

Group Ex. A- 1 to A-12



Transcript of the Deposition of
Sharika Dotts

Case: Alvin Waddy v. City of Chicago; et al.
Taken On: February 15, 2023

Royal Reporting Services, Inc.
Phone: 312.361.8851
Email: info@royalreportingservices.com
Website: www.royalreportingservices.com

Alvin Waddy v. City of Chicago; et al.
Deposition of Sharika Dotts - Taken 2/15/2023

Page 1

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

ALVIN WADDY,)	
)	
Plaintiff,)	
v.)	No. 19 L 10035
)	
CITY OF CHICAGO, et al.,)	
)	
)	
Defendants.)	

The deposition of SHARIKA DOTTS taken via
videoconference before Enza Cosgriff, Certified
Shorthand Reporter and Registered Professional Reporter,
taken pursuant to the provisions of the Illinois Code of
Civil Procedure and the Rules of the Supreme Court
thereof pertaining to the taking of depositions for the
purpose of discovery, commencing at 10:01 a.m. on
February 15th, 2023.

Alvin Waddy v. City of Chicago; et al.
Deposition of Sharika Dotts - Taken 2/15/2023

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1 to see you?

2 A. 575.

3 Q. 575? Okay. Do you remember what unit you

4 were living in?

5 A. Yeah, 102.

6 Q. Who lived with you at that address?

7 A. My grandmother, Charlene Campbell.

8 Q. Anyone else besides you two?

9 A. I got a lot of cousins, but they deceased.

10 Q. Okay. I'm sorry to hear that.

11 When was the last time that you saw Mr. Waddy

12 in person?

13 A. I was just with him, what, last week.

14 Q. Is he living with you in Indiana?

15 A. No.

16 Q. Okay. Do you know where he's living?

17 A. Not at the moment.

18 Q. Okay. Do you know if he's in Chicago?

19 A. Chicago.

20 Q. Okay. He's in Chicago; you just don't know

21 the exact address?

22 A. Right.

23 Q. Okay. You were disclosed as a witness in this

24 case as being both an occurrence witness and a damages

Page 18

1 witness. So I would like to start asking you a few

2 questions about what you know and remember from both

3 your time in the Wells and then also specifically

4 Mr. Waddy's arrest from April 4th, 2007. Okay?

5 A. Okay.

6 Q. First and foremost, how would you describe

7 what it was like growing up in the Wells?

8 A. Oh, man. It was -- For me or for him?

9 Like ...

10 Q. For you. For you, and then we can go to your

11 knowledge of him.

12 A. First for me -- because I've been there all my

13 life, so it's like -- it was okay for me coming up.

14 Q. How -- When you say it was okay for you, what

15 do you mean by that? Because that was just your home;

16 you were used to, or what do you mean?

17 A. I was used to it, yes. I was used to it.

18 Q. Was it -- Is it your understanding that it was

19 different for Mr. Waddy?

20 A. At the moment, no, no.

21 Q. Okay. Do you think it was difficult or

22 different for other people that weren't like you that

23 hadn't grown up there?

24 A. Yeah.

Page 19

1 Q. What do you mean by that?

2 A. I mean, because it was a lot of drug selling

3 through there. There was a lot of, you know, hanging

4 out. When I was coming up, it wasn't all that around

5 there, so it's like -- yeah, it's different for other

6 people.

7 Q. Do you know approximately -- Well, so -- And I

8 want to make sure I'm clear on your testimony. For you

9 having lived there since you were 3, it wasn't always --

10 A. Bad.

11 Q. -- a terrible place to live?

12 A. No, it wasn't.

13 Q. Okay. Do you remember approximately how old

14 you were when you noticed a change?

15 A. I was -- I was coming up around 12, 11.

16 Q. And what was different that made you recognize

17 a change in your environment?

18 A. The hanging out, the police, ambulance. Every

19 time I looked up, ambulance here and there, so yeah.

20 Q. Do you know why the ambulances were there?

21 A. No. I just -- Every time I looked up, they

22 was there. They was coming over there. But no, I don't

23 know what for, but yeah.

24 Q. You mentioned drug sales were also at the

Page 20

1 Wells. Would you say that they were kind of everywhere?

2 A. Everywhere, every building. Like every

3 building sold drugs, yeah.

4 Q. Were drugs being sold both inside and outside

5 the buildings --

6 A. Just inside.

7 Q. -- do you know?

8 Do you remember ever seeing drugs being sold

9 in the 551 building when you lived there?

10 A. You said what? I'm sorry. I didn't hear you.

11 Q. Do you remember observing or seeing drugs

12 being sold when you lived in the 551 building?

13 A. No.

14 Q. In the 575 building, do you recall seeing

15 drugs being sold there?

16 A. (Nodding.)

17 Q. Is that a yes?

18 A. Yes, ma'am.

19 Q. Sorry. Sometimes your voice cuts out just a

20 little bit, so I just want to make sure for both me and

21 the court reporter, we have --

22 A. I'm on a stand. Let me take the cover off.

23 Hold on. I got it sitting on a stand, but I got the

24 cover on too.

Alvin Waddy v. City of Chicago; et al.
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1 A. I don't recall. I don't remember exact date.
2 **Q. Do you remember where you saw him at when you**
3 **first met him?**
4 A. No, I don't recall. I'm sorry.
5 **Q. When you said Mr. Waddy -- You testified**
6 **earlier that Mr. Waddy did not live at the Wells, right?**
7 A. Right.
8 **Q. Mr. Waddy never lived at the Wells, correct?**
9 A. Correct.
10 **Q. And it's your opinion that he -- you said he**
11 **came down there just to hang out?**
12 A. Correct.
13 **Q. Okay. Who were some of Mr. Waddy's friends?**
14 A. That I don't know. Like I told the other
15 lady, I don't know who he hung with per se. I just know
16 he out there.
17 **Q. He's just out there?**
18 A. Out there. Everybody was out there.
19 **Q. You testified earlier that there was a lot of**
20 **drugs sold at the Wells, correct?**
21 A. Correct.
22 **Q. Would you agree with me that the Wells was an**
23 **open-air drug market in the years -- during -- in the**
24 **years of 2006 and 2007?**

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1 A. It was.
2 **Q. Okay. What did Mr. Waddy do for a living when**
3 **he first started trying to talk to you?**
4 A. I couldn't tell you that because I don't know.
5 **Q. All right. How did --**
6 A. I --
7 **Q. Go ahead, ma'am.**
8 A. I didn't know if he had a job. I didn't know
9 what type of income he had at the moment. I don't --
10 Yeah, no, I don't know.
11 **Q. All right. Is Mr. Waddy's nickname Pretty**
12 **Boy?**
13 A. I don't know nothing about that. I don't know
14 nothing about that.
15 **Q. You don't know about that?**
16 **All right. Did Mr. Waddy dress nicely when he**
17 **first started trying to talk to you?**
18 A. Yes.
19 **Q. What kind of clothes would Mr. Waddy wear when**
20 **he first started talking to you?**
21 A. It was name brand. You know, name-brand
22 stuff.
23 **Q. Assuming that I know the name brands, did he**
24 **wear Jabos?**

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1 A. He was back then, yeah.
2 **Q. He wore Jabos back then, right?**
3 **Did he wear Pelle Pelle back then?**
4 A. Yeah.
5 **Q. What other kind of brands did Mr. Waddy wear**
6 **back then?**
7 A. Tales. I mean, that's -- that's all I knew.
8 I mean, he was nice dressed.
9 **Q. He was nice dressed?**
10 **Did he -- Did Mr. Waddy have an aviator jacket**
11 **back then?**
12 A. I think so. I'm not for sure.
13 **Q. Did Mr. Waddy wear any, like, luxury brands**
14 **like Gucci or anything like that?**
15 A. Not that I know of.
16 **Q. Just like your typical -- He wore Jabos,**
17 **Pelle, aviator, Timbs. Did Mr. Waddy have any jewelry?**
18 A. Not that I recall.
19 **Q. What was Mr. Waddy's nickname?**
20 A. I don't know what they called him. Dino.
21 **Q. Dino?**
22 A. (Nodding.)
23 **Q. Okay. How often did Mr. Waddy come down to**
24 **the Wells?**

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1 A. Now, that I don't know. I can't tell you how
2 often because -- Yeah, I don't -- I don't know.
3 **Q. How often did you see him down at the Wells --**
4 **Prior to when he first started talking to you, how often**
5 **would you see him down at the Wells?**
6 A. Not that often. I had to call him for him to
7 even come down there, you know.
8 **Q. Okay. And then -- So I've got to ask you a**
9 **tough question.**
10 A. Okay.
11 **Q. So you decided to have a baby with a man who**
12 **you didn't know whether he had a job or who any of his**
13 **friends were?**
14 A. Correct.
15 MR. ROSATI: Objection to form.
16 BY MR. KOSOKO:
17 **Q. How many times have you been present for when**
18 **Mr. Waddy has been arrested?**
19 A. That one incident that I can recall.
20 **Q. That's the only one?**
21 A. (Nodding.)
22 **Q. Okay. And are -- The only members of the**
23 **tactical team supervised by Sergeant Watts that you are**
24 **familiar with are Sergeant Watts himself, correct?**

Alvin Waddy v. City of Chicago; et al.
Deposition of Sharika Dotts - Taken 2/15/2023


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1 The signature of the witness, SHARIKA DOTTS,
2 was reserved by agreement of counsel.

