

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

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

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

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

<p style="text-align: center;">Page 17</p> <p>1      <b>to see you?</b>  2      A. 575.  3      <b>Q. 575? Okay. Do you remember what unit you</b>  4      <b>were living in?</b>  5      A. Yeah, 102.  6      <b>Q. Who lived with you at that address?</b>  7      A. My grandmother, Charlene Campbell.  8      <b>Q. Anyone else besides you two?</b>  9      A. I got a lot of cousins, but they deceased.  10     <b>Q. Okay. I'm sorry to hear that.</b>  11     <b>When was the last time that you saw Mr. Waddy</b>  12     <b>in person?</b>  13     A. I was just with him, what, last week.  14     <b>Q. Is he living with you in Indiana?</b>  15     A. No.  16     <b>Q. Okay. Do you know where he's living?</b>  17     A. Not at the moment.  18     <b>Q. Okay. Do you know if he's in Chicago?</b>  19     A. Chicago.  20     <b>Q. Okay. He's in Chicago; you just don't know</b>  21     <b>the exact address?</b>  22     A. Right.  23     <b>Q. Okay. You were disclosed as a witness in this</b>  24     <b>case as being both an occurrence witness and a damages</b></p>	<p style="text-align: center;">Page 19</p> <p>1      <b>Q. What do you mean by that?</b>  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      <b>Q. Do you know approximately -- Well, so -- And I</b>  8      <b>want to make sure I'm clear on your testimony. For you</b>  9      <b>having lived there since you were 3, it wasn't always --</b>  10     A. Bad.  11     <b>Q. -- a terrible place to live?</b>  12     A. No, it wasn't.  13     <b>Q. Okay. Do you remember approximately how old</b>  14     <b>you were when you noticed a change?</b>  15     A. I was -- I was coming up around 12, 11.  16     <b>Q. And what was different that made you recognize</b>  17     <b>a change in your environment?</b>  18     A. The hanging out, the police, ambulance. Every  19     time I looked up, ambulance here and there, so yeah.  20     <b>Q. Do you know why the ambulances were there?</b>  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     <b>Q. You mentioned drug sales were also at the</b></p>
<p style="text-align: center;">Page 18</p> <p>1      <b>witness. So I would like to start asking you a few</b>  2      <b>questions about what you know and remember from both</b>  3      <b>your time in the Wells and then also specifically</b>  4      <b>Mr. Waddy's arrest from April 4th, 2007. Okay?</b>  5      A. Okay.  6      <b>Q. First and foremost, how would you describe</b>  7      <b>what it was like growing up in the Wells?</b>  8      A. Oh, man. It was -- For me or for him?  9      Like ...  10     <b>Q. For you. For you, and then we can go to your</b>  11     <b>knowledge of him.</b>  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     <b>Q. How -- When you say it was okay for you, what</b>  15     <b>do you mean by that? Because that was just your home;</b>  16     <b>you were used to, or what do you mean?</b>  17     A. I was used to it, yes. I was used to it.  18     <b>Q. Was it -- Is it your understanding that it was</b>  19     <b>different for Mr. Waddy?</b>  20     A. At the moment, no, no.  21     <b>Q. Okay. Do you think it was difficult or</b>  22     <b>different for other people that weren't like you that</b>  23     <b>hadn't grown up there?</b>  24     A. Yeah.</p>	<p style="text-align: center;">Page 20</p> <p>1      <b>Wells. Would you say that they were kind of everywhere?</b>  2      A. Everywhere, every building. Like every  3      building sold drugs, yeah.  4      <b>Q. Were drugs being sold both inside and outside</b>  5      <b>the buildings --</b>  6      A. Just inside.  7      <b>Q. -- do you know?</b>  8      <b>Do you remember ever seeing drugs being sold</b>  9      <b>in the 551 building when you lived there?</b>  10     A. You said what? I'm sorry. I didn't hear you.  11     <b>Q. Do you remember observing or seeing drugs</b>  12     <b>being sold when you lived in the 551 building?</b>  13     A. No.  14     <b>Q. In the 575 building, do you recall seeing</b>  15     <b>drugs being sold there?</b>  16     A. (Nodding.)  17     <b>Q. Is that a yes?</b>  18     A. Yes, ma'am.  19     <b>Q. Sorry. Sometimes your voice cuts out just a</b>  20     <b>little bit, so I just want to make sure for both me and</b>  21     <b>the court reporter, we have --</b>  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.</p>

