. I understand that there's a fraud that's being 2 committed, and everyone knows it. And you can turn a 3 blind eye to it and you can keep being a part of it 4 because everybody's receiving funds from it. Everybody's 5 motivated by monetary.</p> <p>6 And they said I was motivated by money. 7 Where's all this money that I was motivated by? Where is 8 it?</p> <p>9 I went to prison, sir, for \$5200 that I had 10 no part in. They can't tell you if I -- how much money I 11 took. They can't, because I didn't take any money, sir.</p> <p>12 Q. Okay.</p> <p>13 A. You can roll your eyes like that. And, you know, 14 I'm not offended by that, you know. I think, as a man, 15 you know, you shouldn't roll your eyes at another man. 16 Oh, well, I grew up differently.</p> <p>17 But, that's the -- You're sitting here 18 asking me about people I know nothing off, something about 19 happening 17 -- this is not a game for me. This is my 20 life you guys are playing with, you know. You guys can, 21 you know, keep asking me about Ben Baker and Clarissa 22 Glenn and all this stuff, you know. Those people, yeah, 23 they have something to gain. They've already gained 24 enough off the citizens.</p> <p>25 And the true victims, again, are those kids</p>

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1 that had to go to school daily going through that 2 hellhole, open air drug market where there's films of it. 3 And I'm not just saying this. There's -- you're talking 4 about missions. 5 There's narcotic missions that were done. 6 You guys know that. Sun City, all those missions that 7 were done. And those same people who you asking me about, 8 they're on film in those, in some of those missions. 9 Those people weren't just arrested one or two times. They 10 were arrested multiple times, multiple times, and multiple 11 times. 12 But just -- but just because Ron Watts 13 signed his arrest report, that one is not legit. He was 14 framed. He was framed just on that one. 15 Q. Okay. So, if -- if they -- I forgot it. 16 A. Yeah, I get it. That's the way I feel a lot of 17 days. Forget it. 18 Q. Do you recall Mother's Day 2004? 19 A. Yeah, I do. My mom was alive then and I called 20 her. I remember that. I called her, yeah. 21 Q. Okay. What do you remember about it? 22 A. I called my mom. 23 Q. All right. Where were you when you called your 24 mom? 25 A. I was at home. I think I was preparing to go to	1 mother. 2 Q. Okay. What do you remember specifically about 3 what you said to your mother on May 9th, 2004? 4 A. Happy Mother's Day, love you, girl. 5 Q. Okay. Do you remember being intoxicated that 6 day? 7 A. No. 8 Q. Do you remember seeing Ben Baker that day? 9 A. No. 10 Q. Do you remember being between two buildings, 540 11 and 559? Do you know where 540 and 559 buildings are? 12 A. Absolutely. I patrolled that area for many 13 years. 14 Q. Do you remember encountering Ben that day and 15 saying to him -- saying that you'd been up all night, that 16 you're broke, you ain't got no money? 17 A. No. Never happened. 18 Q. And that you were going to get Ben's ass? 19 A. No. Never happened. 20 Q. Do you remember July 12th, 2004? 21 A. No. 22 Q. Do you remember going to Apartment 206? 23 A. No. 24 Q. Do you know who lived in Apartment 206? 25 A. What building?
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1 work that day. And that's why I called her, because I 2 couldn't go to see her. 3 Q. What shift did you work that day? 4 A. I don't recall what shift. I could refer to the 5 documents. 6 Q. Well, what hours did you work that day? 7 A. I don't recall. I'll refer to the documents. I 8 just know there was a time that I couldn't go see my 9 mother. 10 Q. Okay. When did your mother pass? 11 A. Maybe about -- wow. Hum. 12 MR. KOSOKO: Answer the question and we'll 13 take a break, Sarge. 14 THE WITNESS: Yeah, I will need to take a 15 break. 16 MR. KOSOKO: No, answer the question. 17 THE WITNESS: I'm going to say about eight 18 years ago. 19 BY MR. TEPFER: 20 Q. Okay. But you remember specifically May 9th, 21 2004 speaking to your mother and telling her that you -- 22 A. I remember every Mother's Day speaking to my 23 mother when she was here. 24 Q. Okay. Do you remember that one in specific? 25 A. I remember every Mother's Day speaking to my	1 Q. The 529 building. 2 A. Excuse me? 3 Q. 529. 4 A. No. I don't remember a 529 building. 5 MR. RAUSCHER: Is that the last one? 6 MR. TEPFER: No. No, I'm not asking for an 7 exhibit. Sorry. 8 THE WITNESS: Was there a 529 building? 9 BY MR. TEPFER: 10 Q. Just give me one second. 527. I'm sorry. 11 A. Oh, okay. 12 Q. Do you remember who lived in Apartment 206 in the 13 527 building? 14 A. I can't recall. 15 Q. Did you go there? Did you go to Apartment 206 16 July two thousand -- July 12th, 2004 with officers, with 17 other officers with your guns drawn? 18 A. Not that I recall. 19 Q. All right. 20 A. No. 21 Q. Did you encounter Ben Baker and Clarissa Glenn? 22 A. No, not that I recall. 23 Q. Did you enter their apartment without their 24 consent? 25 A. No, not that I recall.

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<p>1 Q. Have you ever entered their apartment without 2 their consent?</p> <p>3 A. No.</p> <p>4 Q. Do you know who Elgin Moore is?</p> <p>5 A. I think I've heard that name somewhere. I don't 6 know him and he probably don't know me. No. I -- no.</p> <p>7 Q. Would you recognize Elgin Moore if you saw him?</p> <p>8 A. No.</p> <p>9 Q. Did you see Elgin Moore that day at Apartment 206 10 on July 12th, 2004?</p> <p>11 A. No.</p> <p>12 Q. Did you search, unlawfully, Apartment 206 on 13 July 12th, 2004?</p> <p>14 A. No.</p> <p>15 Q. Did you encounter Ben Baker and accuse him of 16 just serving in the hallway?</p> <p>17 A. No.</p> <p>18 Q. Did you then tell the other officers who were 19 with you to just put Ben Baker and Elgin Moore in cuffs?</p> <p>20 A. No.</p> <p>21 Q. Did you then tell Ben Baker that if you find 22 anything you're all going to jail, and if you find nothing 23 you're going to jail for the drugs that were found in the 24 mailbox?</p> <p>25 A. No.</p>	<p>1 Apartment 206. Did you search that apartment and find 2 nothing?</p> <p>3 A. No.</p> <p>4 Q. Did you, nevertheless, falsely arrest Ben Baker?</p> <p>5 A. No. I never arrested Ben Baker.</p> <p>6 Q. You've never arrested Ben Baker?</p> <p>7 A. Not in Apartment 206.</p> <p>8 Q. Okay.</p> <p>9 A. Never arrested Ben Baker in 527 building.</p> <p>10 Q. You did -- You have arrested Ben Baker, though, 11 right?</p> <p>12 A. Yes. I was a -- I was one of the arresting 13 officers.</p> <p>14 Q. Okay. Did you ever -- Do you recall that Ben 15 Baker was in custody from July to November 2004 for the 16 mailbox -- drugs found in the mailbox?</p> <p>17 A. No.</p> <p>18 Q. Do you recall learning that he was released from 19 custody?</p> <p>20 A. No.</p> <p>21 Q. Do you know Alvin Jones?</p> <p>22 A. Of course.</p> <p>23 Q. Did Alvin Jones ever talk to you about 24 conversations he had with Ben Baker?</p> <p>25 A. No.</p>
<p style="text-align: center;">Page 147</p> <p>1 Q. Did you ever find drugs in a mailbox?</p> <p>2 A. No.</p> <p>3 Q. Did any -- Were you ever made aware that any 4 individuals on your team found drugs in the mailbox?</p> <p>5 A. I believe there was a case about drugs being 6 found in a mailbox, that at one particular time there was 7 several cases. That was the habit, so to speak, where 8 guys would put drugs in the mailbox. So, there was 9 probably a number of cases.</p> <p>10 Q. So, you recall many cases?</p> <p>11 A. I said there was probably a number. Possibly. I 12 just remember a time where guys were using the mailboxes 13 to hide narcotics.</p> <p>14 Q. In which building?</p> <p>15 A. All the buildings that they sold narcotics from.</p> <p>16 Q. What buildings did they sell narcotics from?</p> <p>17 A. 511, 527, 540 when it was up, 559, 575, 574, 559. 18 Every building that was down there that was up they was 19 selling narcotics. It was an open air drug market.</p> <p>20 Q. Do you ever recall learning information that Ben 21 Baker stored drugs in the mailbox?</p> <p>22 A. Not specifically Ben Baker, no.</p> <p>23 Q. Okay. Going back to July 12th, 2004 --</p> <p>24 A. 2004, okay.</p> <p>25 Q. -- yeah, I'm going to ask you questions about an</p>	<p style="text-align: center;">Page 149</p> <p>1 MS. OLIVIER: Objection to form and 2 foundation.</p> <p>3 Kelly Olivier.</p> <p>4 MR. TEPFER: What was the objection?</p> <p>5 MS. OLIVIER: Form and foundation.</p> <p>6 BY MR. TEPFER:</p> <p>7 Q. Do you recall Kenneth Young testifying in the 8 prosecution of Ben Baker about the drugs found in the 9 mailbox?</p> <p>10 A. No.</p> <p>11 MS. OLIVIER: Objection; foundation, form.</p> <p>12 BY MR. TEPFER:</p> <p>13 Q. Did you instruct any of your officers after Ben 14 was released in November 2004 to arrest Ben Baker again?</p> <p>15 A. No.</p> <p>16 Q. Did you instruct them to frame him?</p> <p>17 A. No.</p> <p>18 Q. Did you speak to Ben Baker on March 23rd, 2005 at 19 the police station?</p> <p>20 A. No.</p> <p>21 Q. Do you know someone named Bat, B-a-t?</p> <p>22 A. I know -- I know a officer nicknamed Bat. I'm 23 not too familiar with him. I know of him.</p> <p>24 Q. Who is he? What's his name, real name?</p> <p>25 A. Bat.</p>

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1 Q. Do you know his real name? 2 A. No. I don't recall. 3 Q. Was he an officer you worked with? 4 A. No. 5 Q. Was he a -- Did he work at 51st and Wentworth? 6 A. No, not that I recall. 7 Q. Did he work at District 2? 8 A. He was in the 2nd District, I believe, when I was 9 a police officer. Maybe he was a tactical officer then 10 working in public housing. That was years before I even 11 become a sergeant. That's why I said I knew of him. I 12 don't know him personally. 13 Q. Did you -- Do you know if -- Did you ever say to 14 Ben Baker on March 23rd, 2005, "Why didn't you tell me he 15 was Bat's nephew? I would have gave him this one. That 16 is my guy"? 17 A. No. Ah, boy. 18 Q. Did you ever otherwise indicate to Ben Baker that 19 he wouldn't have been charged if you would have known that 20 he was related or kin with Bat? 21 A. No. Never arrested Ben Baker in a hallway. 22 Q. You never spoke to Ben Baker on March 23rd, 2005, 23 you said, right? 24 A. Not that I recall, no, not at all. I would have 25 spoken to his arresting officers.	1 conversation with her. Not that I recall. 2 Q. All right. Let's see if we can recall some of it 3 now. 4 A. All right. 17 years. 5 Q. All right. I'm going to show you -- I'm sorry. 6 The version that I have is not -- didn't print out with 7 the Bates numbers, but it's the vice case report of the 8 date of occurrence June 17th, 2004. 9 A. Can I just have a word with you? I just want to 10 tell you something. 11 MR. KOSOKO: Yeah. 12 MR. TEPFER: You want a break? 13 THE WITNESS: Yeah. 14 MR. KOSOKO: Yeah. Just 30 seconds. 15 THE WITNESS: Yeah. 16 THE VIDEOGRAPHER: We are off the record. 17 Time on the video monitor is 12:40 p.m. 18 (Recess taken from 12:40 p.m. to 1:03 p.m.) 19 THE VIDEOGRAPHER: We are on the record. 20 The time on the video monitor is 1:03 p.m. 21 BY MR. TEPFER: 22 Q. Okay. Welcome back. So, we're going to talk 23 about -- I'm going to show you some of these reports. The 24 first one is marked 27. 25 All right. So -- And, again, for the
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1 Q. Did you ever tell Ben Baker on March 23rd, 2005 2 at the police station that it was too late not to charge 3 him but you can give him some money so he has some money 4 on his books in jail? 5 A. No. 6 Q. Did Ben Baker respond to you and said, "I don't 7 want shit from you"? 8 A. No. 9 Q. Did you indicate to Ben that you would have let 10 him go if the paperwork hadn't already started? 11 A. No. 12 Q. All right. Did you engage in a warrantless 13 search of Clarissa Glenn's apartment on August 20th, 2005? 14 A. No. 15 Q. On March 23rd, 2005, did you and Alvin Jones 16 threaten Clarissa Glenn with bodily harm and false arrest? 17 A. No. 18 Q. On October 28th, 2005 did you threaten Clarissa 19 Glenn with jail? 20 A. No. 21 Q. Have you ever interacted with Clarissa Glenn? 22 A. Not that I recall. 23 Q. Did you have any conversation with her on 24 December 11th, 2005 when you were part of her arrest? 25 A. In December? Not that I -- I don't remember a	1 record, I don't -- the printout didn't have a Bates stamp 2 and I forgot to check, but it's the June 17th vice case 3 report, June 17th, 2004. 4 MR. RAUSCHER: Oh, sorry, that's 26. 5 THE WITNESS: 26, yeah. Darnell -- 6 BY MR. TEPFER: 7 Q. Oh, I'm sorry. That's 26. Okay. And then 27 8 will be the supplemental report related to the arrest of 9 Ben Baker. It's dated -- The supplemental's dated 10 July 11th, 2004. 11 (Deposition Exhibit 26 and Exhibit 27 were 12 marked for identification.) 13 BY MR. TEPFER: 14 Q. All right. So, is your name -- Before you really 15 dig in, is your name anywhere on either of those reports? 16 A. I've looked at these, at this one. 17 Q. Just for the record, you're talking about 26 you 18 looked at? 19 A. 26, yeah, I looked at 26. And now 27. And my 20 name is not on either of these reports. 21 Q. Okay. And it is some of the officers who worked 22 under your supervision are reporting on this arrest, or 23 this investigation, right? 24 A. Yeah. They worked under my supervision, yes. 25 Q. Right. And the reporting officer on both

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<p>1 Exhibit 26 and Exhibit 27 is -- the first one is Kenneth 2 Young, right?</p> <p>3 A. Um-hum.</p> <p>4 Q. And he worked under your -- He was part of your 5 tactical team at the time?</p> <p>6 A. Yes.</p> <p>7 Q. And Alvin Jones is the second reporting officer, 8 right?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. So, have you had a chance to look at -- 11 Well, why don't you look at the narrative, in particular, 12 of these reports. Have you had a chance to look at those?</p> <p>13 A. Okay.</p> <p>14 Q. Does this in any way refresh your recollection 15 about anything beyond that Ben Baker was arrested for this 16 case?</p> <p>17 A. I'm reading the documents, but it doesn't 18 refresh -- why would it refresh my memory? I have nothing 19 to do with the arrest. I wasn't even the approving 20 sergeant. I didn't testify and go to court. I had 21 nothing to do with this.</p> <p>22 Q. Okay. So, that's my question. These documents 23 confirm that you had absolutely nothing to do with this 24 case whatsoever, right?</p> <p>25 A. Nope. I wasn't even the supervisor approving</p>	<p>1 Q. I'm not saying for this specific one. I'm sorry. 2 Let me ask a more clear question.</p> <p>3 Do you remember the testimony earlier, you 4 said sometimes you could, if you were going out on a 5 mission, you could call in and get an RD number and an 6 event number prior to any arrests?</p> <p>7 A. As a supervising sergeant, yes.</p> <p>8 Q. Okay.</p> <p>9 A. But for officers, no, they would never do that. 10 It's beyond their scope.</p> <p>11 Q. Right. But a supervising officer can get an RD 12 number before the mission even starts, right?</p> <p>13 A. Yes.</p> <p>14 Q. And they can get an event number before the -- it 15 even starts?</p> <p>16 A. Yes.</p> <p>17 Q. Can they get an incident number before the 18 mission --</p> <p>19 A. I'm sure --</p> <p>20 Q. -- even starts?</p> <p>21 A. I'm sure there's a incident number along with 22 the -- I'm not -- I can't -- let me check. I'm not sure 23 if there's an incident number. I haven't been part of the 24 Department. I don't know how that works, but it should be 25 an incident number, I guess. Yeah.</p>
<p style="text-align: center;">Page 155</p> <p>1 these.</p> <p>2 Q. Okay. And that includes both the date of the 3 criminal act, which is June 17th, 2004, according to these 4 reports, right?</p> <p>5 A. That's correct.</p> <p>6 Q. And then also -- it also confirmed you had 7 nothing to do with the arrest, which was a month, or 8 almost a month later, July 11th, 2004; is that correct?</p> <p>9 A. Correct.</p> <p>10 Q. Okay. And just one quick question on that 11 Exhibit 27. Do you see in the beginning of the narrative 12 it talks about the event number and the incident number 13 again?</p> <p>14 A. Um-hum.</p> <p>15 Q. I think I forgot to ask you, but when you can 16 call in an RD number and an event number ahead of time, is 17 that also for an incident number, you can call in ahead of 18 time before you go out on a mission?</p> <p>19 A. For the supplemental report here?</p> <p>20 Q. No, for the vice case report, I'm talking about, 21 Exhibit 27. Do you see -- 26, I'm sorry. Exhibit 26, the 22 vice case report, right in the beginning of the narrative 23 in Paragraph 40.</p> <p>24 A. No. He wouldn't -- It wouldn't call -- He 25 didn't --</p>	<p style="text-align: center;">Page 157</p> <p>1 Q. Well, there is an incident number.</p> <p>2 A. Okay.</p> <p>3 Q. I know you're not involved in it, but it says 4 04B52, right?</p> <p>5 A. Yes.</p> <p>6 Q. I'm just asking if you recall when you call in, 7 when a supervisor calls in on those times before a mission 8 to get an RD number or an event number, can they also call 9 in to get an incident number?</p> <p>10 A. I think an incident -- when you generate an RD 11 number and an event number, an incident number is 12 generated also. That's what I recall.</p> <p>13 Q. Okay. So, it would be simultaneous?</p> <p>14 A. Um-hum.</p> <p>15 Q. All right. Okay. All right. I'm going to show 16 you what's marked as Exhibit 28. This is the Ben Baker's 17 arrest report --</p> <p>18 A. Um-hum.</p> <p>19 Q. -- for May -- March 23rd, 2005 arrest. Again, I 20 don't have a Bates number printed out on this. And 21 then --</p> <p>22 MR. KOSOKO: For the record, we can use -- 23 here, you can use -- this should have it. Just, so -- for 24 the --</p> <p>25 MR. TEPFER: Yes, that's fine.</p>

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<p>1 MR. KOSOKO: Baker-Glenn 18758 is the 2 central booking report for the March 23rd, 2005 arrest of 3 Ben Baker. So . . .</p> <p>4 MR. TEPFER: And then Exhibit 29 is the vice 5 case report of the same arrest.</p> <p>6 (Deposition Exhibit 28 and Exhibit 29 were 7 marked for identification.)</p> <p>8 BY MR. TEPFER:</p> <p>9 Q. All right. Now, turning to 29 first, is that 10 your signature in Box 50?</p> <p>11 A. Yes, sir.</p> <p>12 Q. Okay. And have you had a chance to examine these 13 documents yet? It looks like you're doing it now.</p> <p>14 A. Okay. And then this is just his arrest report. 15 It's the same thing. Okay. Yes, sir.</p> <p>16 Q. Okay. Does that refresh your recollection about 17 this case in any way?</p> <p>18 A. It -- Reading it, it gives me -- I signed off on 19 it. Refreshing, when you say refreshing, it's not 20 refreshing to me because it's not my arrest. All I'm 21 doing is -- you know, I didn't testify to it. I didn't 22 arrest him. I didn't generate the report. You're saying 23 refresh as if I had some involvement with it.</p> <p>24 All I did here in this vice case report was 25 to make sure that all the boxes were filled out correct</p>	<p>1 the scene as part of the investigation or the arrest in 2 this case?</p> <p>3 A. I don't know if I went. I can't recall --</p> <p>4 Q. Okay.</p> <p>5 A. -- if I ever showed up or not.</p> <p>6 Q. Okay.</p> <p>7 A. This was '05.</p> <p>8 Q. Okay. Do you recall testifying in this case?</p> <p>9 A. In this case?</p> <p>10 Q. Yeah.</p> <p>11 A. No.</p> <p>12 Q. Okay. Do you recall giving Al Jones, Bob 13 Gonzalez, Brian Bolton, Manuel Leano, and Douglas Nichols 14 and Kenny Young an assignment that day?</p> <p>15 A. I recall that I -- Yes, I gave them assignments. 16 I would have -- the supervisor on duty, I would have gave 17 them assignments according to the information I received 18 from the tactical lieutenant or watch commander or 19 district commander.</p> <p>20 Q. Okay. And I'm asking you -- of course, I know 21 that's your practice. I think we've settled in on that. 22 Do you remember specifically on this day 23 giving them a specific assignment?</p> <p>24 A. No.</p> <p>25 Q. Okay. Do you recall -- Well, I'm going to have</p>
<p style="text-align: center;">Page 159</p> <p>1 and that he had probable cause for the arrest. So, you're 2 saying refresh as if I had something other to do with this 3 case than to clerk it as a supervising sergeant.</p> <p>4 So, to answer your question, no, I had 5 nothing to do with it.</p> <p>6 Q. Okay. Does it refresh your recollection at all 7 about the facts underlying the arrest, or no?</p> <p>8 A. What is here is probable cause for an arrest. 9 So, it -- Doug Nichols and his partner Manny Leano, they 10 made an arrest. And there's probable cause in here, and I 11 signed off on it. And they -- I don't know what happened 12 to the case after that.</p> <p>13 Q. Do you recall whether -- You were there. Does 14 it -- Do you recollect whether you were ever at the scene?</p> <p>15 A. I don't recall if I -- I know I wasn't there 16 during this. I wouldn't recall. But in the report it 17 says that I directed them to relocate to that area, which 18 probably I had been given information by the lieutenant 19 that there were -- he was getting reports of narcotics 20 being sold at the location and he wanted me to send a unit 21 down there. That's usually how it worked. It's not, you 22 know, anything outside of that.</p> <p>23 Q. Okay. As you sit here today, though --</p> <p>24 A. Um-hum.</p> <p>25 Q. -- do you recall whether or not you ever went to</p>	<p style="text-align: center;">Page 161</p> <p>1 to kind of share this one with you. But I'm going to show 2 you what's marked -- I guess we'll start at PLAINTIFFS' 3 JOINT 21709. We'll just go through 21726. Okay?</p> <p>4 What is that, 30?</p> <p>5 MR. RAUSCHER: 30.</p> <p>6 (Deposition Exhibit 30 was marked for 7 identification.)</p> <p>8 BY MR. TEPFER:</p> <p>9 Q. Okay. I'll sort of halfway do this with you. 10 I'm sorry, I only have one version.</p> <p>11 Do you see the title of this first page 12 here? It says People v. Ben Baker and Clarissa Glenn, 13 actually? Do you see that?</p> <p>14 A. Okay.</p> <p>15 Q. "Yes"?</p> <p>16 A. Yeah, I see.</p> <p>17 Q. Okay. And it says Case Number 05-08982, right?</p> <p>18 A. Okay.</p> <p>19 Q. Okay. And these are transcripts of proceedings 20 on June 5th, 2006. Do you see that?</p> <p>21 A. Okay.</p> <p>22 Q. Okay. And here -- And I direct you to Page 23 PLAINTIFFS' JOINT 21714. And do you see what's on the top 24 of the page there?</p> <p>25 A. Yes.</p>

