

Exhibit Q

In Re: Watts Pretrial

Sealed
Shannon Spalding

06/06/2023

<p>1</p> <p>IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION</p> <p>In re: WATTS COORDINATED) Master Docket Case No. PRETRIAL PROCEEDINGS) 19-cv-01717))) Judge Franklin U.) Valderrama))) Magistrate Judge) Sheila M. Finnegan</p> <p>CONTINUED VIDEO DEPOSITION OF SHANNON SPALDING</p> <p>(Excerpts of this transcript have been declared confidential and sealed under separate cover.)</p> <p>Taken on Behalf of Counsel for Loevy Plaintiffs</p> <p>DATE TAKEN: June 6, 2023 TIME: 9:49 a.m. - 5:52 p.m. PLACE: Fort Myers Court Reporting 5660 Strand Court Naples, Florida 34110</p> <hr/> <p>Stenographically Reported By: Terri L. Lewis, RPR, FPR-C FORT MYERS COURT REPORTING, LLC 2180 West First Street, Suite 120 Fort Myers, Florida 33901 Phone: (239) 334-1411 FAX: (239) 334-1476 Serving All of Southwest Florida</p>	<p>3</p> <p>1 APPEARANCES: (Continued) 2 For Defendants Cadman and Spaargaren: 3 JAMES V. DAFFADA, ESQUIRE 4 MEGAN K. McGRATH, ESQUIRE 5 Leinenweber, Baroni & Daffada, LLC 6 Special Assistant Corporation Counsel 7 120 N. LaSalle Street, Suite 2000 8 Chicago, Illinois 60602 9 jim@ilesq.com 10 mkm@ilesq.com 11 (Present via videoconference.) 12 13 For Defendants City of Chicago, Cline, Kirby, Rowan, 14 Bosak, Starks and Hillard: 15 DANIEL M. NOLAND, ESQUIRE 16 Reiter Burns, LLP 17 Special Assistant Corporation Counsel 18 311 S. Wacker Drive, Suite 5200 19 Chicago, Illinois 60606 20 dnoland@reiterburns.com 21 (Present via videoconference.) 22 For Flaxman Defendants: 23 JOEL FLAXMAN, ESQUIRE 24 COLLIN GIL, ESQUIRE 25 Law Offices of Kenneth N. Flaxman, P.C. 200 S. Michigan Avenue, Suite 201 Chicago, Illinois 60604-2430 jaf@kenlaw.com cjb@kenlaw.com (Present via videoconference.)</p> <p>Also present: Diane Dowling, Videographer</p> <p>*****</p>
<p>2</p> <p>1 APPEARANCES: 2 For the Loevy Plaintiffs: 3 JOSHUA TEPFER, ESQUIRE 4 Loevy & Loevy 5 311 N. Aberdeen Street, Third Floor 6 Chicago, Illinois 60607 7 josh@loevy.com 8 For the Deponent: 9 TOM DEVINE, ESQUIRE 10 Government Accountability Project 11 1612 K Street NW, #1100 12 Washington, D.C. 20006 13 tom@whistleblower.org 14 For the Defendant Officers: 15 KELLY OLIVIER, ESQUIRE 16 Hale & Monico, LLC 17 Assistant Corporation Counsel 18 53 W. Jackson Boulevard, Suite 330 19 Chicago, Illinois 60604 20 kolivier@halemonico.com 21 For Defendant Watts: 22 BRIAN P. GAINER, ESQUIRE 23 Johnson & Bell, Ltd. 24 Special Assistant Corporation Counsel 25 33 West Monroe Street, Suite 2700 Chicago, Illinois 60603 gainerb@jbltd.com (Present via videoconference.) For Defendant Mohammed: ERIC S. PALLES, ESQUIRE Daley Mohan Groble P.C. Special Assistant Corporation Counsel 55 West Monroe, Suite 1600 Chicago, Illinois 60603 epalles@daleymohan.com (Present via videoconference.)</p>	<p>4</p> <p>1 INDEX 2 WITNESS PAGE 3 SHANNON SPALDING 4 Cross-Examination by Ms. Olivier7 5 Cross-Examination by Mr. Gainer280 6 Cross-Examination by Mr. Noland330 7 8 ***** 9 10 EXHIBITS 11 NUMBER DESCRIPTION PAGE 12 Exhibit 9 COPA Watts 43407 - 43409 312 13 Exhibit 11 Bates DO Joint 5282-5286 60 14 Exhibit 12 Rap Sheet for Chewbacca 64 15 Exhibit 13 Vice Case Report - DO Joint 5287-5288 69 16 17 Exhibit 14 Photograph of William Carter 99 18 19 Exhibit 15 Photograph of Milton 99 20 Delaney, Jr. 21 Exhibit 16 Photograph of Marc Giles 100 22 Exhibit 17 Photograph of Leonard Gipson 100 23 Exhibit 18 Photograph of Stefon Harrison 102 24 Exhibit 19 Photograph of Tyrone Herron 103 25 Exhibit 20 Photograph of Allen Jackson 103 Exhibit 21 Photograph of Jesse Lockett 104 Exhibit 22 Photograph of Larry Lomax 104</p>

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<p style="text-align: right;">145</p> <p>1 A I failed to mention all those, but yes, yes,</p> <p>2 yes.</p> <p>3 Q Okay. I'm looking at the clock right now, and</p> <p>4 it's noon. Why don't we take a break right now see if</p> <p>5 maybe our food is here, and then I think this would be a</p> <p>6 good time to take that lunch break.</p> <p>7 A It's 1:00.</p> <p>8 Q Yeah.</p> <p>9 A Yeah.</p> <p>10 THE VIDEOGRAPHER: Okay. Going off the</p> <p>11 record. The time is now 12:58 Eastern,</p> <p>12 11:58 Central.</p> <p>13 (A brief recess was had from 12:58 p.m. to</p> <p>14 1:25 p.m.)</p> <p>15 THE VIDEOGRAPHER: Okay. We're rolling.</p> <p>16 We're back on the record. The time is now 1:25</p> <p>17 Eastern, and 12:25 Central.