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<p>1       A. I don't recall. I don't remember exact date.</p> <p>2       <b>Q. Do you remember where you saw him at when you</b></p> <p>3       <b>first met him?</b></p> <p>4       A. No, I don't recall. I'm sorry.</p> <p>5       <b>Q. When you said Mr. Waddy -- You testified</b></p> <p>6       <b>earlier that Mr. Waddy did not live at the Wells, right?</b></p> <p>7       A. Right.</p> <p>8       <b>Q. Mr. Waddy never lived at the Wells, correct?</b></p> <p>9       A. Correct.</p> <p>10      <b>Q. And it's your opinion that he -- you said he</b></p> <p>11      <b>came down there just to hang out?</b></p> <p>12      A. Correct.</p> <p>13      <b>Q. Okay. Who were some of Mr. Waddy's friends?</b></p> <p>14      A. That I don't know. Like I told the other</p> <p>15      lady, I don't know who he hung with per se. I just know</p> <p>16      he out there.</p> <p>17      <b>Q. He's just out there?</b></p> <p>18      A. Out there. Everybody was out there.</p> <p>19      <b>Q. You testified earlier that there was a lot of</b></p> <p>20      <b>drugs sold at the Wells, correct?</b></p> <p>21      A. Correct.</p> <p>22      <b>Q. Would you agree with me that the Wells was an</b></p> <p>23      <b>open-air drug market in the years -- during -- in the</b></p> <p>24      <b>years of 2006 and 2007?</b></p>	<p>1       A. He was back then, yeah.</p> <p>2       <b>Q. He wore Jabos back then, right?</b></p> <p>3       <b>Did he wear Pelle Pelle back then?</b></p> <p>4       A. Yeah.</p> <p>5       <b>Q. What other kind of brands did Mr. Waddy wear</b></p> <p>6       <b>back then?</b></p> <p>7       A. Tales. I mean, that's -- that's all I knew.</p> <p>8       I mean, he was nice dressed.</p> <p>9       <b>Q. He was nice dressed?</b></p> <p>10      <b>Did he -- Did Mr. Waddy have an aviator jacket</b></p> <p>11      <b>back then?</b></p> <p>12      A. I think so. I'm not for sure.</p> <p>13      <b>Q. Did Mr. Waddy wear any, like, luxury brands</b></p> <p>14      <b>like Gucci or anything like that?</b></p> <p>15      A. Not that I know of.</p> <p>16      <b>Q. Just like your typical -- He wore Jabos,</b></p> <p>17      <b>Pelle, aviator, Timbs. Did Mr. Waddy have any jewelry?</b></p> <p>18      A. Not that I recall.</p> <p>19      <b>Q. What was Mr. Waddy's nickname?</b></p> <p>20      A. I don't know what they called him. Dino.</p> <p>21      <b>Q. Dino?</b></p> <p>22      A. (Nodding.)</p> <p>23      <b>Q. Okay. How often did Mr. Waddy come down to</b></p> <p>24      <b>the Wells?</b></p>
<p style="text-align: center;">Page 82</p> <p>1       A. It was.</p> <p>2       <b>Q. Okay. What did Mr. Waddy do for a living when</b></p> <p>3       <b>he first started trying to talk to you?</b></p> <p>4       A. I couldn't tell you that because I don't know.</p> <p>5       <b>Q. All right. How did --</b></p> <p>6       A. I --</p> <p>7       <b>Q. Go ahead, ma'am.</b></p> <p>8       A. I didn't know if he had a job. I didn't know</p> <p>9       what type of income he had at the moment. I don't --</p> <p>10      Yeah, no, I don't know.</p> <p>11      <b>Q. All right. Is Mr. Waddy's nickname Pretty</b></p> <p>12      <b>Boy?</b></p> <p>13      A. I don't know nothing about that. I don't know</p> <p>14      nothing about that.</p> <p>15      <b>Q. You don't know about that?</b></p> <p>16      <b>All right. Did Mr. Waddy dress nicely when he</b></p> <p>17      <b>first started trying to talk to you?</b></p> <p>18      A. Yes.</p> <p>19      <b>Q. What kind of clothes would Mr. Waddy wear when</b></p> <p>20      <b>he first started talking to you?</b></p> <p>21      A. It was name brand. You know, name-brand</p> <p>22      stuff.</p> <p>23      <b>Q. Assuming that I know the name brands, did he</b></p> <p>24      <b>wear Jabos?</b></p>	<p style="text-align: center;">Page 84</p> <p>1       A. Now, that I don't know. I can't tell you how</p> <p>2       often because -- Yeah, I don't -- I don't know.</p> <p>3       <b>Q. How often did you see him down at the Wells --</b></p> <p>4       <b>Prior to when he first started talking to you, how often</b></p> <p>5       <b>would you see him down at the Wells?</b></p> <p>6       A. Not that often. I had to call him for him to</p> <p>7       even come down there, you know.</p> <p>8       <b>Q. Okay. And then -- So I've got to ask you a</b></p> <p>9       <b>tough question.</b></p> <p>10      A. Okay.</p> <p>11      <b>Q. So you decided to have a baby with a man who</b></p> <p>12      <b>you didn't know whether he had a job or who any of his</b></p> <p>13      <b>friends were?</b></p> <p>14      A. Correct.</p> <p>15      MR. ROSATI: Objection to form.</p> <p>16      BY MR. KOSOKO:</p> <p>17      <b>Q. How many times have you been present for when</b></p> <p>18      <b>Mr. Waddy has been arrested?</b></p> <p>19      A. That one incident that I can recall.</p> <p>20      <b>Q. That's the only one?</b></p> <p>21      A. (Nodding.)</p> <p>22      <b>Q. Okay. And are -- The only members of the</b></p> <p>23      <b>tactical team supervised by Sergeant Watts that you are</b></p> <p>24      <b>familiar with are Sergeant Watts himself, correct?</b></p>