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<p>1 Q. It's your testimony in that case, right?</p> <p>2 A. Okay.</p> <p>3 Q. All right. Let's keep this together so we don't</p> <p>4 screw this up here.</p> <p>5 A. But not for this. This is something totally</p> <p>6 different.</p> <p>7 Q. Okay. Well, we can -- You know what, why don't</p> <p>8 you just go ahead and -- You know what, I'll read it to</p> <p>9 you. "Directing your" --</p> <p>10 A. Excuse me. Wait. Excuse me. Because -- Are you</p> <p>11 saying that I testified about this case? Is that what</p> <p>12 you're showing me there?</p> <p>13 Q. That's what I'm trying to show you, yes.</p> <p>14 A. Okay. Okay.</p> <p>15 Q. So, on the bottom of Page 21714 you see the</p> <p>16 question, "Directing your attention to March 23rd, 2005,</p> <p>17 were you on duty that date?" [Quoted as read.] Do you</p> <p>18 see that?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. And you said "Yes," correct?</p> <p>21 A. Um-hum.</p> <p>22 Q. And then going back to the next page, 21715, it</p> <p>23 says -- you were asked, "And on March the 23rd of 2005 who</p> <p>24 were some of your team members, do you recall what their</p> <p>25 names were?" [Quoted as read.]</p>	<p>1 And you answered "Correct."</p> <p>2 A. Okay.</p> <p>3 Q. Do you see that?</p> <p>4 "Do you see that person in court here</p> <p>5 today?"</p> <p>6 You answer "Yes."</p> <p>7 And then you were asked to identify him, and</p> <p>8 you do. Is that all correct?</p> <p>9 A. Okay. Yes, I testified to it.</p> <p>10 Q. Okay. And then there's a question -- and we</p> <p>11 talked about this earlier. You wanted to see some</p> <p>12 documents, what I was basing it on. But there's another</p> <p>13 question here. "Now, in regard to the defendant at any</p> <p>14 time did you ever tell him you would not be charged</p> <p>15 because he was kin to Bat?"</p> <p>16 And you say, "No," right?</p> <p>17 A. Right.</p> <p>18 Q. Okay. All right. So, does that -- Now that you</p> <p>19 -- No reason to think this testimony is false, right?</p> <p>20 A. No.</p> <p>21 Q. Okay. It's accurate?</p> <p>22 A. It sounds pretty accurate to me, yes --</p> <p>23 Q. Okay.</p> <p>24 A. -- from what you read off to me. I mean, I would</p> <p>25 have read it myself, but --</p>
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<p>1 And you say Officer Jones -- Al Jones, Bob</p> <p>2 Gonzalez, Brian Bolton, Manuel Leano, Doulas Nichols, and</p> <p>3 Kenny Young. Do you see that?</p> <p>4 A. Um-hum.</p> <p>5 Q. Okay. And then you were asked, "Now, did you</p> <p>6 have an assignment for Officer Nichols that day and his</p> <p>7 partners?"</p> <p>8 Answer: "The assignment was to relocate to</p> <p>9 the extensions which is, it is a six building area in the</p> <p>10 Ida B. Wells Housing Development."</p> <p>11 Question: "And what was their assignment on</p> <p>12 that date?</p> <p>13 "To suppress the gang and drug</p> <p>14 activities" --</p> <p>15 A. Um-hum.</p> <p>16 Q. -- "in the area."</p> <p>17 A. Okay.</p> <p>18 Q. Correct?</p> <p>19 A. Yes.</p> <p>20 Q. No reason that's not accurate, right?</p> <p>21 A. Right.</p> <p>22 Q. Okay. And then on the bottom of PLAINTIFFS'</p> <p>23 JOINT 21716, you were asked, "You arrived on the scene</p> <p>24 subsequent to the arrest of the defendant Ben Baker,</p> <p>25 correct?"</p>	<p>1 Q. Okay. So, my question, I guess, is, now that</p> <p>2 you've read that portion of the testimony, do you have any</p> <p>3 memories of actually being on the scene that day?</p> <p>4 A. I arrived at the scene, yes.</p> <p>5 Q. And you do have an independent recollection of</p> <p>6 arriving at the scene?</p> <p>7 A. I arrived at the scene.</p> <p>8 Q. Okay. And when did you arrive there?</p> <p>9 A. After the arrest, as reported there, as I</p> <p>10 testified to.</p> <p>11 Q. All right.</p> <p>12 A. I was not there for the arrest.</p> <p>13 Q. What else do you remember? What happened? What</p> <p>14 happened when you arrived on the scene?</p> <p>15 A. I'll refer to what I testified to.</p> <p>16 Q. Okay.</p> <p>17 A. It's not something that I, you know, I just</p> <p>18 remember. I remember because I testified to it.</p> <p>19 Q. Okay. So you don't really, as you sit here,</p> <p>20 remember being at the scene on March 23rd, 2005, you're</p> <p>21 just trusting that your testimony at the time is accurate,</p> <p>22 right?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. All right. I'm going to show you what I'm</p> <p>25 marking as Exhibit 31.</p>

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<p>1 (Deposition Exhibit 31 was marked for 2 identification.)</p> <p>3 MR. TEPFER: This is CITY-BG-12903.</p> <p>4 MR. RAUSCHER: Actually, sorry. Hold on one 5 second. The Zoom may not be working for anybody.</p> <p>6 MR. KOSOKO: Yeah.</p> <p>7 THE VIDEOGRAPHER: Would you like to go off 8 the record?</p> <p>9 MR. TEPFER: Yeah.</p> <p>10 THE VIDEOGRAPHER: We are off the record. 11 The time on the video monitor is 1:23 p.m.</p> <p>12 (Discussion off the record. Zoom 13 participants now re-join the proceedings.)</p> <p>14 THE VIDEOGRAPHER: We are on the record. 15 The time on the video monitor is 1:28 p.m.</p> <p>16 MR. TEPFER: Okay. I'm done with Exhibit 30 17 unless --</p> <p>18 MR. RAUSCHER: You want to put that on the 19 record?</p> <p>20 MR. TEPFER: Oh, isn't that what we just 21 did? Oh, okay. Sure.</p> <p>22 We accidentally didn't realize that all but 23 counsel for Loevy plaintiffs, everyone who's in the room, 24 and Ahmed for Defendant Watts, everyone else on the Zoom 25 was frozen out for the last 20 minutes.</p>	<p>1 think we can continue.</p> <p>2 MR. TEPFER: Okay. Sorry about that.</p> <p>3 BY MR. TEPFER:</p> <p>4 Q. Okay. All right. So, I'm going to show you now 5 what's Exhibit 31, which is CITY-BG-12903 through 12927.</p> <p>6 And I'm really only going to ask you about the first page, 7 903. But this is the full CR dated -- or, numbered 8 309282.</p> <p>9 And in the bottom half of that document 10 there's an allegation from Clarissa Glenn that you made a 11 warrantless entry into the apartment. Do you see that?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. Does that -- Do you recall making a 14 warrantless entry into her -- their apartment in 15 August 20th, 2005?</p> <p>16 A. No. It never happened.</p> <p>17 Q. So that's a false allegation?</p> <p>18 A. Yes.</p> <p>19 Q. How do you know it never happened?</p> <p>20 A. I was -- August 20th, I -- I never been in her 21 apartment in 206, that I recall. Never.</p> <p>22 Q. Okay. Is there any other reason you know it's a 23 false allegation?</p> <p>24 A. Because it never happened, so I know it's false, 25 because it never happened.</p>
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<p>1 So, we've got them up to speed on -- from 2 Exhibit 26 to Exhibit 30, which is basically what we 3 covered, which was what's known as the Mailbox arrest and 4 the March 23rd, 2005 arrest.</p> <p>5 And as we discussed, there was essentially 6 efforts to see if any of those documents refreshed his 7 recollection. And that's about --</p> <p>8 MR. RAUSCHER: We agreed that to the extent 9 people look at the transcript from that 20-minute or so 10 portion when they weren't on the Zoom, when it wasn't 11 working, and they can add objections into it later.</p> <p>12 MR. KOSOKO: Correct. No objection from 13 counsel for Watts regarding any testimony between 14 Exhibits 26 through 30 if any parties involved in the 15 matter would like to retroactively apply objections to the 16 questions.</p> <p>17 MR. TEPFER: Same.</p> <p>18 MR. PALLE: And/or follow up on that 19 material.</p> <p>20 MR. TEPFER: That, too, correct.</p> <p>21 MR. PALLE: Right.</p> <p>22 MR. MICHALIK: This is Michalik, and I would 23 just say that we know what the exhibits were. I would not 24 agree that we were brought up to speed on what the 25 testimony was regarding those exhibits. So, with that, I</p>	<p>1 Q. Okay. All right. I'm going to show you what's 2 Exhibit 32, which is CITY-BG-12928 through 12936. This is 3 CR309359. And I'm just really going to focus on the 4 second page of that one, which is CITY-BG-12929. Okay?</p> <p>5 (Deposition Exhibit 32 was marked for 6 identification.)</p> <p>7 BY MR. TEPFER:</p> <p>8 Q. Do you see that there's an allegation, then, on 9 October 28th, 2005 you threatened Clarissa Glenn with 10 jail. Do you see that?</p> <p>11 A. Yes.</p> <p>12 Q. Did that ever happen?</p> <p>13 A. Never happened.</p> <p>14 Q. That's a false allegation, as well?</p> <p>15 A. That's a false allegation, as well.</p> <p>16 Q. Okay. How do you know it didn't happen?</p> <p>17 A. I'm the accused and I know I didn't say that.</p> <p>18 I'm the accused. I know it didn't happen, without a 19 doubt.</p> <p>20 Q. Okay. And, I'm sorry, I'm going back to 21 Exhibit 31. As well, there's a second allegation. I'm 22 back on this document, CITY-BG-12903.</p> <p>23 A. Um-hum.</p> <p>24 Q. And there's an allegation that you threatened 25 Clarissa Glenn that you would cause her bodily harm and</p>

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<p>1 that you would arrest her for no reason on October 23rd, 2 2005. Do you see that?</p> <p>3 A. Yes.</p> <p>4 Q. And that's, like, five days before the allegation 5 that you threatened to jail her; is that right?</p> <p>6 A. Never happened.</p> <p>7 Q. Okay. So, that didn't happen either --</p> <p>8 A. No.</p> <p>9 Q. -- October 23rd, 2005?</p> <p>10 A. Never happened.</p> <p>11 Q. You didn't threaten her with bodily harm?</p> <p>12 A. Never happened.</p> <p>13 Q. You didn't threaten to falsely arrest Clarissa 14 Glenn?</p> <p>15 A. Never happened.</p> <p>16 Q. How do you know?</p> <p>17 A. I'm the accused. I know it didn't happen. 18 Wasn't there at her apartment, didn't talk to Clarissa 19 like that; again.</p> <p>20 Q. Have you ever talked to Clarissa Glenn?</p> <p>21 A. I don't know. I don't recall talking to her.</p> <p>22 Q. Okay. All right. I'm going to show you the 23 arrest report of Ben Baker on December 11th, 2005. It's 24 three pages. And my printed out version does not have a 25 number on it. What's that exhibit? Exhibit 33.</p>	<p>1 Q. Okay. Does this refresh your recollection about 2 some of the facts underlying this arrest?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. What do you recall now?</p> <p>5 A. They were arrested that day.</p> <p>6 Q. Okay. Besides that they were actually arrested 7 that day, what do you recall about the circumstances of 8 their arrest?</p> <p>9 A. Nothing specific. I mean, what do I -- I mean, I 10 just know they were arrested that day.</p> <p>11 Q. Okay. Well, what do you -- Did you witness 12 anything?</p> <p>13 A. I was there on the scene on this one.</p> <p>14 Q. Okay. What did you see?</p> <p>15 A. I saw him violate a traffic sign and I approached 16 the vehicle. And that was it.</p> <p>17 Q. Was this a mission?</p> <p>18 A. This -- Yes, this had been a mission. I think it 19 was a earlier mission. And during that mission was when 20 we received the information on Ben Baker.</p> <p>21 Q. Okay. What was the earlier mission? Was it that 22 day?</p> <p>23 A. I don't recall.</p> <p>24 Q. Well, who did you receive the information from 25 Ben Baker about?</p>
<p style="text-align: center;">Page 171</p> <p>1 And then Exhibit 34's going to be the vice 2 case report for the Baker and Glenn arrest on that date. 3 Okay?</p> <p>4 A. Okay.</p> <p>5 (Deposition Exhibit 33 and Exhibit 34 were 6 marked for identification.)</p> <p>7 MR. TEPFER: And then 35's going to be the 8 arrest report of Clarissa Glenn --</p> <p>9 A. Um-hum.</p> <p>10 Q. -- which I actually have a Bates number on that 11 one, but I can barely read it. It's COPA-WATTS 44096, I 12 think, through 98.</p> <p>13 (Deposition Exhibit 35 was marked for 14 identification.)</p> <p>15 BY MR. TEPFER:</p> <p>16 Q. Okay. I think when I started asking you 17 questions about the report before you, you just remembered 18 that you were present for this arrest; is that right?</p> <p>19 A. Correct.</p> <p>20 Q. Okay. I'm going to spend some time with this 21 report, so why don't you go ahead and read the narrative 22 and see if you recall other facts about this case after 23 this arrest after reading that report -- or, those 24 reports.</p> <p>25 A. Okay.</p>	<p style="text-align: center;">Page 173</p> <p>1 A. A concerned citizen, it says, in the report.</p> <p>2 Q. Who --</p> <p>3 A. I'm referring to the report.</p> <p>4 Q. Who is the concerned citizen?</p> <p>5 A. I have not a clue.</p> <p>6 Q. Not a clue. So you have no real memory of this?</p> <p>7 A. No.</p> <p>8 Q. Okay. So, you're just basically reading from the 9 report?</p> <p>10 A. Correct.</p> <p>11 Q. Okay. Were you at 574 East 36th Street that day?</p> <p>12 A. It's a possibility, yes. I really don't recall.</p> <p>13 Q. Okay. What's 5 -- Is that part of the Ida B. 14 Wells complex?</p> <p>15 A. It's one of the buildings located in the six 16 buildings that were left on the Ida B. Wells Housing 17 Development.</p> <p>18 Q. Okay. Was going to 574 East 36th Street part of 19 your mission that day?</p> <p>20 A. I don't recall what the mission was.</p> <p>21 Q. But you know it's a mission?</p> <p>22 A. I don't recall.</p> <p>23 Q. Well, you testified it was a mission, right?</p> <p>24 A. I testified that it may have been a mission.</p> <p>25 If -- if you have documents stating that we made arrests</p>

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<p>1 at 574 and it was a mission, then I could refer to those 2 documents. But if you want me to remember something that 3 happened, you know, 17 years ago, I just don't remember. 4 We've had several hundreds of missions.</p> <p>5 Q. I'm asking about the arrest of Ben Baker and 6 Clarissa Glenn --</p> <p>7 A. I see that.</p> <p>8 Q. -- at 527 -- 511 East Browning.</p> <p>9 A. Um-hum.</p> <p>10 Q. Was that part of a mission?</p> <p>11 A. Not that I recall.</p> <p>12 Q. Okay. So, it wasn't?</p> <p>13 A. I said that.</p> <p>14 Q. Okay. Who's David -- who's D. Soltis? I'm 15 looking at the vice case report, Exhibit --</p> <p>16 A. I'm looking at the vice case report. One of the 17 officers -- I believe he was the off- -- he wasn't on my 18 team, so he would have been the officer that made the 19 traffic stop. B211.</p> <p>20 Q. Okay. Was the traffic stop planned?</p> <p>21 MR. KOSOKO: Object to the form of the 22 question.</p> <p>23 THE WITNESS: By Ben Baker?</p> <p>24 BY MR. TEPFER:</p> <p>25 Q. No. Was the traffic stop part of the plan to</p>	<p>1 A. And I can't recall. I'm going off the report 2 again. And, again, in the report, it's -- Al Jones 3 generated this report, so I'm going off what Al Jones 4 generated in this report and that I signed as having 5 probable cause and being all the boxes filled out in this 6 particular report.</p> <p>7 So, in this report where my signature is on 8 Page 2 -- because you keep asking me these questions about 9 the vice case reports. And it clearly states why, as a 10 supervisor, I signed this report. I have -- and the 11 statement there, it reads I have read this report and my 12 signature indicate that it is acceptable.</p> <p>13 Q. Where are you reading from?</p> <p>14 A. Next to my --</p> <p>15 Q. I see.</p> <p>16 A. Next to my signature on Page 2.</p> <p>17 Q. Okay.</p> <p>18 A. So, maybe I wasn't -- I didn't explain it 19 eloquently enough, but that's what it means when we 20 approve these reports as a supervisor; that I have read 21 this report, and my signature indicate that it is 22 acceptable; meaning, as I stated before, the probable 23 cause and that all the boxes are filled in accordingly.</p> <p>24 Q. Would it have been acceptable if it had 25 inaccurate information?</p>
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<p>1 apprehend Ben Baker on this day?</p> <p>2 A. Ben Baker violated one of the traffic laws, so he 3 would have had to have been in on the plan. He violated a 4 traffic law.</p> <p>5 Q. Okay. All right. So, the -- If Ben Baker hadn't 6 violated the traffic law, you wouldn't have -- he wouldn't 7 have been stopped that day?</p> <p>8 MR. KOSOKO: Object to the form of the 9 question.</p> <p>10 THE WITNESS: I don't know. I probably 11 would have stopped him once he exited the vehicle, yes, 12 due to the information that I had.</p> <p>13 BY MR. TEPFER:</p> <p>14 Q. What information did you have?</p> <p>15 A. That Ben Baker had went to receive narcotics to 16 sell at 527 East Browning.</p> <p>17 Q. That he was on his way to go there and do that?</p> <p>18 A. Yeah, that he was on his way to go get dope to 19 bring back to that location.</p> <p>20 Q. Okay. And you don't recall -- you learned that 21 from a concerned citizen?</p> <p>22 A. Yes.</p> <p>23 Q. But you don't recall who?</p> <p>24 A. No.</p> <p>25 Q. Okay. And then --</p>	<p>1 A. My signature wouldn't be on it.</p> <p>2 Q. Right. Okay. And you were -- And, like you 3 said, you were involved in this arrest, right?</p> <p>4 A. I was involved in this arrest, yes.</p> <p>5 Q. So, you actually viewed -- so, you would not have 6 signed this report if it said something that you knew to 7 be untrue?</p> <p>8 A. I would definitely not sign any report if it had 9 information in it that I knew to be untrue. Again, this 10 officer generated this report establishing probable cause. 11 I cannot tell what this officer eyes see, even though I 12 was on the scene.</p> <p>13 So, you're asking me if I can -- I just 14 can't answer the question that you want -- the way you 15 want me to answer it because it's not feasible. It's -- 16 it's -- you searching.</p> <p>17 Q. What did you see that day?</p> <p>18 A. Who?</p> <p>19 Q. You.</p> <p>20 A. What did I see that day?</p> <p>21 Q. Yeah.</p> <p>22 A. I saw him violate the traffic law.</p> <p>23 Q. Okay. And did you -- let's stop there. Did you 24 curb the vehicle?</p> <p>25 A. I did not curb the vehicle. In the report it</p>

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<p>1 states that B211, which was called to administer a traffic 2 violation, a traffic stop, curbed the vehicle.</p> <p>3 Q. Okay. And this is the same day where you had 4 actually gone out there to go look for Ben Baker, right, 5 because a concerned citizen called you about Ben Baker was 6 about to go deliver, right?</p> <p>7 A. You -- what you're doing is you're mixing apples 8 with oranges here. When we were at that location that you 9 have there that you're reading from there --</p> <p>10 Q. What location?</p> <p>11 A. That you're reading from there.</p> <p>12 Q. I don't know what that means.</p> <p>13 A. Because you asked me about it.</p> <p>14 Q. 511 East Browning?</p> <p>15 A. If that's where that mission was held, because 16 while at the mission is when we received the information. 17 And so that's how we set up the surveillance, waiting to 18 see if they -- if the information that we received was 19 true, had credence to it.</p> <p>20 And upon us seeing that vehicle re-enter the 21 area, make a traffic stop -- traffic violation right 22 there, called in for a vehicle to make the traffic stop 23 who was just -- he was right there, and he made the 24 traffic stop.</p> <p>25 Upon making the traffic stop, we exited our</p>	<p>1 probable cause to stop him because he violated. So, it 2 was -- thanks to Ben not adhering to the traffic laws we 3 were able to have the probable cause to stop him, knowing 4 that he had already went to pick up the narcotics that the 5 concerned citizen had told us about. And while 6 approaching the vehicle, the officer who generated this 7 report says what he saw.</p> <p>8 Q. Okay. So you broke your surveillance and --</p> <p>9 A. No, no. We didn't break our surveillance. We 10 arrived because we were in a unmarked vehicle. We didn't 11 have to break our surveillance. We followed right there 12 and we approached the vehicle. They never saw us because 13 they didn't know that vehicle. It wasn't my usual -- 14 wasn't my usual unmarked car.</p> <p>15 Q. What car was it?</p> <p>16 A. In the report it says that it was a surveillance 17 vehicle, which means it was a vehicle used by TAC teams to 18 secrete themselves in the environment where they're -- 19 won't be noticed and to observe. And that's what we did.</p> <p>20 So, when we got out, I approached the 21 vehicle from one side and Officer Jones approached the 22 vehicle from another side. He saw what he saw. And he 23 reacted. He responded to what he saw.</p> <p>24 Q. Who's "he"?</p> <p>25 A. I just said; Officer Jones. He responded to what</p>
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<p>1 vehicle, which was not a marked vehicle, it was a 2 surveillance vehicle. We approached that vehicle. I 3 don't -- this is what the officer who generated this 4 paperwork said he saw.</p> <p>5 Q. And you were with the officer who generated this 6 paperwork --</p> <p>7 A. Yes.</p> <p>8 Q. -- when he saw it, right?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. And so I'm asking, you were there to 11 surveil because you had information that Ben Baker was 12 about to drop off a bunch of drugs, right?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. And then sort of before that happened, 15 he -- beat -- David, Officer Soltis, curbed the vehicle 16 because of a traffic violation, right?</p> <p>17 A. Yes.</p> <p>18 Q. So those two things were -- had nothing to do 19 with one another; is that accurate?</p> <p>20 A. What two things?</p> <p>21 Q. The traffic violation -- That Officer Soltis 22 curbed the vehicle for a traffic violation had nothing to 23 do with your surveillance of Ben Baker?</p> <p>24 A. It had nothing to do with our surveillance of Ben 25 Baker. But once he made the traffic stop, now we have</p>	<p>1 he saw. Or, Officer Jones, and then Officer Jones 2 responded to what he saw.</p> <p>3 Q. Okay. So, are you saying that -- okay. So this 4 report -- and I'm reading from the second page of the vice 5 case report -- says --</p> <p>6 A. Um-hm.</p> <p>7 Q. -- "R/Os were approaching at the same time in a 8 covert vehicle. R/Os pulled along the passenger side of 9 the offender's vehicle and then served Offender 1 with a 10 clear plastic bag of suspect narcotics. Offender 1 gave 11 that bag of narcotics to Offender 2 who placed the bag 12 inside the driver's side armrest console." Did I read 13 that correctly?</p> <p>14 A. Yes. Probable cause for arrest. And I trust 15 that, and that's why I signed it.</p> <p>16 Q. So you didn't see it?</p> <p>17 A. No, I didn't see it.</p> <p>18 Q. Oh --</p> <p>19 A. I never saw it.</p> <p>20 Q. Okay. Only Officer Jones saw that?</p> <p>21 A. Right. And I didn't testify that I saw it, 22 because I didn't see. I couldn't say I saw it.</p> <p>23 Q. Okay. So you didn't see any of that, of the 24 actual criminal act, you only -- when you signed off on 25 this report, you were relying upon that Alvin Jones was</p>