</p> <p>18 BY MS. OLIVIER:</p> <p>19 Q Officer Spalding, you indicated when we were</p> <p>20 off record that something -- you had a memory that came</p> <p>21 to mind about one of the questions I asked you earlier</p> <p>22 today?</p> <p>23 A Correct.</p> <p>24 MR. TEPPER: Sorry to interrupt. Joel asked</p> <p>25 if we could give him one second.</p>		<p style="text-align: right;">147</p> <p>1 but many of them. So they're going to get a bit</p> <p>2 repetitive. I'm going to warn you on that right now.</p> <p>3 But I do need to ask these questions for each of these</p> <p>4 individuals, okay?</p> <p>5 A Yes.</p> <p>6 Q Just so you know where I'm going with this.</p> <p>7 The first individual I'm going to ask you about is Brian</p> <p>8 Bolton. His name came up yesterday a couple of times.</p> <p>9 So, first and foremost, were you ever directly partnered</p> <p>10 with him?</p> <p>11 A No.</p> <p>12 Q Okay. But you did work -- did you ever work</p> <p>13 on the same team as him?</p> <p>14 A I don't believe we were ever assigned on the</p> <p>15 same team.</p> <p>16 Q Okay. But you did testify yesterday that you</p> <p>17 worked with him when you were in the Second District?</p> <p>18 A I do believe that we did.</p> <p>19 Q All right.</p> <p>20 A I mean, if memory serves me correct, I do</p> <p>21 believe that we did. I may have that wrong, but I do --</p> <p>22 I want to say that him and Matt Cadman were transferred</p> <p>23 into the Second District while I was still there. It</p> <p>24 gets a little bit gray area-ish, because I transferred</p> <p>25 to Public Housing, which was just, like I said, like,</p>
<p style="text-align: right;">146</p> <p>1 MR. FLAXMAN: My computer's working now, sorry</p> <p>2 about that.</p> <p>3 MR. TEPPER: Okay. All right. Thank you.</p> <p>4 BY MS. OLIVIER:</p> <p>5 Q Okay. Sorry. What were you going to explain</p> <p>6 to me on our break?</p> <p>7 A In a previous question, you asked me how often</p> <p>8 I go back to Chicago.</p> <p>9 Q Yes.</p> <p>10 A And my question [sic] was, "Whenever the City</p> <p>11 of Chicago forces me to go back." I wanted to elaborate</p> <p>12 on that. I have -- you know, I do go back if I need to</p> <p>13 go back for other things, like when a family member is</p> <p>14 sick or other business. I wanted to add that, because I</p> <p>15 left that part of the equation off. So I just wanted to</p> <p>16 make sure you had that additional information as well.</p> <p>17 Q Sure. So I believe before you'd said that you</p> <p>18 go back once a year. So in addition to that once a</p> <p>19 year, do you know approximately how many times you've</p> <p>20 been back since you left in 2017?</p> <p>21 A I went back one additional time because a</p> <p>22 family member was very sick.</p> <p>23 Q Okay. Thank you for that clarification.</p> <p>24 I'm now going to be asking you a series of</p> <p>25 questions about a number of my clients, not all of them,</p>		<p style="text-align: right;">148</p> <p>1 three or four blocks down, and we still patrolled the</p> <p>2 exact same areas, and I still reported, like, into the</p> <p>3 Second District.</p> <p>4 So I don't know if I was officially assigned</p> <p>5 to Public Housing when they came to the Second District</p> <p>6 or if I was still assigned to the Second District. But</p> <p>7 to the very best of my recollection, I believe we were</p> <p>8 simultaneously assigned to the Second District, but, I</p> <p>9 mean, I could potentially be wrong about that.</p> <p>10 Q Okay. Do you think that you were -- were you</p> <p>11 both in Unit 715 together or no?</p> <p>12 A Oh, yes, we were both in Unit 715 together.</p> <p>13 Q Okay. But never partnered together, never</p> <p>14 working on the same team, correct?</p> <p>15 A No, but -- no, that is correct.</p> <p>16 Q Okay. Did you ever personally observe him</p> <p>17 engage in any criminal activity?</p> <p>18 A No, I did not.</p> <p>19 Q Okay. Did you ever observe him falsely arrest</p> <p>20 anyone?</p> <p>21 A No, I never did.</p> <p>22 Q Okay. And also, so my questions are clear,</p> <p>23 I'm talking about from -- well, strike that. Let's back</p> <p>24 up a little bit.</p> <p>25 When is the first time that you can recall</p>

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1 meeting or coming to know who Brian Bolton was?	1 South from approximately 1996 to 2004ish, and then your	
2 A I do remember, and I thought we were assigned	2 involvement with Operation Brass Tax was through 2012 --	
3 to the Second District at the same time. I do remember	3 A Uh-huh, yes.	