3 The undersigned is not interested in the
4 within case, nor of kin or counsel to any of the
5 parties.

6 Witness my official signature as a Certified
7 Shorthand Reporter in the State of Illinois on
8 March 7th, 2023.

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ENZA COSGRIFF, CSR, RPR
161 North Clark Street
Suite 3050
Chicago, Illinois 60601
Phone: 312.361.8851



CSR No. 084-004873

Exhibit A-2



Transcript of the Deposition of
Gregory Young

Case: In Re: Watts Coordinated Pretrial Proceedings
Taken On: February 16, 2024

Royal Reporting Services, Inc.
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In Re: Watts Coordinated Pretrial Proceedings
Deposition of Gregory Young - Taken 2/16/2024

Page 1

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

)
)
In re: WATTS COORDINATED)
PRETRIAL PROCEEDINGS) Case No. 19 cv 1717
)
)
)

The videotaped deposition of GREGORY YOUNG, called by the Defendants for examination, pursuant to notice and pursuant to the Federal Rules of Civil Procedure for the United States District Courts pertaining to the taking of depositions, taken via videoconference before Kari Wiedenhaupt, Certified Shorthand Reporter within and for the County of Cook and State of Illinois, commencing at 10:11 a.m. on the 16th day of February, 2024.

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Gregory Young - Taken 2/16/2024

<p style="text-align: right;">Page 25</p> <p>1 A. 102. I mean -- pardon me. 103, I 2 think. 3 Q. And Ben Baker, the drug dealer, he 4 lived on the second floor, right? 5 A. Yes. 6 Q. And do you know his wife, Clarissa 7 Glenn? 8 A. Yes. 9 Q. Do you know his kids? 10 A. Yes. 11 Q. All right. Did -- were his kids and 12 your kids friends? 13 A. Yes. 14 Q. What types of things would your kids 15 and Ben Baker's kids do together? 16 A. Oh, play football, rode bikes, skate, 17 whatever. 18 Q. Did -- did they go to the same school? 19 A. No. 20 Q. Where did your kids go to school when 21 you -- when you lived at Ida B. Wells? 22 A. Dolittle. Ah, my -- my son Corey went 23 to CVS. My other kids went to Dolittle. Not 24 Dolittle. I take that back. Yeah, Dolittle.</p>	<p style="text-align: right;">Page 27</p> <p>1 illegal narcotics? 2 A. Yes. 3 Q. And many of those people would be what 4 you would think were junkies? Would you agree 5 with that? 6 A. No. 7 Q. Okay. Like, drug addicts would go -- 8 would be going there every day to buy -- to get 9 drugs, or you didn't see that? 10 A. Yes, yes. 11 Q. That's true, right? 12 A. Yes. 13 Q. Do you know what a wake-up call is? 14 A. Yes. 15 Q. What's a wake-up call? 16 A. That's something in terms that they use 17 before you -- I can't -- that's something in 18 terms that they use before you get on security 19 or something. 20 Q. So in a way, it's a payment for someone 21 to assist in illegal narcotics operations; is 22 that right? Yes? 23 A. Mm-hmm. 24 Q. And so the drug dealers would give a</p>
<p style="text-align: right;">Page 26</p> <p>1 Q. Right. Dolittle is right across the 2 street from Ida B. Wells, right? 3 A. Yes, yes. 4 Q. And is there a park right there near 5 Ida B. Wells? 6 A. Yes. 7 Q. Yeah. And where's the park in relation 8 to Ida B. Wells? 9 A. The park would be on Cottage Grove, by 10 Cottage Grove. 11 Q. So I want to go back -- again, I'm 12 focusing on -- from the year of, like, 2000 13 until you moved out in approximately 2007 in 14 terms of illegal narcotics activity that you 15 would observe. Okay? 16 A. Mm-hmm. 17 Q. And you understand that? 18 A. Yes, sir. 19 Q. Okay. And I want to ask you, would you 20 agree that illegal narcotics were being sold at 21 Ida B. Wells 24/7? 22 A. Yes. 23 Q. And would you agree that you would have 24 people coming there every day looking to obtain</p>	<p style="text-align: right;">Page 28</p> <p>1 wake-up call, say, to an individual and that 2 person would act as security for the narcotics 3 operations? 4 A. Yes. 5 Q. And it -- again, I'm just focusing on 6 Ida B. Wells in that time period, 2000 until you 7 moved away in 2007. 8 You would have individuals who would be 9 actually selling the drugs on any given day, 10 right? 11 A. Yes. 12 Q. And then the sellers, they would have 13 lookouts who would be watching out for the 14 police, right? 15 A. Yes. 16 Q. And the drug dealers would also have 17 individuals who were also soliciting the sale of 18 the illegal -- illegal narcotics, right? 19 A. Yes. 20 Q. Where there -- they might be calling 21 out the names of certain drugs that are being 22 sold, right? 23 A. Yes. 24 Q. Like, you know, calling out, say, for</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Gregory Young - Taken 2/16/2024

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1 YOUNG, was reserved by agreement of counsel.

2 The undersigned is not interested in the
3 within case, nor of kin or counsel to any of the
4 parties.

5 Witness my official signature as a
6 Certified Shorthand Reporter in the State of
7 Illinois on April 3, 2024.

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Kari Wiedenhaupt, CSR
161 North Clark Street
Suite 3050
Chicago, Illinois 60601
Phone: 312.361.8851



CSR No. 084-003582

Exhibit A-3



Transcript of the Deposition of

Raynard Carter

Case: In Re: Watts Coordinated Pretrial Proceedings

Taken On: May 12, 2022

Royal Reporting Services, Inc.

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In Re: Watts Coordinated Pretrial Proceedings
Deposition of Raynard Carter - Taken 5/12/2022

Page 1

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

IN RE: WATTS)
COORDINATED PRETRIAL) Case No. 19 CV 1717
PROCEEDINGS)

The videotaped deposition of RAYNARD CARTER, taken via videoconference in the above-entitled cause, called for examination by the Defendants pursuant to the Rules of Civil Procedure for the United States District Courts pertaining to the taking of depositions, taken before Sharon L. Patanella, a Certified Shorthand Reporter in the State of Illinois, on the 12th day of May, 2022, at the hour of 10:00 o'clock a.m.

Reported by: Sharon L. Patanella
Illinois CSR License 84-002169

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Raynard Carter - Taken 5/12/2022

<p style="text-align: right;">Page 182</p> <p>1 A. No. Living means waking up alive, living, 2 getting your day started. 3 Q. All right. So when you were a GD, what 4 did you do on a typical day? 5 A. I wake up, I eat breakfast, go out and 6 enjoy the day, get me some lunch, enjoy the day 7 some more. 8 Q. Okay. And where did you get the money to 9 enjoy your day? 10 A. Out of my pocket. 11 Q. And is that money that you earned from 12 selling drugs with the GDs? 13 A. No, some money I woke up with. 14 Q. So where did you conjure up this money 15 that you woke up with it? 16 MS. PAUKSTIS: Objection. 17 All right. Go ahead. You can answer. 18 THE WITNESS: I got it out of my house. 19 It was in my drawer. 20 BY MR. KOSOKO: 21 Q. Okay. And where was it before it got to 22 your drawer? 23 A. It was in my mother's pocketbook before 24 she gave it to me.</p>	<p style="text-align: right;">Page 184</p> <p>1 A. Yeah. I violated by catching another 2 case. 3 Q. What I'm asking you is as part of your 4 probation, you were not supposed to violate any 5 other laws; correct? 6 A. I don't recall. I'd have to go all the 7 way back to look at what was set forth in my 8 probation. 9 Q. Okay. On January 22, 2002, you were 10 arrested again; correct? 11 A. On January 22nd? 12 Q. 2003. 13 A. That's correct. 14 Q. Were you arrested by plainclothes officers 15 or uniformed officers? 16 A. I believe it was plainclothes. 17 Q. Okay. And tell us the circumstances of 18 that arrest. 19 A. I took the weight again. 20 Q. Okay. When you woke up -- around what 21 time were you arrested that day? 22 A. It was probably in the daytime. 23 Q. Okay. And tell me how you ended up being 24 placed into custody by plainclothes Chicago Police</p>
<p style="text-align: right;">Page 183</p> <p>1 Q. So then you were arrested again on 2 January 22, 2003; is that correct? 3 A. Correct. 4 Q. And was your probation, had that in fact 5 been terminated before that arrest? 6 A. No. 7 Q. You were still on probation; is that 8 correct? 9 A. Correct. 10 Q. What were some of the terms of your 11 probation? 12 A. Community service, and I think I had to 13 pay a fine or something. 14 Q. So did the judge sentence you to community 15 service to allow you to hang around drug dealers? 16 MS. PAUKSTIS: Object to form. 17 THE WITNESS: I don't recall. 18 BY MR. KOSOKO: 19 Q. Wouldn't it have been part of your 20 probation that you were not to be around gang 21 members? 22 A. I don't recall. 23 Q. That you not violate any of the Illinois 24 Statutes?</p>	<p style="text-align: right;">Page 185</p> <p>1 Officers? 2 A. They came down the hallway. They were 3 already in the building and came down the hallway 4 and came in through the breezeway. 5 Q. And the area that you were arrested, that 6 was again an open-air drug market; correct? 7 A. Correct. 8 Q. It was a place where a lot of people came 9 to buy drugs; correct? 10 A. Correct, and it was a place where 11 everybody hung out at. 12 Q. Okay. And people who hung out there sold 13 drugs to those people; correct? 14 A. People just hung out there as well. 15 Q. And some of those people hanging out sold 16 drugs; right? 17 MS. PAUKSTIS: Objection to form. 18 BY MR. KOSOKO: 19 Q. And you knew that; correct? 20 A. Everybody knew that. 21 Q. Okay. And in fact, the people that hung 22 out and sold drugs there were Gangster Disciples; 23 correct? 24 A. Correct.</p>

50 (Pages 182 to 185)

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Raynard Carter - Taken 5/12/2022

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1 attorneys hereinbefore mentioned.