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<p>1 reporting correctly what he saw, correct?</p> <p>2 A. Correct.</p> <p>3 MR. KOSOKO: Object to the form of the</p> <p>4 question.</p> <p>5 But the answer stands.</p> <p>6 THE WITNESS: Yes.</p> <p>7 BY MR. TEPFER:</p> <p>8 Q. Okay. But you were there with Alvin Jones when</p> <p>9 you guys approached the vehicle, right?</p> <p>10 A. Yes.</p> <p>11 Q. And you knew what time it was, right?</p> <p>12 A. I knew what time it was? What do you mean?</p> <p>13 Q. What time you stopped the vehicle, right?</p> <p>14 A. You mean the hour, when you say did I know what</p> <p>15 hour of the day?</p> <p>16 Q. Yes.</p> <p>17 A. I don't recall what time it was.</p> <p>18 Q. All right. Well, it says right on the report,</p> <p>19 right --</p> <p>20 A. Oh, okay.</p> <p>21 Q. -- the date of occurrence, in Box 5, is</p> <p>22 December 11th, 2005. And then it says 1212, right?</p> <p>23 A. Okay. Hold on. Date of occurrence, 1212. Yes.</p> <p>24 That could be --</p> <p>25 Q. Okay. And 1212 is 12:12 p.m., right?</p>	<p>1 BY MR. TEPFER:</p> <p>2 Q. Well, how -- how long after Ben Baker's car was</p> <p>3 curbed for the traffic violation, how long did it take for</p> <p>4 you two to approach the vehicle?</p> <p>5 A. I don't recall.</p> <p>6 Q. Was it hours?</p> <p>7 A. I don't recall.</p> <p>8 Q. Okay. So, it could have been -- they could have</p> <p>9 been sitting there for hours and then you just waited</p> <p>10 while he was processing the traffic ticket?</p> <p>11 A. It wasn't past 12:12 according to this, this</p> <p>12 document.</p> <p>13 Q. Because 12:12 would indicate at the far end when</p> <p>14 they saw the criminal activity, right?</p> <p>15 A. You'd have to ask that officer. I'm going off</p> <p>16 his report. I don't know when he saw.</p> <p>17 Q. But you signed off on the report, right?</p> <p>18 A. I signed off on the information that the officer</p> <p>19 placed in this report. I signed off on it because I had</p> <p>20 read this report and my signature indicate that it is</p> <p>21 acceptable.</p> <p>22 Q. And it wouldn't have been acceptable if it had</p> <p>23 incorrect information, correct?</p> <p>24 A. Correct. It's acceptable.</p> <p>25 Q. It would not be acceptable if it had incorrect</p>
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<p>1 A. That could be the time. It says date of</p> <p>2 occurrence. Okay. Date and time of occurrence. That</p> <p>3 could be the -- that doesn't necessarily have to be the</p> <p>4 time that the vehicle was actually stopped. That could be</p> <p>5 the time when the officer actually saw the illegal</p> <p>6 activity.</p> <p>7 So, when you -- When he generated this</p> <p>8 report he put time of occurrence. That's, you know, him</p> <p>9 generating the report. He would have to respond to why he</p> <p>10 placed that time there. I can't give you an answer for</p> <p>11 why he placed that time there.</p> <p>12 Q. Okay. All right. But putting aside the exact</p> <p>13 time, but he says R/Os were approaching at the same time</p> <p>14 as a covert vehicle. R/Os pulled along the passenger side</p> <p>15 of the offender's vehicle and observed Offender 1 with a</p> <p>16 clear plastic bag of suspect narcotics. That's almost</p> <p>17 simultaneous when they're -- when you approach, right?</p> <p>18 That's when he's writing that he observed this, Officer</p> <p>19 Jones?</p> <p>20 A. You would --</p> <p>21 MR. MICHALIK: Object to the form of the</p> <p>22 question.</p> <p>23 THE WITNESS: Yeah, you'd have to ask</p> <p>24 Officer Jones what he saw, what he did. I can tell you</p> <p>25 what Sergeant Watts did.</p>	<p>1 information?</p> <p>2 A. It would not.</p> <p>3 Q. Right. So, if this happened, if the incident</p> <p>4 happened at 4:00 in the morning and you saw -- and -- and</p> <p>5 you -- and you curbed the vehicle at 4:00 in the morning</p> <p>6 and you saw that it was written 12:12, you wouldn't have</p> <p>7 signed this report?</p> <p>8 A. I would ask -- I would have questioned the</p> <p>9 officer and ask him about the time. It's that simple. I</p> <p>10 mean, you know, it was -- come on. If it was 12:00 noon,</p> <p>11 11:00 and it was 4:00 in the morning, I'm going to say,</p> <p>12 "Hey, what happened here?" you know.</p> <p>13 Q. Right. And the same thing if it was at midnight</p> <p>14 or 11:00 p.m. at night and it said 12:12 p.m., you would</p> <p>15 question and have him change that, right?</p> <p>16 A. If I caught it. If I saw it then, yes, I would.</p> <p>17 If the time was improper, I would have them adjust the</p> <p>18 time to be the time in which it occurred, yes.</p> <p>19 Q. All right. And you signed in Box 49. It says</p> <p>20 that you signed the report on December 5th, 2005, correct?</p> <p>21 A. No. December 11th.</p> <p>22 Q. I'm sorry, December 11th. You're right. I</p> <p>23 apologize.</p> <p>24 A. All right. Yeah. Wow.</p> <p>25 Q. You signed the report on December 11th, 2005,</p>

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1 right? 2 A. That's the date and that is my signature, yes, 3 sir. 4 Q. Okay. And the time, it says -- 5 A. 1735. 6 Q. All right. So that's 5:35 p.m. when you signed 7 that report? 8 A. Yes. 9 Q. All right. Reading this report now, knowing that 10 it was Officer Jones' report, is there anything in there 11 that you know now is incorrect or inaccurate? 12 A. I signed the report and my signature stands by 13 what's in the report. I have read this report and my 14 signature indicate that it is acceptable. 15 Q. Great. All right. I'm going to show you what's 16 marked -- 17 A. Are we done with this one? 18 Q. You can leave it in front of you. 19 All right. We've marked as Petitioner's 20 Exhibit 36, which is COPA 2267, I assume to -- yeah, it's 21 2267 to 2268. 22 (Deposition Exhibit 36 was marked for 23 identification.) 24 BY MR. TEPFER: 25 Q. By the way, on Exhibit 35, who's the second	1 Q. Do you recall this arrest? 2 A. Yes. 3 Q. Were you present? 4 A. Yes. 5 Q. Okay. What do you recall about it? 6 A. That we received information that there were 7 narcotics being sold at the above location, and we 8 responded as a team -- 9 Q. Okay. 10 A. -- and made several arrests. 11 Q. Okay. So, your name isn't in Box 18 for this 12 one, right? 13 A. It's not, no. 14 Q. Okay. Or Box 12, right? 15 A. Right. 16 Q. Okay. So, does this mean to you that Elsworth 17 Smith was one of those officers who wouldn't necessarily 18 put his sergeant in Box 12 or 18 even if they were at the 19 scene? 20 MR. MICHALIK: Object to the form, 21 foundation. Michalik. 22 THE WITNESS: That would be a question for 23 Elsworth Smith. I wouldn't -- I wouldn't know what 24 Elsworth Smith would or wouldn't do in his reports except 25 for what's in front of me.
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1 arresting officer, second reporting officer? It's 35, the 2 other one. 3 A. This is 35. 4 Q. Oh, sorry. 34. 5 A. 34? 6 Q. Correct. 7 MR. KOSOKO: 33. 8 MR. TEPFER: Ben's report or -- 9 BY MR. TEPFER: 10 Q. The vice case report. 11 A. 34. It's Kallatt Mohammed. 12 Q. Okay. So, Kallatt Mohammed. 13 And the first reporting officer is Elsworth 14 Smith? 15 A. No. It's Al Jones. 16 Q. Oh, I'm sorry. You're right. It is Al Jones. 17 Okay. Sorry about that. 18 A. As a sergeant, I was usually right. 19 Q. Okay. All right. And then in Exhibit 36, the 20 first reporting officer is Elsworth Smith and the second 21 one is Kallatt Mohammed, right? 22 A. Yes. 23 Q. All right. You've reviewed this report. This is 24 regarding an arrest at 574 East 36th Street, right? 25 A. Yes.	1 BY MR. TEPFER: 2 Q. But you know you were there for this one? 3 A. Yes. 4 Q. Okay. And I thought you testified earlier 5 that some -- it was sort of the reporting officer's 6 discretion was what was -- 7 A. Right. So -- 8 Q. -- listed? 9 A. -- you might find other reports where he did list 10 me. You know, I -- I can't say what he -- 11 Q. Fair enough. But -- 12 A. On this one, he didn't. 13 Q. And in Exhibit 34 -- 14 A. Um-hum. 15 Q. -- you are listed in those boxes, right? 16 A. Yes, they did. 17 Q. And by "those" boxes, I mean Box 18, right? 18 A. Yes. 19 Q. So, Alvin Jones is the reporting officer on this 20 report, right? 21 A. That is correct. 22 Q. All right. Does that indicate to you in any way 23 that it was his practice to list you when you were 24 actually at the scene? 25 MR. KOSOKO: Object to the form of the

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<p>1 question.</p> <p>2 MS. OLIVIER: Kelley Olivier.</p> <p>3 Objection to form and foundation.</p> <p>4 THE WITNESS: I just know from the report he</p> <p>5 listed me. I don't know if it was his practice. I know</p> <p>6 he listed me on this particular report.</p> <p>7 BY MR. TEPFER:</p> <p>8 Q. All right. So, you had information about</p> <p>9 narcotics at 574 East 36th Street and you were there.</p> <p>10 What do you remember happened when you were there?</p> <p>11 A. When I was there?</p> <p>12 Q. Yeah, at 574 East 36th Street.</p> <p>13 A. There were several arrests made while I was</p> <p>14 there. I mean, from the information that I'm reading and</p> <p>15 the report generated, there was -- surveillance was set up</p> <p>16 and officers observed narcotics transactions.</p> <p>17 Q. Were you part of the surveillance team on that</p> <p>18 one?</p> <p>19 A. I may have been, but -- I'm sure I was, but I</p> <p>20 might not have been in a location where I could observe</p> <p>21 what those particular officers observed. We're not in the</p> <p>22 same location. You know, everybody's looking at one</p> <p>23 thing. When you have surveillance, that's just what it</p> <p>24 is. You're at different points and you're surveying</p> <p>25 the -- the full layout, not just one particular area.</p>	<p>1 Mohammed on this report.</p> <p>2 So, when you generate the report, the</p> <p>3 practice is you put your partner down. If you're talking</p> <p>4 about practices and what's done, that's what's done.</p> <p>5 That's the second man on the car, or even a third man on</p> <p>6 the car if he placed it there. I mean, I don't know why</p> <p>7 you wouldn't, but that's why it's there.</p> <p>8 Q. So, let me make sure I understand.</p> <p>9 A. Okay.</p> <p>10 Q. So, Elsworth Smith -- So, an arresting officer</p> <p>11 will list his partner as the second reporting officer even</p> <p>12 if they weren't involved in the arrest as long as they</p> <p>13 were partners?</p> <p>14 A. Yes.</p> <p>15 Q. Okay.</p> <p>16 A. Because if -- because your partner don't always</p> <p>17 see what you see. So, even -- They're partners. He -- he</p> <p>18 don't have to be there to see what Elsworth saw. Mohammed</p> <p>19 don't have to be there to see what Al saw. Because if</p> <p>20 he's subpoenaed to court all he can testify to is what he</p> <p>21 saw on that particular day involving that particular</p> <p>22 arrest.</p> <p>23 So, yes, he can put it down, and his partner</p> <p>24 will have to, as his partner, and if he's subpoenaed, all</p> <p>25 he can do is go in and testify as to what he legitimately</p>
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<p>1 So, it could have been that I was there.</p> <p>2 And I'm pretty sure I was there. I vaguely remember. But</p> <p>3 I was somewhere else.</p> <p>4 Q. Well, where were you?</p> <p>5 A. In the area on surveillance.</p> <p>6 Q. Do you remember specifically where you were?</p> <p>7 A. No, I don't recall.</p> <p>8 Q. Okay. Do you remember where Elsworth Smith was?</p> <p>9 A. No.</p> <p>10 Q. Do you remember, was Alvin Jones there?</p> <p>11 A. Yes.</p> <p>12 Q. Where was he?</p> <p>13 A. I don't recall.</p> <p>14 Q. Okay. Where was -- Was Mohammed there?</p> <p>15 A. Yes.</p> <p>16 Q. Where was he?</p> <p>17 A. I don't recall.</p> <p>18 Q. Was Mohammed there at the 511? The one where you</p> <p>19 stopped Clarissa Glenn and Ben Baker at 511, was he there?</p> <p>20 A. Not at the time we stopped them, no.</p> <p>21 Q. Okay. He arrived later?</p> <p>22 A. He arrived later, yes, I think he did come later.</p> <p>23 I'm not -- I'm pretty sure he came later. And -- and Al</p> <p>24 and Mohammed were partners on that day for -- I think it</p> <p>25 may have been a three-man car. That's why Elsworth has</p>	<p>1 saw.</p> <p>2 Q. And when you go in and testify, because there's</p> <p>3 so many arrests and you have a busy law enforcement</p> <p>4 career, you rely on the reports that are generated to help</p> <p>5 refresh your recollection of the arrest, right?</p> <p>6 A. Some officers remember it if it's within the</p> <p>7 scope. Some officers actually remember it and some refer</p> <p>8 to the reports. It all depends on the officer.</p> <p>9 I don't know what -- I know at the time when</p> <p>10 I was on the Department, I -- I remembered some and I</p> <p>11 relied on the reports for others. It doesn't -- you know.</p> <p>12 Q. Right. But you need to put accurate information</p> <p>13 in the report, so --</p> <p>14 A. Absolutely.</p> <p>15 Q. Okay. All right. So --</p> <p>16 A. And in this incident, it's accurate, because when</p> <p>17 you go back to Box -- I think that's Box -- it's above</p> <p>18 that -- 12, and Elsworth, he stated, Mohammed and Jones</p> <p>19 because those were his partners. So, I don't know. You</p> <p>20 know, when you say his practice, I don't know if it was</p> <p>21 his practice, but that's the way he generated the report,</p> <p>22 and it was acceptable.</p> <p>23 Q. Right. And you know it was acceptable because</p> <p>24 you signed the report, right?</p> <p>25 A. It was acceptable to me as the supervising</p>

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1 sergeant, yes.	1 A. Okay.
2 Q. Okay. And you were there on surveillance, you	2 Q. Is that -- That's accurate, right?
3 said, you just don't remember where exactly, right?	3 A. Yes.
4 A. Correct.	4 Q. All right. And you wouldn't have signed it if
5 Q. Okay. So -- and you actually recall some of this	5 that wasn't the accurate time because you were there,
6 actual arrest, correct?	6 right?
7 A. I recall that there were arrests made.	7 A. I wouldn't have signed it if it had -- I'm not
8 Q. Okay. Do you recall Willie Robinson?	8 going to question what time the officer actually saw it.
9 A. No.	9 So it's 12:08. And that's what the officer
10 Q. Louis Moore?	10 stated. And to me it's -- I'm not signing this saying it
11 A. No.	11 was exactly 12:08, no. The officer filled out the report.
12 Q. Laurence Little?	12 It's filled out properly. So, it's filled out properly
13 A. No.	13 and it has the probable cause. So, therefore, it's
14 Q. Michael Henderson?	14 acceptable to me.
15 A. No.	15 Q. Right.
16 Q. Larry Pulley?	16 A. So --
17 A. No.	17 Q. And you already testified earlier that you
18 Q. Okay. All right. And you signed this report?	18 wouldn't have signed the report if you knew the time was
19 A. Correct.	19 wrong on an incident when you were there, right?
20 Q. Twice actually, right?	20 A. Well --
21 A. Excuse me?	21 MR. KOSOKO: Object to the form of the
22 Q. You signed this vice case report twice, correct?	22 question.
23 A. Correct.	23 BY MR. TEPFER:
24 Q. All right. You signed it. You pointed me to	24 Q. You can answer.
25 this on the second page where it says "I have read this	25 A. I wouldn't know if the time was right or wrong.
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1 report and the signature indicates that it is acceptable."	1 I wouldn't -- I'm not looking at the time. Again, I'm not
2 That's your signature right?	2 looking at the time. I don't know if the time is right or
3 A. Correct.	3 wrong. That's the time that the officer is submitting in
4 Q. And you signed that on December 11th, 2005?	4 his report.
5 A. Correct.	5 Q. And you were there, right? You said -- you
6 Q. Doesn't say a time, though, right?	6 testified you were there, so you would know.
7 A. No.	7 A. I said --
8 Q. Okay. And then you signed the second time in	8 MR. KOSOKO: Object to form, argumentative.
9 Box 49. We've talked about this before. That's your	9 I mean, your analogy was about daytime and nighttime and
10 signature on Box 50, right?	10 now we're coming down to the last minute. So, you're
11 A. Correct.	11 getting argumentative, you know.
12 Q. And you signed it at 1730. So, 5:30 p.m., right?	12 BY MR. TEPFER:
13 A. Correct.	13 Q. You can answer the question.
14 Q. On December 11th, 2005?	14 A. I was there. I was there. I'm not sure about
15 A. Correct.	15 the time that the officer placed on his report. But it
16 Q. And so that is -- You signed it five minutes	16 was a time that was reasonable and so it was acceptable.
17 before you signed the other report, right, the Exhibit 34?	17 Q. So, there were two different surveillances going
18 A. Correct.	18 on at Ida B. Wells on this day, December 11th, 2005; is
19 Q. All right. So, going up to Box 5 of Exhibit 36	19 that accurate?
20 this says the date of occurrence is December 11th, 2005,	20 MR. KOSOKO: Object to the form of the
21 right?	21 question.
22 A. Exhibit 36?	22 THE WITNESS: There was a surveillance by
23 Q. Um-hum.	23 all the officers. Within that arrest of these off--
24 A. Yes.	24 offenders, a concerned citizen gave information on the
25 Q. All right. And it's at 12:08 p.m., right?	25 second surveillance of the Bakers and Glenn.

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<p>1 BY MR. TEPFER:</p> <p>2 Q. The concerned citizen -- My understanding is, the 3 concerned citizen called so you went to surveil because 4 you knew Ben Baker was going to arrive; is that correct?</p> <p>5 A. No.</p> <p>6 Q. Okay. Oh, then please --</p> <p>7 A. I don't think you're following me.</p> <p>8 Q. I'm clearly not.</p> <p>9 A. Yeah. So, the best I can do is try again, is 10 that here on the first one, we went down. We received the 11 information.</p> <p>12 Upon these arrests being made, right, we 13 went and did a different surveillance after -- after this 14 because we had received the information about guys selling 15 drugs and that they were -- who it was and where they was, 16 and all that good stuff. And we relocated to the area 17 with the information about the Baker from another 18 concerned citizen.</p> <p>19 Q. So, is your testimony that you received the 20 information about Baker and Glenn from the arrest part of 21 the investigation in Exhibit 36?</p> <p>22 A. You're asking me if I received the information?</p> <p>23 Q. Your team.</p> <p>24 A. You keep telling me -- no. The officer. The 25 officer who generated this report. So, if the officer</p>	<p>1 Q. Okay. But, Sergeant Watts --</p> <p>2 A. Um-hum.</p> <p>3 Q. -- you've testified that you were at both 4 incidents, right?</p> <p>5 A. Yes.</p> <p>6 Q. You were surveilling the information that was in 7 Exhibit 36.</p> <p>8 A. Which is --</p> <p>9 Q. So I'm asking not on the reports, on your memory 10 right now, do you recall which of the surveillances 11 happened first?</p> <p>12 A. No, I don't.</p> <p>13 Q. Okay. That's all I want to know.</p> <p>14 Now, you are being very clear that Elsworth 15 Smith is the one who generated this report for -- in 16 Exhibit 36, correct?</p> <p>17 A. His signature is there so -- and my signature is 18 there saying that it was acceptable. So, he would have 19 been the officer that actually tendered this report to me.</p> <p>20 Q. Okay. And, certainly -- and you already 21 testified to the fact that he has Mohammed as the second 22 reporting officer doesn't necessarily mean that Mohammed 23 witnessed the criminal act; is that correct?</p> <p>24 A. Doesn't actually mean that he saw what Elsworth 25 saw, right. Correct, yes.</p>
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<p>1 generated this report and said he received information 2 from a concerned citizen, that's what I went with. And 3 that's why I signed off on it.</p> <p>4 You're asking me about what the officer 5 learned from someone else. I don't know. I'm trusting 6 the officer. I wasn't there beside the officer when he 7 received the information from a concerned citizen.</p> <p>8 Q. Okay. What I'm asking, I thought what you were 9 saying, you kept pointing to this document, Exhibit 36, 10 before, so I'm just misunderstanding.</p> <p>11 A. Yeah.</p> <p>12 Q. Did you learn anything about Ben Baker and 13 Clarissa Glenn from the investigation that is documented 14 in Exhibit 36? Did you or your team?</p> <p>15 A. Not that I'm aware of.</p> <p>16 Q. Okay. But you're testifying -- Well, tell me 17 which happened first, the investigation that's documented 18 in the Exhibit 36 or the investigation that's documented 19 in Exhibit 34?</p> <p>20 A. I don't know. You'd have to ask the officers who 21 generated the report. Al Jones generated this report from 22 a concerned citizen. Elsworth Smith considered -- 23 generated this report from a concerned citizen. So, I 24 don't know who did what first, how, who got their 25 information first.</p>	<p>1 Q. So, he may have even -- He was just his partner 2 so that's why he listed him. That could be a reason, 3 correct?</p> <p>4 A. He was his partner and -- he was his partner and 5 he was in the vicinity. I don't know what he saw. And he 6 was his partner, so, yes. When he -- Yes. When he 7 generated the report, it is practice to list your partner, 8 yes.</p> <p>9 Q. Okay. And, certainly, the individuals listed in 10 Box 18 who are marked as witnesses in this case on Exhibit 11 36 are Mohammed and Jones. That does not indicate by just 12 the fact that their names are listed there that they 13 witnessed the same criminal act as the person who --</p> <p>14 A. Correct.</p> <p>15 Q. -- wrote it, right?</p> <p>16 A. Right. Yes.</p> <p>17 Q. Okay.</p> <p>18 A. They were his partners that day. And if they 19 were subpoenaed about this, all they could do is testify 20 to whatever it is that they witnessed.</p> <p>21 Q. Right. Okay. And if they didn't remember what 22 they witnessed, the fact that they're listed in Box 18 23 wouldn't necessarily refresh their recollection, right?</p> <p>24 MR. KOSOKO: Object to the form of the 25 question.</p>

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<p>1 THE WITNESS: I don't know what --</p> <p>2 MR. KOSOKO: Hang on, Sarge.</p> <p>3 Object to the form of the question; form,</p> <p>4 foundation. You're asking him to speculate what the</p> <p>5 reading of a report would -- the mental impact it would</p> <p>6 have on the reader. And I don't know what you want him to</p> <p>7 say.</p> <p>8 BY MR. TEPFER:</p> <p>9 Q. Do you understand my question?</p> <p>10 A. I understand it.</p> <p>11 Q. Can you answer it?</p> <p>12 A. Yeah, I can.</p> <p>13 Q. Okay.</p> <p>14 A. I don't know what they would get from reading</p> <p>15 this. He might remember it, he might not.</p> <p>16 Q. Right.</p> <p>17 A. I don't know.</p> <p>18 Q. So, if an individual gets subpoenaed to court to</p> <p>19 testify -- well, let's just be very specific.</p> <p>20 If Alvin Jones got subpoenaed to court to</p> <p>21 testify about the incident that's documented in Exhibit</p> <p>22 36, if that happened and he didn't remember it at all,</p> <p>23 would the fact that he's listed in Box 18 give an</p> <p>24 indication of what he witnessed?</p> <p>25 MR. KOSOKO: Object to the form of the</p>	<p>1 individuals who were arrested in Exhibit 36, that you</p> <p>2 rushed from the building accompanied by Alvin Jones?</p> <p>3 A. I don't recall if that happened, no.</p> <p>4 Q. Do you recall coming back and telling the other</p> <p>5 officers that you had gotten Ben Baker?</p> <p>6 A. I don't recall.</p> <p>7 Q. Did you receive any radio or cell phone call</p> <p>8 informing you that Baker had been stopped as part of a</p> <p>9 traffic stop?</p> <p>10 A. No. I observed the traffic stop.</p> <p>11 Q. All right. I want to go back to Plaintiffs' --</p> <p>12 or, sorry, Exhibit 18. It's going to be on the very</p> <p>13 bottom. It's the first one we used today.</p> <p>14 MR. KOSOKO: The COPA report, Sarge.</p> <p>15 THE WITNESS: Um-hum. Got it.</p> <p>16 BY MR. TEPFER:</p> <p>17 Q. All right. I'm going to ask you to turn to</p> <p>18 Page 12. And I want you to read the first three full</p> <p>19 paragraphs under Section 2(a) -- start where it says</p> <p>20 "Michael Henderson" -- to yourself.</p> <p>21 MR. FLAXMAN: Sorry, Josh, what exhibit?</p> <p>22 MR. TEPFER: It's Exhibit 18.</p> <p>23 MR. FLAXMAN: Thanks.</p> <p>24 MR. TEPFER: Sure.</p> <p>25 THE WITNESS: And what page was that again,</p>
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<p>1 question.</p> <p>2 MR. PALLE: Palles. Object to the form of</p> <p>3 the question.</p> <p>4 MR. KOSOKO: Object to the form of the</p> <p>5 question.</p> <p>6 MR. PALLE: Yeah, whatever. Speculation.</p> <p>7 BY MR. TEPFER:</p> <p>8 Q. Do you understand the question?</p> <p>9 A. I understand the question, as muddled as it is.</p> <p>10 It would not, no.</p> <p>11 Q. Okay.</p> <p>12 A. He could only testify to what he actually knows.</p> <p>13 Q. Okay.</p> <p>14 THE VIDEOGRAPHER: Counsel, sorry to</p> <p>15 interrupt. I just wanted to give you a heads up. Your</p> <p>16 laptop is in the camera's line of sight.</p> <p>17 MR. KOSOKO: Oh, don't want that. I don't</p> <p>18 want that.</p> <p>19 BY MR. TEPFER:</p> <p>20 Q. All right. Did you -- On December 11th, 2005,</p> <p>21 did you receive a radio message indicating that a target,</p> <p>22 namely, Ben Baker, was seen going into the parking lot of</p> <p>23 a different building?</p> <p>24 A. I don't recall.</p> <p>25 Q. Do you recall, during the course of detaining the</p>	<p>1 please?</p> <p>2 BY MR. TEPFER:</p> <p>3 Q. 12. It's PLAINTIFFS' JOINT 68073.</p> <p>4 A. Starting Number 2, you said, on Page 12? Is that</p> <p>5 correct?</p> <p>6 Q. Yes. Sorry.</p> <p>7 A. Okay. Thank you.</p> <p>8 Q. Stop when you get to the end of that page.</p> <p>9 A. Okay.</p> <p>10 Q. Okay. First of all, do you know Brian Ford?</p> <p>11 A. I don't actually recall him by that name, Brian</p> <p>12 Ford, no. I think -- I remember the nickname B-Low. And</p> <p>13 this says -- the guy's saying the name, if that's his real</p> <p>14 name, I just recall that name, B-Low.</p> <p>15 Q. Okay. Was B-Low an informant for you?</p> <p>16 A. No.</p> <p>17 Q. Well, how do you know B-Low?</p> <p>18 A. He was one of the drug dealers at 574.</p> <p>19 Q. Okay. All right. You started laughing while you</p> <p>20 were reading this exhibit. Is that accurate?</p> <p>21 A. Yes.</p> <p>22 Q. What part made you laugh?</p> <p>23 A. When he said a guy, the heavy set guy reminded --</p> <p>24 or resembled the boxer Jack Johnson.</p> <p>25 Q. Why is that funny? Do you know who he's talking</p>