4 being on a call, plain clothes. Maybe I was in Public	4 Q -- during that time period, when I asked you	
5 Housing. And Brian -- and, again, his partner's name	5 before, you never observed him observe [sic] criminal	
6 was Matt Cadman -- Matt Cadman, they responded to a	6 activity, we're talking about that time period of when	
7 call. I remember I was working with CHA officers. We	7 you would be around Officer Bolton, correct?	
8 were in Ida B. Wells. I struck up a conversation with	8 A That's correct.	
9 his partner, Matt. I remember that we were on, like,	9 Q Okay. Same for my question about falsely	
10 the Roc-Block. The reason I remember this is his	10 arresting anyone, during that time period, you never	
11 partner, Matt, was telling me that they had just been	11 observed him falsely arrest anyone, correct?	
12 reassigned from, like, the 25th District.	12 A No, I did not.	
13 Q Okay.	13 Q Okay. Did you ever observe him framing	
14 A And I thought, what the hell did you guys do	14 anyone?	
15 to get reassigned from the 25th District to the Second	15 A No, I did not.	
16 District? You must have done something wrong.	16 Q Plant narcotics on anyone?	
17 And he said, "Yeah, we pissed off the bosses,	17 A No, I did not.	
18 and we got reassigned." And I didn't know if they were	18 Q Stealing money from anyone?	
19 joking or not, but that's quite a stretch to go, and	19 A No, I did not.	
20 that always stood out in my mind. And then Matt told me	20 Q Officer Douglas Nichols, you know -- that name	
21 he lived in the Beverly area, which was my neighborhood,	21 came up as well yesterday, correct?	
22 so that initial conversation stood out to me. And that	22 A That is correct.	
23 is the only reason I remember, like, where I ran into	23 Q All right. And did you ever work directly	
24 them was because of that conversation --	24 with Officer Nichols?	
25 Q Sure.	25 A No, I did not.	
150	152	
1 A -- with his partner.	1 Q Never partnered with him?	
2 Q And where in the City of Chicago is the 25th	2 A Never.	
3 District located?	3 Q Never on the same team?	
4 A Way on the north side. I can't even tell you,	4 A Never.	
5 but it was like the -- to me it might as well be in	5 Q Okay. Do you recall ever working within the	
6 Wisconsin.	6 same unit as him?	
7 Q When was the last time you saw or had any	7 A Never.	
8 interactions with Brian Bolton?	8 Q Okay. Did you ever observe -- or do you	
9 A Oh, my gosh. I can't tell you that.	9 recall what was the first year that you became aware of	
10 Q Okay.	10 Officer Nichols?	
11 A It -- you know, when we were -- Danny and --	11 A I don't recall that.	
12 when I say "we" -- whenever I say we, I'm referring to	12 Q In the context of your career, do you know	
13 Danny and I --	13 where you would have been assigned when you first either	
14 Q Okay.	14 heard his name or saw him in any capacity?	
15 A -- were working for Operation Brass Tax, or	15 A To the best of my educated guess would be	
16 maybe it was in Fugitive, we would cross paths in, you	16 either Organized Crime -- I would believe it would be	
17 know, the Second District. I want to say it was	17 Organized Crime.	
18 probably Brass Tax. You know, it's not like I directly	18 Q All right. And do you know what the context	
19 worked with him, but we would induce situations to put	19 of that introduction potentially would have been?	
20 ourselves in proximity with them. And to best of my	20 A I believe it would be when we started to hear	
21 recollection, I would say it was probably then, and that	21 information about Watts and the team doing illegal	
22 would put us around maybe 20, I don't know, '13 -- '12,	22 activity, I believe his name came -- is when --	
23 '13, something like that.	23 potentially is when his name began to surface.	