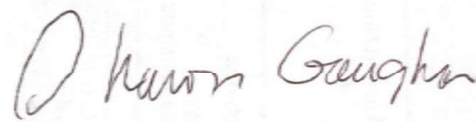
2 I further certify that I am not counsel
3 for nor in any way related to the parties to this
4 suit, nor am I in any way interested in the outcome
5 thereof.

6 IN TESTIMONY WHEREOF: I have hereunto set
7 my verified digital signature this 31st day of May,
8 2022.

9

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12

Sharon L. Patanella

13

Illinois Certified Shorthand Reporter

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161 North Clark Street, Suite 3050

15

Chicago, Illinois 60601

16

312-361-8851

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Exhibit

A-4



Transcript of the Deposition of
Bobby Coleman

Case: In Re: Watts Coordinated Pretrial Proceedings
Taken On: November 13, 2023

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In Re: Watts Coordinated Pretrial Proceedings
Deposition of Bobby Coleman - Taken 11/13/2023

Page 1

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

In re: WATTS COORDINATED) No. 19 CV 01717
PRETRIAL PROCEEDINGS)

The videotaped deposition of BOBBY COLEMAN, called by the Defendants for examination, taken before Enza Cosgriff, Certified Shorthand Reporter and Registered Professional Reporter, taken pursuant to notice and pursuant to the Federal Rules of Civil Procedure for the United States District Courts pertaining to the taking of depositions at 53 West Jackson Boulevard, Suite 334, Chicago, Illinois, commencing at 10:05 a.m. on November 13th, 2023.

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Bobby Coleman - Taken 11/13/2023

Page 23

1 **narcotics; is that right?**
2 A. Correct.
3 **Q. And where did you sell narcotics at?**
4 A. At the 5- -- 527 East Browning.
5 **Q. The 527 building?**
6 A. Correct.
7 **Q. Right? Ida B. Wells?**
8 A. Correct.
9 **Q. Would you agree at the 527 building, if -- if**
10 **I was a junky or someone who -- who wanted to buy**
11 **narcotics, I could get narcotics at the 527 building**
12 **24/7?**
13 A. Correct.
14 **Q. And why was that? Because there were dope**
15 **dealers that were selling narcotics around the clock at**
16 **the 527 building?**
17 A. Yes.
18 **Q. What would -- If you had to rank the different**
19 **buildings at Ida B. Wells with the most amount of**
20 **narcotics that were being sold on a daily basis, what**
21 **would -- where would you rank the 527 building?**
22 MS. GIZZI: Objection: form.
23 BY THE WITNESS:
24 A. There ain't no ranking.

Page 24

1 **Q. Well, would it be number one? Would it be in**
2 **the top three?**
3 A. I wouldn't know that.
4 **Q. Okay. But you knew about the nar- -- You did**
5 **know about the narcotics activity going on at the**
6 **527 building, right?**
7 A. Correct.
8 **Q. When did you first start -- Did you sell**
9 **narcotics from any -- out of any other building other**
10 **than the 527 building?**
11 A. 559.
12 **Q. 559 East Browning, right?**
13 A. Correct.
14 **Q. What other buildings did you sell narcotics**
15 **from?**
16 A. Just them two.
17 **Q. Just those two. And what was your -- Strike**
18 **that.**
19 **What narcotics did you sell -- What -- Strike**
20 **that.**
21 **What type of narcotics did you sell out of the**
22 **527 building?**
23 A. Heroin.
24 **Q. Anything else?**

Page 25

1 A. No.
2 **Q. What type of narcotics did you sell out of the**
3 **559 building?**
4 A. Heroin.
5 **Q. Anything else?**
6 A. No.
7 **Q. What was the -- Excuse me.**
8 **During what time frame did you sell heroin out**
9 **of the 527 building?**
10 A. From the morning to the evening.
11 **Q. Would you sell it until you ran out of**
12 **narcotics to sell?**
13 A. For -- Yes.
14 **Q. And would you do that every day?**
15 A. Yes.
16 **Q. What was the time frame -- Or strike that.**
17 **What were the -- What were the -- What --**
18 **During what years did you sell the heroin on a daily**
19 **basis out of the 527 building?**
20 A. From 2000 to -- to the time it -- it closed
21 down.
22 **Q. Well, the 527 building, that was open until at**
23 **least 2009; is that right?**
24 A. Correct.

Page 26

1 **Q. Okay. So for close to a decade, you sold**
2 **heroin out of the 527 building, right?**
3 A. Correct.
4 **Q. Okay. So now, the 559 building, during**
5 **what -- what years did you sell heroin out of the 559**
6 **building?**
7 A. The same years as the 527. Just hopping
8 building to building.
9 **Q. Okay. They're -- They're very close to each**
10 **other, right?**
11 A. Correct.
12 **Q. Tell me -- So nearly ten years, right?**
13 A. Correct.
14 **Q. Okay. That you were selling heroin out of**
15 **those two buildings, right?**
16 A. Correct.
17 **Q. Okay. Did you sell -- ever sell narcotics at**
18 **any time during the 1990s?**
19 A. No.
20 **Q. So how was it -- How was it that you first**
21 **became a drug dealer in -- in the year 2000?**
22 A. How I became a drug dealer?
23 **Q. Yes.**
24 A. Just growing up in the neighborhood.


In Re: Watts Coordinated Pretrial Proceedings
Deposition of Bobby Coleman - Taken 11/13/2023

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1 The undersigned is not interested in the
2 within case, nor of kin or counsel to any of the
3 parties.

4 Witness my official signature as a Certified
5 Shorthand Reporter in the State of Illinois on
6 November 22nd, 2023.

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CSR No. 084-004873

Exhibit A-5



Transcript of the Deposition of
Milton Delaney

Case: Milton Delaney, Jr. v. City of Chicago; et al.
Taken On: July 26, 2021

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Milton Delaney, Jr. v. City of Chicago; et al.
Deposition of Milton Delaney - Taken 7/26/2021

Page 1

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

IN RE WATTS COORDINATED PRETRIALS:)	
)	
MILTON DELANEY, JR.,)	
)	
Plaintiff,)	
)	
-vs-)	No. 19 CV 1083
)	
CITY OF CHICAGO, et al.,)	Judge Kocoras
)	Magistrate
)	Judge Finnegan
Defendants.)	

The deposition of MILTON DELANEY, taken pursuant to the Federal Rules of Civil Procedure of the United States District Courts pertaining to the taking of depositions, taken via videoconference before KRISTA R. DOLGNER, Registered Professional Reporter and Certified Shorthand Reporter of the State of Illinois, on Monday, July 26, 2021, at 9:00 a.m.

Milton Delaney, Jr. v. City of Chicago; et al.
Deposition of Milton Delaney - Taken 7/26/2021

Page 93	Page 95
<p>1 A. I was in the squad car.</p> <p>2 Q. Okay. Were any officers in the squad car</p> <p>3 at the time?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. How many officers were inside the</p> <p>6 squad car at the time?</p> <p>7 A. I know there was a driver. I just don't</p> <p>8 remember if there was someone in the passenger's</p> <p>9 seat.</p> <p>10 Q. And was the driver one of the ones who</p> <p>11 searched your car?</p> <p>12 A. I don't remember.</p> <p>13 Q. Can you describe any of the officers that</p> <p>14 you saw sweeping the building, the 574 building?</p> <p>15 A. Repeat that.</p> <p>16 Q. Sure. Can you describe any of the</p> <p>17 officers you saw sweeping the 574 building?</p> <p>18 A. No. I'm just familiar with</p> <p>19 Sergeant Watts. I know he was present.</p> <p>20 Q. You know, in your experience living at</p> <p>21 Ida B. Wells and when you would go back after you</p> <p>22 moved out, were there people who would come to</p> <p>23 Ida B. Wells who were there who didn't live there,</p> <p>24 who weren't visiting people, but rather were just</p>	<p>1 Q. Okay. Was Madden Park, to your knowledge,</p> <p>2 part of the Chicago Park District?</p> <p>3 A. Yes.</p> <p>4 Q. Now, you said -- I'm sorry. Strike that.</p> <p>5 Could you describe the officer that drove</p> <p>6 you to the police station?</p> <p>7 A. Repeat that.</p> <p>8 Q. Sure. Can you describe the officer that</p> <p>9 drove you to the police station?</p> <p>10 A. No.</p> <p>11 Q. Now, in paragraph number 7 of your</p> <p>12 affidavit, it says, "At the station, I was</p> <p>13 handcuffed to a bench. While I was sitting there, I</p> <p>14 began asking why I was being arrested. No one would</p> <p>15 tell me why. It wasn't until the officer doing the</p> <p>16 fingerprinting told me I was being charged with</p> <p>17 possession of ecstasy that I found out what was</p> <p>18 going on."</p> <p>19 Could you describe any of the officers you</p> <p>20 asked -- not the fingerprint officer, but the other</p> <p>21 officers -- that you asked why you were being</p> <p>22 arrested?</p> <p>23 A. No.</p> <p>24 Q. Okay. Can you describe the officer that</p>
Page 94	Page 96
<p>1 there to buy drugs?</p> <p>2 A. Yes, because there was drugs being sold.</p> <p>3 Yes.</p> <p>4 Q. And you said you were driven to the</p> <p>5 station after you were arrested; is that correct?</p> <p>6 A. Say that again. Ask me that question</p> <p>7 again.</p> <p>8 Q. Sure. I said, after you were arrested,</p> <p>9 you were taken to the police station; is that</p> <p>10 correct?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. Now, at the time you were on</p> <p>13 Ida B. Wells property, you did not live there; is</p> <p>14 that correct?</p> <p>15 MR. RAUSCHER: Object to form.</p> <p>16 BY THE WITNESS:</p> <p>17 A. I considered it the park and not</p> <p>18 Ida B. Wells. It was the park.</p> <p>19 Q. Okay. So you thought you could sit at the</p> <p>20 park all you wanted there, and you were fine?</p> <p>21 A. Repeat that.</p> <p>22 Q. Sure. You thought you could sit at Madden</p> <p>23 Park, and you were fine?</p> <p>24 A. Yes.</p>	<p>1 was fingerprinting you?</p> <p>2 A. No.</p> <p>3 Q. For paragraph number 9, it says, "I told</p> <p>4 my attorney that I was framed. I ended up taking a</p> <p>5 plea deal because my attorney recommended I take</p> <p>6 one."</p> <p>7 What attorney was that that you told you</p> <p>8 were being framed and that you were referencing in</p> <p>9 this paragraph number 9?</p> <p>10 A. I'm not sure. It had to be a public</p> <p>11 defender because I don't remember his name.</p> <p>12 Q. Okay. Is this attorney you're referencing</p> <p>13 in Number 9 the attorney who was in the courtroom at</p> <p>14 26th Street or the one that was in bond court or the</p> <p>15 one that was in the preliminary hearing courtroom,</p> <p>16 if you recall?</p> <p>17 A. One second. I'm trying to get -- I'm</p> <p>18 trying to kill this fly that's irritating me.</p> <p>19 THE VIDEOGRAPHER: Counsel, would you like to</p> <p>20 stay on the record? Oh, never mind.</p> <p>21 BY THE WITNESS:</p> <p>22 A. Can you repeat that question, please?</p> <p>23 Q. Sure. I think I asked you which attorney</p> <p>24 was it, the one in the courtroom at 26th Street, in</p>