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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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# Exhibit A-2



Transcript of the Deposition of  
**Gregory Young**

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

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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

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)  
In re: WATTS COORDINATED )  
PRETRIAL PROCEEDINGS ) Case No. 19 cv 1717  
)  
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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: center;">Page 25</p> <p>1        A. 102. I mean -- pardon me. 103, I 2        think. 3        <b>Q. And Ben Baker, the drug dealer, he</b> 4        <b>lived on the second floor, right?</b> 5        A. Yes. 6        <b>Q. And do you know his wife, Clarissa</b> 7        <b>Glenn?</b> 8        A. Yes. 9        <b>Q. Do you know his kids?</b> 10       A. Yes. 11       <b>Q. All right. Did -- were his kids and</b> 12       <b>your kids friends?</b> 13       A. Yes. 14       <b>Q. What types of things would your kids</b> 15       <b>and Ben Baker's kids do together?</b> 16       A. Oh, play football, rode bikes, skate, 17       whatever. 18       <b>Q. Did -- did they go to the same school?</b> 19       A. No. 20       <b>Q. Where did your kids go to school when</b> 21       <b>you -- when you lived at Ida B. Wells?</b> 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: center;">Page 27</p> <p>1        <b>illegal narcotics?</b> 2        A. Yes. 3        <b>Q. And many of those people would be what</b> 4        <b>you would think were junkies? Would you agree</b> 5        <b>with that?</b> 6        A. No. 7        <b>Q. Okay. Like, drug addicts would go --</b> 8        <b>would be going there every day to buy -- to get</b> 9        <b>drugs, or you didn't see that?</b> 10       A. Yes, yes. 11       <b>Q. That's true, right?</b> 12       A. Yes. 13       <b>Q. Do you know what a wake-up call is?</b> 14       A. Yes. 15       <b>Q. What's a wake-up call?</b> 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       <b>Q. So in a way, it's a payment for someone</b> 21       <b>to assist in illegal narcotics operations; is</b> 22       <b>that right? Yes?</b> 23       A. Mm-hmm. 24       <b>Q. And so the drug dealers would give a</b></p>
<p style="text-align: center;">Page 26</p> <p>1        <b>Q. Right. Dolittle is right across the</b> 2        <b>street from Ida B. Wells, right?</b> 3        A. Yes, yes. 4        <b>Q. And is there a park right there near</b> 5        <b>Ida B. Wells?</b> 6        A. Yes. 7        <b>Q. Yeah. And where's the park in relation</b> 8        <b>to Ida B. Wells?</b> 9        A. The park would be on Cottage Grove, by 10       Cottage Grove. 11       <b>Q. So I want to go back -- again, I'm</b> 12       <b>focusing on -- from the year of, like, 2000</b> 13       <b>until you moved out in approximately 2007 in</b> 14       <b>terms of illegal narcotics activity that you</b> 15       <b>would observe. Okay?</b> 16       A. Mm-hmm. 17       <b>Q. And you understand that?</b> 18       A. Yes, sir. 19       <b>Q. Okay. And I want to ask you, would you</b> 20       <b>agree that illegal narcotics were being sold at</b> 21       <b>Ida B. Wells 24/7?</b> 22       A. Yes. 23       <b>Q. And would you agree that you would have</b> 24       <b>people coming there every day looking to obtain</b></p>	<p style="text-align: center;">Page 28</p> <p>1        <b>wake-up call, say, to an individual and that</b> 2        <b>person would act as security for the narcotics</b> 3        <b>operations?</b> 4        A. Yes. 5        <b>Q. And it -- again, I'm just focusing on</b> 6        <b>Ida B. Wells in that time period, 2000 until you</b> 7        <b>moved away in 2007.</b> 8        <b>You would have individuals who would be</b> 9        <b>actually selling the drugs on any given day,</b> 10       <b>right?</b> 11       A. Yes. 12       <b>Q. And then the sellers, they would have</b> 13       <b>lookouts who would be watching out for the</b> 14       <b>police, right?</b> 15       A. Yes. 16       <b>Q. And the drug dealers would also have</b> 17       <b>individuals who were also soliciting the sale of</b> 18       <b>the illegal -- illegal narcotics, right?</b> 19       A. Yes. 20       <b>Q. Where there -- they might be calling</b> 21       <b>out the names of certain drugs that are being</b> 22       <b>sold, right?</b> 23       A. Yes. 24       <b>Q. Like, you know, calling out, say, for</b></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  
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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