24 Q And to the extent that you were in the Second	24 Q When you say, "We became aware of illegal	
25 District from approximately -- and then Public Housing	25 activity," I know that there's a couple different time	

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<p style="text-align: right;">153</p> <p>1 periods that we've talked about in the deposition, so I</p> <p>2 just want to make sure that I'm clear. Is this when</p> <p>3 Danny was doing the debriefings in approximately 2007,</p> <p>4 and you were no longer partnered together, but he would</p> <p>5 call you and let you know, "Hey, this is what these guys</p> <p>6 are saying to me"?</p> <p>7 A Yeah. It would be -- and I'm -- and I'm doing</p> <p>8 an educated guess, because I'm trying to remember, like,</p> <p>9 with him, specifically, I'm thinking his name surfaced</p> <p>10 while we were probably informally working with Patrick</p> <p>11 Smith, and that would have placed me in Organized Crime,</p> <p>12 and that is to the best of my recollection with an</p> <p>13 educated guess.</p> <p>14 Q Okay. And so the time period that we've</p> <p>15 already discussed when you were informally working with</p> <p>16 Patrick Smith was sometime in kind of the fall of 2007,</p> <p>17 before August 2008, when you were officially given the</p> <p>18 assignment?</p> <p>19 A Yeah, that's about the best I can give you.</p> <p>20 Q Okay. Did you ever observe Officer Nichols</p> <p>21 engage in any criminal activity?</p> <p>22 A I did not.</p> <p>23 Q Did you ever observe Officer Nichols falsely</p> <p>24 arrest anyone?</p> <p>25 A I did not.</p>	<p style="text-align: right;">155</p> <p>1 A I believe we were in the Second District</p> <p>2 together.</p> <p>3 Q Okay.</p> <p>4 A If memory serves me correct, I believe we</p> <p>5 worked in the Second District together, and then I</p> <p>6 believe also 715 -- unless I have that wrong, I believe</p> <p>7 we were in both together. To the best of my</p> <p>8 recollection, I think -- I thought I met him in the</p> <p>9 Second District.</p> <p>10 Q Did you -- and going back to Officer Nichols</p> <p>11 for a moment, did you ever have any face-to-face</p> <p>12 interactions with Officer Nichols yourself?</p> <p>13 A I did have face-to-face interactions with him</p> <p>14 once we were putting ourselves in the situation to make</p> <p>15 that happen.</p> <p>16 Q Okay. Do you remember the context of the</p> <p>17 first time you would have been face to face with Officer</p> <p>18 Nichols?</p> <p>19 A We were -- we were going to the Second</p> <p>20 District tac office to make conversation to put</p> <p>21 ourselves in there. And I don't -- you know, to walk</p> <p>22 in -- whatever our scenario was to inquire about</p> <p>23 something or -- and he would be present.</p> <p>24 Q Okay. During those interactions, did he ever</p> <p>25 say anything that you perceived to be incriminating or</p>
<p style="text-align: right;">154</p> <p>1 Q Did you ever observe Officer Nichols frame</p> <p>2 anyone?</p> <p>3 A I did not.</p> <p>4 Q Did you ever observe Officer Nichols plant</p> <p>5 narcotics on anyone?</p> <p>6 A No, I did not.</p> <p>7 Q Did you ever observe Officer Nichols steal</p> <p>8 money from anyone?</p> <p>9 A I did not.</p> <p>10 Q Robert, or Bobby, Gonzalez, he's an officer</p> <p>11 that we've talked about in this deposition as well,</p> <p>12 correct?</p> <p>13 A That is correct.</p> <p>14 Q All right. When did you first come to know</p> <p>15 who Bobby Gonzalez was?</p> <p>16 A That would be the Second District.</p> <p>17 Q Okay. Did you -- were you ever partnered with</p> <p>18 Officer Gonzalez?</p> <p>19 A I was not.</p> <p>20 Q Were you ever on the same team as him?</p> <p>21 A I was not.</p> <p>22 Q All right. Were you assigned to the same unit</p> <p>23 as him?</p> <p>24 A Yes, I was.</p> <p>25 Q All right. Was that Unit 715?</p>	<p style="text-align: right;">156</p> <p>1 indicating that he was engaging in criminal activity</p> <p>2 with respect to Officer Nichols?</p> <p>3 A No.</p> <p>4 Q Okay. When you would go into the tac office,</p> <p>5 would Officer Bolton also be there?</p> <p>6 A There were times.</p> <p>7 Q Okay. And did -- when you were there in the</p> <p>8 tac office when Officer Bolton was present, did he ever</p> <p>9 say anything that you heard that was incriminating to</p> <p>10 you or indicated that he was engaged in criminal</p> <p>11 activity?</p> <p>12 A Not that I can recall right now.</p> <p>13 Q Okay. Going back to Officer Gonzalez, do you</p> <p>14 recall your first interaction or when you first met him</p> <p>15 or came to know him, like what the context of that was?</p> <p>16 A I want to say the very first time that I met</p> <p>17 or interacted with him was at the front desk of the</p> <p>18 Second District. My recollection is, you know,</p> <p>19 interacting with him at the front desk of the Second</p> <p>20 District. To the best of my recollection, I thought we</p> <p>21 were both assigned to the Second District at the time.</p> <p>22 I could have shortly left and then went to 715. Could I</p> <p>23 have already been assigned to 715? I mean, it's</p> <p>24 possible. It's a long time ago. But we were in the</p> <p>25 Second District, I believe, when I first encountered</p>

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1	Bobby Gonzalez.	1	A No, not that I can recall.
2	Q Do you remember the substance of any	2	Q Okay. Officer Alvin Jones, his name has also
3	conversations you had with him at that time?	3	come up.
4	A I really don't.	4	A Alvin Jones, yes, his name has come up.
5	Q Okay. And when was the last time you had any	5	Q Okay. Did you -- were you ever partnered with
6	interactions with or observations of Officer Gonzalez?	6	Officer Jones?
7	A I -- last time with Bobby Gonzalez may have	7	A Directly, no.
8	been when we were doing surveillance for Brass Tax.	8	Q Were you ever on the same team as him?