27 (Pages 93 to 96)

Milton Delaney, Jr. v. City of Chicago; et al.
Deposition of Milton Delaney - Taken 7/26/2021

Page 141	Page 143
<p>1 A. Huh?</p> <p>2 Q. The narcotics trade happened at the Wells</p> <p>3 daily, correct?</p> <p>4 A. Yeah. Even before I was born or even</p> <p>5 before I started selling it. It was -- it was</p> <p>6 happening when I -- I mean, they're gone now, but,</p> <p>7 you know, yeah.</p> <p>8 Q. It was -- it was an open-air drug market,</p> <p>9 correct?</p> <p>10 A. Yeah.</p> <p>11 Q. I mean, more people than you can imagine</p> <p>12 came down there to buy drugs, correct?</p> <p>13 A. Yeah.</p> <p>14 Q. So during that time period, did you ever</p> <p>15 observe George Almond get arrested?</p> <p>16 A. I know he has served prison terms, but I</p> <p>17 never was present at his actual arrests that he has</p> <p>18 been incarcerated.</p> <p>19 Q. Okay. That's fine. You never personally</p> <p>20 observed Mr. Almond get arrested, correct?</p> <p>21 A. Correct.</p> <p>22 Q. But you guys sometimes -- he sold drugs</p> <p>23 sometimes during the time period you sold drugs,</p> <p>24 right?</p>	<p>1 A. Can I ask my attorney a question? Can I</p> <p>2 ask my attorney a question?</p> <p>3 Q. You might not want to do that on record.</p> <p>4 If you want to go off record, go ahead.</p> <p>5 Scott? I don't know.</p> <p>6 MR. RAUSCHER: If you need to ask me something,</p> <p>7 let me see what it is. Yeah, why don't we go off</p> <p>8 the record for a minute?</p> <p>9 THE VIDEOGRAPHER: We are now going off the</p> <p>10 record.</p> <p>11 MR. KOSOKO: Hang on. Hang on. Hang on.</p> <p>12 THE VIDEOGRAPHER: Okay. Okay.</p> <p>13 BY MR. KOSOKO:</p> <p>14 Q. I believe I have a question pending</p> <p>15 though. So you need to answer that question.</p> <p>16 MR. RAUSCHER: What's the -- sorry, I actually</p> <p>17 don't know what the question pending anymore is.</p> <p>18 But maybe if he does, then ...</p> <p>19 MR. KOSOKO: Could you -- Ms. Court Reporter,</p> <p>20 could you please repeat the last question?</p> <p>21 (Record read.)</p> <p>22 MR. RAUSCHER: So I don't know if there is a</p> <p>23 question. I guess I'm not sure there is a question.</p> <p>24 MR. KOSOKO: So he interrupted. That's fine.</p>
Page 142	Page 144
<p>1 A. Repeat that.</p> <p>2 Q. George Almond sold drugs during the time</p> <p>3 period you sold drugs too, correct?</p> <p>4 A. Uh-huh, yes.</p> <p>5 Q. I just -- I just want to ask you about a</p> <p>6 few people, and you tell me if you know them; tell</p> <p>7 me if you don't know them. Do you know Ben Baker?</p> <p>8 A. Yeah, he's like the highlight of this</p> <p>9 situation. He's like the -- like the -- like the</p> <p>10 highlight of the Watts situation.</p> <p>11 Q. Okay. The Watts situation. Did you know</p> <p>12 Ben Baker before the consolidated proceedings?</p> <p>13 A. What are the consolidated proceedings?</p> <p>14 Q. Everybody from the Wells, these</p> <p>15 proceedings that you are a part of.</p> <p>16 MR. RAUSCHER: Object to form.</p> <p>17 BY MR. KOSOKO:</p> <p>18 Q. All right. Let me ask you this: When you</p> <p>19 lived at the Wells -- so you started selling -- you</p> <p>20 started selling dope for Pattiak in '92, right?</p> <p>21 A. Actually, man, he was a resource for me,</p> <p>22 really, you know. It's -- he was a resource for me.</p> <p>23 Q. All right. So you were selling dope you</p> <p>24 said until 2007. So in 2007 --</p>	<p>1 You can consult with your attorney and come back,</p> <p>2 and we will restart it.</p> <p>3 MR. RAUSCHER: All right. Mr. Delaney --</p> <p>4 THE VIDEOGRAPHER: We are now going off the</p> <p>5 record at 12:37 p.m.</p> <p>6 (Recess taken.)</p> <p>7 THE VIDEOGRAPHER: The time is 12:40 p.m. We</p> <p>8 are now back on the record.</p> <p>9 BY MR. KOSOKO:</p> <p>10 Q. So, Mr. Milton, you said you were sort of</p> <p>11 like an independent contractor during your years of</p> <p>12 being a crack distributor?</p> <p>13 A. After a while, yeah.</p> <p>14 Q. After a while. So before that, were you</p> <p>15 not an independent distributor?</p> <p>16 A. No.</p> <p>17 Q. Who did you -- who did you sell crack</p> <p>18 with? Let's start in 2003. Who were you selling</p> <p>19 crack with then?</p> <p>20 A. When?</p> <p>21 Q. Who were you selling crack with in 2003?</p> <p>22 A. 2003?</p> <p>23 Q. Yes, sir.</p> <p>24 A. Patrick Noonier.</p>

Milton Delaney, Jr. v. City of Chicago; et al.
Deposition of Milton Delaney - Taken 7/26/2021

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1 STATE OF ILLINOIS)
) SS:
2 COUNTY OF C O O K)

3 I, KRISTA R. DOLGNER, a Certified
4 Shorthand Reporter within and for the State of
Illinois, do hereby certify:

5 That previous to the commencement of the
6 examination of the witness, the witness was duly
sworn to testify the whole truth concerning the
7 matters herein;

8 That the foregoing videoconference
9 deposition was reported stenographically by me, was
thereafter reduced to a computerized transcript by
10 me, and constitutes a true record of the testimony
given and the proceedings had;

11 That the said deposition was taken before
me on the date and time specified;

12 That the reading and signing by the
13 witness of the deposition transcript was agreed upon
as stated herein;

14 That I am not a relative or employee or
15 attorney or counsel, nor a relative or employee of
such attorney or counsel for any of the parties
16 hereto, nor interested directly or indirectly in the
outcome of this action.

17 IN WITNESS WHEREOF, I do hereunto set my
18 hand at Chicago, Illinois.

19


20

21

22

23 CSR License No. 084-002878

24



Krista R. Dolgner, CSR, RPR
161 North Clark Street
Suite 3050
Chicago, Illinois 60601
312.361.8851



Exhibit A-6



Transcript of the Deposition of
Willie J. Gaddy

Case: In Re: Watts Coordinated Pretrial Proceedings
Taken On: December 1, 2022

Royal Reporting Services, Inc.
Phone: 312.361.8851
Email: info@royalreportingservices.com
Website: www.royalreportingservices.com

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Willie J. Gaddy - Taken 12/1/2022

Page 1

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

In re: WATTS COORDINATED) No. 19 CV 01717
PRETRIAL PROCEEDINGS)

The deposition of WILLIE J. GADDY, called by the Defendants for examination, taken via videoconference before Enza Cosgriff, Certified Shorthand Reporter and Registered Professional Reporter, taken pursuant to notice and pursuant to the Federal Rules of Civil Procedure for the United States District Courts pertaining to the taking of depositions, commencing at 10:22 a.m. on December 1st, 2022.