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1 about? 2 A. Could have -- He could have been talking about 3 me, for all I know. I don't know what the man was 4 thinking. 5 Q. Okay. Do you -- 6 A. Do you know how heavy Jack Johnson was? That's 7 what's funny. 8 Q. Well, is there anyone on your team who you think 9 resembles Jack Johnson? 10 A. No. 11 Q. Okay. Do you see the Footnote Number 60 there? 12 A. Yes. 13 Q. It says "Based on the similarity of Henderson's 14 description to Jones' appearance and similar witness 15 descriptions, COPA investigators concluded that he was 16 referring to Jones"? Do you see that? 17 A. Yes. But my recollection, Jack Johnson was what, 18 about six foot, about six foot, right? Al is all of about 19 five-seven, you know, or five-six, or something like that. 20 And no way does he resemble -- well, that's in my opinion. 21 I don't know what the guy was thinking. 22 Q. Okay. Fair enough. All right. So, is -- so, 23 Michael Henderson is recounting his memory of what 24 happened on December 11th at 574 East 36th Street; is that 25 accurate?	1 from some location but you don't recall specifically 2 whether you ever went into the building? 3 A. Right. 4 Q. Okay. And you don't recall running out and 5 chasing after Ben Baker? 6 A. No. That didn't happen. 7 Q. That's false? 8 A. That's false. 9 Q. That's a lie, right? 10 A. It's a lie. 11 Q. All right. I want you to read the next section 12 on the next page, the Willie Robinson aspect. Please read 13 those three paragraphs. Okay? 14 A. Okay. Okay. 15 Q. Okay. Do you recall putting Robinson, Henderson, 16 and four or five other men against the wall? 17 A. I don't recall that. 18 Q. Do you -- You don't recall it one way or the 19 other? 20 A. I don't recall -- I did not put anyone on a wall. 21 Q. Okay. Did you go upstairs with anyone and come 22 back down with drugs? 23 A. No. 24 Q. That didn't happen? 25 A. Never happened.
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1 A. From what I read in the document, yes. 2 Q. Okay. And is his memory consistent with yours? 3 A. No. 4 Q. Okay. What's wrong? What's different? 5 What's -- what's erroneous about this? 6 A. Really, a lot of it. I -- I don't -- I don't 7 know what happened here. He says some officers ran up. I 8 don't know who ran after B-Low. I don't know who got him. 9 I don't -- I can't say if that's so. I didn't see that. 10 Of course, we discussed that Al doesn't 11 resemble Jack Johnson. I don't agree with that. 12 And then he's talking about my radio 13 messages. I -- I mean -- I mean, how would he even know 14 about my radio messages. If there was that many officers 15 in the lobby, we would all -- we all would have got the 16 same message. I don't get it. So, how would he know it's 17 my radio message. 18 Q. Okay. Well, did anyone -- Do you recall 19 receiving a radio message while you were at 574 East 36th 20 Street? 21 A. No, I don't recall it. 22 Q. Did you ever enter the building of 574 East 36th 23 Street that day? 24 A. I don't recall if I did, but it's possible. 25 Q. Okay. So, you recall that you were surveilling	1 Q. That's a lie? 2 A. That's a blatant lie. 3 Q. Do you have any idea why Willie Robinson is 4 lying? 5 A. Don't know, but if it -- even what you had me 6 read before with Mike Henderson, Michael Henderson called 7 him a liar, too. 8 Q. Michael called Robinson a liar? 9 A. Yes. 10 Q. In what way? 11 A. Because he said somebody ran up the stairs, they 12 ran up after him, and a officer ran up after him and 13 brought him back down with the drugs. This guy said I 14 went upstairs with the guy. So, he -- all of them lying 15 because that never happened. 16 Q. So they're both lying, right? 17 A. They both lying because I didn't chase nobody. I 18 had -- I had a tactical team there. 19 Q. Okay. Do you recall anyone chasing anyone? 20 A. I don't recall anyone chasing anyone, but I 21 didn't put anybody on a wall. I had a tactical team 22 there. I -- I -- if we hit the building and officers went 23 in, they knew how to -- they knew how to be safe 24 about themselves by securing everyone who was suspected of 25 a illegal activity.

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<p>1 Q. Okay. And Robinson also tells these COPA 2 investigators that Watts rushed from the building, 3 possibly accompanied by a heavy set officer, returning a 4 short time later and telling the other officers present 5 that he had gotten Ben Baker, right?</p> <p>6 A. Prompted by a radio or a cell phone. So they -- 7 that's why I said he calling them a liar. They don't know 8 if it was a cell phone, my radio, and -- and neither, 9 because it didn't happen. Because I would have not had a 10 need to be called if I was there present when Bill -- when 11 Ben Baker was pulled over. I watched the officer pull Ben 12 Baker over with my own eyes, so I didn't need nobody to 13 radio me.</p> <p>14 Q. Okay. So, they're both lying about that, then, 15 right?</p> <p>16 A. Yes. I stated that several times. They're both 17 lying, yes.</p> <p>18 Q. Okay. And Robinson's also saying that he didn't 19 have any drugs, correct?</p> <p>20 A. That's what he says.</p> <p>21 Q. Okay. And he was charged with drugs, right?</p> <p>22 A. His arrest report -- I saw he was arrested. I 23 didn't see what he was actually charged with. But if he 24 was arrested and charged with narcotics and the officer 25 put that in his report and went to court and testified to</p>	<p>1 question.</p> <p>2 THE WITNESS: No. You asked the question 3 about what Robinson said. I don't -- again, I don't 4 supervise Robinson. And, no, I would not sign a report in 5 which I had knowledge that it was inaccurate.</p> <p>6 BY MR. TEPFER:</p> <p>7 Q. And you wouldn't sign off on a report if you had 8 knowledge that somebody was getting framed, right?</p> <p>9 A. If I had knowledge that anything in the report 10 was not acceptable, I would not sign it.</p> <p>11 Q. Well, is it acceptable to frame somebody?</p> <p>12 A. It's definitely not acceptable to frame anyone.</p> <p>13 It's not acceptable to lie on the police. It's not 14 acceptable to sell narcotics in distressed areas.</p> <p>15 It's not acceptable to take statements from 16 known drug dealers and file false, false lawsuits against 17 officers about something that happened 17 years ago or -- 18 so, a lot of things are not acceptable.</p> <p>19 This is definitely not acceptable. At the 20 time I signed these reports, it was very much so 21 acceptable.</p> <p>22 Q. The report was acceptable?</p> <p>23 A. Absolutely. I signed it.</p> <p>24 Q. Okay. But you did testify it wouldn't be 25 acceptable, beyond all the other things you said aren't</p>
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<p>1 it, then you have to talk to the officer about that. I 2 didn't arrest him.</p> <p>3 Q. But you signed off on the report, right?</p> <p>4 A. I signed off on the report because my 5 signature -- I have read this report, and my signature 6 indicate that it is acceptable.</p> <p>7 Q. You never would have signed off on this report if 8 what Robinson was saying was true and he didn't actually 9 have drugs but they claimed he did, right?</p> <p>10 MR. KOSOKO: Object to the form of the 11 question. It's argumentative and calls for a speculative 12 response.</p> <p>13 BY MR. TEPFER:</p> <p>14 Q. Well, would you have?</p> <p>15 A. Whatever Robinson did wouldn't have no 16 determination of what I do on a report. I'm not 17 supervising Robinson. I'm supervising Chicago police 18 officers who're willing to testify in court about the 19 activity that they generated in those reports.</p> <p>20 Q. Right. But what I'm asking is, if you witnessed 21 one of your officers that you supervised plant drugs on 22 someone, then you wouldn't have signed off on a report 23 that said it was a good arrest, right?</p> <p>24 A. No, you asked --</p> <p>25 MR. KOSOKO: Object to the form of the</p>	<p>1 acceptable, to frame someone for a crime they didn't 2 commit?</p> <p>3 A. It's definitely not acceptable to frame someone 4 for a crime that they did not commit.</p> <p>5 Q. Okay. Let's look at the section for Louis Moore.</p> <p>6 A. It's not acceptable for the Chicago Police 7 Department. It's not acceptable for the FBI. It's not 8 acceptable for anybody's attorney to continue to push 9 false information that they know is false.</p> <p>10 Just like I signed off on that that I know 11 it's acceptable, is because I trusted the officers that it 12 was acceptable.</p> <p>13 Q. All right. Can you -- Going back to Exhibit 18, 14 can you read the paragraph documenting Louis Moore?</p> <p>15 A. Yes. Okay.</p> <p>16 Q. Do you know Louis Moore?</p> <p>17 A. Yes. I'm going to say, yes, I -- I recall that 18 name.</p> <p>19 Q. What do you recall?</p> <p>20 A. It wasn't Louis Moore. I forgot the nickname. I 21 know him.</p> <p>22 Q. Cool?</p> <p>23 A. No. Nobody called him Cool.</p> <p>24 Q. Michael Henderson called him Cool.</p> <p>25 A. Everybody thought that's how he was, but that</p>

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<p>1 wasn't his nickname.</p> <p>2 Q. Okay. So Michael Henderson's wrong?</p> <p>3 A. Um-hum.</p> <p>4 Q. Okay.</p> <p>5 A. Slick was his nickname.</p> <p>6 Q. Okay. So, Louis Moore is known as Slick?</p> <p>7 A. Louis Moore was known as Slick.</p> <p>8 Q. Okay. What do you remember about Louis Moore?</p> <p>9 A. He was a -- he was a part of the drug trade down 10 in the Ida B. Wells in the open air drug market.</p> <p>11 Q. Okay. Had you arrested him 15 to 30 times?</p> <p>12 A. I haven't arrested him. He doesn't have an 13 arrest report with my name as the arresting officer or 14 ever testifying against him in a court.</p> <p>15 Q. Fair enough. Have you -- Did you ever sign off 16 on any reports when Louis Moore was arrested?</p> <p>17 A. If he was arrested by my team, of course.</p> <p>18 Q. Okay. Did you do it 15 to 30 times?</p> <p>19 A. Not that I recall, 15 to 30 times.</p> <p>20 Q. All right. So, Louis Moore is alleging that you, 21 Mohammed, Smitty, and Al took, among others, took his 22 money and arrested him along with seven other people that 23 day. Do you see that?</p> <p>24 A. And above that, again, he's lying because he said 25 we placed him on his knees. If you believe Robinson and</p>	<p>1 illegal -- illegal funds derived from drug trade.</p> <p>2 Q. Okay. So if it's not listed in the arrest 3 report, does that mean that he didn't have any money 4 inventoried from him that day?</p> <p>5 A. It could mean that he took his money to --</p> <p>6 MR. KOSOKO: Hang on.</p> <p>7 Object to the form of the question, calls 8 for a speculative response, foundation. Sergeant Watts 9 did not draft this report.</p> <p>10 Go ahead, Sarge.</p> <p>11 THE WITNESS: If it mean that he had money 12 on him and he took it -- it was in his property bag, 13 which -- which was with him when he went to the lock-up.</p> <p>14 If -- if money is on a arrestee and it's not a part of the 15 crime in which he's being arrested for, the money stays 16 with the arrestee in his property bag, unless it's over a 17 certain amount, and then it's inventoried as prisoner's 18 property.</p> <p>19 BY MR. TEPFER:</p> <p>20 Q. Okay. But they don't get to the keep the money 21 that they have on them while they're in lock-up right?</p> <p>22 A. No. It's in their per- -- it's in their bag.</p> <p>23 Q. So, it's inventory?</p> <p>24 A. No. It's in a bag. If it's not inventory, and 25 it's only inventory, the money, if it's part of the</p>
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<p>1 the other guy, Henderson, we put 'em on the wall. So, all 2 of them is lying.</p> <p>3 Q. Okay. So, that's not true?</p> <p>4 A. That's not true at all.</p> <p>5 Q. You didn't take his money?</p> <p>6 A. Never.</p> <p>7 Q. Have you ever taken anyone's money who you were 8 detaining?</p> <p>9 A. I -- I've received money and inventoried it 10 according to the inventory statutes of the Chicago Police 11 Department. So, a lot of times people, arrestees, will 12 say that we took their money. And not understanding that 13 when we -- yeah, we take their money. We confiscate their 14 money and we inventory it.</p> <p>15 And if you -- and if you were to look at 16 their arrest report, there sh- -- if he had money, it 17 should be listed on his arrest report that he had an 18 inventory.</p> <p>19 Q. Did you take money from Louis Moore that day?</p> <p>20 A. I did not arrest Louis Moore that day. There 21 would be no need for me to take money from him. I did not 22 arrest him, so I would not need to, not take money, but 23 confiscate money from Louis Moore.</p> <p>24 It would be -- it -- depending on what his 25 charge was, it would be perceived as contraband or</p>	<p>1 criminal act. If it's not going to be inventory, it's 2 placed in his property bag. And his property bag is 3 signed and sealed by the arresting officer.</p> <p>4 Q. Okay.</p> <p>5 A. If it's over a certain amount, and I don't want 6 to guesstimate, but if it's over a certain amount, then 7 it's -- the money is inventoried and it's inventoried as 8 prisoner's property and he's given an inventory receipt.</p> <p>9 And then he follows the procedures, once he's released, to 10 get his property back, i.e., his money.</p> <p>11 Q. Wait. Sorry. If it's over a certain amount he 12 gets to get his money back; is that what you said?</p> <p>13 MR. KOSOKO: Object to the form of the 14 question, misstates testimony.</p> <p>15 MR. TEPFER: I'm asking.</p> <p>16 THE WITNESS: If it's over a certain amount, 17 he's not allowed to keep it in his property bag.</p> <p>18 BY MR. TEPFER:</p> <p>19 Q. Right.</p> <p>20 A. It has to be inventoried, and then he's given a 21 receipt for his money, i.e., his inventory property slip.</p> <p>22 So, after he's released, he just goes, shows that he's the 23 one that was arrested, this was his property, and he gets 24 his money back.</p> <p>25 Q. Okay. And if it's under a certain amount, how</p>

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1 does he get his money back?	1 Q. Okay. The actual handwritten arrest reports, do
2 A. His money is in his inventory bag --	2 you sign those?
3 Q. Right.	3 A. Yes.
4 A. -- and it's sealed. So, when he's released he's	4 Q. As a supervisor?
5 given his inventory bag right there with his shoelaces,	5 A. Yes.
6 his I.D., his wallet, whatever else he had in his pocket.	6 Q. Okay.
7 Q. Okay. Would that -- if it's under a certain	7 A. And also on a arrest report, if -- because it
8 amount of money, is he -- strike that.	8 wouldn't state here, but on -- if you had the actual
9 All right. I'm going to show you Exhibit	9 arrest report, you probably would see what was inventoried
10 37, which is COPA-WATTS 2237 through 2265.	10 from each arrestee.
11 A. Um-hum.	11 Q. Okay. So, these computer-generated reports, in
12 Q. It's the arrest reports of Henderson and Robinson	12 your experience, or department-generated reports, wouldn't
13 and everyone.	13 necessarily list what is inventoried from each arrestee?
14 A. Okay.	14 A. No.
15 (Deposition Exhibit 37 was marked for	15 Q. Okay. Can you turn to -- well, take me through
16 identification.)	16 that process of what happens after you sign -- Is this
17 MR. PALLES: Josh, is that the one that was	17 generated -- Are these computer-generated, or
18 designated as Elsworth Smith exhibits?	18 department-generated reports, generated after you sign off
19 MR. RAUSCHER: No.	19 on the handwritten arrest report?
20 MR. TEPFER: No, those are for a different	20 A. These?
21 arrest, Eric.	21 Q. Yes.
22 MR. PALLES: All right. I'll find it.	22 A. Yes.
23 MR. TEPFER: I think, Eric, if you look at	23 Q. Okay. Can you look at COPA-WATTS 2261, the one
24 the pdf that's titled Henderson, et al., vice, it may	24 that's the arrest report of Willie Robinson?
25 be -- maybe it's in there. I don't know.	25 A. Okay.
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1 MR. PALLES: Okay.	1 Q. By the way, looking at his picture right there in
2 MR. MICHALIK: Eric, it's in the one that	2 the top right corner, does that refresh your recollection
3 starts out at Page 1 with Exhibit Statement and Officer	3 of who Willie Robinson is at all?
4 Manuel Leano.	4 A. He was one of the people down there. No, I
5 MR. PALLES: Thanks.	5 didn't know him.
6 THE WITNESS: This is not the officers'	6 Q. You didn't know him?
7 generated arrest report.	7 A. No.
8 BY MR. TEPFER:	8 Q. Okay. What was I going to ask?
9 Q. Well, what is it then?	9 All right. So, there it says, under
10 A. This is the arrest report from the -- from the	10 "Charges," it says "PCS, possess 15 to a hundred grams of
11 police department. The officers' arrest report would be	11 heroin." Do you see that?
12 handwritten, wouldn't it?	12 A. Yes.
13 Q. Okay.	13 Q. So there was some question that you didn't know
14 A. What date is this?	14 what he was charged with, but this indicates he was
15 Q. Have you ever seen a document like this before?	15 charged with drugs?
16 A. Sure.	16 A. Correct.
17 Q. Okay.	17 Q. All right. And the arrest date right above that
18 A. Back then they didn't -- the -- the Department	18 is December 11, 2005, at 12:08 p.m., right?
19 went -- did go to a system where you could type everything	19 A. Yes.
20 up in the -- in the system and -- and print it out, but it	20 Q. Okay. And it actually does, in his instance,
21 would still be on the arrest report form. This is not a	21 indicate they recovered narcotics and the estimated street
22 actual arrest report.	22 value, correct?
23 See, this is the final arrest report, the	23 A. Correct.
24 final approval, which means they went through the system.	24 Q. All right. So this one does indicate, I guess,
25 It went through lock-up and all that good stuff.	25 what was recovered, right?

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<p>1 A. What was recovered, yes.</p> <p>2 Q. Strike that.</p> <p>3 All right. And then on Page 2, it does</p> <p>4 specifically list what was inventoried, too, correct?</p> <p>5 A. The narcotics that was recovered, yes.</p> <p>6 Q. Yeah. And also the money, correct?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. So, does that mean that these</p> <p>9 computer-generated reports do indicate what was</p> <p>10 inventoried?</p> <p>11 A. Yes.</p> <p>12 Q. Okay.</p> <p>13 A. It's -- it's there. I didn't -- I didn't know.</p> <p>14 We didn't deal with these type of inventories -- arrest.</p> <p>15 What you handed me was a COPA. COPA, what</p> <p>16 they did was, they went to 35th Street and had these guys'</p> <p>17 arrest reports pulled. This is not the arrest report that</p> <p>18 the officer initially generated.</p> <p>19 Q. Did you witness COPA do that?</p> <p>20 A. No, sir.</p> <p>21 Q. Okay. All right. And then turning to the first</p> <p>22 page of COPA --</p> <p>23 A. But being an experienced sergeant and having</p> <p>24 dealings with COPA and investigating CR numbers, I've had</p> <p>25 to go to 35th Street and pull arrest reports myself. So</p>	<p>1 A. Yeah.</p> <p>2 Q. Okay.</p> <p>3 A. And they're just like a -- they're a independent</p> <p>4 body that investigate police, from my understanding.</p> <p>5 Q. Okay.</p> <p>6 MR. KOSOKO: Can we take a quick break,</p> <p>7 please? I need to go use the washroom.</p> <p>8 THE VIDEOGRAPHER: We are off the record.</p> <p>9 Time on the video monitor is 2:46 p.m. And this ends</p> <p>10 Media 2.</p> <p>11 (Recess taken from 2:46 p.m. to 2:51 p.m.)</p> <p>12 THE VIDEOGRAPHER: We are on the record.</p> <p>13 The time on the video monitor is 2:51 p.m. This begins</p> <p>14 Media 3.</p> <p>15 BY MR. TEPFER:</p> <p>16 Q. Okay. All right. We're still on this</p> <p>17 Exhibit 37.</p> <p>18 A. Um-hum.</p> <p>19 Q. All right. Each of these -- These are five</p> <p>20 individual arrest reports, and each of them indicate the</p> <p>21 arrest date was December 11th, 2005. And all indicate</p> <p>22 that they were at 12:08, correct?</p> <p>23 A. Um-hum, yes.</p> <p>24 Q. Okay. And all of them have a picture. Do you</p> <p>25 recognize the picture of Michael Henderson? Do you know</p>
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<p>1 I'm well aware, sir, of these documents and how COPA would</p> <p>2 actually get them. So . . .</p> <p>3 Q. When have you dealt with COPA?</p> <p>4 A. Throughout my career, I probably -- maybe once,</p> <p>5 twice, even three times that I recall.</p> <p>6 Q. In what context?</p> <p>7 A. There was a CR number.</p> <p>8 Q. Like, that you initiated or that you were named</p> <p>9 as?</p> <p>10 A. Probably both.</p> <p>11 Q. Okay. One -- three times in your career?</p> <p>12 A. That I recall.</p> <p>13 Q. That you recall?</p> <p>14 A. Um-hum.</p> <p>15 Q. And when you say COPA, are you also referring to</p> <p>16 the Office of Professional Standards or the Independent</p> <p>17 Police Review Authority?</p> <p>18 A. Yeah. They -- they change their name so much,</p> <p>19 you know, but it's the same outfit.</p> <p>20 Q. The same outfit, okay.</p> <p>21 A. Yeah.</p> <p>22 Q. So you're saying no more than three times in your</p> <p>23 career were you ever spoken to by one of those outfits?</p> <p>24 A. That I recall.</p> <p>25 Q. That you recall?</p>	<p>1 who that is now?</p> <p>2 A. No.</p> <p>3 Q. Do you recognize the picture of Laurence Little?</p> <p>4 A. No.</p> <p>5 Q. Louis Moore, do you recognize that picture?</p> <p>6 A. Yes, I remember him.</p> <p>7 Q. That's the one you remember. He goes by Slick,</p> <p>8 right?</p> <p>9 A. Slick, yes.</p> <p>10 Q. And what about Larry Pulley, do you recognize</p> <p>11 him?</p> <p>12 A. You just go down there, he always cleaning up the</p> <p>13 buildings. Yeah, he was a drug user down there.</p> <p>14 Q. Oh, he was a drug user down there?</p> <p>15 A. Um-hum.</p> <p>16 Q. Okay.</p> <p>17 A. From his appearance and -- I would assume that.</p> <p>18 Q. What about his appearance makes you conclude he</p> <p>19 was a drug user?</p> <p>20 A. For at the time, I think he was a male, Black,</p> <p>21 probably in his forties or fifties, and to be down there</p> <p>22 with his attire, the way it was, and his uncleanliness,</p> <p>23 just the way he -- it's a certain way that you could -- a</p> <p>24 certain appearance for certain narcotics users, in my</p> <p>25 experience as being a police officer.</p>