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

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

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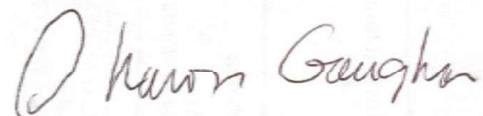
1 attorneys hereinbefore mentioned.

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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11



12

Sharon L. Patanella

13

Illinois Certified Shorthand Reporter

14

161 North Clark Street, Suite 3050

15

Chicago, Illinois 60601

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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

Royal Reporting Services, Inc.  
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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

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In re: WATTS COORDINATED ) No. 19 CV 01717  
PRETRIAL PROCEEDINGS )  
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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	Page 25
<p>1      narcotics; is that right?</p> <p>2      A. Correct.</p> <p>3      Q. And where did you sell narcotics at?</p> <p>4      A. At the 5- -- 527 East Browning.</p> <p>5      Q. The 527 building?</p> <p>6      A. Correct.</p> <p>7      Q. Right? Ida B. Wells?</p> <p>8      A. Correct.</p> <p>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?</p> <p>13     A. Correct.</p> <p>14     Q. And why was that? Because there were dope 15     dealers that were selling narcotics around the clock at 16     the 527 building?</p> <p>17     A. Yes.</p> <p>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?</p> <p>22     MS. GIZZI: Objection: form.</p> <p>23     BY THE WITNESS:</p> <p>24     A. There ain't no ranking.</p>	<p>1      A. No.</p> <p>2      Q. What type of narcotics did you sell out of the 3      559 building?</p> <p>4      A. Heroin.</p> <p>5      Q. Anything else?</p> <p>6      A. No.</p> <p>7      Q. What was the -- Excuse me.</p> <p>8      During what time frame did you sell heroin out 9      of the 527 building?</p> <p>10     A. From the morning to the evening.</p> <p>11     Q. Would you sell it until you ran out of 12     narcotics to sell?</p> <p>13     A. For -- Yes.</p> <p>14     Q. And would you do that every day?</p> <p>15     A. Yes.</p> <p>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?</p> <p>20     A. From 2000 to -- to the time it -- it closed 21     down.</p> <p>22     Q. Well, the 527 building, that was open until at 23     least 2009; is that right?</p> <p>24     A. Correct.</p>
<p>1      Q. Well, would it be number one? Would it be in 2      the top three?</p> <p>3      A. I wouldn't know that.</p> <p>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?</p> <p>7      A. Correct.</p> <p>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?</p> <p>11     A. 559.</p> <p>12     Q. 559 East Browning, right?</p> <p>13     A. Correct.</p> <p>14     Q. What other buildings did you sell narcotics 15     from?</p> <p>16     A. Just them two.</p> <p>17     Q. Just those two. And what was your -- Strike 18     that.</p> <p>19     What narcotics did you sell -- What -- Strike 20     that.</p> <p>21     What type of narcotics did you sell out of the 22     527 building?</p> <p>23     A. Heroin.</p> <p>24     Q. Anything else?</p>	<p>1      Q. Okay. So for close to a decade, you sold 2      heroin out of the 527 building, right?</p> <p>3      A. Correct.</p> <p>4      Q. Okay. So now, the 559 building, during 5      what -- what years did you sell heroin out of the 559 6      building?</p> <p>7      A. The same years as the 527. Just hopping 8      building to building.</p> <p>9      Q. Okay. They're -- They're very close to each 10     other, right?</p> <p>11     A. Correct.</p> <p>12     Q. Tell me -- So nearly ten years, right?</p> <p>13     A. Correct.</p> <p>14     Q. Okay. That you were selling heroin out of 15     those two buildings, right?</p> <p>16     A. Correct.</p> <p>17     Q. Okay. Did you sell -- ever sell narcotics at 18     any time during the 1990s?</p> <p>19     A. No.</p> <p>20     Q. So how was it -- How was it that you first 21     became a drug dealer in -- in the year 2000?</p> <p>22     A. How I became a drug dealer?</p> <p>23     Q. Yes.</p> <p>24     A. Just growing up in the neighborhood.</p>