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Willie J. Gaddy - Taken 12/1/2022

Page 9	Page 11
<p>1 drugs or medication that would impair your ability to</p> <p>2 testify truthfully today?</p> <p>3 A. No.</p> <p>4 Q. Okay. Did you do anything to prepare for your</p> <p>5 deposition today?</p> <p>6 A. No.</p> <p>7 Q. Do you have any documents in front of you,</p> <p>8 sir?</p> <p>9 A. Just the stuff they sent me, like the -- for</p> <p>10 the -- the subpoena.</p> <p>11 Q. Okay. Other than the subpoena, do you have</p> <p>12 any other documents in front of you?</p> <p>13 A. No.</p> <p>14 Q. Okay. Mr. Gaddy, can you state your full name</p> <p>15 for the record, please?</p> <p>16 A. Willie J. Gaddy.</p> <p>17 Q. Have you ever gone by any other name other</p> <p>18 than Willie Gaddy?</p> <p>19 A. No.</p> <p>20 Q. Do you have a nickname, sir?</p> <p>21 A. No.</p> <p>22 Q. And, sir, is your date of birth March 22nd,</p> <p>23 1974?</p> <p>24 A. Yes.</p>	<p>1 A. Yes.</p> <p>2 Q. From 2000 to 2004 or '05, were you involved in</p> <p>3 drug sales at the Ida B. Wells complex?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. Prior to 2000, did you ever sell drugs</p> <p>6 out of the Ida B. Wells?</p> <p>7 A. Prior to 2000, yes.</p> <p>8 Q. Okay. What was the first year in which you</p> <p>9 started selling out of the Ida B. Wells?</p> <p>10 A. Early '90s, maybe in '90.</p> <p>11 Q. I'm sorry. I didn't catch that last part.</p> <p>12 A. Maybe 1990.</p> <p>13 Q. During the time that you sold illegal drugs in</p> <p>14 the Ida B. Wells, did you -- were you aware that Chicago</p> <p>15 Police officers patrolled the area?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. Did you become familiar with any of the</p> <p>18 Chicago Police officers that patrolled the Ida B. Wells</p> <p>19 the time that you were selling drugs out of the</p> <p>20 Ida B. Wells complex?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. Do you recall any of those police</p> <p>23 officers' names?</p> <p>24 A. Yes.</p>
Page 10	Page 12
<p>1 Q. Mr. Gaddy, are you familiar with what's the</p> <p>2 former Ida B. Wells complex?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. Did you ever live in the Ida B. Wells?</p> <p>5 A. No.</p> <p>6 Q. Okay. Did you have any family members that</p> <p>7 lived in the Ida B. Wells?</p> <p>8 A. No.</p> <p>9 Q. Okay. Was there a period of time that you</p> <p>10 would frequently go to the Ida B. Wells?</p> <p>11 A. Yes.</p> <p>12 Q. What was that time period?</p> <p>13 A. Between 2000 and 2004, '05, something like</p> <p>14 that.</p> <p>15 Q. And why would you frequently go there from</p> <p>16 2000 to 2004 or '05?</p> <p>17 A. Why would I go there?</p> <p>18 Q. Yes, sir.</p> <p>19 A. To conduct whatever business I was doing</p> <p>20 there.</p> <p>21 Q. And what was that business?</p> <p>22 A. Illegal drug sales.</p> <p>23 Q. Sir, would you agree that the Ida B. Wells was</p> <p>24 an open-air drug market?</p>	<p>1 Q. What names do you recall?</p> <p>2 A. Starting from the '90s or more recent?</p> <p>3 Q. If you can start from the 2000s, from 2000 --</p> <p>4 A. 2000?</p> <p>5 Q. Yes, sir.</p> <p>6 A. Ronald Watts.</p> <p>7 Q. Anyone else?</p> <p>8 A. Mohammed. That's pretty much it. Like I</p> <p>9 would hear other names, but those are the ones I was</p> <p>10 more so familiar with because of the interactions I had</p> <p>11 with them.</p> <p>12 Q. Now, the other officers that you heard names</p> <p>13 or you knew of, do you remember any of those names other</p> <p>14 than Mohammed and Watts?</p> <p>15 A. Smitty; Big Al, Al, something like that; Coco;</p> <p>16 Saint Eyes (phonetic); China Man. That's -- that's</p> <p>17 about it. I really didn't have that much interaction</p> <p>18 with police.</p> <p>19 Q. And these other officers that you just listed</p> <p>20 off, were you aware that some of the officers were a</p> <p>21 part of the tactical team that were -- that Sergeant</p> <p>22 Ronald Watts was, in fact, their sergeant? Were you</p> <p>23 aware of that?</p> <p>24 A. Yes.</p>

6 (Pages 9 to 12)

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Willie J. Gaddy - Taken 12/1/2022

Page 207

1 The signature of the witness, WILLIE J. GADDY,
2 was waived by agreement of counsel.

3 The undersigned is not interested in the
4 within case, nor of kin or counsel to any of the
5 parties.

6 Witness my official signature as a Certified
7 Shorthand Reporter in the State of Illinois on
8 December 19th, 2022.

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17 CSR No. 084-004873

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24



Enza Cosgriff, CSR, RPR
161 North Clark Street
Suite 3050
Chicago, Illinois 60601
Phone: 312.361.8851



Exhibit A-7



Transcript of the Continued Deposition of
Goleather Jefferson

Case: In Re: Watts Coordinated Pretrial Proceedings

Taken On: June 27, 2022

Royal Reporting Services, Inc.

Phone: 312.361.8851

Email: info@royalreportingservices.com

Website: www.royalreportingservices.com

In Re: Watts Coordinated Pretrial Proceedings
Continued Deposition of Goleather Jefferson - Taken 6/27/2022

Page 1

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

In re: WATTS COORDINATED
PRETRIAL PROCEEDINGS

)
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) Case No. 19 CV 1717
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The continued videotaped deposition of
GOLEATHER JEFFERSON, called by the Defendant for
examination, taken pursuant to notice and pursuant to
the Federal Rules of Civil Procedure for the United
States District Courts pertaining to the taking of
depositions, taken before Monica Kim, Certified
Shorthand Reporter, via videoconference, commencing at
11:20 a.m. on June 27th, 2022.

In Re: Watts Coordinated Pretrial Proceedings
Continued Deposition of Goleather Jefferson - Taken 6/27/2022

<p style="text-align: right;">Page 104</p> <p>1 What's your question?</p> <p>2 MR. KOSOKO: My question is -- I understand you're</p> <p>3 making a vague or whatever objection. But I'm asking</p> <p>4 Mr. Goleather.</p> <p>5 BY MR. KOSOKO:</p> <p>6 Q. Is it your testimony, Mr. Goleather, that on</p> <p>7 May 4th, 2000- --</p> <p>8 A. My name is Goleather.</p> <p>9 Q. Hang on. Let me finish my question. I'll try</p> <p>10 to make it as clear as possible.</p> <p>11 Is it your testimony, Mr. Jefferson, that on</p> <p>12 May 4th of 2005 at approximately 12:15 p.m. you were not</p> <p>13 standing at the back door of the 574 East 36th building?</p> <p>14 A. No, I wasn't.</p> <p>15 Q. Okay. Is it your testimony that on May 4th,</p> <p>16 2005 at approximately 12:14 p.m. you encountered an</p> <p>17 individual and you searched that individual?</p> <p>18 A. No.</p> <p>19 Q. Okay. Is it your testimony that immediately</p> <p>20 thereafter you sent that person up the stairs to</p> <p>21 purchase crack-cocaine?</p> <p>22 A. It's not.</p> <p>23 Q. Okay. Is it your testimony that you were not</p> <p>24 walk -- walk -- working with Ricky Walker that day to</p>	<p style="text-align: right;">Page 106</p> <p>1 A. You could get drugs in all of them.</p> <p>2 Q. You could get heroin in any of those</p> <p>3 buildings, correct?</p> <p>4 A. Yes, yes, yes.</p> <p>5 Q. Drugs was a problem in that community,</p> <p>6 correct?</p> <p>7 A. I guess so, yes.</p> <p>8 Q. Okay. Mr. Jefferson, I want to direct your</p> <p>9 attention to Exhibit No. 2.</p> <p>10 MR. KOSOKO: And, Joel, if you could show it to</p> <p>11 him, please.</p> <p>12 MR. FLAXMAN: We have it.</p> <p>13 BY MR. KOSOKO:</p> <p>14 Q. Okay. Mr. Jefferson, is there anything in</p> <p>15 this affidavit that is untrue?</p> <p>16 A. Take that all the way -- Everything is right.</p> <p>17 Yeah, everything is true in this here.</p> <p>18 Q. Okay. I'm going to direct your attention to</p> <p>19 page 4 of that affidavit. Do you see that?</p> <p>20 A. September 12.</p> <p>21 MR. FLAXMAN: You mean paragraph 4?</p> <p>22 MR. KOSOKO: No, no, no. Page 4, the verification.</p> <p>23 MR. FLAXMAN: Oh, I have that as page 3, but it's</p> <p>24 page 4 on the PDF.</p>
<p style="text-align: right;">Page 105</p> <p>1 sell narcotics?</p> <p>2 A. Yeah.</p> <p>3 Q. No?</p> <p>4 A. No. No.</p> <p>5 Q. Mr. Jefferson, did you at any point live in</p> <p>6 the 574 building?</p> <p>7 A. When I was younger.</p> <p>8 Q. And when you say you were younger, could you</p> <p>9 tell me what age you were?</p> <p>10 A. Like 15, 16, somewhere along there.</p> <p>11 Q. Okay. And you'd agree with me that the --</p> <p>12 that Ida B. Wells projects was a place where the</p> <p>13 narcotics trade occurred, correct?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. In fact, do you know what an open air</p> <p>16 drug market is?</p> <p>17 A. Not really. What is it?</p> <p>18 Q. Okay. The Ida B. Wells was a place where a</p> <p>19 lot of people came to buy drugs, correct?</p> <p>20 A. Yes.</p> <p>21 Q. And the drugs were sold everywhere, correct?</p> <p>22 A. Like they do all over the city.</p> <p>23 Q. You could get crack-cocaine in any of those</p> <p>24 buildings, right?</p>	<p style="text-align: right;">Page 107</p> <p>1 MR. KOSOKO: You know what? I -- Yeah, it's fine.</p> <p>2 It is -- It's -- it's -- The exhibit page is counting as</p> <p>3 a page on there, but yes, the last -- the last page of</p> <p>4 that document.</p> <p>5 BY THE WITNESS:</p> <p>6 A. Yes.</p> <p>7 Q. And it says --</p> <p>8 You can read, correct, Mr. Jefferson?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. And could you read out loud what that</p> <p>11 thing under "Verification" says?</p> <p>12 A. Which one? The "Under penalty as provided by</p> <p>13 law"? What's that? "Pursuit" --</p> <p>14 Q. Yeah. You could start there where it says,</p> <p>15 "Under penalties as provided by law," correct. Go</p> <p>16 ahead.</p> <p>17 A. By the law of -- What's that -- that --</p> <p>18 "Pursuit"?</p> <p>19 MR. FLAXMAN: "Pursuant."</p> <p>20 BY THE WITNESS:</p> <p>21 A. "Pursuant to Section 1-" -- "1109 of the Code</p> <p>22 of Civil" -- What's that word? I don't know that word.</p> <p>23 MR. FLAXMAN: "Procedure."</p> <p>24</p>