9	Q So --	9	A No, not that I can -- to the best of my
10	A But I didn't -- we didn't interact. He didn't	10	recollection, I don't believe so.
11	know we were watching him.	11	Q Okay. And I believe yesterday you testified
12	Q Do you know -- do you remember what occurred	12	that your paths crossed with Officer Jones on a regular
13	in that specific surveillance?	13	basis when you were in the Second District.
14	A Gosh, we were following him for so many things	14	A Yes.
15	for so long. I really don't.	15	Q Okay. Were you also assigned to Unit 715
16	Q Okay. Did you ever observe Officer Gonzalez	16	together?
17	engage in any criminal activity?	17	A Yes.
18	A I did not.	18	Q Was that the last time you would have worked
19	Q Did you ever observe Officer Gonzalez falsely	19	with Officer Jones?
20	arrest anyone?	20	A Yes.
21	A I did not.	21	Q When was last time that you had any
22	Q Did you ever observe Officer Gonzalez frame	22	interactions with or observations of Officer Jones?
23	anyone for any crime?	23	A I'm -- during Operation Brass Tax, and I can't
24	A I did not.	24	recall exactly. During Operation Brass Tax with the
25	Q Did you ever observe Officer Gonzalez plant	25	FBI, but I can't -- I can't say exactly what that --
158		160	
1	narcotics on anyone?	1	what it would have been.
2	A I did not.	2	Q Okay. Did you ever observe Officer Jones
3	Q Did you ever observe Officer Gonzalez steal	3	engage in criminal activity?
4	money from anyone?	4	A I did not.
5	A Me personally observe it?	5	Q Did you ever observe Officer Jones falsely
6	Q Correct.	6	arrest anyone?
7	A I did not.	7	A I did not.
8	Q When you say "me personally," is there -- do	8	Q Did you ever observe Officer Jones frame
9	you have a different story? Do you know of someone else	9	anyone?
10	that did?	10	A I did not.
11	A No, I did not.	11	Q Did you ever observe Officer Jones planting
12	Q Okay. But my question is a little bit	12	narcotics on anyone?
13	different. Do you know of someone that did observe him	13	A I did not.
14	steal money from someone?	14	Q Did you ever observe Officer Jones stealing
15	A No. I'm just thinking about, like, videos and	15	money?
16	stuff.	16	A I did not.
17	Q Okay. Do you recall seeing a video where	17	Q The next officer I'm going to ask you about is
18	Officer Gonzalez was stealing money?	18	Manuel Leano. Are you familiar with that officer? His
19	A I was just trying to recall the videos from	19	name has not come up.
20	search warrants.	20	A I know that he was listed as a target of
21	Q Okay. So you've never observed him stealing	21	Operation Brass Tax, but I am not very familiar with
22	money?	22	him. I have no personal knowledge of him.
23	A No.	23	Q Okay. Do you -- I know that yesterday we
24	Q And you've never learned from someone else	24	discussed how when you began the investigation and went
25	that they observed him stealing money?	25	to the FBI, the list of individuals or "the targets" was

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<p style="text-align: right;">161</p> <p>1 the term that was used, was smaller than what it</p> <p>2 eventually had become, true?</p> <p>3 A True.</p> <p>4 Q Do you recall when Officer Leano was added to</p> <p>5 that list of targets? Because he was not on the initial</p> <p>6 list that you had given yesterday.</p> <p>7 A I was not familiar with him, and as</p> <p>8 individuals would make allegations, we would do photo</p> <p>9 array lineups. As other individuals that were alleging</p> <p>10 that they were victims or targets of the crimes or</p> <p>11 from -- you know, Watts and the team members would</p> <p>12 identify these subjects. He could have potentially been</p> <p>13 identified, or we need to remember that there was</p> <p>14 already an existing file that was ongoing prior to us</p> <p>15 going there. He may have already been existing on that</p> <p>16 file. I can't say for certainty at what point he was</p> <p>17 put into that file. He is not someone that we gave as a</p> <p>18 name but somebody that was identified through one of the</p> <p>19 victims or Patrick Smith.</p> <p>20 Q Okay. But as you're testifying, you don't</p> <p>21 have any recollection of how he made it onto the list of</p> <p>22 targets. You're explaining these are the ways that he</p> <p>23 could have made it onto that list?</p> <p>24 A Yeah. I didn't -- I don't -- I personally, as</p> <p>25 I sit here today, don't recall someone giving me that</p>		<p style="text-align: right;">163</p> <p>1 Q The next officer is Elsworth Smith, Jr., who</p> <p>2 has come up in the deposition. Were you partnered with</p> <p>3 Officer Smith?</p> <p>4 A No, I wasn't.</p> <p>5 Q Were you ever on the same team as Officer</p> <p>6 Smith?</p> <p>7 A No.</p> <p>8 Q Did you ever serve in the same unit as Officer</p> <p>9 Smith?</p> <p>10 A No.</p> <p>11 Q When did you first become aware of Officer</p> <p>12 Smith?</p> <p>13 A When -- I would say when I was working -- let</p> <p>14 me see. That's a good question. I'm -- it may have</p> <p>15 been before Brass Tax.</p> <p>16 Q Okay.</p> <p>17 A I may have become -- just because I was, you</p> <p>18 know, still friendly with Watts and those officers, I</p> <p>19 believe I became aware of who he was by, you know, just</p> <p>20 knowing them and before Brass Tax or that. That's, I'm</p> <p>21 thinking, potentially how that happened.</p> <p>22 Q Do you remember the context of that initial</p> <p>23 introduction or how you would have come to know him or</p> <p>24 be aware of him?</p> <p>25 A Probably -- I think probably in passing, like,</p>