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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*Angie Tenuelli*  
ENZA COSGRIFF, CSR, RPR  
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# 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

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

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

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

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

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

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

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

17 That the reading and signing by the  
18 witness of the deposition transcript was agreed upon  
19 as stated herein;

20 That I am not a relative or employee or  
21 attorney or counsel, nor a relative or employee of  
22 such attorney or counsel for any of the parties  
23 hereto, nor interested directly or indirectly in the  
24 outcome of this action.

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

A circular seal with a yellow and orange gradient background. The text "NDTCA" is at the top, "Electronic Transcripts" is in the middle, and "Signed" is at the bottom.

26 Krista R. Dolgner, CSR, RPR  
27 161 North Clark Street  
28 Suite 3050  
29 Chicago, Illinois 60601  
30 312.361.8851

31 CSR License No. 084-002878

32

# 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](mailto:info@royalreportingservices.com)  
Website: [www.royalreportingservices.com](http://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

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

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

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

CSR No. 084-004873

# 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](mailto:info@royalreportingservices.com)  
Website: [www.royalreportingservices.com](http://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

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Case No. 19 CV 1717  
In re: WATTS COORDINATED  
PRETRIAL PROCEEDINGS  
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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: center;">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        <b>Q. Is it your testimony, Mr. Goleather, that on</b></p> <p>7        <b>May 4th, 2000--</b></p> <p>8        A. My name is Goleather.</p> <p>9        <b>Q. Hang on. Let me finish my question. I'll try</b></p> <p>10      <b>to make it as clear as possible.</b></p> <p>11      <b>Is it your testimony, Mr. Jefferson, that on</b></p> <p>12      <b>May 4th of 2005 at approximately 12:15 p.m. you were not</b></p> <p>13      <b>standing at the back door of the 574 East 36th building?</b></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: center;">Page 106</p> <p>1        A. You could get drugs in all of them.</p> <p>2        <b>Q. You could get heroin in any of those</b></p> <p>3        <b>buildings, correct?</b></p> <p>4        A. Yes, yes, yes.</p> <p>5        <b>Q. Drugs was a problem in that community,</b></p> <p>6        <b>correct?</b></p> <p>7        A. I guess so, yes.</p> <p>8        <b>Q. Okay. Mr. Jefferson, I want to direct your</b></p> <p>9        <b>attention to Exhibit No. 2.</b></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      <b>Q. Okay. Mr. Jefferson, is there anything in</b></p> <p>15      <b>this affidavit that is untrue?</b></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      <b>Q. Okay. I'm going to direct your attention to</b></p> <p>19      <b>page 4 of that affidavit. Do you see that?</b></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: center;">Page 105</p> <p>1        <b>sell narcotics?</b></p> <p>2        A. Yeah.</p> <p>3        <b>Q. No?</b></p> <p>4        A. No. No.</p> <p>5        <b>Q. Mr. Jefferson, did you at any point live in</b></p> <p>6        <b>the 574 building?</b></p> <p>7        A. When I was younger.</p> <p>8        <b>Q. And when you say you were younger, could you</b></p> <p>9        <b>tell me what age you were?</b></p> <p>10      A. Like 15, 16, somewhere along there.</p> <p>11      <b>Q. Okay. And you'd agree with me that the --</b></p> <p>12      <b>that Ida B. Wells projects was a place where the</b></p> <p>13      <b>narcotics trade occurred, correct?</b></p> <p>14      A. Yes.</p> <p>15      <b>Q. Okay. In fact, do you know what an open air</b></p> <p>16      <b>drug market is?</b></p> <p>17      A. Not really. What is it?</p> <p>18      <b>Q. Okay. The Ida B. Wells was a place where a</b></p> <p>19      <b>lot of people came to buy drugs, correct?</b></p> <p>20      A. Yes.</p> <p>21      <b>Q. And the drugs were sold everywhere, correct?</b></p> <p>22      A. Like they do all over the city.</p> <p>23      <b>Q. You could get crack-cocaine in any of those</b></p> <p>24      <b>buildings, right?</b></p>	<p style="text-align: center;">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        <b>Q. And it says --</b></p> <p>8        <b>You can read, correct, Mr. Jefferson?</b></p> <p>9        A. Yes.</p> <p>10      <b>Q. Okay. And could you read out loud what that</b></p> <p>11      <b>thing under "Verification" says?</b></p> <p>12      A. Which one? The "Under penalty as provided by</p> <p>13      law"? What's that? "Pursuit" --</p> <p>14      <b>Q. Yeah. You could start there where it says,</b></p> <p>15      <b>"Under penalties as provided by law," correct. Go</b></p> <p>16      <b>ahead.</b></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>