28 (Pages 104 to 107)

In Re: Watts Coordinated Pretrial Proceedings
Continued Deposition of Goleather Jefferson - Taken 6/27/2022

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1 The signature of the witness, GOLEATHER
2 JEFFERSON, was reserved by agreement of counsel.

3 Witness my signature as a Certified Shorthand
4 Reporter in the State of Illinois, on July 20th, 2022.

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MONICA KIM, CSR
161 North Clark Street
Suite 3050
Chicago, Illinois 60601
Phone: 312.361.8851

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CSR No. 084-004606

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Exhibit A-8



Transcript of the Continued Deposition of
Arthur Lewis Kirksey

Case: In Re: Watts Coordinated Pretrial Proceedings
Taken On: December 6, 2022

Royal Reporting Services, Inc.
Phone: 312.361.8851
Email: info@royalreportingservices.com
Website: www.royalreportingservices.com

In Re: Watts Coordinated Pretrial Proceedings
Continued Deposition of Arthur Lewis Kirksey - Taken 12/6/2022

Page 1

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

In re: WATTS COORDINATED) Case No. 19 CV 1717
PRETRIAL PROCEEDINGS)

The continued videotaped deposition of ARTHUR LEWIS KIRKSEY, called by the Defendants for examination, taken pursuant to notice and pursuant to the Federal Rules of Civil Procedure for the United States District Courts pertaining to the taking of depositions, taken before Monica Kim, Certified Shorthand Reporter via videoconference, commencing at 12:39 p.m. on December 6th, 2022.

In Re: Watts Coordinated Pretrial Proceedings
Continued Deposition of Arthur Lewis Kirksey - Taken 12/6/2022

Page 37

1 **Q. It didn't take too much effort for you to --**
2 **to -- to move your product, right?**
3 A. I -- I guess.
4 **Q. You had difficulty selling crack cocaine at**
5 **the Ida B. Wells?**
6 A. No.
7 **Q. It was easy to do, correct?**
8 A. I mean, once you put the work in, I mean, I
9 don't -- You got to -- Yeah, I guess.
10 **Q. I mean, people came down there to buy drugs,**
11 **correct?**
12 A. Correct.
13 **Q. It's the projects. I'm not asking you a trick**
14 **question.**
15 A. You're asking me is it -- is it hard or is it
16 easy? I -- It depends on who -- who is who, if it's
17 hard or if it's easy. It ain't easy for everybody.
18 It's not hard for everybody. So I don't -- I don't
19 know.
20 **Q. Okay. And so when would you typically start**
21 **working?**
22 A. The times vary. No certain time or no time I
23 started, no time that I end. It varies.
24 **Q. It just -- You would just --**

Page 38

1 You know, whenever you woke up and felt --
2 **felt the need, you would just go down there and move**
3 **your work?**
4 A. Correct.
5 **Q. How long --**
6 **What's the latest you ever stayed at the Wells**
7 **selling crack cocaine?**
8 A. I leave before a watch member get off -- get
9 off their shift.
10 **Q. You said you leave before they get off their**
11 **shift?**
12 A. Yeah.
13 **Q. Okay. And why is that?**
14 A. So I won't go to jail.
15 **Q. Okay. But when --**
16 **What -- what shift did Bob Marley's team work?**
17 A. The shift after Watts and them shift.
18 **Q. Okay. And you've before arrested by Bob**
19 **Marley's team multiple times, correct?**
20 A. I've been caught by, I think, Watts twice
21 maybe.
22 **Q. Okay. We talked about that. One is the --**
23 **one is the -- the one involving your car where you --**
24 **where you dumped the crack in your car, right?**

Page 39

1 A. That was -- that was Watts and them.
2 **Q. Okay. I get it. You're saying, "Watts and**
3 **them." That's -- that's one time with Watts and them,**
4 **right, the crack cocaine in the car? Right?**
5 A. Correct.
6 **Q. Is that -- Am I right or am I wrong,**
7 **Mr. Kirksey?**
8 A. You right.
9 **Q. Okay. The second time was -- was just a**
10 **trespass, correct?**
11 A. Correct.
12 **Q. Okay. But are --**
13 **Bob Marley's team arrested you on**
14 **January 23rd, 2008, correct?**
15 A. I'm not sure of the month, but he -- they
16 arrested me.
17 **Q. He's arrested -- That team has arrested you**
18 **multiple times, correct?**
19 A. I believe twice.
20 **Q. So the Watts team arrested you twice; Bob**
21 **Marley's team arrested you twice?**
22 A. Correct.
23 **Q. After this supposed first time where you gave**
24 **Watts some unknown amount of money in some unknown**

Page 40

1 **amount of months, some whatever, when was the next time**
2 **he asked you for money?**
3 A. I don't believe there was a next time for --
4 for Watts.
5 **Q. Okay. How did you know to give Ronald Watts**
6 **money on the date -- this random day we can't pinpoint?**
7 A. I had a phone call.
8 **Q. Who -- who called you?**
9 A. I'm not sure. It was -- it was -- it was
10 Watts or it was -- if it was Mohammed. I'm not sure
11 which one it was.
12 **Q. Okay. And when you made -- when you --**
13 **Did you -- did you give him cash? Did you**
14 **give a -- Could you tell me anything about this alleged**
15 **incident? Was it in a plastic bag? Was it in a paper**
16 **bag? Give me something.**
17 A. It was cash.
18 MR. FLAXMAN: Objection, form.
19 BY THE WITNESS:
20 A. It was cash. I mean, they -- they got police
21 cameras right there. So you just go back, rewind the
22 police camera. It will show you the day I'm talking
23 about, the time I'm talking about, who it was that
24 grabbed me in the building. Go back and rewind the

In Re: Watts Coordinated Pretrial Proceedings
Continued Deposition of Arthur Lewis Kirksey - Taken 12/6/2022

Page 84

1 The signature of the witness, ARTHUR LEWIS
2 KIRKSEY, was reserved by agreement of counsel.

3 Witness my signature as a Certified Shorthand
4 Reporter in the State of Illinois, on December 27th,
5 2022.

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CSR No. 084-004606

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24



MONICA KIM, CSR
161 North Clark Street
Suite 3050
Chicago, Illinois 60601
Phone: 312.361.8851



Exhibit A-9



Transcript of the Deposition of
Jesse Lockett

Case: In Re: Watts Coordinated Pretrial Proceedings
Taken On: February 27, 2024

Royal Reporting Services, Inc.
Phone: 312.361.8851
Email: info@royalreportingservices.com
Website: www.royalreportingservices.com

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Jesse Lockett - Taken 2/27/2024

Page 1

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

)	
)	
In re: Watts)	No. 19-cv-1717
Coordinated Pretrial)	
Proceedings)	
)	

The videotaped deposition of JESSE LOCKETT, called for examination, pursuant to the Federal Rules of Civil Procedure of the United States District Court pertaining to the taking of depositions, taken before MARY T. MURPHY McGUIRK, a Notary Public within and for the County of Cook, State of Illinois, and a Certified Shorthand Reporter of said state, at Reiter Burns, 311 South Wacker Drive, Suite 5200, Chicago, Illinois, commencing at 10:00 a.m. on February 27, 2024.