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<p>1 Q. Is there a difference between someone who just 2 lives in poverty versus someone who's a drug user in their 3 appearance?</p> <p>4 MR. KOSOKO: Object to the form of the 5 question.</p> <p>6 THE WITNESS: My experience, coming from an 7 area that was definitely where people lived that were 8 living in poverty, I know people who live in poverty who 9 were of age that carried theirself as if they were -- they 10 were very well kept, clean, their clothing, their 11 mannerisms.</p> <p>12 And also being a police and being in that 13 area, I've also observed those who are on different 14 substances who are dirty, unkept, for an individual that 15 is of age and has a place where there's sufficient 16 facilities to keep theirself in a decent way.</p> <p>17 So, that's my assessment. I don't know, you 18 know, how you would assess it, but you asked the question. 19 So, yes, there is a difference.</p> <p>20 BY MR. TEPFER:</p> <p>21 Q. Okay. All right. Can you get Exhibit 18 back in 22 front of you, please?</p> <p>23 A. 18. Yes. The COPA report. Yeah. What page?</p> <p>24 Q. Just the first page there.</p> <p>25 A. Okay.</p>	<p>1 A. -- are untrue.</p> <p>2 Q. But you don't know whether or not the -- whether 3 there's sworn affidavits and legal pleadings, whether or 4 not that's true or not?</p> <p>5 A. If they're sworn affidavits to this statement, 6 it's still untrue and it's a lie. So, I would still say 7 that's untrue. I don't know about legal proceedings or 8 statements to investigative bodies. I don't know what 9 bodies that they're -- that they made the statements to.</p> <p>10 Q. Do you know who Roscoe Bryson is?</p> <p>11 A. Roscoe Bryson? I have no clue. Never heard the 12 name.</p> <p>13 Q. Okay. Can you turn to Page 7 of this document, 14 and Footnote 24?</p> <p>15 A. Okay. Yes.</p> <p>16 Q. Okay. It says -- I'm going to read that to you. 17 It says, "COPA investigators interviewed Roscoe Bryson on 18 October 4th, 2018. Mr. Bryson worked at 527 East Browning 19 during the period in which the events described occurred. 20 He knew Watts and recalled that Watts would ask him to 21 unlock the laundry room so he could meet privately with 22 drug dealers." Is that true?</p> <p>23 A. That's not true. No, I stated I didn't know 24 Roscoe Bryson. And I never asked anybody to unlock any 25 door other than management.</p>
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<p>1 Q. All right. The second paragraph --</p> <p>2 A. Um-hum.</p> <p>3 Q. -- the third full sentence, it starts "Since 4 2005." Do you see that?</p> <p>5 A. Yes.</p> <p>6 Q. "Since 2005, claims that the Team, including 7 Jones, ran an illegal enterprise in the Wells Homes have 8 been supported by many other residents in sworn 9 affidavits, legal pleadings, and statements to 10 investigative bodies." Do you see that?</p> <p>11 A. Yes.</p> <p>12 Q. All right. Is that accurate?</p> <p>13 A. No.</p> <p>14 Q. What's inaccurate about it?</p> <p>15 A. The full statement, in my opinion, it's totally 16 untrue.</p> <p>17 Q. Okay. Is it untrue that the allegations have 18 been supported by sworn affidavits and legal pleadings?</p> <p>19 A. I don't -- I don't know. I haven't seen -- 20 I have not seen any sworn affidavits, legal opinions or 21 statements other than what I -- what's in front of me now. 22 So, for me, it's totally -- it's untrue.</p> <p>23 Q. The allegations are --</p> <p>24 A. The allegations --</p> <p>25 Q. -- are untrue?</p>	<p>1 Q. Who would you ask in management?</p> <p>2 A. Whoever the management was at the time.</p> <p>3 Q. Ms. Osborn?</p> <p>4 A. Yes, that's who, exactly who it was, um-hum.</p> <p>5 Q. Is that the only person you ever asked?</p> <p>6 A. That's the only person I ever asked for -- and 7 she didn't unlock it, she would actually give me the keys 8 to vacants.</p> <p>9 (Court reporter clarification.)</p> <p>10 THE WITNESS: The keys to vacant apartments.</p> <p>11 BY MR. TEPFER:</p> <p>12 Q. She'd give you the keys?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. So, she wouldn't even unlock it, she'd 15 just give you the keys and say you could go there?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. What would you use the vacants for?</p> <p>18 A. Surveillance.</p> <p>19 Q. Got it. Did you ever meet privately in laundry 20 rooms with drug dealers?</p> <p>21 A. No.</p> <p>22 Q. Never happened in your entire career?</p> <p>23 A. Never happened in my entire career.</p> <p>24 Q. Any idea why Mr. Bryson would lie about that?</p> <p>25 A. I don't know Mr. Bryson. And I'm not sure if</p>

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<p>1 Mr. Bryson even knows me, other than that I was the police 2 down there.</p> <p>3 So, you asking me to speculate on why he 4 would say something. I don't know because he don't know 5 me and I don't know him.</p> <p>6 Q. Okay. The next line says, "Mr. Bryson thought 7 the meetings were unusual because the dealers were not 8 arrested and would continue to openly deal drugs following 9 their meetings with Watts." Do you see that?</p> <p>10 A. Yes.</p> <p>11 Q. It says, "Watts was the only officer in the 12 laundry room, but other team officers would typically 13 stand by just outside the door." Do you see that?</p> <p>14 A. I don't see that.</p> <p>15 Q. The next line.</p> <p>16 A. Okay. Yes. Yes. Yes.</p> <p>17 Q. Is that true?</p> <p>18 A. No.</p> <p>19 Q. Did you ever ask any of your team members to 20 stand by while you met with drug dealers anywhere?</p> <p>21 A. No.</p> <p>22 Q. Did you ever have an argument with Ben Baker?</p> <p>23 A. No.</p> <p>24 Q. Okay. Mr. Bryson says he recalled seeing a 25 resident of 527 East Browning he knew has been arguing</p>	<p>1 you that. I don't know who Roscoe Bryson is.</p> <p>2 Q. Any reason to deny that he worked at 527 East 3 Browning?</p> <p>4 A. I don't know who Roscoe Bryson is, so how would I 5 know where he worked?</p> <p>6 Q. Okay. So, you have no way to know one way or the 7 other whether Roscoe Bryson is a drug dealer, right?</p> <p>8 A. If I -- I don't know Roscoe Bryson. If I saw -- 9 If I saw an arrest report and he was charged or I saw what 10 he was convicted, then I would know that, or I had other 11 information from a --</p> <p>12 Q. Okay.</p> <p>13 A. -- reliable source.</p> <p>14 Q. And you don't have any of that information?</p> <p>15 A. No. I don't even know who -- who he is.</p> <p>16 Q. Okay.</p> <p>17 A. Don't even know if he was ever employed at the 18 location.</p> <p>19 Q. Okay. And Roscoe Bryson told COPA that Watts was 20 shaking his finger in Baker's face and appeared to be 21 threatening him, but Baker just walked away. Did that 22 ever happen with Ben Baker?</p> <p>23 A. No.</p> <p>24 Q. Okay. Going back to Page 2 of this report, it 25 says, on the second full paragraph, the first line, it</p>
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<p>1 with Watts in the building lobby. That's untrue?</p> <p>2 A. Yes, that's untrue. Arguing with -- Again, I did 3 not converse with Ben Baker in the lobby. I did not 4 arrest Ben Baker in a lobby. There was no need for me to 5 talk to Ben Baker in a lobby. I don't know where this 6 Bryson, Roscoe Bryson, is getting this from. It's just 7 totally untrue.</p> <p>8 Q. Okay.</p> <p>9 A. You're -- you're --</p> <p>10 Q. Go ahead.</p> <p>11 A. You -- you -- what you're doing is, you're 12 reading statements against, well, me, and you're asking me 13 to legitimize and verify these statements that these dope 14 dealers and people that we've arrested has given against 15 the police, which was -- it was a known -- it was a known 16 tactic of drug dealers and arrestees to make false 17 allegations against any police officer who arrested them 18 thinking that it would help them in their cases. That was 19 just known.</p> <p>20 And so you present me with allegations and 21 asking me is that true. And I'm going to always say no, 22 because what they are accusing me of is something that I 23 just would not do in my -- in the course of my duties.</p> <p>24 Q. Is Roscoe Bryson a drug dealer?</p> <p>25 A. I don't know who Roscoe -- I just -- I just gave</p>	<p>1 says, "COPA's investigation revealed that Watts and Jones 2 falsely arrested Baker and Glenn." Do you see that?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. So, the COPA, the city agency charged with 5 investigating police officers, concluded that you falsely 6 arrested Ben Baker and Clarissa Glenn; is that right?</p> <p>7 MR. MICHALIK: Michalik. Object to the form 8 and foundation.</p> <p>9 MR. KOSOKO: Watts joining in that.</p> <p>10 THE WITNESS: That's COPA's investigation.</p> <p>11 And they -- I don't know, where did they get their 12 information from? I can't -- I wouldn't rely on their 13 information or that investigation because I know from the 14 arrest reports, the vice case reports, and the proceedings 15 after that that that's not true.</p> <p>16 BY MR. TEPFER:</p> <p>17 Q. And you know because you were there and witnessed 18 it, right?</p> <p>19 A. Oh, this guy here. I was there. I didn't 20 witness it. I -- I was there. And the officer who 21 generated the report, the vice case report and the arrest 22 report, stated what he saw, his probable cause for arrest. 23 You asked me the same thing, and it's not going to change 24 because you can't change the truth. The truth don't 25 change.</p>

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<p>1 Q. Okay.</p> <p>2 A. So, no matter how many times you ask me if I 3 arrested him, if I saw it, I did not see it, and I have 4 stated that to you. And we're wasting, you know, my day, 5 now because you've asked me this about nine times and I've 6 answered you nine times.</p> <p>7 And it's -- you know, it's a little, you 8 know -- you know, it's not frustrating to me. I just 9 think it's a waste.</p> <p>10 Q. Okay. The next -- after the comma where it says, 11 "Watts and Jones falsely arrested Baker and Glenn, it says 12 that, "Jones then falsified related vice case reports, 13 VCRs, and arrest reports in furtherance of the false 14 arrest; that Jones then testified falsely under oath in 15 court hearings regarding the arrest, and that when COPA 16 investigators later questioned about the events related to 17 the arrest, he continued to provide false information."</p> <p>18 That's COPA's conclusion, correct?</p> <p>19 MS. OLIVIER: Objection, form and 20 foundation.</p> <p>21 MR. KOSOKO: Same objection.</p> <p>22 THE WITNESS: If he --</p> <p>23 Hang on. Hang on. Sarge, just hang on.</p> <p>24 I'm going to object to this entire line of 25 questioning regarding this unapproved report that's still</p>	<p>1 understanding.</p> <p>2 BY MR. TEPFER:</p> <p>3 Q. Right, because the grammar was fine, and the --</p> <p>4 A. Probable cause was --</p> <p>5 MR. KOSOKO: Hang on. Hang on. Hang on, 6 Sarge.</p> <p>7 As relates to that question, I'm going to 8 object because it's misstating the witness's testimony. 9 He testified that narcotics, physical narcotics, were 10 recovered as part of his analysis.</p> <p>11 Go ahead, Sarge.</p> <p>12 THE WITNESS: All of the above. Like you 13 said, grammar, the narcotics that was inventoried, being 14 on the scene, and the officer on the scene, in the heat of 15 the moment, states what he saw, not -- I wasn't -- it 16 wasn't told to me later what he saw.</p> <p>17 BY MR. TEPFER:</p> <p>18 Q. Right.</p> <p>19 A. So, yes, I trusted what he had in his report.</p> <p>20 Q. So, that's my question. Because you never 21 witnessed the criminal act. You never saw Ben Baker, 22 Clarissa Glenn possess the narcotics, right?</p> <p>23 MR. KOSOKO: Hang on, Sarge.</p> <p>24 Object to the form of the question. If 25 you're saying you didn't see the exchange, I understand</p>
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<p>1 being contested, that foundationally the sergeant doesn't 2 know what COPA's saying in this. So, this entire line of 3 questioning regarding this exhibit, as it relates to my 4 client I'm going -- I'm going to object to.</p> <p>5 Go ahead, though.</p> <p>6 THE WITNESS: So, according to what you just 7 read about Al Jones, you would have to ask Al about that. 8 I wasn't interviewed by COPA. I don't know how they went 9 about their investigation, who they got their information 10 from. And it's false. Their investigation was a bad 11 investigation. And they should be investigated if this is 12 their -- the result of their investigation.</p> <p>13 BY MR. TEPFER:</p> <p>14 Q. Okay. How do you know that their investigation 15 concluding specifically that Jones falsified related vice 16 case reports and arrest reports is wrong?</p> <p>17 MR. KOSOKO: Again, just renewing my 18 objection again.</p> <p>19 Go ahead, Sarge.</p> <p>20 THE WITNESS: Because when I approved the 21 officer's vice case report and the arrest report, the 22 officer had the narcotics, which was inventoried. He had 23 probable cause. And so, therefore, the officer -- all the 24 documentation at the time that was submitted to me, they 25 were acceptable and in good standings and truthful, to my</p>	<p>1 that. But actual, physical -- whether it's actual or 2 constructive possession, he clearly observed that. So, if 3 we can specify what you're asking him. It's a vague 4 question.</p> <p>5 BY MR. TEPFER:</p> <p>6 Q. Did you see Alvin Jones -- Did you see Ben 7 Baker -- strike that.</p> <p>8 Did you see Clarissa Glenn pass drugs to Ben 9 Baker?</p> <p>10 A. No.</p> <p>11 Q. Did you see Ben Baker put drugs in the console of 12 the car?</p> <p>13 A. No.</p> <p>14 Q. Okay. So, how do you know that Alvin Jones 15 didn't plant the drugs on them?</p> <p>16 MR. KOSOKO: Object; asked and answered.</p> <p>17 MS. OLIVIER: Object to the form.</p> <p>18 THE WITNESS: I -- For the same reason 19 you're asking me, the same reason, I'm going to say I know 20 Clarissa passed the drugs to Ben and Ben actually had the 21 drugs because they're narcotics dealers. If you want me 22 to just speculate, because that's what you're asking me to 23 do, to speculate on what Al saw, I can't speculate on what 24 Al saw. I can read the reports, verify the reports for 25 its accuracy and probable cause, and I can sign off on it.</p>

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<p>1 And then Al can go to court, go through the legal channel, 2 and he can testify to what he saw. 3 And if I'm subpoenaed because I'm on the 4 scene, all I can do is testify to what I just testified 5 here to, is that I did not see it. 6 BY MR. TEPFER: 7 Q. So, you didn't see it. So, that's why I'm asking 8 you a very specific question. You testified that COPA's 9 conclusion is wrong that Jones falsified related vice case 10 reports. How do you know that? 11 A. For the same reason that I know Ben Baker and 12 Clarissa are involved in the drug trade at 527 East 13 Browning, is because of my previous experience and my 14 knowledge of the drug trade in the housing area at 527 15 East Browning, and that at the time Al Jones stated what 16 he saw and they were placed in custody, and he -- and 17 there was a chain of evidence of what he recovered. He 18 held onto it. He inventoried it. He generated reports. 19 So, there was no reason for me, as a police officer, to 20 think otherwise, because any other factors outside of that 21 just wasn't present at that particular time. 22 Q. Did you check -- 23 A. Did I answer your question? 24 Q. Yeah. 25 Did you check Alvin Jones' sleeves prior to</p>	<p>1 citizens. 2 So, for me to, just because of the word of 3 known drug dealers who've been arrested on several other 4 occasions by other arresting officers for the same thing, 5 I would be more in line to say that they had the drugs on 6 them. 7 Did that answer your question? 8 BY MR. TEPFER: 9 Q. Yeah. When has Clarissa Glenn been arrested by 10 other officers? 11 A. I -- I don't know her -- from what I found out 12 today, that her place was searched, or something, and -- 13 and so for -- if she wasn't arrested, then she should have 14 known or did know that there were narcotic activity in 15 her -- inside her home, because she reside with a known 16 drug dealer, convicted of selling and distributing and 17 manufacturing drugs. 18 Q. Are you aware of any other time Clarissa Glenn's 19 been arrested beside December 11th, 2005? 20 A. No, I'm not. 21 Q. All right. 22 A. I know that after Ben was exonerated and he 23 received, from the taxpayers of the state of Illinois, 24 about \$190,000, that he was arrested by DEA agents for 25 trying to buy a kilo of heroin.</p>
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<p>1 this arrest of whether or not he was hiding drugs in 2 there? 3 A. Sir -- sir -- 4 MR. KOSOKO: Objection to the form of the 5 question, and argumentative. 6 THE WITNESS: I did not check Alvin Jones' 7 sleeves. I did not check Clarissa Glenn's sleeves. I did 8 not check Ben Baker's sleeves, sir. 9 BY MR. TEPFER: 10 Q. Okay. So you don't know if Alvin Jones was 11 hiding drugs in his sleeves? 12 A. I don't know if -- 13 MS. OLIVIER: Objection; form, 14 argumentative. 15 THE WITNESS: I would be more in line to say 16 I knew Ben Baker and Clarissa Glenn had drugs than to -- 17 than to try to assess what Al Jones had. Because of all 18 the hundreds of narcotics arrests that Al Jones have been 19 involved in, from my experience, he's never had to frame 20 anyone, put dope on anyone, that type of thing. 21 Al Jones was a decorated officer for the 22 arrests he made, for the amount of narcotics that he's 23 recovered and taken off the streets of the housing 24 development. Al Jones is dedicated. He shows up for 25 work. He does his job. He's a -- he's polite to the</p>	<p>1 So -- and those -- in that aspect, again I 2 would be more in line to believe what Al Jones placed in 3 his report than the ongoing narcotic trade from a person 4 like Ben Baker and Clarissa Glenn. 5 Did I answer your question? 6 Q. Were you holding drugs in your sleeve on 7 December 11, 2005? 8 A. No. 9 Q. Did you plant drugs in the car after you searched 10 the car for Ben and Clarissa? 11 A. Never searched the car, and, no. 12 Q. Did Kallatt Mohammed type up the reports of the 13 December 11th, 2005 arrest of Clarissa Glenn and Ben 14 Baker? 15 A. No. 16 Q. How do you know? 17 A. The first arresting officer presented me with 18 that arrest report and paperwork was Al Jones. 19 Q. So, you recall Al Jones presenting you with the 20 paperwork? 21 A. The first arresting officer, yes. 22 Q. Do you recall specifically Al Jones presenting 23 you with the paperwork for your signature -- 24 A. No. 25 Q. -- on December 11, 2005?</p>

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<p>1 A. I specifically remember Al Jones generating 2 those -- the case report, vice case report, arrest report, 3 yes, and -- and giving it to me to approve, yes. That is 4 the procedure, that is what happened, and it was not 5 deviated from on that one particular arrest.</p> <p>6 Q. Did you search Ben Baker on December 11th, 2005?</p> <p>7 A. No.</p> <p>8 Q. Who did? Did anyone?</p> <p>9 A. I don't recall who searched him.</p> <p>10 Q. Somebody did?</p> <p>11 A. He was under arrest, so, yes. The procedure, if 12 you have someone under arrest, you search them for 13 weapons, other contrabands, and for officer safety. So, 14 he was, I'm pretty sure, with seasoned Chicago police 15 officers, he was searched, but not by myself.</p> <p>16 Q. Okay. Did you search Clarissa Glenn?</p> <p>17 A. No.</p> <p>18 Q. Do you know, did anyone search Clarissa Glenn?</p> <p>19 A. In the report it reads she was searched by a 20 female officer.</p> <p>21 Q. Do you know who that was?</p> <p>22 A. In the report it says G. Hurt, which would be 23 Gina Hurt.</p> <p>24 Q. Is she -- Who is Gina Hurt?</p> <p>25 A. A police officer.</p>	<p>1 If this guy's making an arrest of a female 2 and I'm on the scene, I'm not going to have him deal with 3 his arrestee. When I'm standing there, I might -- it's -- 4 I think it's a common courtesy to a co-worker, for someone 5 to, "Hey" -- I can simply, "Hey, squad, can you send me a 6 female over here for a search?" It's just that simple. 7 It's nothing big. It's nothing out of line. It's within 8 the confines of what we were doing --</p> <p>9 Q. So --</p> <p>10 A. -- and how we operate.</p> <p>11 Q. -- your practice and the practice of your team, 12 if I understand it, would just be to call and ask for a 13 female officer, not Ms. Hurt in particular?</p> <p>14 A. Not my practice? That's -- At the time, I don't 15 know about now, but at the time that was one of the SOPs 16 of the police department.</p> <p>17 Q. To call for a female officer to search a female 18 arrestee?</p> <p>19 A. Right, unless it was something detrimental at the 20 time. If you -- if I'm a male officer and I see a female 21 and it looks as if she has a weapon on her that could 22 possibly hurt me, I'm not going to call a female officer, 23 no. I'm going to take action right there. But if it's 24 something that I can, you know, allow myself the 25 opportunity to call a female officer, then that's what I'm</p>
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<p>1 Q. Does she work on your team?</p> <p>2 A. No.</p> <p>3 Q. How do you -- Do you know her?</p> <p>4 A. She was a police officer that worked in the 2nd 5 District, yes.</p> <p>6 Q. Okay. Was she at the scene during the arrest?</p> <p>7 A. I don't -- She was called to the scene to -- it 8 was our -- it's procedure not to have a male officer 9 search a female officer (sic) unless it's -- it's 10 completely about officer safety. If there's a female 11 officer available, you are to contact a female officer and 12 have them search a female prisoner. And I think that's 13 why she was -- I'm pretty sure that's why she was called 14 to the scene, to search the arrestee, Clarissa Glenn for.</p> <p>15 Q. Do you know who called her?</p> <p>16 A. I don't know. No, I don't recall.</p> <p>17 Q. Do you know whether it was you?</p> <p>18 A. I don't recall.</p> <p>19 Q. Okay. Had you called her to the scene other 20 times to search female arrestees?</p> <p>21 A. I didn't call her then. I don't recall if I 22 called her then. And I probably -- all the arrests we've 23 made of female arrestees, I might have called, you know, 24 or the arresting officer called, or -- you know, it's -- 25 it's no set guideline when these guys make arrests.</p>	<p>1 going to do.</p> <p>2 Q. I understand that. My question is, would you 3 just -- when you called for a female officer, would you 4 call for a specific female officer like Ms. Hurt, or would 5 you just call for a female officer generally?</p> <p>6 A. "Squad, send me a female officer for a search."</p> <p>7 Q. Got it.</p> <p>8 A. A female officer. No one in particular.</p> <p>9 Q. Got it.</p> <p>10 A. As long as it was a female.</p> <p>11 Q. Okay. Do you know Patrick Frazier?</p> <p>12 A. No.</p> <p>13 Q. All right. Can you turn to Page 7 of the 14 Exhibit 18, please. I'm looking at Footnote 25. Okay?</p> <p>15 A. Footnote 25?</p> <p>16 Q. Yeah. It's on the very bottom.</p> <p>17 A. Okay. Um-hum.</p> <p>18 Q. It says, "COPA investigators interviewed Patrick 19 Frazier on August 27, 2018. Frazier was present on one 20 occasion when Watts came to Baker's apartment demanding 21 money saying, 'Man, you got to pay like everybody else.'" 22 Is that accurate?</p> <p>23 A. No.</p> <p>24 Q. Never happened?</p> <p>25 A. Never happened.</p>