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

Page 152

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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10                     
11                   MONICA KIM, CSR  
12                   161 North Clark Street  
13                   Suite 3050  
14                   Chicago, Illinois 60601  
15                   Phone: 312.361.8851



16                   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  
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Website: [www.royalreportingservices.com](http://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

<p style="text-align: center;">Page 37</p> <p>1       <b>Q. It didn't take too much effort for you to --</b>    2       <b>to -- to move your product, right?</b>    3       A. I -- I guess.    4       <b>Q. You had difficulty selling crack cocaine at</b>    5       <b>the Ida B. Wells?</b>    6       A. No.    7       <b>Q. It was easy to do, correct?</b>    8       A. I mean, once you put the work in, I mean, I    9       don't -- You got to -- Yeah, I guess.    10      <b>Q. I mean, people came down there to buy drugs,</b>    11      <b>correct?</b>    12      A. Correct.    13      <b>Q. It's the projects. I'm not asking you a trick</b>    14      <b>question.</b>    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      <b>Q. Okay. And so when would you typically start</b>    21      <b>working?</b>    22      A. The times vary. No certain time or no time I    23      started, no time that I end. It varies.    24      <b>Q. It just -- You would just --</b></p>	<p style="text-align: center;">Page 39</p> <p>1       A. That was -- that was Watts and them.    2       <b>Q. Okay. I get it. You're saying, "Watts and</b>    3       <b>them."</b> That's -- that's one time with Watts and them,    4       right, the crack cocaine in the car? Right?    5       A. Correct.    6       <b>Q. Is that -- Am I right or am I wrong,</b>    7       <b>Mr. Kirksey?</b>    8       A. You right.    9       <b>Q. Okay. The second time was -- was just a</b>    10      <b>trespass, correct?</b>    11      A. Correct.    12      <b>Q. Okay. But are --</b>    13      <b>Bob Marley's team arrested you on</b>    14      <b>January 23rd, 2008, correct?</b>    15      A. I'm not sure of the month, but he -- they    16      arrested me.    17      <b>Q. He's arrested -- That team has arrested you</b>    18      <b>multiple times, correct?</b>    19      A. I believe twice.    20      <b>Q. So the Watts team arrested you twice; Bob</b>    21      <b>Marley's team arrested you twice?</b>    22      A. Correct.    23      <b>Q. After this supposed first time where you gave</b>    24      <b>Watts some unknown amount of money in some unknown</b></p>
<p style="text-align: center;">Page 38</p> <p>1       <b>You know, whenever you woke up and felt --</b>    2       <b>felt the need, you would just go down there and move</b>    3       <b>your work?</b>    4       A. Correct.    5       <b>Q. How long --</b>    6       <b>What's the latest you ever stayed at the Wells</b>    7       <b>selling crack cocaine?</b>    8       A. I leave before a watch member get off -- get    9       off their shift.    10      <b>Q. You said you leave before they get off their</b>    11      <b>shift?</b>    12      A. Yeah.    13      <b>Q. Okay. And why is that?</b>    14      A. So I won't go to jail.    15      <b>Q. Okay. But when --</b>    16      <b>What -- what shift did Bob Marley's team work?</b>    17      A. The shift after Watts and them shift.    18      <b>Q. Okay. And you've before arrested by Bob</b>    19      <b>Marley's team multiple times, correct?</b>    20      A. I've been caught by, I think, Watts twice    21      maybe.    22      <b>Q. Okay. We talked about that. One is the --</b>    23      <b>one is the -- the one involving your car where you --</b>    24      <b>where you dumped the crack in your car, right?</b></p>	<p style="text-align: center;">Page 40</p> <p>1       <b>amount of months, some whatever, when was the next time</b>    2       <b>he asked you for money?</b>    3       A. I don't believe there was a next time for --    4       for Watts.    5       <b>Q. Okay. How did you know to give Ronald Watts</b>    6       <b>money on the date -- this random day we can't pinpoint?</b>    7       A. I had a phone call.    8       <b>Q. Who -- who called you?</b>    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      <b>Q. Okay. And when you made -- when you --</b>    13      <b>Did you -- did you give him cash? Did you</b>    14      <b>give a -- Could you tell me anything about this alleged</b>    15      <b>incident? Was it in a plastic bag? Was it in a paper</b>    16      <b>bag? Give me something.</b>    17      A. It was cash.    18      <b>MR. FLAXMAN: Objection, form.</b>    19      <b>BY THE WITNESS:</b>    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</p>