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Jesse Lockett - Taken 2/27/2024

<p style="text-align: right;">Page 42</p> <p>1 So it wasn't like -- we didn't have, like, a schedule</p> <p>2 like, okay, you got these days or you got these -- like,</p> <p>3 I was kind of special, if you want to say. So I could</p> <p>4 come out when I want to. So whenever I came out, I was</p> <p>5 able to sell the drugs.</p> <p>6 Q. Okay. And why -- why were you able to do it</p> <p>7 that way?</p> <p>8 A. I mean, like, it was like they -- they --</p> <p>9 Wilbert liked me a lot, a lot so...</p> <p>10 Q. So were you considered maybe higher up --</p> <p>11 A. Yes, ma'am.</p> <p>12 Q. -- with Big Shorty?</p> <p>13 A. Yes, ma'am.</p> <p>14 Q. And was Allen Jackson considered higher up?</p> <p>15 A. I don't -- I mean, no, not to my knowledge.</p> <p>16 Q. Okay. And so you could sell drugs at any time</p> <p>17 that you wanted to, correct?</p> <p>18 A. Anytime I wanted.</p> <p>19 Q. Do you know if Allen Jackson had to sell drugs</p> <p>20 at a specific time?</p> <p>21 A. No, ma'am.</p> <p>22 Q. You don't know?</p> <p>23 A. No.</p> <p>24 Q. Okay. Do you know when he generally was</p>	<p style="text-align: right;">Page 44</p> <p>1 Q. -- selling the drugs?</p> <p>2 A. Yes.</p> <p>3 Q. And then is there some type of runner or</p> <p>4 someone to go to the other areas? Is there a runner?</p> <p>5 A. I don't know what you mean.</p> <p>6 Q. No? Okay.</p> <p>7 So you're the pitcher on the mound. Where</p> <p>8 does that make everybody else in terms of the baseball</p> <p>9 setting?</p> <p>10 A. It -- it's not no baseball set. It's just</p> <p>11 call the mound. I'm the pitcher. I sell drugs, so...</p> <p>12 Q. So the mound would be basically the lobby of</p> <p>13 574?</p> <p>14 A. The lobby or the second floor or the third</p> <p>15 floor.</p> <p>16 Q. And then do you know if there were runners</p> <p>17 that would bring money to and from Big Shorty?</p> <p>18 A. No, I don't know.</p> <p>19 Q. Okay. Do you know Octayvia McDonald?</p> <p>20 A. Octayvia McDonald. She got a nickname?</p> <p>21 Because I know Octayvia, but I don't know her name.</p> <p>22 Q. Boo-Boo?</p> <p>23 A. Yeah, I know Boo-Boo.</p> <p>24 Q. Okay. And so do you know if Boo-Boo was</p>
<p style="text-align: right;">Page 43</p> <p>1 selling drugs? What time?</p> <p>2 A. I'm pretty sure from 6:00 in the morning.</p> <p>3 Like, whenever -- because it's like -- whenever -- like</p> <p>4 I could come out and do it anytime I want. So some days</p> <p>5 I wouldn't come out. So when I wouldn't come out, I</p> <p>6 wouldn't know who -- you know, like who was on the mound</p> <p>7 or who -- because it's called the mound. So I don't</p> <p>8 know who selling what or doing what.</p> <p>9 Q. Okay. And in the phrase you just said was the</p> <p>10 mile, correct?</p> <p>11 A. Yeah, that's what it's called.</p> <p>12 Q. Okay. And can you just -- like what is -- how</p> <p>13 did the mile work?</p> <p>14 A. It's called -- we called it the mound. That's</p> <p>15 what you sell, the jersey. I'm the pitcher on the</p> <p>16 mound, like baseball.</p> <p>17 Q. The mound?</p> <p>18 A. The mound.</p> <p>19 Q. Oh --</p> <p>20 A. Yeah.</p> <p>21 Q. -- okay. Not mile, M-I-L-E. It's the mound?</p> <p>22 A. No, mound. Yeah.</p> <p>23 Q. Okay. So you are the pitcher on the mound --</p> <p>24 A. Yes.</p>	<p style="text-align: right;">Page 45</p> <p>1 considered a runner on --</p> <p>2 A. No.</p> <p>3 Q. -- on the mound?</p> <p>4 A. No, ma'am. Not when I was -- not when I was</p> <p>5 in 574. No, ma'am.</p> <p>6 Q. Do you know if she worked at all for</p> <p>7 Big Shorty?</p> <p>8 A. I don't.</p> <p>9 Q. You don't know?</p> <p>10 A. I don't know.</p> <p>11 Q. Okay. When is the last time you've seen</p> <p>12 Ms. McDonald or Boo-Boo?</p> <p>13 A. I haven't seen her in a while.</p> <p>14 Q. Okay. Other than Allen Jackson at 574, do you</p> <p>15 recall any other individuals who were also selling drugs</p> <p>16 at that time period?</p> <p>17 A. Harry. I don't know his last name. I think</p> <p>18 Owens.</p> <p>19 Q. Okay.</p> <p>20 A. But he's the one who's actually bringing me</p> <p>21 the drugs, so --</p> <p>22 Q. Okay. So he was -- he would bring you the</p> <p>23 drugs --</p> <p>24 A. Yes.</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Jesse Lockett - Taken 2/27/2024

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REPORTER'S CERTIFICATE

I, Mary T. Murphy McGuirk, a Certified
Shorthand Reporter of the State of Illinois, do hereby
certify that the foregoing was reported via
videoconference by stenographic and mechanical means,
which matter was held on the date and at the time and
place set out on the title page hereof, and that the
foregoing constitutes a true and accurate transcript of
same.

I further certify that I am not related to
any of the parties, nor am I an employee of or related
to any of the attorneys representing the parties, and I
have no financial interest in the outcome of this
matter.

IN WITNESS WHEREOF, I do hereunto set my hand
in Tinley Park, Illinois, this 25th day of March, 2024.

Mary T. Murphy McGuirk



Mary T. Murphy McGuirk
Certified Shorthand Reporter
CSR Certificate No. 84-4160

Exhibit A-10



**Transcript of the Deposition of
Damica Nickerson**

Case: In Re: Watts Coordinated Pretrial Proceedings

Taken On: May 31, 2019

Royal Reporting Services, Inc.

Phone: 312.361.8851

Fax: 312.361.8861

Email: info@royalreportingservices.com

Internet: www.royalreportingservices.com

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Damica Nickerson - Taken 5/31/2019

Page 1

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

In re: WATTS COORDINATED) No. 19 CV 01717
PRETRIAL PROCEEDINGS)

The deposition of DAMICA NICKERSON, called by the Defendant for examination, taken pursuant to notice and pursuant to the Federal Rules of Civil Procedure for the United States District Courts pertaining to the taking of depositions, taken before Enza Tenerelli, Certified Shorthand Reporter and Registered Professional Reporter, at 311 North Aberdeen Street, 3rd Floor, Chicago, Illinois, commencing at 1:05 p.m. on May 31st, 2019.

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Damica Nickerson - Taken 5/31/2019

Page 17

1 When you were living in the Ida B. Wells
2 527 building at the Ida B. Wells housing complex, were
3 you aware that drug transactions were occurring?

4 **A.** I mean, I seen'd it.

5 **Q.** You --

6 **A.** When I was in and out because I was going to
7 school at the time, so yeah.

8 **Q.** So as you were walking in and out of the
9 building, you would see --

10 **A.** I mean, you would see a few people hanging
11 out, yeah.

12 **Q.** And was that a pretty constant thing that you
13 would see?

14 **A.** Most of the time.

15 **Q.** Were there specific times where, like, the
16 drug transactions would occur, like, during the day?

17 **A.** Ain't no specific time it would be --
18 occurred.

19 **Q.** Was it just, like, all throughout the day?

20 **A.** Almost.

21 **Q.** And was there a specific location in the
22 building that the drug sales would occur?

23 **A.** I mean, I don't know. I wasn't looking for
24 it. You just know you see people.

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Damica Nickerson - Taken 5/31/2019

Page 91

1 In witness whereof, I have hereunto set my
2 hand and affixed my seal of office at Chicago, Illinois,
3 this June 20th, 2019.

4
5
6
7
8 *Enza Tenerelli*

Enza Tenerelli, CSR, RPR
161 North Clark Street
Suite 3050
Chicago, Illinois 60601
Phone: 312.361.8851



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12 CSR No. 084-004873
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Exhibit A-11



Transcript of the Deposition of
Calvin Robinson

Case: In Re: Watts Coordinated Pretrial Proceedings
Taken On: December 15, 2022

Royal Reporting Services, Inc.
Phone: 312.361.8851
Email: info@royalreportingservices.com
Website: www.royalreportingservices.com

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Calvin Robinson - Taken 12/15/2022

Page 1

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

In re: WATTS COORDINATED)
PRETRIAL PROCEEDINGS,) Case No. 19-CV-1717
)
)
)

The VIDEOTAPED DEPOSITION of CALVIN
ROBINSON, pursuant to notice and pursuant to the
Rules of Civil Procedure for the United States
District Courts pertaining to the taking of
depositions, taken via videoconference before
Barbara Perkovich, CSR, Certified Shorthand
Reporter in and for the State of Illinois on the
15th day of December 2022 at 10:00 a.m.