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1 Q. Any idea why he would make that up? 2 A. No idea. Don't know Patrick Frazier. 3 Q. "Frazier said that he would call Baker when 4 police found narcotics in a mailbox because he knew the 5 Team was targeting Baker." Did you know that Frazier did 6 that? 7 A. No. 8 Q. Okay. Frazier also described an occasion when he 9 was selling cigarettes in the lobby of 527 East Browning. 10 Watts took a carton of cigarettes from him without paying, 11 telling him that "Everything gotta get taxed. Everything 12 gonna come through me." Did that happen? 13 A. No. 14 Q. Did you ever tell individuals, any individual, 15 that "Everything gotta be taxed"? 16 A. No. 17 Q. Did you ever tell residents of Ida B. Wells that 18 "Everything gonna come through me"? 19 A. No. 20 Q. Did Shannon Spaulding ever show up as one of the 21 female officers who would search? 22 A. It's a possibility. 23 Q. Is Shannon Spaulding a drug user? 24 A. A drug user? 25 Q. Yeah.	1 allegation against you that Shannon Spaulding has made? 2 A. I know he was Shannon Spaulding's partner. And 3 he didn't get quite two million. I think he got a 4 million. So, that would help, yeah. 5 Q. Is Daniel Atravario, as far as you know, a drug 6 user or a drug dealer? 7 A. Not that I know of. Never worked -- He never 8 worked on my team. And I knew him from working on another 9 team. 10 Q. All right. I want to go to Page 29 -- or, 28, 11 I'm sorry, of the COPA report. It's Exhibit 18. I want 12 you to look at that map on the top. Okay. 13 A. 28, you said? 14 Q. Yeah. 15 A. Okay. Um-hum. 16 Q. Okay. That's purported to be like an overhead 17 view of what -- the Ida B. Wells housing complex area. Is 18 that consistent with your understanding of how the Ida B. 19 Wells was set up? 20 A. I'm going to say yes. 21 Q. Okay. And so there is a location sort of in the 22 middle on the left of that that says 511 East Browning. 23 Do you see that? 24 A. Yes. 25 Q. Okay. And that building, is that where, your
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1 A. I don't know. 2 Q. Is she a drug dealer? 3 A. I don't know. 4 Q. Okay. I mean, you're aware that she's made 5 allegations against you, correct? 6 A. Yes. 7 Q. Okay. Do you -- Can you explain that? 8 A. No, I can't explain what Shannon Spaulding does. 9 Somebody paid me \$2 million I might make allegations also. 10 Shannon Spaulding made allegations against 11 me, as well as other officers in the Department, and 12 walked away with about \$2 million stating that she was 13 blackballed while, yet, and, still, Shannon Spaulding 14 worked -- she was allowed by the Chicago Police Department 15 to work with the FBI. 16 You show me -- you show me some other 17 officers with less than 15 years on the job that is 18 allowed and assigned to work with the FBI. Why Shannon 19 Spaulding if she was blackballed and if -- I guess, yeah, 20 nobody questioned that money either. 21 So, when you bring up Shannon 22 Spaulding . . . 23 Q. Do you know Daniel Atravario? 24 A. Yes, I remember Daniel Atravario. 25 Q. Okay. Are you aware that he's made similar	1 understanding, where 511 West Browning would be on this 2 map? 3 A. I would say that's pretty accurate, yes. 4 Q. Okay. And then on the bottom, near the bottom 5 right, there's a building that says it's 574 East 36th 6 Street; is that correct? 7 A. Yes. 8 Q. Okay. And then there's a few buildings in 9 between, like 527 East Browning Avenue is labeled as one 10 of them; is that correct? 11 A. Yes. 12 Q. Okay. And is this -- 13 A. You said -- wait a minute. You said what -- what 14 was the address you just gave? Five what? 15 Q. 527 East Browning. 16 A. 527, yes. 17 Q. Okay. So -- And that's in between 511 East 18 Browning and 574 East 36th Street; is that accurate? 19 A. That is correct. 20 Q. Okay. And there's a couple other buildings that 21 are unlabeled. There's one kind of below 527 East 22 Browning. Do you know -- 23 A. 540, 559. 24 Q. Okay. Great. So that one's -- The one on the 25 bottom is 540 East Browning --

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<p>1 A. Um-hum.</p> <p>2 Q. -- and the one just above that to the left is</p> <p>3 559 East Browning?</p> <p>4 A. To the right. To my right.</p> <p>5 Q. I'm sorry, to -- above, like, northeast to 540</p> <p>6 East Browning, the building right there is 559?</p> <p>7 A. The unlabeled building, yes.</p> <p>8 Q. Yeah. And then there's one a little bit north of</p> <p>9 there to the east --</p> <p>10 A. 575 East Browning. 575.</p> <p>11 Q. Great. Were there narcotics -- Was it an open</p> <p>12 air drug market in all of those buildings or in and around</p> <p>13 all of those buildings?</p> <p>14 A. In and around all those buildings, open air drug</p> <p>15 market, yes.</p> <p>16 Q. All right. So, this is marked on the top left,</p> <p>17 according to COPA, Alvin Jones' self-described</p> <p>18 surveillance location. Do you see that?</p> <p>19 A. Yes.</p> <p>20 Q. All right. Is that -- Do you recall whether or</p> <p>21 not you were surveilling -- that's where you were</p> <p>22 surveilling when Ben Baker and Clarissa Glenn's car was</p> <p>23 stopped?</p> <p>24 A. Somewhere in that vicinity, yes.</p> <p>25 Q. So, that -- So, Alvin Jones -- COPA accurately</p>	<p>1 Q. All right. Does looking at this map give you any</p> <p>2 indication of where you were surveilling from when you</p> <p>3 were involved in the arrest at 574 East 36th Street on the</p> <p>4 same day?</p> <p>5 A. No. I don't recall.</p> <p>6 Q. You don't recall. Okay.</p> <p>7 All right. On the top of Page 15 of this</p> <p>8 report -- okay. The first few lines COPA's purporting to</p> <p>9 document information that Jones gave them when they</p> <p>10 interviewed him.</p> <p>11 And it says, "Jones stated that he worked as</p> <p>12 a tactical officer on Watts-supervised Team from</p> <p>13 approximately 2002 through 2012. Jones offered the</p> <p>14 following account of events of December 11, 2005. Watts</p> <p>15 had received information that Baker would be driving to</p> <p>16 527 East Browning that day to deliver narcotics." [Quoted</p> <p>17 as read.] Do you see that?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. Is that accurate?</p> <p>20 MS. OLIVIER: Continuing objection to the</p> <p>21 use of this COPA report as already been indicated by</p> <p>22 other -- my co-counsel, as it's not been certified.</p> <p>23 THE WITNESS: It's accurate according to</p> <p>24 Al's -- I guess if Al gave the statement, you have to ask</p> <p>25 Al if his statement is accurate. I can't authenticate</p>
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<p>1 describes your memory, as well, about where --</p> <p>2 A. Somewhere in that vicinity. I'm not going to say</p> <p>3 that exact location, no.</p> <p>4 Q. Okay. But is it fair to say it was northwest of</p> <p>5 the 511 East Browning building?</p> <p>6 A. Probably so, if I recall right.</p> <p>7 Q. Okay.</p> <p>8 A. Yeah.</p> <p>9 Q. Where on this map was the car stopped when you</p> <p>10 approached Ben and Clarissa's car on December 11th, 2005?</p> <p>11 A. Where it says "Parking lot." Where you see</p> <p>12 "Rhodes Avenue."</p> <p>13 Q. Okay.</p> <p>14 A. To the right of that Rhodes Avenue, you see</p> <p>15 "Parking lot" --</p> <p>16 Q. Um-hum.</p> <p>17 A. -- right behind the 511 East Browning, facing</p> <p>18 527 East Browning.</p> <p>19 Q. Got it. So, his car, the car that you observed,</p> <p>20 was facing east towards 527 East Browning, and it was</p> <p>21 south of the 511 East Browning building; is that correct?</p> <p>22 A. That's correct.</p> <p>23 Q. Okay. And that's where the car was stopped when</p> <p>24 you approached with Officer Jones, correct?</p> <p>25 A. That is correct.</p>	<p>1 Al's statement.</p> <p>2 BY MR. TEPFER:</p> <p>3 Q. Fair enough. Can you -- I guess I'm specifically</p> <p>4 asking, do you recall that you, in particular, had</p> <p>5 received the information that Baker would be driving to</p> <p>6 527 East Browning that day to deliver narcotics?</p> <p>7 A. No, I don't recall if I --</p> <p>8 Q. Okay. Okay. It says, the next sentence says,</p> <p>9 "Watts and Jones, together, in unmarked vehicle set up</p> <p>10 surveillance in a parking lot on the west side of Rhodes</p> <p>11 Avenue, north of Browning and waited. Jones recalled</p> <p>12 conducting surveillance for at least 30 minutes, possibly</p> <p>13 as long as two hours, before Baker arrived." Is that</p> <p>14 consistent with your memory, about 30 to 120 minutes?</p> <p>15 A. Not consistent with my memory, no.</p> <p>16 Q. What is your memory?</p> <p>17 A. I don't -- I don't recall two hours. I don't</p> <p>18 recall 30 minutes. I don't know -- I don't know how long</p> <p>19 it was.</p> <p>20 Q. You just don't recall one way or the other?</p> <p>21 A. No.</p> <p>22 Q. You're not denying that it could have been 30 to</p> <p>23 120 minutes, you just don't recall?</p> <p>24 A. I don't recall.</p> <p>25 Q. Okay. On Page 16, according to this COPA report,</p>

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<p>1 the first -- the second full paragraph, it says, starting 2 on Line 2, it says, "Jones admitted that it was impossible 3 for him to have been surveilling both narcotic 4 transactions taking place in front of 574 East 36th Street 5 and Baker from the parking lot he indicated on the west 6 side of Rhodes." Will you agree that it would be 7 impossible to surveil both locations at the same time?</p> <p>8 MR. KOSOKO: Object to the form of the 9 question, assumes -- it's an incomplete hypothetical.</p> <p>10 THE WITNESS: I've --</p> <p>11 MR. KOSOKO: Assumes facts not in evidence 12 also.</p> <p>13 Go ahead, Sarge.</p> <p>14 THE WITNESS: I've surveilled both locations 15 before from a -- from an area. It's possible. So, you -- 16 it's -- maybe Al's not aware that it's possible, but I 17 know it's possible.</p> <p>18 BY MR. TEPFER:</p> <p>19 Q. Okay. Is it possible from the location that 20 you -- northwest of 511 East Browning Avenue, as you 21 describe on Page 28?</p> <p>22 A. I know it's possible. You can get high enough in 23 the adjacent buildings and you can see right over into the 24 Browning building. So, it is possible from that area, 25 yes.</p>	<p>1 somewhere where I'm not sure where we were.</p> <p>2 Q. Okay. Can you mark on the same exhibit, with an 3 X, the location where you're able to simultaneously 4 surveil 511 East Browning or the parking lot at 511 East 5 Browning and the 574 East 36th Street that you just 6 testified?</p> <p>7 MR. KOSOKO: Well, I'm going to object to 8 that question as it assumes facts not in evidence. First 9 you may want to ask him if that's contained in the photo.</p> <p>10 THE WITNESS: It's not.</p> <p>11 BY MR. TEPFER:</p> <p>12 Q. Okay. Where is it in reference to the photo? Is 13 it north or west of the photo?</p> <p>14 A. West.</p> <p>15 Q. Okay. Is it direct -- Is it further -- Is it 16 north or south of the scene where 511 East Browning is?</p> <p>17 A. Probably directly across.</p> <p>18 Q. Okay. So it's directly west from there?</p> <p>19 A. Yes.</p> <p>20 Q. Is it across Rhodes Avenue?</p> <p>21 A. Yes. It's a possi- -- you asked me about the 22 possibility. It's a possibility, yes.</p> <p>23 Q. Okay. And there's a building -- you're saying 24 there's a building directly -- or, there was a building 25 directly west of 511 East Browning that would ena- -- that</p>
<p>1 Q. Okay. So, were you in a high area of an adjacent 2 building when you were surveilling 511 East Browning?</p> <p>3 A. I said it's possible. I didn't say I was there. 4 You asked -- you asked the possibility of it.</p> <p>5 Q. Okay. Now I'm asking a different question. Were 6 you in a high-up building --</p> <p>7 A. No.</p> <p>8 Q. -- on the northwest side at that time?</p> <p>9 A. No.</p> <p>10 Q. Okay. All right. Let's go back to Page 28. Can 11 you take this pen and mark specifically where you think 12 you and Jones were standing when you --</p> <p>13 A. I don't recall.</p> <p>14 Q. Can you say approximately?</p> <p>15 A. No.</p> <p>16 Q. So you're refusing to mark on the exhibit where 17 you were standing?</p> <p>18 A. No. If I don't recall, I don't recall. You're 19 saying I'm refusing. I don't recall. What -- what do you 20 want me to do? You want me to guess? You want me to say 21 we were over here? You want me to guess?</p> <p>22 Q. No. I want you -- You testified that you were 23 northwest of 511 East Browning Avenue, correct?</p> <p>24 A. And I don't recall exactly where we were, it was 25 my testimony here today. And I'm not going to mark</p>	<p>1 you could be at a certain height where you could surveil 2 both locations?</p> <p>3 A. Those buildings --</p> <p>4 MR. KOSOKO: Hang on. Hang on. Hang on. 5 Hang on. Hang on.</p> <p>6 THE WITNESS: Okay.</p> <p>7 MR. KOSOKO: I want to object to the 8 question as it misstates my client's testimony. If you 9 want to use the word possibility to recognize that we're 10 speculating, then we can go forward.</p> <p>11 Go ahead, Sarge.</p> <p>12 THE WITNESS: The building -- it's a 13 possibility in a building. Those buildings are still 14 there. They are high-rises right across on Rhodes, and 15 they're still there, to my knowledge.</p> <p>16 BY MR. TEPFER:</p> <p>17 Q. Okay. When you were -- When you say there's a 18 possibility, did you ever attempt -- did you ever conduct 19 a surveillance from those buildings that you're 20 describing?</p> <p>21 A. Yes. I've conducted surveillance from those, 22 from that location, yes.</p> <p>23 Q. Okay. And do you recall, as you sit here today, 24 that you could go to a certain height of that building 25 where you would be able to surveil both 511 East Browning</p>

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<p>1 and the parking lot, as well as 574 East 36th Street?</p> <p>2 A. Again, it's a possibility that could occur, yes.</p> <p>3 Q. Okay. I'm not asking about a possibility. I'm</p> <p>4 asking whether or not you --</p> <p>5 A. You did.</p> <p>6 Q. -- you can actually -- you recall actually being</p> <p>7 able to do that.</p> <p>8 A. It's possible.</p> <p>9 Q. Okay. I'm not asking what's possible. I'm</p> <p>10 asking, as you sit here today, do you recall being in a</p> <p>11 building, the building that you described, at a certain</p> <p>12 height and being able to actually see both activity that's</p> <p>13 going on in and around the parking lot of 511 East</p> <p>14 Browning as well as 574 East 36th Street?</p> <p>15 A. I've surveilled from that location and I've</p> <p>16 identified activity at 511 East Browning, 540, 574 East</p> <p>17 36th Street, and 527 East Browning, yes.</p> <p>18 Q. Okay. Do you remember the address of the</p> <p>19 building?</p> <p>20 A. I gave you the location of the building. No.</p> <p>21 Q. How many times have you done that?</p> <p>22 A. Don't recall.</p> <p>23 Q. More than five?</p> <p>24 A. Don't recall.</p> <p>25 Q. More than a hundred?</p>	<p>1 want that to be a part of the record.</p> <p>2 MR. TEPFER: All right. I mean, you guys</p> <p>3 can keep calling it unverified. I mean, you've called it</p> <p>4 unapproved. And on Page 32 it says, quote, approved. So,</p> <p>5 I don't know what to tell you. It's a public report. I'm</p> <p>6 going to spend as many questions as I have on it. And, I</p> <p>7 mean, I don't know how long I'm going to take, so . . .</p> <p>8 MR. KOSOKO: Okay.</p> <p>9 MR. TEPFER: Can we continue?</p> <p>10 MS. OLIVIER: And for the record, I'd just</p> <p>11 like to reflect -- this is Kelly Olivier -- that we have a</p> <p>12 continuing, running objection based on the fact that our</p> <p>13 stance on that is that it's not a formal report and not an</p> <p>14 official report.</p> <p>15 THE WITNESS: Right. I say it, too.</p> <p>16 MR. TEPFER: That's fine.</p> <p>17 MR. KOSOKO: I mean, we'll end up</p> <p>18 litigating. It's not an official report. So, that's</p> <p>19 fine. We'll -- we'll get to that issue when we get to</p> <p>20 that issue.</p> <p>21 MR. TEPFER: I mean, that's fine. I just</p> <p>22 don't understand what the grounds are that I -- let's say</p> <p>23 for a second that you're correct that it's not an official</p> <p>24 report. What are the grounds that I can't ask questions</p> <p>25 about it.</p>
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<p>1 A. Don't recall.</p> <p>2 Q. You don't recall whether or not it was closer to</p> <p>3 a hundred or five?</p> <p>4 A. Don't recall.</p> <p>5 Q. Is it more than once?</p> <p>6 A. Don't recall.</p> <p>7 Q. You don't recall whether or not it was once or a</p> <p>8 hundred times?</p> <p>9 MR. KOSOKO: Objection, asked and answered.</p> <p>10 THE WITNESS: Don't recall.</p> <p>11 And sanity is the definition of asking the</p> <p>12 same thing and getting the same result. You keep doing</p> <p>13 it. I don't recall. I don't know what you want me to</p> <p>14 say, sir.</p> <p>15 BY MR. TEPFER:</p> <p>16 Q. Okay. On Page 18 of this same report --</p> <p>17 MR. KOSOKO: Can we, just for a brief</p> <p>18 second, just for the purposes of what we're doing, are</p> <p>19 we -- are we spending the entire day on this COPA report?</p> <p>20 I just want to -- I want to -- and I want this part of the</p> <p>21 record.</p> <p>22 How many hours are we going to spend on this</p> <p>23 unverified report? Because it's going to -- we're not</p> <p>24 going to just unlimitedly keep coming back to Arizona to</p> <p>25 talk to Watts. If we're going to waste time on this, I</p>	<p>1 MR. KOSOKO: I mean, you're asking Ronald</p> <p>2 Watts what some -- Bennick, or one of these people from</p> <p>3 COPA thinks about whatever after they've talked to him. I</p> <p>4 don't -- What is the point of that?</p> <p>5 MR. TEPFER: I'm asking him very specific</p> <p>6 questions about whether he -- whether things that are said</p> <p>7 in the -- that they documented in the report are true or</p> <p>8 not. It's totally proper questions. But let's just move</p> <p>9 on.</p> <p>10 BY MR. TEPFER:</p> <p>11 Q. All right. On --</p> <p>12 A. Except the one about the building, I don't think</p> <p>13 that was a proper question, sir.</p> <p>14 Q. Okay. Thank you for your opinion.</p> <p>15 A. Okay. It was just opinion.</p> <p>16 Q. All right. In paragraph -- the second paragraph</p> <p>17 on Page 18, at the bottom it says, "He," referring to</p> <p>18 Jones, "also admitted to signing Mohammed's name to a</p> <p>19 report detailing events that Mohammed could not have</p> <p>20 observed and that his signing Mohammed's name was an</p> <p>21 egregious error." Do you see that?</p> <p>22 A. Yes.</p> <p>23 Q. Okay. Did you know that Jones admitted to</p> <p>24 signing Mohammed's name to a report that -- of something</p> <p>25 that Mohammed didn't observe?</p>

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<p>1 MR. KOSOKO: Objection.</p> <p>2 MS. OLIVIER: Object to the form.</p> <p>3 MR. KOSOKO: Form, assumes facts not in</p> <p>4 evidence, incomplete hypothetical.</p> <p>5 THE WITNESS: So, if an officer gives an</p> <p>6 officer permission to use his --</p> <p>7 MR. KOSOKO: Hang on, Sarge.</p> <p>8 I want to also object with regards to his</p> <p>9 competence to testify regarding this issue.</p> <p>10 But go ahead, Sarge.</p> <p>11 THE WITNESS: If Mohammed is there -- I</p> <p>12 don't know if that's Mohammed's signature or Al's</p> <p>13 signature. So, who's making this statement? You saying</p> <p>14 again COPA is saying Al signed Mohammed's signature, or he</p> <p>15 also -- who is "he"?</p> <p>16 BY MR. TEPFER:</p> <p>17 Q. Do you know if Jones signed Mohammed's signature?</p> <p>18 A. No, I do not know.</p> <p>19 Q. Do you agree it would be an egregious error if he</p> <p>20 did?</p> <p>21 A. I would say so.</p> <p>22 MR. MICHALIK: Hold on. Michalik.</p> <p>23 I object. It's not what the sentence says.</p> <p>24 Misstates the sentence.</p> <p>25 BY MR. TEPFER:</p>	<p>1 identify Mr. Mohammed's signature.</p> <p>2 MS. OLIVIER: To the extent that you want to</p> <p>3 ask questions about whether or not if he recalls this is</p> <p>4 how things happened, or things like that, that's fine.</p> <p>5 It's just when you go into COPA's findings and the</p> <p>6 statements relayed to COPA, that's where we're having</p> <p>7 issues here.</p> <p>8 MR. TEPFER: Okay. Thanks. Your</p> <p>9 objection's noted.</p> <p>10 BY MR. TEPFER:</p> <p>11 Q. So, Exhibit 34 --</p> <p>12 A. I don't know if Al made that statement. I</p> <p>13 don't -- It's a third party and they're not -- they're not</p> <p>14 credible in a lot of arenas. I don't even know if Al made</p> <p>15 that statement. I wasn't there. I have no knowledge.</p> <p>16 COPA didn't, themselves, never revealed to</p> <p>17 me themselves that Al made a statement to them. And now</p> <p>18 you come and tell me this is the statement that Al made to</p> <p>19 COPA. You weren't there at -- to COPA. So, now, how can</p> <p>20 I answer the question that Al actually made this statement</p> <p>21 and give it any type of validity.</p> <p>22 Q. Okay. I want to go back to the testimony that it</p> <p>23 looked to you like Mohammed's signature. I just want to</p> <p>24 make sure what you're talking about. Were you referring</p> <p>25 to Exhibit 34, Box 46, or under Box 46?</p>
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<p>1 Q. You can answer the question.</p> <p>2 A. If he -- If Al, Al, in his statement, is saying</p> <p>3 it's egregious, that's what he feels. If you asking me, I</p> <p>4 would -- I would say, you know, it's -- if Mohammed is</p> <p>5 there, I -- I didn't -- I recognize the signature as being</p> <p>6 Mohammed's signature. I don't -- I've seen Mohammed's</p> <p>7 signature several times. It appear to me to be Mohammed's</p> <p>8 signature.</p> <p>9 Q. Okay. And you're referring to --</p> <p>10 A. To whatever --</p> <p>11 Q. -- the report on Exhibit 34 and 36.</p> <p>12 MS. OLIVIER: This is Kelly Olivier. I'm</p> <p>13 also objecting --</p> <p>14 (Technical issue. Court reporter</p> <p>15 clarification.)</p> <p>16 MS. OLIVIER: This is Kelly Olivier. I'm</p> <p>17 further objecting to all lines of questioning concerning</p> <p>18 the Defendant Officer Alvin Jones' statement to COPA that</p> <p>19 are contained within this unofficial report as these</p> <p>20 statements were obtained in violation of law and we will</p> <p>21 be having further litigation over this topic.</p> <p>22 MR. PALLE: Excuse me. Eric Palles.</p> <p>23 I would just simply say that I would object</p> <p>24 that Mr. Watts lacks foundation as a handwriting expert</p> <p>25 and I question his inability to detect -- his ability to</p>	<p>1 A. That's good enough for Mohammed for me, yeah.</p> <p>2 Q. Okay. So that's who you were referring to, that</p> <p>3 that looks like Mohammed's signature to you?</p> <p>4 A. Yeah.</p> <p>5 Q. Okay.</p> <p>6 A. It all depends on what pen he writes with and</p> <p>7 what day of the week it is. I don't know. It appears to</p> <p>8 be.</p> <p>9 Q. Okay. I want to -- I know you don't recall how</p> <p>10 many times other than more than one that you observed --</p> <p>11 that you surveilled from that building west of Rhodes and</p> <p>12 west of 511 East Browning. Do you know what I'm talking</p> <p>13 about?</p> <p>14 A. Yes.</p> <p>15 Q. How did you access the building?</p> <p>16 A. Stairwell.</p> <p>17 MR. KOSOKO: Hang on. Hang on.</p> <p>18 I'm going to object as to foundation and</p> <p>19 form.</p> <p>20 BY MR. TEPFER:</p> <p>21 Q. Okay. Go ahead. How?</p> <p>22 A. I think it was the elevator or a stairwell, one</p> <p>23 or the other.</p> <p>24 Q. Was it a CHA building?</p> <p>25 (Court reporter clarification.)</p>

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1 BY MR. TEPFER:	1 and would give information that would help us to do our
2 Q. Was it a CHA building?	2 job down there.
3 A. I think it actually became a CHA building. I	3 Q. Did you have individuals, like repeat concerned
4 don't know if it was at that particular time because I	4 citizens, people who knew they could trust you and go to
5 don't recall what time it was. So, I don't know.	5 you multiple occasions?
6 Q. Where were you in the building when you were	6 A. Possibly. Even the aldermen, we got calls from
7 conducting surveillance?	7 the aldermen who were repeat -- we would get calls from
8 A. I don't recall what location I was in.	8 the alderman office about drug sales in certain locations
9 Q. Were you on the roof?	9 in Ida B. Wells.
10 A. I don't recall what location I was in.	10 So, it was a variety. It was a lot of
11 Q. Were you in an apartment?	11 people that wasn't okay with that activity that gave us
12 A. I don't recall what location I was in.	12 information. That was the information that I received
13 Q. Were you in an office?	13 from the lieutenant, that he had received information.
14 A. I don't recall what location I was in.	14 So, the information came from a variety of
15 Q. Were you alone when you would surveil from that	15 sources, not just people that gave me information, but
16 location?	16 that gave other officers information and that called in
17 A. I don't recall. I don't know. I don't remember	17 and gave information.
18 who -- if I was alone or someone was with me. I don't	18 Q. Okay. I'm asking about people who specifically
19 know who was with me or if I was alone.	19 gave you information. Are there any of those?
20 Q. Do you know if Al Jones was ever with you?	20 A. When you said specifically gave me, what do you
21 A. I don't recall who was with me.	21 mean are there any of those? Yeah, that gave me
22 Q. You don't recall if Kallatt Mohammed was ever	22 information, yeah.
23 with you?	23 Q. Okay. Does that include aldermen?
24 A. I don't recall if he was with me.	24 A. Yes.
25 Q. Okay. Do you know who Charles Miller is?	25 Q. So, there's aldermen who would specifically call
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1 A. Yes.	1 the station or call asking for you, or called your cell
2 Q. Who's that?	2 phone to give you information?
3 A. He was one of the guys that were down there, one	3 A. Yes.
4 of the -- the guys that -- I guess he was involved in the	4 Q. Okay. Can you name the alderman?
5 drug trade. I did know Charlie, yeah.	5 A. What's her named? McDoud. McDoud, I think,
6 Q. You called him Charlie?	6 would. And at the time I was down there, Dorothy Tillman,
7 A. Yeah.	7 the alderman.
8 Q. Do you --	8 And we also got calls from alderman, at the
9 A. That's what his nickname was, Charlie.	9 time, Preckwinkle's office. Any other community leaders
10 Q. Oh, okay. Do you have a relationship with him?	10 down there, we got -- and had my actual number would call
11 MR. KOSOKO: Object to the form of the	11 my phone sometimes, or call the lieutenant's phone, or
12 question.	12 call the district commander.
13 THE WITNESS: I do not have a relationship	13 Q. I really want to focus on just people who would
14 with anyone that lived down in the Ida B. Wells	14 call you or called --
15 development. When you say -- If you want to clarify	15 A. Well --
16 relationship, what do you mean by that?	16 Q. -- the station directly --
17 BY MR. TEPFER:	17 A. Okay.
18 Q. Well, was he an informant for you?	18 Q. -- for you.
19 A. No.	19 A. Okay.
20 Q. How many informants did you have during the	20 Q. So, who in Preckwinkle's office would call you?
21 course of your career in the Ida B. Wells housing complex?	21 A. I don't recall who it was by name.
22 A. I didn't have any registered informants.	22 Q. Okay. So, Dorothy Tillman is one who would call
23 Q. How many unregistered informants?	23 you directly?
24 A. I didn't have any unregistered informants. I had	24 A. Yes. Her office, when you say direct.
25 concerned citizens that was concerned about the community	25 Q. Okay. And she was an alderwoman?