<p style="text-align: right;">162</p> <p>1 specific name.</p> <p>2 Q Okay. So you never worked directly with him?</p> <p>3 A No, I did not.</p> <p>4 Q Never partnered with him?</p> <p>5 A I have no information about this officer.</p> <p>6 Q Okay. So I'm just going to go through my</p> <p>7 questions, though, just so it's clear. You were never</p> <p>8 assigned to the same team as him?</p> <p>9 A No.</p> <p>10 Q And never assigned to the same unit as Officer</p> <p>11 Leano?</p> <p>12 A Correct.</p> <p>13 Q Did you ever observe Officer Leano engage in</p> <p>14 any criminal activity?</p> <p>15 A No.</p> <p>16 Q Did you observe Officer Leano ever falsely</p> <p>17 arrest anyone?</p> <p>18 A No.</p> <p>19 Q Did you observe Officer Leano frame anyone?</p> <p>20 A No.</p> <p>21 Q Did you observe Officer Leano plant narcotics</p> <p>22 on anyone?</p> <p>23 A No.</p> <p>24 Q Did you observe Officer Leano stealing money?</p> <p>25 A No.</p>		<p style="text-align: right;">164</p> <p>1 you know -- you know, every time I would pass Ronald</p> <p>2 Watts, he would give me a hug, hi, how are you? How's</p> <p>3 your daughter? He would be with him. This is so and</p> <p>4 so. He'd get introduced. You know, I think in that</p> <p>5 regards potentially is how that would have happened.</p> <p>6 Q Do you know the last time you would have had</p> <p>7 any interactions with or made observations of Officer</p> <p>8 Smith?</p> <p>9 A It would have been through Brass Tax.</p> <p>10 Q Okay. Did you ever observe Officer Smith</p> <p>11 engaged in any criminal activity?</p> <p>12 A I did not.</p> <p>13 Q Did you ever observe Officer Smith falsely</p> <p>14 arrest anyone?</p> <p>15 A I did not.</p> <p>16 Q Did you ever observe Officer Smith frame</p> <p>17 anyone?</p> <p>18 A I did not.</p> <p>19 Q Did you ever observe Officer Smith plant</p> <p>20 narcotics on anyone?</p> <p>21 A I did not.</p> <p>22 Q Did you ever observe Officer Smith stealing</p> <p>23 money?</p> <p>24 A I did not.</p> <p>25 Q Okay. Officer John Rodriguez, that name has</p>

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		173	175
1	Q Okay.	1	have made her a target of the investigation.
2	A She was handling it. She was addressing it	2	Q Going back to Officer Kenny Young, did you --
3	directly with her supervisors. That wasn't my issue.	3	were you ever partnered with Officer Young?
4	That was her issue.	4	A No, but I did work with him a lot.
5	Q Okay. And again -- and I think I already	5	Q Okay. When did you -- I have a note here, I
6	asked this, but just in case I didn't, you didn't follow	6	think, from yesterday, you worked with him at the Second
7	back up with her to find out the resolution of that	7	District?
8	situation or to make sure that it was reported or	8	A I did.
9	whatever needed to be done needed -- got done?	9	Q Okay. Were you on the same team as him?
10	A I didn't need to. She was -- she was going to	10	A When I started out in the Second District as a
11	address the situation herself. It wasn't going to	11	brand-new baby, we didn't have teams like that. He
12	happen.	12	was -- I was one of the -- it was me and one other white
13	Q All right. Did you ever observe Officer Lewis	13	person in the district. And he kind of took me under
14	engage in criminal activity?	14	his wing a little bit and was helping me out, because I
15	A No.	15	didn't know what the hell I was doing in the projects, a
16	Q Did you ever observe Officer Lewis falsely	16	white blonde girl, and Kenny kind of looked after me.
17	arrest anyone?	17	THE VIDEOGRAPHER: Microphone.
18	A No.	18	THE WITNESS: Sorry, guys. My microphone got
19	Q Did you ever observe Officer Lewis frame	19	caught on the wheel of the chair.
20	anyone?	20	MS. OLIVIER: We can go off the record while
21	A No, I did not.	21	we figure it out.
22	Q Did you ever see Officer Lewis plant narcotics	22	THE VIDEOGRAPHER: I'm not off the record.
23	on anyone?	23	I'm sorry.
24	A No.	24	MS. OLIVIER: Well, that's fine.
25	Q Did you ever observe Officer Lewis stealing	25	THE WITNESS: Sorry, guys.
		174	176
1	money?	1	BY MS. OLIVIER:
2	A No.	2	Q Then never mind. Just stay on.
3	Q Officer Kenny Young.	3	A So we didn't have teams. And they were
4	A Can I say something else?	4	rotating cars. So whatever day you weren't off, you
5	Q Sure.	5	work -- there was three people on a car. You just
6	A I think Officer Lewis was exactly opposite,	6	jumped on a car, whatever.
7	that she wouldn't go along with any of that corruption,	7	So I worked with him in the Second District.