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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24

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



CSR No. 084-004606

# 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.  
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Website: [www.royalreportingservices.com](http://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

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

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

Page 200

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REPORTER'S CERTIFICATE

2

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

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

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

18

19

21

  
*Mary T. Murphy McGuirk*

Mary T. Murphy McGuirk

22

Certified Shorthand Reporter

23

CSR Certificate No. 84-4160

24

# 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](mailto:info@royalreportingservices.com)  
Internet: [www.royalreportingservices.com](http://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

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.

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*Enza Tenerelli*

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



CSR No. 084-004873

# 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.  
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Website: [www.royalreportingservices.com](http://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 ) Case No. 19-CV-1717  
PRETRIAL PROCEEDINGS, )  
 )  
 )  
 )

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: center;">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: center;">Page 187</p> <p>1        <b>also; is that correct?</b> 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: center;">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: center;">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

1

REPORTER'S CERTIFICATE

2

3 I, BARBARA PERKOVICH, CSR No. 84-004070,  
4 Certified Shorthand Reporter, certify:  
5 That the foregoing proceedings were taken  
6 before me on the date and time therein set  
7 forth. At which time the witness was put  
8 under oath by me;  
9 That the testimony of the witness, the  
10 questions propounded, and all objections and  
11 statements made at the time of the  
12 examination were recorded stenographically by  
13 me and were thereafter transcribed;  
14 That the foregoing is a true and correct  
15 transcript of my shorthand notes so taken.  
16 I further certify that I am not a relative or  
17 employee of any attorney of the parties, nor  
18 financially interested in the action.  
19 I declare under penalty of perjury under the  
20 laws of Illinois that the foregoing is true  
21 and correct.  
22 Dated this 28th day of December, 2022.  
23   
24 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

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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

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

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1 STATE OF ILLINOIS )  
2 ) SS:  
3 COUNTY OF COOK )

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

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

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

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

17 That the reading and signing by the  
18 witness of the deposition transcript was agreed upon  
19 as stated herein;

20 That I am not a relative or employee or  
21 attorney or counsel, nor a relative or employee of  
22 such attorney or counsel for any of the parties  
23 hereto, nor interested directly or indirectly in the  
24 outcome of this action.

25 IN WITNESS WHEREOF, I do hereunto set my  
26 hand at Chicago, Illinois.

A circular seal with a yellow and orange gradient background. The words "NDTCA" are at the top, "Electronic Transcripts" are in the middle, and "Signed" is at the bottom. The seal is partially obscured by a signature.

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