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1 A. Yes.	1 A. A team informant? What is a team informant? If
2 Q. Okay. And someone named McDoud, you said?	2 you just -- I mean, I don't even know what that is,
3 A. Yeah. I think it's Pat McDoud.	3 really.
4 Q. Pat McDoud. She would call you directly?	4 Q. Okay. Fair enough. Was Charles Miller an
5 A. Her office, yes.	5 informant for any member of your team, as far as you know?
6 Q. Her office would?	6 A. Not that I'm aware of.
7 A. Yes.	7 Q. All right. And Charles Miller says he described
8 Q. And she was an alderwoman, as well?	8 Jones as Watts' bodyguard and enforcer, a man who was
9 A. Yes.	9 known to beat people in order to get information.
10 Q. Okay. And these are people -- And they called	10 A. That's not true.
11 you on more than one occasion?	11 Q. That's not true?
12 A. Oh, yes.	12 A. No. Al Jones was a member of my tactical team,
13 Q. More than 10 occasions?	13 never a bodyguard. I never saw Al beat anyone to get
14 A. I don't know. Maybe so, throughout the years,	14 information. If Al was involved in a altercation, there
15 over the years. Maybe it was 10 or more collectively.	15 was a -- always a proper form submitted. And I -- I don't
16 Q. And would they give you -- would Pat McDoud give	16 know where this information is derived from.
17 you specific information about particular drug dealers?	17 Q. Okay. "Miller said that Jones, among others,
18 A. She would relay the information that was relayed	18 rewarded him for providing information by telling him
19 to her from different residents in a specific area. So,	19 where to find stashed narcotics for his personal use." Do
20 sometimes it would be specific dope dealers. Sometimes it	20 you see that?
21 would just be descriptions, times that they were selling	21 A. Yes.
22 dope. It all depends on what the information was.	22 Q. Do you have any knowledge of that?
23 Q. Would Dorothy Tillman give you specific	23 A. No. You want me to answer something he said was
24 information?	24 between him and Jones? Again --
25 A. It would be the same.	25 Q. I'm just asking if you have knowledge of that.
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1 Q. Same thing?	1 A. No.
2 A. Yeah.	2 Q. Okay. "He also said that Jones was routinely
3 Q. All right. What about specific residents? Can	3 involved in false arrests, indicating that if a dealer got
4 you recall any specific residents who called you directly?	4 away without being arrested, or his drugs were
5 A. No. I can't recall any that called me directly.	5 confiscated, he would be arrested when he next encountered
6 I'm sure -- I'm sure some did. My -- I had cards that I	6 the Team, whether or not he possessed narcotics at the
7 gave to the residents, so I'm sure I got calls. But I	7 time of his arrest." Do you see that?
8 don't know who called me at this -- you know, directly all	8 MR. KOSOKO: I'm going to object to this
9 the time. You know, there was some, but I just don't	9 question on a number of grounds. Probable cause doesn't
10 recall who they were.	10 dissipate. I'm not really quite sure what the sentence is
11 Q. Okay. Not even all the time. Can you recall any	11 even saying, which is the problem of this entire report.
12 single resident who called you directly with information?	12 As to our stated objection, it's an
13 A. No.	13 ambiguous question. It's -- I don't even understand if
14 Q. Any nickname that you can recall?	14 Sergeant Watts has the competency to testify regarding
15 A. No.	15 what this hearsay is.
16 Q. Okay. All right. So, turning to Page 23 of the	16 But go ahead, Sarge.
17 COPA report, it says -- I'm talking about the first full	17 THE WITNESS: Just because someone gets away
18 paragraph. It says, "COPA investigators also interviewed	18 doesn't mean that the evidence that was recovered, and if
19 Charles Miller, a former Team informant." Do you see	19 you can identify that person, that they can't be arrested
20 that?	20 at a later date.
21 A. Yeah.	21 So, if Al, if he's saying that he has
22 Q. Okay. That's not accurate? Charles Miller is	22 knowledge of Al arresting someone at a later date after
23 not a team informant?	23 finding narcotics on that person, he has that knowledge.
24 A. No. A team informant, no.	24 I don't know, maybe somebody who was arrested who got away
25 Q. Okay.	25 and then got arrested told him that. I don't know. That

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<p>1 was -- so, I don't know how he knows that or would know 2 that or even if it's true in that particular circumstance. 3 But I know throughout the Department it has 4 happened where a subject is -- who did escape, and 5 contraband was found, and you could identify him, 6 positively identify him, and we would go through the 7 proper procedure and generate the proper reports and 8 submit out an arrest report, yes. So . . .</p> <p>9 BY MR. TEPFER:</p> <p>10 Q. Okay. So that's something that did happen? 11 A. I didn't say that happened. I said that's 12 something that could happen. I don't know if that 13 particular -- if it happened in that -- I said that's 14 something that happens on the -- throughout the whole 15 police department, that happens.</p> <p>16 Q. Properly, is what you're saying? 17 A. Yes, properly. 18 Q. Got it. 19 A. And that's what I said, right? The proper 20 documentation. 21 Q. Do you know who Harold Owens is? 22 A. I have -- I remember that name but I can't recall 23 who he is. I just remember that name, Harold Owens. 24 Q. Okay. Did you ever have an encounter with Harold 25 Owens where you, Al, and Smitty where you all ordered</p>	<p>1 A. If that even occurred. I'm just saying that's 2 the procedure for releasing someone without charges. 3 Q. Do you know Jerome Jointer? 4 A. No. 5 Q. Are you aware of any time where Jerome Jointer 6 gave guns to you or members of this team to avoid arrest 7 and prosecution? 8 A. No. 9 Q. Did you ever request guns for protection from 10 arrests from individuals in the housing project? 11 A. No. 12 Q. Never happened? 13 A. Never happened. 14 MR. TEPFER: All right. Can we take a 15 little break? 10 minutes. 16 MR. KOSOKO: Sure. 17 THE VIDEOGRAPHER: We are off the record. 18 The time on the video monitor is 3:58 p.m. 19 (Recess taken from 3:58 p.m. to 4:13 p.m.) 20 THE VIDEOGRAPHER: We are on the record. 21 The time on the video monitor is 4:13 p.m. 22 MS. OLIVIER: This is Kelly Olivier on 23 behalf of the Hale & Monico individual defendant officers. 24 We're just putting on the record at this time that we'd 25 like to designate all questions relating to Defendant</p>
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<p>1 Owens to retrieve all the narcotics he intended to sell 2 that day promising him that he would then be released? 3 A. No. 4 Q. Did you have an encounter where he then did give 5 you and your team the narcotics and he was, indeed, 6 released? 7 A. No. You said he gave us narcotics and he was 8 released? Is that what you're saying? 9 Q. I'm asking if that ever happened with Harold 10 Owens. 11 A. No. 12 Q. Do you recall an incident where Harold Owens was 13 arrested by Al and Smitty, and then after he gave them the 14 drugs he was taken to the station but you released him 15 without charges? 16 A. No. 17 Q. Did that ever happen? 18 A. No. I cannot release anyone without charges. 19 That is a function that is above my pay grade. He can be 20 -- if he was released without charging, the proper 21 documentation was submitted to the watch commander and he 22 made the decision to release him without charges. 23 Q. Okay. So this could have been one of those 24 instances where you were -- you were overruled and there 25 was no probable cause based on the report?</p>	<p>1 Alvin Jones' statements to COPA under the protective order 2 for purposes of this deposition. Thank you. 3 MR. TEPFER: Okay. And just for the record, 4 we and the plaintiffs, Loevy plaintiffs, are going to 5 object to that on the basis that it's a public document 6 and that's what we distributed. 7 BY MR. TEPFER: 8 Q. Okay. All right. Sergeant Watts, do you know an 9 individual named Anthony McDaniels? 10 A. Anthony, no. 11 Q. Have you ever heard the name at all? 12 A. Yes. 13 Q. When have you heard the name? 14 MR. KOSOKO: Object to the question as it -- 15 Sarge, I'm going to allow you to answer it, 16 but do not include any conversations you had with me or 17 any other attorney. Go ahead. 18 THE WITNESS: It -- it was brought up in 19 some documents. It was just brought up in some documents 20 as a person that was arrested by officers on my team. 21 BY MR. TEPFER: 22 Q. Okay. And did you review those documents? 23 A. Not at all. 24 Q. No? Okay. All right. I'm going to show you 25 what I'm marking as Exhibit 38.</p>

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1 (Deposition Exhibit 38 was marked for 2 identification.)	1 Q. Okay. So, it was before November 21st -- 2 A. Oh, absolutely.
3 MR. TEPFER: I'm sorry. This is the arrest 4 report of Anthony McDaniels at issue. DO-JOINT 5727 to 5 31.	3 Q. -- 2008? 4 A. Um-hum.
6 BY MR. TEPFER: 7 Q. Okay. Starting up at the top right-hand corner, 8 that's a picture of Anthony McDaniels. Do you recognize 9 him? 10 A. No. 11 Q. Okay. All right. You said -- This is an arrest 12 dated November 21st, 2008. Do you see that under the 13 incident? 14 A. Yes. 15 Q. Okay. And the first arresting officer on Page 3 16 it listed as Leano, M.S. That's Manuel Leano, right? 17 A. Um-hum. 18 Q. Okay. And then Douglas -- or, Nicholas, Jr., DE. 19 That's Douglas Nichols as the second arresting officer, 20 correct? 21 A. Correct. 264 Charlie. 22 Q. Okay. And 264 Charlie was the unit you were 23 supervising, right? 24 MR. KOSOKO: Object to the form of the 25 question. Foundationally --	5 Q. Yeah, okay. Who hit you with a car? 6 A. I don't remember who it was. 7 Q. Were you in a car? 8 A. No. 9 Q. You were a pedestrian? 10 A. Yes. 11 Q. Okay. And you suffered injuries? 12 A. Yes. 13 Q. And it kept you out for a long time? 14 A. Yes. 15 Q. Okay. All right. Who -- But 264, other than 16 when you were not at work, 264 was the unit that you 17 supervised, right? 18 A. Yes. 19 Q. Okay. Do you know who took over your supervision 20 duties while you were on -- what did you call it? IOD -- 21 A. IOD. 22 Q. IOD. 23 A. Injured on duty. 24 Q. Sorry. Do you know who took over your daily 25 supervisory duties?
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1 MR. TEPFER: Sure. 2 MR. KOSOKO: -- you talking about the day 3 or -- 4 MR. TEPFER: Good point. 5 BY MR. TEPFER: 6 Q. On that day, November 21st, 2008, were you 7 supervising Beat 264C? 8 A. No. 9 Q. Okay. Who was? 10 A. I don't know. 11 Q. How do you know you weren't? 12 A. How do I know what? Because I wasn't at work. 13 Q. You weren't at work that day? 14 A. I wasn't at work that day. 15 Q. Okay. You recall November 21st, 2008 that you 16 weren't at work? 17 A. Yeah. 18 Q. How do you recall that? 19 A. I was on IOD for a while. I had got injured. I 20 was hit by a car. 21 Q. What's IOD? 22 A. Injured on duty. 23 Q. Got it. When were you put on injured on duty? 24 A. If I remember -- I don't remember the dates, but 25 it lasted pretty long. I was hit by a car.	1 A. I was taking care of me. Didn't care. 2 Q. Okay. So you don't know? 3 A. Nope. 4 Q. Do you know who Dion Redfield is? 5 A. No. 6 Q. Do you know who John Griffin is? 7 A. No. 8 Q. I'm going to show you Exhibit 39. This is a case 9 supplementary report for Anthony McDaniels. It's -- 10 Where do I see the date? Date approved, November 22nd, 11 2008. 12 A. So, it was the next day? 13 Q. Correct. 14 (Deposition Exhibit 39 was marked for 15 identification.) 16 THE WITNESS: And the question? 17 BY MR. TEPFER: 18 Q. Do either of the documents, Exhibit 38 or 39, do 19 either of them reflect who was the supervisor? 20 A. Not who was the supervisor, but the approving -- 21 the approving supervisor who approved their reports. 22 Q. And who's that? 23 A. It look like it was Dion Redfield. I don't know. 24 Q. You don't know who that is, though? 25 A. No, I don't know who that is.

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<p>1 Q. Do you know who Michael Kennedy is?</p> <p>2 A. Kennedy? Kennedy? No. Michael Kennedy, no.</p> <p>3 Q. All right. I'm going to show you Exhibit 40.</p> <p>4 This is also a case supplementary report for Anthony</p> <p>5 McDaniels, this one submitted on November 23rd, 2008 and</p> <p>6 approved on November 24th, 2008.</p> <p>7 (Deposition Exhibit 40 was marked for</p> <p>8 identification.)</p> <p>9 MR. KOSOKO: Let me just get the Bates of</p> <p>10 that. Oh, it don't have a Bates. It might be --</p> <p>11 All right. So, just for the record, that</p> <p>12 document that Josh just identified as Exhibit 39 appears</p> <p>13 to be Bates number DO-JOINT 5734.</p> <p>14 MR. RAUSCHER: 39 or 40?</p> <p>15 MR. KOSOKO: 39.</p> <p>16 THE WITNESS: Not aware who these people are</p> <p>17 and have no knowledge of this arrest, that person, those</p> <p>18 people who approved it.</p> <p>19 BY MR. TEPFER:</p> <p>20 Q. Okay. Oh, what the heck. I'll show you</p> <p>21 Exhibit 41.</p> <p>22 (Deposition Exhibit 41 was marked for</p> <p>23 identification.)</p> <p>24 BY MR. TEPFER:</p> <p>25 Q. It's another supplementary report for McDaniels.</p>	<p>1 A. I -- I -- like I just spoke on, I think he was</p> <p>2 one of the ones exonerated. I assume all those that were</p> <p>3 exonerated filed lawsuits.</p> <p>4 Q. Okay. But you have no knowledge -- take all the</p> <p>5 time -- I don't know if I gave you enough time, but all</p> <p>6 those exhibits I marked, you can review them. I'm just</p> <p>7 going to ask you a question of whether anything that you</p> <p>8 reviewed gives you any -- refreshes your recollection in</p> <p>9 any way or -- strike that.</p> <p>10 Do you have any knowledge whatsoever one way</p> <p>11 or the other about Anthony McDaniels' arrest on</p> <p>12 November 20 --</p> <p>13 Was it, November? Gosh. Sorry. Somebody</p> <p>14 help me.</p> <p>15 MR. KOSOKO: November 21, 2008.</p> <p>16 BY MR. TEPFER:</p> <p>17 Q. -- November 21, 2008.</p> <p>18 A. I have no knowledge of his arrest. And just</p> <p>19 another example of this massive fraud upon the people of</p> <p>20 Illinois, because no one vetted these people. No one</p> <p>21 cared. They cared about putting more dirt on Sergeant</p> <p>22 Watts, unnecessarily. And that's -- that's what happened.</p> <p>23 Here it is, a guy, a convicted felon, with a</p> <p>24 pistol out there looking to kill somebody, and you</p> <p>25 exonerate him, give him money, and -- because he says --</p>
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<p>1 This one, dated submitted, February 11th, 2011, and it was</p> <p>2 approved on February 12th, 2011. I don't have a Bates.</p> <p>3 MR. KOSOKO: I got it. No, they're not, but</p> <p>4 I found 'em.</p> <p>5 MR. TEPFER: Let her put the sticker on it.</p> <p>6 MR. KOSOKO: I'll call them out. So, this</p> <p>7 Exhibit Number 40 appears to be Bates Number DO-JOINT 5737</p> <p>8 through -- yeah, whatever, but that's where it starts.</p> <p>9 THE WITNESS: For whatever reason, this is</p> <p>10 not the second -- this -- it appears that somehow, I don't</p> <p>11 know for what reason, like I said, I wasn't there, but it</p> <p>12 appears that the detectives took this over. These are</p> <p>13 detectives' case supplementary reports, for whatever</p> <p>14 reason. I have no clue.</p> <p>15 MR. KOSOKO: Just a second and I'll make a</p> <p>16 record of this so we can keep up.</p> <p>17 So, Josh's Exhibit 41 appears to be DO-JOINT</p> <p>18 5740, through whatever. That's where it starts. Okay.</p> <p>19 THE WITNESS: And the McDaniels, again, was</p> <p>20 one of those that was exonerated? Oh, you don't know.</p> <p>21 You don't know that.</p> <p>22 BY MR. TEPFER:</p> <p>23 Q. Okay. So, are you aware that Anthony McDaniels</p> <p>24 has filed a lawsuit and named you as a defendant in the</p> <p>25 lawsuit?</p>	<p>1 makes a statement about Sergeant Watts, who he's never</p> <p>2 encountered in his life, and I can guarantee you that.</p> <p>3 Q. What statement are you referring to that Anthony</p> <p>4 McDaniels --</p> <p>5 A. He had to make a statement to get exonerated.</p> <p>6 MR. KOSOKO: Hang on. Hang on. Hang on.</p> <p>7 Just don't include anything you talked to me about, but --</p> <p>8 MR. TEPFER: Fair enough.</p> <p>9 MR. KOSOKO: -- go ahead.</p> <p>10 BY MR. TEPFER:</p> <p>11 Q. What statement are you referring to where Anthony</p> <p>12 McDaniels named you as engaging in any sort of misconduct</p> <p>13 regarding his arrest?</p> <p>14 A. You -- you just stated that he has a lawsuit</p> <p>15 against me. So, for him to have a lawsuit against me</p> <p>16 there is some improprieties, there's something that was</p> <p>17 done to him by me, according to his arrest, that goes</p> <p>18 along with his arrest.</p> <p>19 And now, according to the date and time that</p> <p>20 this man was arrested, I was not even on duty. It shows</p> <p>21 the carelessness of the -- of the -- of the attorney's</p> <p>22 office, State's Attorney's Office, on releasing these</p> <p>23 people just because they mention the name Sergeant Watts.</p> <p>24 It shows a carelessness of those that would put forth his</p> <p>25 lawsuit on Sergeant Watts because nobody's vetting these</p>

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<p>1 people, when it's all, as you said, about the -- the COPA 2 stuff. It's all public record. This is all public 3 record. So --</p> <p>4 Q. Did you review any of the public record related 5 to Anthony McDaniels' postconviction --</p> <p>6 A. I -- I --</p> <p>7 Q. -- I'm sorry, Anthony McDaniels' postconviction 8 filings?</p> <p>9 A. No. I -- I -- I viewed this. This was enough 10 for me, that he has a lawsuit. What else do I need to 11 view outside of you showing me this, that he filed a 12 lawsuit against me about an arrest that I wasn't involved 13 in, that I had no connection to. I was nowhere in the 14 vicinity. And I wasn't the supervising sergeant.</p> <p>15 He just -- it's that money-grab where, if 16 you say Sergeant Watts, you can be exonerated by the 17 State's Attorney and you can go down to these different 18 attorney office and you can file a lawsuit against 19 Sergeant Watts because you think you know him.</p> <p>20 BY MR. TEPFER:</p> <p>21 Q. Did you ever request to speak to the State's 22 Attorney's Office?</p> <p>23 A. For what?</p> <p>24 Q. To address the fraud that's being inflicted upon 25 them?</p>	<p>1 privilege and communications between his attorney and what 2 your attorney may be doing on your behalf.</p> <p>3 Go ahead.</p> <p>4 THE WITNESS: I have not spoken with anyone 5 in the State's Attorney's Office about the exonerations 6 that's going on for guns, drugs, anything associated with 7 Sergeant Watts.</p> <p>8 BY MR. TEPFER:</p> <p>9 Q. Okay. Do you recall ever encountering Anthony 10 McDaniels over near 505 East 38th Street?</p> <p>11 A. Never. No.</p> <p>12 Q. Do you know where 505 East 38th Street is?</p> <p>13 A. I have an idea of where it is, yes.</p> <p>14 Q. Have you ever been in and around that area?</p> <p>15 A. I'm sure I have. It's in the Darrow Homes and 16 Ida B. Wells Developments. It's in-- I patrolled there as 17 a police officer. I patrolled there as a sergeant of 18 police. So, I'm pretty sure.</p> <p>19 Q. Did you have -- Do you recall ever having a 20 conversation with him over in that area?</p> <p>21 A. I don't know Anthony McDaniels, never met him, 22 never had a conversation with him. No, sir.</p> <p>23 Q. Okay. Did you ever ask -- did you ever ask him 24 what he was doing over there?</p> <p>25 A. I've never met Anthony McDaniels, never had a</p>
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<p>1 A. The fraud that the State's Attorney's Office is 2 constantly piling on? Why would I -- why would I talk to 3 the devil? Why -- you know. You -- you -- it's there 4 every day. I see the statements they made. You know, 5 they get the ear of the different county -- I get calls 6 from Chicago that my name is in the mode again because 7 somebody said this and somebody said that on TV. And I -- 8 I had to tell people, "Hey, I appreciate it, but don't 9 call me with that nonsense."</p> <p>10 Q. So, you have not ever reached out to the State's 11 Attorney's Office?</p> <p>12 A. When I was -- when I was working as a police 13 officer, I did. But concerning these lawsuits --</p> <p>14 Q. No, concerning the --</p> <p>15 A. The mass fraud against the people of Illinois?</p> <p>16 Q. Yeah, concerning the mass fraud against the 17 people of Illinois, have you reached out to the State's 18 Attorney's Office to ask them to stop perpetuating the 19 mass fraud against you?</p> <p>20 A. And they have not contacted me to ask me.</p> <p>21 MR. KOSOKO: Well -- well --</p> <p>22 MR. TEPFER: I'm asking a question.</p> <p>23 MR. KOSOKO: I know. And I'm not -- I'm not 24 trying to be an obstructionist, but I just want to make 25 sure that we're not treading into attorney/client</p>	<p>1 conversation with Anthony McDaniels, never knew Anthony 2 McDaniels, don't know Anthony McDaniels. No, sir.</p> <p>3 Q. Did you ever tell him that the next time you saw 4 him over there that you were going to lock him up?</p> <p>5 A. Never had a conversation with Anthony McDaniels, 6 I don't know Anthony McDaniels, never met the guy, didn't 7 arrest him, wasn't even at work when he got arrested. No, 8 sir.</p> <p>9 Q. Did you ever encounter Anthony McDaniels near 10 22nd Street?</p> <p>11 A. Never encountered Anthony McDaniels, don't know 12 him, never associated with him, never had a word with him, 13 never met him, never was there when he was arrested 14 throughout all of his arrest record. Never. No, sir.</p> <p>15 Q. Okay. I'm going to show you what's marked as 16 Exhibit 42.</p> <p>17 (Deposition Exhibit 42 was marked for 18 identification.)</p> <p>19 BY MR. TEPFER:</p> <p>20 Q. This is the affidavit of Anthony McDaniels. It's 21 marked PLAINTIFF-JOINT 38414 through 38416. I'm going to 22 ask you to take some time to read this.</p> <p>23 Did you review that document?</p> <p>24 A. Yes, sir.</p> <p>25 Q. Okay. Did Anthony McDaniels, in that document,</p>