8	is my personal opinion.	8	Then I went to Public Housing South back when it was a
9	Q You've mentioned during the course of this	9	very small unit under Tolliver, and I worked with Kenny
10	deposition that you believe that there are certain	10	Young there when CHA, Chicago Housing Authority, was up,
11	individuals that have been sued that, in your mind,	11	and we worked there together.
12	should not have been sued. Is Officer Lewis in that	12	Q When you worked in Public Housing with him,
13	category?	13	were you ever on the same team as him there?
14	A For the -- the conversations I, you know, had	14	A You know, I don't know if we were on the same
15	with her, I mean, an officer comes forward and says, you	15	team together or not. I can't say because that was such
16	know, this isn't going to happen. I'm not going to have	16	a small unit. I think there was only 40 officers at
17	any part of it. I'm going to address the supervisor and	17	that time, a tiny little unit. So when officers were --
18	make sure it doesn't happen, that's a strong indication	18	had their days off and stuff, there might only be 10 or
19	that she's not going to be part of any corruption. And	19	15 of us working at a time, so we all worked together.
20	for her to get off the team and go work foot patrol	20	It didn't really matter on paper who you were assigned
21	right in the area where she used to go and arrest the	21	to. I mean, that was a big -- Robert Taylor, State Way,
22	drug dealers and say, I would rather work foot patrol	22	Ida B. Wells, we all went out together, so it didn't
23	here than be on a team that I don't fit into is a strong	23	matter. There would be one or two sergeants, and we all
24	indication that she would not be part of any corruption.	24	went out together so -- a lot of times. So, I mean, I
25	So in my personal and professional opinion, I wouldn't	25	don't -- I don't really know --

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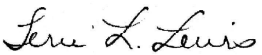
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<p style="text-align: right;">177</p> <p>1 Q Was Public Housing South the last time you</p> <p>2 worked with Officer Young?</p> <p>3 A Yes, because -- oh, did he -- he might have</p> <p>4 been in the Organized Crime building capacity for a</p> <p>5 little while, but then -- but then I believe he went to</p> <p>6 headquarters. He might have been in Homan Square in</p> <p>7 Organized Crime for a little while in some capacity. I</p> <p>8 believe I saw him in the building. I didn't work with</p> <p>9 him directly. And then he went down to headquarters,</p> <p>10 but I would see him. So, yes, it was.</p> <p>11 Q When was the last time you interacted with or</p> <p>12 had any observations of Officer Young?</p> <p>13 A Oh, gosh. I would run into him at</p> <p>14 headquarters. I didn't -- I didn't run into him at all</p> <p>15 in Operation Brass Tax, at all. We would see him at</p> <p>16 headquarters. I think he was inside, because when we</p> <p>17 were at Detached Services and stuff, we would run into</p> <p>18 him in headquarters. I would talk to him every single</p> <p>19 time. He was inside. He wasn't on the street. He said</p> <p>20 he was inside because he's getting ready to retire.</p> <p>21 Q Was he ever a target of your investigation?</p> <p>22 A He was on Operation Brass Tax.</p> <p>23 Q Okay. Do you know how he became a target?</p> <p>24 A No idea how he became a target.</p> <p>25 Q All right. But you didn't have any personal</p>	<p style="text-align: right;">179</p> <p>1 Q Did you actually have face-to-face</p> <p>2 interactions with Officer Summers?</p> <p>3 A I did. He used to tell me he -- I mean, he</p> <p>4 worked at the park district too. I talked to him, I</p> <p>5 think.</p> <p>6 Q So was Unit 715 the first time that you became</p> <p>7 aware of Officer Summers?</p> <p>8 A Yes.</p> <p>9 Q All right. And when was the last time you had</p> <p>10 any interactions with or made observations of Officer</p> <p>11 Summers?</p> <p>12 A Unit 715, it disbanded. I never saw him</p> <p>13 again.</p> <p>14 Q Okay. Was he a target of your investigation,</p> <p>15 Operation Brass Tax?</p> <p>16 A You know, I don't -- I don't even know if he</p> <p>17 is a target -- yes, he is. I think he is, yes. He is</p> <p>18 a -- he is a target.</p> <p>19 Q Do you know how it came to be that he was a</p> <p>20 target?</p> <p>21 A I don't know.</p> <p>22 Q Were you ever partnered with Officer Summers?</p> <p>23 A Never.</p> <p>24 Q Were you ever on the same team as him?</p> <p>25 A No.</p>