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Calvin Robinson - Taken 12/15/2022

<p style="text-align: right;">Page 185</p> <p>1 MS. GIZZI: Objection, form. You can 2 answer. 3 BY MR. KOSOKO: 4 Q. And when I say that, I'm talking about 5 any other officer, a member of the Chicago Police 6 Department. Can you please tell me how I'm 7 supposed to know that when you use the word 8 "Watts," you're not talking about one of the 9 10,000 members of the Chicago Police Department? 10 Could you please tell me that? 11 A. No. 12 Q. Mr. Robinson, are you using the name 13 Watts in this lawsuit because you know that's the 14 only way you're going to get any money out of 15 this? 16 A. Say that again. 17 Q. Are you using the word "Watts" to refer 18 to the officer in this lawsuit because you know 19 that's the only way you can get any money in this 20 lawsuit? 21 A. No. 22 Q. Now, Mr. Robinson, you -- can you 23 describe the clothing this person that you claim 24 to be Watts had on?</p>	<p style="text-align: right;">Page 187</p> <p>1 also; is that correct? 2 A. No. No. 3 Q. Okay. You didn't testify earlier that 4 she wanted to buy crack cocaine to smoke? 5 A. No. No, I didn't say that. 6 Q. You didn't say that? 7 A. No. 8 Q. Okay. But she -- she went into the 9 building with you, though, correct? 10 A. She went in the building with me. 11 Q. And your plans were to leave with her 12 to go back to -- what is it, 67th and Stony where 13 you were staying? 14 A. Right. 15 Q. And you all were going to get it on? 16 A. Guess so. 17 Q. That was your hope, right? 18 A. Yes. 19 Q. And you wanted -- you wanted to impress 20 her, right, in hopes that she would -- she would 21 have sexual relations with you, correct? 22 A. Maybe. I don't know. 23 Q. I mean, you were trying to have a good 24 time, right?</p>
<p style="text-align: right;">Page 186</p> <p>1 A. No. 2 Q. All right. Let me give you -- let me 3 give you an easy one. Can you tell me anything 4 about what this person looked like in your own 5 words? 6 A. No. 7 Q. All right. Mr. Robinson, you did not 8 live at the Ida B. Wells in January 22nd of 2007; 9 is that correct? 10 A. No. 11 Q. Huh? 12 A. No. 13 Q. Okay. And you weren't invited by 14 anybody who lived there on January 22nd, 2007, 15 correct? 16 A. No. 17 Q. Okay. And in fact, you testified 18 earlier that your intentions for going down there 19 were to buy drugs, correct? 20 A. Yes. 21 Q. And you met one of -- another person 22 who was arrested here or Ms. Jones along the way? 23 A. Yes. 24 Q. And her intentions was to buy drugs</p>	<p style="text-align: right;">Page 188</p> <p>1 A. Tried to. 2 Q. Sex, drugs, rock and roll, right? 3 A. I guess so. 4 Q. So when you were -- when you were 5 arrested by members of the Chicago Police 6 Department, you believed that you were -- you were 7 being arrested for trespassing, correct? 8 A. Yes. 9 Q. And that's in fact because you were -- 10 you were trespassing, correct? 11 A. Yes. 12 Q. Okay. And it's illegal to trespass, 13 correct? 14 A. What? 15 Q. Trespassing is illegal, correct? 16 A. No. 17 Q. Trespassing is not against Illinois 18 Compiled Statutes? 19 MS. GIZZI: Objection, calls for a 20 legal conclusion. You can answer. You can 21 answer. 22 THE WITNESS: Can I? 23 MS. GIZZI: Yep. 24</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Calvin Robinson - Taken 12/15/2022

Page 219

REPORTER'S CERTIFICATE

I, BARBARA PERKOVICH, CSR No. 84-004070,
Certified Shorthand Reporter, certify:
That the foregoing proceedings were taken
before me on the date and time therein set
forth. At which time the witness was put
under oath by me;
That the testimony of the witness, the
questions propounded, and all objections and
statements made at the time of the
examination were recorded stenographically by
me and were thereafter transcribed;
That the foregoing is a true and correct
transcript of my shorthand notes so taken.
I further certify that I am not a relative or
employee of any attorney of the parties, nor
financially interested in the action.
I declare under penalty of perjury under the
laws of Illinois that the foregoing is true
and correct.

Dated this 28th day of December, 2022.


BARBARA PERKOVICH, C.S.R. No. 84-004070



Exhibit A-12



Transcript of the Deposition of
Henry Thomas

Case: In Re: Watts Coordinated Pretrial Proceedings
Taken On: March 16, 2021

Royal Reporting Services, Inc.
Phone: 312.361.8851
Email: info@royalreportingservices.com
Website: www.royalreportingservices.com

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Henry Thomas - Taken 3/16/2021

Page 1

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

IN RE: WATTS COORDINATED)
PRETRIAL PROCEEDINGS)
)
)
) No. 19 CV 01717
)
) Judge Wood
) Magistrate
) Judge Finnegan

The videotaped deposition of HENRY THOMAS,
taken pursuant to the Federal Rules of Civil
Procedure of the United States District Courts
pertaining to the taking of depositions, taken via
videoconference before KRISTA R. DOLGNER, Registered
Professional Reporter and Certified Shorthand
Reporter of the State of Illinois, on Tuesday,
March 16, 2021, at 9:00 a.m.

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Henry Thomas - Taken 3/16/2021

Page 282	Page 284
<p>1 to vehicle, how many of the team members were 2 together with you? 3 A. At that time, I just remember Watts and 4 Gonzalez. 5 Q. It was just Watts and Gonzalez together? 6 A. I said that's who I remember. 7 Q. Okay. Now, when you say "Watts," are you 8 talking about Steven Watts? 9 A. No. 10 MS. KLEINHAUS: Objection to form. 11 BY THE WITNESS: 12 A. No. I'm talking about Sergeant Ronald 13 Watts. 14 Q. Okay. Were you ever arrested by another 15 officer by the name of Watts? 16 A. No. Not that I remember, no. 17 Q. Not that you remember. You have never 18 been arrested by an Officer Steven Watts? 19 A. Not that I remember, no. 20 Q. A/k/a Big Booty Steve? 21 A. Big Booty Steve? 22 Q. Uh-huh. 23 A. Oh, yeah. I've been locked up by Big 24 Booty Steve before.</p>	<p>1 their interactions with you at the Wells; is that 2 correct? 3 A. Yes. 4 Q. And every time you interacted with them, 5 they didn't arrest you; is that correct? 6 A. Excuse me. Could you repeat that? 7 Q. Every time you interacted with them, they 8 didn't arrest you; is that correct? 9 A. Not every time. 10 MS. KLEINHAUS: Objection to form. 11 BY THE WITNESS: 12 A. Not every time. 13 Q. So how did -- how did the operation work 14 at 527? 15 A. Operation? 16 Q. Yeah. 17 MS. KLEINHAUS: Objection to form as to 18 "operation." 19 You can answer it, if you understand. 20 BY THE WITNESS: 21 A. I don't know. I don't understand. Like, 22 what's the operation? 23 Q. All right. You sold drugs at the Wells, 24 right?</p>
Page 283	Page 285
<p>1 Q. Okay. That's what I'm asking you. So do 2 you remember this, or don't you remember it? 3 A. Well, I -- 4 MS. KLEINHAUS: Objection -- objection. 5 Argumentative. So there's not a question pending. 6 Ask a fresh question, please. 7 BY MR. KOSOKO: 8 Q. So another officer with the last name of 9 Watts has arrested you before; is that correct? 10 A. Now, that you say his name, we know him by 11 Big Booty Steve. Even a lot of these officers -- 12 that's what I was explaining to you-all. We don't 13 know them by their government. We know them by 14 nicknames. And a lot of people you-all questioned 15 me about, we all know them by nicknames. 16 Q. You know what? I appreciate that, 17 Mr. Thomas. Can you give us -- can you name all the 18 members of the Watts team, whether by real name or 19 nickname? Can you give them to us? Can you name 20 them for us, please? 21 A. Gonzalez, Watts, Al, Smitty, Kenny, Jay 22 Boog, Mohammed. That's who all I can think of right 23 now. 24 Q. Okay. And you learned of them through</p>	<p>1 A. Yes. 2 Q. Okay. You had a way in which you sold 3 drugs at the Wells to avoid detection by police 4 officers; is that correct? 5 A. Yes. 6 Q. Okay. Tell us how that went. 7 A. I -- 8 MS. KLEINHAUS: Objection to form. 9 You can answer. 10 BY THE WITNESS: 11 A. I'd post up in the building and stay in 12 the building and distribute my drugs. 13 Q. And how would you know who wanted to buy 14 drugs? 15 MS. KLEINHAUS: Objection. Asked and answered. 16 You can answer again. 17 BY THE WITNESS: 18 A. How would I know when to by drugs? 19 Q. How would you know who wanted to buy 20 drugs? 21 A. Oh. You ask them. 22 Q. You would approach them and ask them if 23 they wanted to buy drugs? 24 A. When they came in the building.</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Henry Thomas - Taken 3/16/2021

Page 358

1 STATE OF ILLINOIS)
) SS:
2 COUNTY OF C O O K)

3 I, KRISTA R. DOLGNER, a Certified
4 Shorthand Reporter within and for the State of
Illinois, do hereby certify:

5 That previous to the commencement of the
6 examination of the witness, the witness was duly
sworn to testify the whole truth concerning the
7 matters herein;

8 That the foregoing videoconference
9 deposition was reported stenographically by me, was
thereafter reduced to a computerized transcript by
10 me, and constitutes a true record of the testimony
given and the proceedings had;

11 That the said deposition was taken before
me at the date and time specified;

12 That the reading and signing by the
13 witness of the deposition transcript was agreed upon
as stated herein;

14 That I am not a relative or employee or
15 attorney or counsel, nor a relative or employee of
such attorney or counsel for any of the parties
16 hereto, nor interested directly or indirectly in the
outcome of this action.

17 IN WITNESS WHEREOF, I do hereunto set my
18 hand at Chicago, Illinois.

19


20

21

22

23

24


Krista R. Dolgner, CSR, RPR
161 North Clark Street
Suite 3050
Chicago, Illinois 60601
312.361.8851



CSR License No. 084-002878