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1 make any allegations against you specifically? 2 A. Yes. 3 Q. What? 4 A. He mentioned -- he mentioned me, that I fucked 5 with him all the time. 6 Q. Okay. 7 A. And I've never met the guy, never saw him on any 8 occasion. And I think that's specific enough. 9 And as far as my team, I -- I -- I don't 10 know if they -- I don't know who on my team actually knows 11 this guy, so I can't -- I don't know. I don't know 12 everybody that they know. 13 So, yeah, that's the only thing. I never 14 met this guy. He probably couldn't pick me out of a 15 line-up, probably don't know who I really am. 16 But it was that money-grab from the -- from 17 the flyers that was passed out. You know, all you have to 18 do is mention Sergeant Watts and it's a possibility you 19 can recoup funds, at the 39er's picnic one summer. 20 Q. Do you have a copy of that flyer? 21 A. Oh, no. They didn't give me one. I wasn't -- 22 Q. Where did you hear about this flyer? 23 A. A concerned citizen. 24 Q. What person? 25 A. A concerned citizen.	1 office it was. And the numbers just started swelling from 2 that point on. 3 Q. Okay. And this -- this was -- was this before 4 COVID? 5 A. Yes. 6 Q. Okay. So, this was -- when did this person 7 contact you in regards to the -- was it immediately after 8 the picnic? 9 A. Sometime thereafter. 10 Q. Okay. But, like, shortly thereafter? 11 A. I don't recall how far along. I know the picnic 12 is in the summer, towards the end of the summer. I don't 13 know. 14 Q. Where were you living at the time? 15 A. Where was I living? 16 Q. Yeah. 17 A. Probably Vegas. 18 Q. Okay. When did you stop living in Vegas? 19 A. I said probably. I don't know. Maybe, you know, 20 when did -- I probably would be more familiar with it 21 if -- When did these, the Bakers and all them, file 22 their -- get exonerated? It was right af- -- before that, 23 you know. 24 Q. Okay. Well, Ben Baker -- 25 A. So, what year was that, you know?
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1 Q. Okay. What's the name of the concerned citizen? 2 A. I don't recall their name. 3 Q. When did you hear about this flyer? 4 A. It was sometime after it was passed out at the 5 picnic. It was one summer. 6 Q. Okay. What summer? 7 A. A couple years ago. Right before all these 8 exonerations. It was right after -- it was right before, 9 if I recall, when I got -- when I got the information from 10 the citizen. It was -- The first group of exonorees 11 with -- who was it? Fun Banks. Was it Fun Banks? Or 12 someone. I don't even remember. Coleman, I know Coleman 13 was one of them, I think. Ben Baker, yeah. 14 Like I said, it's not stuff I sit around 15 and -- you know, it's -- and think about, you know, 16 because it's useless for me. 17 Q. What were you specifically told by this concerned 18 citizen? 19 A. That there was a flyer that was passed out at the 20 39er's annual picnic, and all you had to do -- that if you 21 were arrested by Watts or his team, contact this attorney, 22 this attorney's office. And I don't know which attorney's 23 office. It might have been your attorney's office, Loevy 24 Loevy. It was one of the attorneys' office that's 25 representing these clients. I can't recall which attorney	1 Q. Ben Baker had his conviction overturned in 2 January of 2016. So, was it before that? 3 A. Yeah. It was -- it was after that. No, it was 4 after 2016. It was -- So, January. So, it was probably 5 that summer of '16 then. 6 Q. And did this concerned citizen call you on the 7 phone? 8 A. I can't recall if it was a text message or a 9 phone call, but I received that information. 10 Q. Did you receive it from more than one person or 11 just the one person? 12 A. I heard about it from more than one person. I 13 didn't receive the -- there were several people that, you 14 know, that was the, you know, that was the hood -- it was 15 just, like, you know, hood knowledge. 16 Q. Do you remember the name of any of the people 17 that you heard about it from? 18 A. No. 19 Q. Was it somebody who was living in Chicago? 20 A. Yeah, somebody that was living -- they attended 21 the picnic. I believe they attended the picnic because 22 that's -- they said that the flyer was there. And I would 23 assume they saw it for themselves. 24 Q. Okay. Do you have a lot of, still, contacts with 25 people in Chicago?

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1 A. Not a lot. 2 Q. Okay. Well, can you recall who it was that 3 contacted you? 4 A. I don't recall who it was. 5 Q. Can you recall any -- Can you tell me any of the 6 names of -- 7 A. I just know this is not the first time that this 8 is now being spoke upon. It's not the first time that 9 your law firm has heard this. I know that for a fact, 10 because it's been revealed again through other resources 11 in the neighborhood, word of mouth and, you know, flyers 12 or whatever, distributions of -- distributing things at 13 certain events. So . . . 14 Q. So, tell me the names of some of the people 15 you're still in contact with in Chicago. 16 A. I'm -- I have no contacts in Chicago now. 17 Q. Okay. Tell me the names of some of the people 18 you were in contact with in the summer of 2016 who were in 19 Chicago? 20 A. Who lived in Chicago? 21 Q. Yeah. 22 A. In the summer of '16? 23 Q. Yes. 24 A. Probably my daughter, who doesn't live in Chicago 25 anymore -- didn't live in Chicago then. We lived out in	1 this flyer? 2 A. I don't recall the person, no. 3 Q. Okay. What do you recall this unknown individual 4 told you that the flyer said? 5 A. Again, the flyer said if you had -- if you were 6 arrested by Sergeant Watts or anyone on Sergeant -- 7 something to the effect Sergeant Watts, anyone on Sergeant 8 Watts' team, if you were arrested by 2nd District 9 officers, then contact this law office. Something to that 10 effect. I never laid eyes on it. I was just given the 11 information. 12 Q. Did you ask to see it? 13 A. No. To be honest, I wasn't concerned. What 14 could I possibly do with that information besides what I 15 did? Blow it off. Because it -- apparently it was true 16 because the numbers that -- the numbers just grew. And -- 17 and certain law firms, the number, their numbers grew with 18 people that were suing Sergeant Watts. So, I don't know. 19 Some truth to it. The facts. 20 Q. Okay. But you've never seen the actual flyer? 21 A. No, never seen it. 22 Q. Did the individual tell you that they had a copy 23 of the flyer? 24 A. No. 25 Q. They just told you they saw it?
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1 Park Forest -- Forest Park. 2 Q. Anybody else? 3 A. Not that lived in Chicago. 4 Q. Was your daughter the one who told you the 5 information about the flyer? 6 A. If she was, I would have remembered that. 7 Q. So, the answer is "No"? 8 A. The answer is "No." 9 I'm sure your law firm knows about this, 10 because the information was revealed. And I don't know, 11 apparently a copy was retrieved by your law firm, Loevy & 12 Loevy. That's the -- that's the same street information 13 that I got. Just like a lot of this street information, 14 that was the street information. 15 Q. Who told you the information that Loevy & Loevy 16 obtained a copy of this flyer? 17 A. The streets. It's in the streets. Just like a 18 lot of this stuff, just in the streets. People, you 19 know . . . 20 Q. But somebody said the words to you, right? 21 Streets can't talk. 22 A. The streets do talk. That's how you get 23 information from the streets. 24 Q. Do you know the name of the individual who told 25 you that Loevy & Loevy received -- retrieved a copy of	1 A. Yes. 2 Q. Okay. Did they -- did the individual tell you 3 that the flyer said anything about money? 4 A. I don't know if it had anything about money, but 5 I -- I can't recall if it said anything about money, but 6 it had -- there was a possibility that you could get paid, 7 or something to that effect, or it had dollar signs on it. 8 It was something, some street, you know, jargon. 9 Q. Okay. So this person that you don't remember 10 told you that it had dollar signs on it or that there was 11 some sort of street jargon indicating that you could 12 profit from this; is that correct? 13 A. Basically, yes, that you could profit from it. 14 Q. Okay. What did this person specific -- 15 MR. PALLES: Excuse me. I'm objecting. I 16 mean, is this -- How is this at all relevant to any 17 subject matter in this case, Josh? 18 MR. TEPFER: Your objection's noted. 19 MR. PALLES: Yeah. Okay. Because -- 20 MR. TEPFER: I mean, he said the whole -- 21 MR. PALLES: Because if it is relevant, then 22 it will become relevant for us to ask you to produce any 23 literature that you or the exoneration project has 24 distributed. I mean, is that -- is that really an issue 25 we want to litigate in this case?

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<p>1 MR. TEPFER: Send a request, Eric. That's 2 fine. Go ahead and send your request. That's fine. That 3 is not a problem.</p> <p>4 MR. KOSOKO: I think a number of the 5 plaintiffs have been asked in these proceedings, Frank 6 Saunders specifically, about --</p> <p>7 (Court reporter clarification.)</p> <p>8 MR. KOSOKO: Frank Saunders being one that I 9 can remember off the top of my head regarding the 10 initiation of this project. So -- To Eric's objection. 11 So, whatever.</p> <p>12 MR. TEPFER: Fair enough. I mean -- okay. 13 Do you want to respond? Okay.</p> <p>14 BY MR. TEPFER:</p> <p>15 Q. What's your daughter's name?</p> <p>16 A. Excuse me?</p> <p>17 Q. What's your daughter's name that used to live in 18 Chicago?</p> <p>19 A. That used to live in Chicago?</p> <p>20 Q. Or that you were referring to that lived in 21 Chicago in the summer 2016.</p> <p>22 A. Daisha Roane-.</p> <p>23 Q. How do you spell Ronae --</p> <p>24 A. R-o-n-a-e, hyphen.</p> <p>25 Q. And I just want to ask you, during the course of</p>	<p>1 arrest report, a vehicle impound report, that type of 2 thing.</p> <p>3 Q. Would the -- And when a vehicle is impounded, is 4 it taken to a specific location?</p> <p>5 A. Initially it's taken to the District where -- or, 6 it can be left there and the paperwork can be done and the 7 tow driver will go to that location and get it and take it 8 to the impoundment yard. Which -- what impoundment yard, 9 I don't know. It's downtown somewhere.</p> <p>10 Q. Fair enough. So, one option is the tow driver 11 will take it at the place where the arrest occurred and 12 drive it to the impound lot?</p> <p>13 A. Yes.</p> <p>14 Q. Is there another option where it would be taken 15 to the District, did you say?</p> <p>16 A. The officer would drive it in and then have the 17 tow truck driver come to the District.</p> <p>18 Q. Got it.</p> <p>19 A. A lot of -- And that's for officer safety and tow 20 truck driver safety, because a lot of times if you leave 21 the vehicle in certain areas, you know, other people that 22 know the person that got arrested might go and get the 23 vehicle. Or you send a tow truck driver over there, he's 24 the tow truck driver, you talking about impounding 25 somebody vehicle, and he end up in a -- in a situation.</p>
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<p>1 your career, did you ever make arrests that caused you to 2 have to impound a vehicle?</p> <p>3 MR. KOSOKO: Object to the form of the 4 question. Are you talking about during his time as a 5 sergeant or his entire career?</p> <p>6 MR. TEPFER: Okay. That's a good point. 7 Let's -- During --</p> <p>8 BY MR. TEPFER:</p> <p>9 Q. I'm talking about both, so did you ever 10 supervise -- let's just talk about your time during a 11 sergeant. Did you ever supervise individuals who made 12 arrests that -- where a vehicle had to be impounded?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. Can you talk to me a little bit about the 15 procedure for impounding vehicles?</p> <p>16 A. About the proce- -- as I recall it, if someone's 17 arrested, it's considered prisoner's property. So, 18 therefore, you could not just abandon prisoner's property, 19 so you have to secure it. And the way the City of Chicago 20 secures prisoner's property, i.e., vehicles, is, it's 21 impounded. And then the arrestee would have to later go 22 and retrieve their vehicle.</p> <p>23 That's what, off the top of my head, what I 24 remember about that process. So, the process is, you 25 submit an impound report just like a vice case report,</p>	<p>1 Q. Is there any sort of factors that are considered 2 in deciding which of the two routes to take, whether the 3 tow truck driver takes it to impound or the officer drives 4 it to the District?</p> <p>5 A. Just the facts would be that I just stated. It 6 would be what's the location and what's the situation if 7 the -- if there's a -- if there's an officer, if they have 8 the manpower to actually drive the car back.</p> <p>9 If the car was involved in a -- it all 10 depends on what the crime was. If the car had evidence 11 inside, it could be a car with blood in it or something. 12 You wouldn't want to drive that one back. You'd want to 13 leave it there. But you probably would call and have a 14 unit sit on it until the tow truck driver come and get it, 15 that type of thing.</p> <p>16 Q. Is one of the factors whether or not they had 17 access to the actual keys that would operate the vehicle?</p> <p>18 A. If you don't have the keys, then you 19 definitely -- if you're going to impound it and you don't 20 have the keys, you definitely probably have a tow truck 21 come. You have to have a tow truck come to that location 22 and then -- but you would probably call and have an 23 officer sit on that vehicle until the tow truck arrive. 24 Because if you don't have the keys, somebody has the keys.</p> <p>25 Q. Right. But is it fair to characterize that it</p>

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<p>1 would be proper, if the arrestee has the keys, to take the 2 keys for the sole purpose to drive the car back to the 3 District if that was the choice that was made?</p> <p>4 A. If the -- if the arrestee has his keys, it's 5 officer's discretion. Sometimes, you know, a officer 6 might say, "Hey, I don't want to leave your car here. Do 7 you want me to drive your car back?"</p> <p>8 And the person might say, "Yeah," because 9 it's going to be towed anyway. You know, "You want me to 10 leave your car here?" Some of them, they, "No, I don't 11 want you in my car," you know.</p> <p>12 Q. Sure.</p> <p>13 A. And --</p> <p>14 Q. But if they consent, certainly nothing wrong with 15 that?</p> <p>16 A. Nothing wrong it.</p> <p>17 Q. Okay.</p> <p>18 A. But it's -- it's -- it's the property of the 19 Chicago Police Department now because you -- so, it's 20 officer's discretion.</p> <p>21 You gonna search the vehicle. Because if 22 you decide to drive it in, you don't know what's inside 23 the vehicle, so you -- you want to search the vehicle. 24 And you want to search the vehicle because a lot of times 25 arrestees will say, "Hey, I had," you know, "a laptop, I</p>	<p>1 to look online like you would have to look online and see 2 what they do. I'm not a part of Chicago Police 3 Department, so --</p> <p>4 BY MR. TEPFER:</p> <p>5 Q. Okay. I'm asking about during your time in, 6 let's just say, 2008. Okay?</p> <p>7 A. 2008?</p> <p>8 Q. Yeah.</p> <p>9 A. Okay.</p> <p>10 Q. All right. If an officer are in a chase and 11 they're chasing someone with a weapon, are they trained to 12 call in that there is a -- that the -- that the suspect 13 has a weapon?</p> <p>14 A. It all depends. If, you know, it's in heat of 15 the moment, maybe the officer would say he have a weapon. 16 Maybe the officer's so focused on the chase he's not 17 thinking to call in and say whether someone, as he's -- 18 you know, it's that split second call of the officers. 19 You know, maybe another officer can call in.</p> <p>20 You know, you asking me to speculate on 21 something. And you have to be in that situation or have 22 been in that situation to -- There have been times where 23 I -- I've had classes, I can say for my own experience, 24 where a guy had a gun and I -- I called it in that he had 25 a gun, and there's times where I -- I -- you know, he had</p>
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<p>1 had a cell phone," I had all this stuff in the vehicle, so 2 you want to inventory what you consider high value items, 3 or whatever, that's inside the vehicle.</p> <p>4 Q. Okay. I want to ask you briefly about training, 5 if you are -- when there's a weapon or a gun involved, 6 okay, if your officers encounter a citizen or a suspect 7 who has a weapon. Okay?</p> <p>8 A. Um-hum.</p> <p>9 MR. KOSOKO: Just -- Just for the record, 10 Josh, I'm going to object to this entire line of 11 questioning based upon the fact if -- as it relates to 12 Anthony McDaniels, as my client has no personal 13 involvement in the incident involving Anthony McDaniels' 14 gun arrest.</p> <p>15 But go ahead, Sarge.</p> <p>16 MR. TEPFER: Yeah, I'm just asking him about 17 training generally.</p> <p>18 MR. KOSOKO: Okay. All right.</p> <p>19 Go ahead, Sarge.</p> <p>20 THE WITNESS: Well, seeing that I haven't 21 been on the -- I retired in 2013, I wasn't a -- on the 22 Department for approximately a year or so before that, and 23 procedures change, training change.</p> <p>24 So, as far as training now for the Chicago 25 Police Department, I don't know. I would -- I would have</p>	<p>1 a gun and I didn't have time. You know, the guy was a lot 2 faster than old sarge, you know.</p> <p>3 Q. So you didn't have time to call it in, period, is 4 what you're saying?</p> <p>5 A. No. I was running.</p> <p>6 Q. Okay. But if you're calling in for back-up in 7 that kind of situation, would it be proper to alert the 8 other officers that the suspect is armed?</p> <p>9 A. Oh, that would be very proper to let other 10 officers know that you have a armed suspect, armed, yeah. 11 Anybody armed outside of you, the --</p> <p>12 Q. Because that would be for officer safety, right?</p> <p>13 A. Absolutely.</p> <p>14 Q. You certainly don't want officers to come to a 15 scene to help with an arrest not -- without the knowledge 16 that the suspect that they're chasing is armed, correct?</p> <p>17 A. Correct, unless -- the situation, as you could -- 18 if -- if when you call it in and you subdue them and you 19 secured the weapon, there's no need to say, "Hey, the guy 20 had a gun," because now you have officers coming in hot, 21 you know, to get there to assist the other officers.</p> <p>22 So, if the guy's already secured, the 23 situation -- the gun is already secured, maybe he threw 24 the gun and you chasing the guy, you know, he -- he 25 doesn't have the gun.</p>

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<p>1 So, you know, it's -- it's -- I don't know 2 the scenario. You can give me a thousand scenarios, you 3 know.</p> <p>4 And I think you want to go back to Anthony 5 McDaniels, and I don't know because I wasn't there. I was 6 recuperating.</p> <p>7 Q. Okay. I want to ask you one final question about 8 you mentioned that, I think it was on December 11th, 2005 9 you were in a surveillance vehicle. Do you remember that 10 testimony?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. And that was different than the normal 13 vehicle that you had as a sergeant, and I think you said 14 was a Chevy, I believe, right?</p> <p>15 A. Um-hum.</p> <p>16 Q. All right. What kind of car was the surveillance 17 vehicle?</p> <p>18 A. I don't recall. I think in the document it did 19 state that we were in a covert -- it did say covert 20 vehicle, which the Department does have covert vehicles 21 out for tactical teams and just -- you know, if you need 22 them for whatever reason, there are covert vehicles to 23 use.</p> <p>24 Q. What makes them covert?</p> <p>25 A. Because they could. It could be a Cadillac</p>	<p>1 MR. KOSOKO: I'm just going -- I'm just 2 going to ask one question, just for the record on this, 3 okay?</p> <p>4 MR. TEPFER: Sure.</p> <p>5</p> <p>6 EXAMINATION</p> <p>7 BY MR. KOSOKO:</p> <p>8 Q. I'm going to use an exhibit. I'll print it out 9 later, just so we can be done with --</p> <p>10 MR. KOSOKO: We'll mark this Exhibit Watts 11 Number 1, Bates Stamp DO-JOINT 5725.</p> <p>12 MR. RAUSCHER: Why don't you call it 43?</p> <p>13 MR. TEPFER: That's so much easier.</p> <p>14 MR. KOSOKO: That's fine, yeah. Exhibit 15 Number 43 is DO-JOINT --</p> <p>16 MR. TEPFER: Okay. What is it? DO-JOINT 17 what?</p> <p>18 MR. KOSOKO: DO-JOINT 5725.</p> <p>19 MR. TEPFER: Got it.</p> <p>20 (Deposition Exhibit 43 was marked for 21 identification.)</p> <p>22 BY MR. KOSOKO:</p> <p>23 Q. All right. Sarge, I'm going to show you what's 24 marked Exhibit Number 43. Have you ever seen a document 25 like this before?</p>
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<p>1 sitting on 26es, and it could be a TransAm. It could be a 2 Mustang.</p> <p>3 Q. So, the point is, it just could be any car that a 4 citizen could have?</p> <p>5 A. Yeah.</p> <p>6 Q. So, the police have surveill- -- cars that they 7 use for covert purposes that are really just -- that will 8 blend in with any other car; is that what you're saying?</p> <p>9 A. Yes.</p> <p>10 Q. And that's different than the -- the tactical 11 team car?</p> <p>12 A. Oh, absolutely, yeah.</p> <p>13 Q. All right. But you don't recall what specific --</p> <p>14 A. I don't know what --</p> <p>15 Q. -- surveillance vehicle, covert vehicle, you were 16 in that day, right?</p> <p>17 A. No.</p> <p>18 MR. TEPFER: All right. I don't have any 19 more questions for today.</p> <p>20 Does anyone else have questions for today?</p> <p>21 All right.</p> <p>22 MR. KOSOKO: Nobody?</p> <p>23 Do you -- we're not circling back on Anthony 24 McDaniels, are we?</p> <p>25 MR. TEPFER: Not for Mr. Watts, no.</p>	<p>1 A. Yes.</p> <p>2 Q. What is this? Can you identify this document for 3 the record?</p> <p>4 A. Sure.</p> <p>5 Q. What is it?</p> <p>6 A. It's -- it's called an A&A sheet. It's called --</p> <p>7 Q. And can you tell us what the acronym A&A means?</p> <p>8 A. It means -- I know it's assigned -- it's --</p> <p>9 it's -- basically, it's an attendance sheet. It's</p> <p>10 attendance and assignment sheet, is what it is, attendance</p> <p>11 and assignment.</p> <p>12 So, on A&A -- it's a A&A sheet. It's for 13 any officer who's working that day. Whatever shift he's</p> <p>14 working, he should appear on the A&As.</p> <p>15 Q. Do you see what date -- This Exhibit Number 43, 16 what date is that for?</p> <p>17 A. 21 November 2008.</p> <p>18 Q. Okay. Do you see your name listed as -- on this 19 document?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. And can you describe what your assignment 22 was for that day, please?</p> <p>23 A. I was code 84, which is IOD.</p> <p>24 Q. And that's injured on duty, correct?</p> <p>25 A. That's injured on duty. I wasn't there.</p>

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1 MR. KOSOKO: No further questions from us.
 2 THE WITNESS: Another fraud upon the state
 3 of Illinois, the good citizen taxpayers. Wow.
 4 THE VIDEOGRAPHER: Counsel, would you like
 5 to go off the record and conclude the deposition?
 6 MR. TEPFER: Yep, I do.
 7 THE VIDEOGRAPHER: We are off the record.
 8 The time on the video monitor is 4:56 p.m. This ends
 9 Media Number 3 and the deposition of Ronald Watts.
 10 (Discussion off the record.)
 11 MR. RAUSCHER: I think we'll order this one.
 12 MR. KOSOKO: Me, too. We will order also.
 13 MR. RAUSCHER: We'll take a copy.

14

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RONALD WATTS

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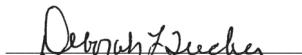
25

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1 STATE OF ARIZONA)
 2 COUNTY OF MARICOPA)
 3 BE IT KNOWN the foregoing deposition was
 4 taken by me pursuant to stipulation of counsel; that I was
 5 then and there a Certified Reporter of the State of
 6 Arizona, and by virtue thereof authorized to administer an
 7 oath; that the witness before testifying was duly sworn by
 8 me to testify to the whole truth; notice was provided that
 9 the transcript was available for signature by the
 10 deponent; that the questions propounded by counsel and the
 11 answers of the witness thereto were taken down by me in
 12 shorthand and thereafter transcribed into typewriting
 13 under my direction; that the foregoing pages are a full,
 14 true, and accurate transcript of all proceedings and
 15 testimony had and adduced upon the taking of said
 16 deposition, all to the best of my skill and ability.

17 I FURTHER CERTIFY that I am in no way related to
 18 nor employed by any parties hereto nor am I in any way
 19 interested in the outcome hereof.

20 DATED at Phoenix, Arizona, this 21st day of
 21 October, 2022.

22 
 23

Deborah L. Tucker, RPR

24 Certified Reporter #50464

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