<p style="text-align: right;">178</p> <p>1 awareness or involvement with him in your portion of the</p> <p>2 Operation Brass Tax?</p> <p>3 A No, zero.</p> <p>4 Q Okay. Did you ever observe Officer Young</p> <p>5 engaged in any criminal activity?</p> <p>6 A No.</p> <p>7 Q Did you ever observe Officer Young falsely</p> <p>8 arrest anyone?</p> <p>9 A No.</p> <p>10 Q Did you observe Officer Young frame anyone?</p> <p>11 A No.</p> <p>12 Q Did you ever observe Officer Young plant</p> <p>13 narcotics on anyone?</p> <p>14 A No.</p> <p>15 Q Steal money from anyone?</p> <p>16 A No.</p> <p>17 Q Okay. Officer Gerome Summers.</p> <p>18 A I know who he is.</p> <p>19 Q All right. And how do you know who Officer</p> <p>20 Summers is?</p> <p>21 A Public Housing South, Unit 715. He worked for</p> <p>22 Ronald Watts.</p> <p>23 Q Is that the first time you became aware of</p> <p>24 Officer Summers or had any interactions with him?</p> <p>25 A Correct.</p>	<p style="text-align: right;">180</p> <p>1 Q Did you ever observe Officer Summers engaged</p> <p>2 in any criminal activity?</p> <p>3 A No.</p> <p>4 Q Did you ever observe Officer Summers falsely</p> <p>5 arrest anyone?</p> <p>6 A No.</p> <p>7 Q Did you ever observe Officer Summers frame</p> <p>8 anyone?</p> <p>9 A No.</p> <p>10 Q Did you ever observe Officer Summers plant</p> <p>11 narcotics on anyone?</p> <p>12 A No.</p> <p>13 Q Did you ever observe Officer Summers stealing</p> <p>14 money from anyone?</p> <p>15 A No.</p> <p>16 Q Calvin Ridgell.</p> <p>17 A I know Calvin.</p> <p>18 Q Okay. And how do you know Calvin?</p> <p>19 A Me and Calvin got some history.</p> <p>20 Q Good or bad?</p> <p>21 A Well, it's a complicated situation.</p> <p>22 I know Calvin from the Second District. I</p> <p>23 know Calvin from -- let me see -- Organized Crime. I</p> <p>24 know Calvin from the U.S. Marshals. I know Calvin from</p> <p>25 Calvin calling me. I know Calvin from you. Calvin</p>

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<p style="text-align: right;">359</p> <p style="text-align: center;">CERTIFICATE OF OATH</p> <p>STATE OF FLORIDA</p> <p>COUNTY OF COLLIER</p> <p>I, Terri Lewis, Notary Public for the State of Florida, certify that SHANNON SPALDING appeared before me personally and was duly sworn on the 6th day of June 2023.</p> <p>Signed this 19th day of June 2023.</p> <p style="text-align: center;"></p> <p>TERRI L. LEWIS, RPR, FPR-C Notary Public, State of Florida Commission No: HH 125014 Commission Expires: August 23, 2025</p>	<p style="text-align: right;">361</p> <p style="text-align: center;">E R R A T A S H E E T</p> <p>IN RE: Watts Coordinated Pretrial Deposition of SHANNON SPALDING taken on June 6, 2023</p> <p>DO NOT WRITE ON TRANSCRIPT -- ENTER CHANGES HERE</p> <table border="1"> <thead> <tr> <th>Page/Line No.</th> <th>Change</th> <th>Reason</th> </tr> </thead> <tbody> <tr><td>5</td><td></td><td></td></tr> <tr><td>6</td><td></td><td></td></tr> <tr><td>7</td><td></td><td></td></tr> <tr><td>8</td><td></td><td></td></tr> <tr><td>9</td><td></td><td></td></tr> <tr><td>10</td><td></td><td></td></tr> <tr><td>11</td><td></td><td></td></tr> <tr><td>12</td><td></td><td></td></tr> <tr><td>13</td><td></td><td></td></tr> <tr><td>14</td><td></td><td></td></tr> <tr><td>15</td><td></td><td></td></tr> <tr><td>16</td><td></td><td></td></tr> <tr><td>17</td><td></td><td></td></tr> <tr><td>18</td><td></td><td></td></tr> <tr><td>19</td><td></td><td></td></tr> <tr> <td>20</td> <td colspan="2">Under penalties of perjury, I declare that I have read the foregoing document and that the facts stated in it are true.</td> </tr> <tr> <td>22</td> <td>SHANNON SPALDING</td> <td>Date</td> </tr> <tr> <td>23</td> <td colspan="2">CC: Kelly Olivier, Esq. Josh Tepfer, Esq.</td> </tr> </tbody> </table>	Page/Line No.	Change	Reason	5			6			7			8			9			10			11			12			13			14			15			16			17			18			19			20	Under penalties of perjury, I declare that I have read the foregoing document and that the facts stated in it are true.		22	SHANNON SPALDING	Date	23	CC: Kelly Olivier, Esq. Josh Tepfer, Esq.	
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<p style="text-align: right;">360</p> <p style="text-align: center;">CERTIFICATE OF REPORTER</p> <p>STATE OF FLORIDA</p> <p>COUNTY OF COLLIER</p> <p>I, Terri L. Lewis, Registered Professional Reporter and Notary Public, do hereby certify that I was authorized to and did stenographically report the deposition of SHANNON SPALDING; that a review of the transcript was requested; and that the transcript consisting of Pages 7 through 358 inclusive, is a true record of my stenographic notes.</p> <p>I FURTHER CERTIFY that I am not a relative, employee, attorney, or counsel of any of the parties, nor am I a relative or employee of any of the parties' attorney or counsel connected with the action, nor am I financially interested in the action.</p> <p>DATED this 19th day of June 2023 in Naples, Collier County, Florida.</p> <p style="text-align: center;"></p> <p>Terri L. Lewis, RPR, FPR-C and Notary Public</p>																																																										