

Exhibit Q

In Re: Watts Pretrial

Sealed
Shannon Spalding

06/06/2023

<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</p> <p>))))))))))))</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>1 APPEARANCES: (Continued)</p> <p>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.)</p> <p>12 For Defendants City of Chicago, Cline, Kirby, Rowan, 13 Bosak, Starks and Hillard: 14 DANIEL M. NOLAND, ESQUIRE 15 Reiter Burns, LLP 16 Special Assistant Corporation Counsel 17 311 S. Wacker Drive, Suite 5200 18 Chicago, Illinois 60606 19 dnoland@reiterburns.com 20 (Present via videoconference.)</p> <p>21 For Flaxman Defendants: 22 JOEL FLAXMAN, ESQUIRE 23 COLLIN GIL, ESQUIRE 24 Law Offices of Kenneth N. Flaxman, P.C. 25 200 S. Michigan Avenue, Suite 201 Chicago, Illinois 60604-2430 jaf@kenlaw.com cjj@kenlaw.com 26 (Present via videoconference.)</p> <p>27 Also present: Diane Dowling, Videographer</p> <p>28 * * * * *</p> <p>29</p> <p>30</p> <p>31 INDEX</p> <p>32 WITNESS</p> <p>33 SHANNON SPALDING</p> <p>34 Cross-Examination by Ms. Olivier 7</p> <p>35 Cross-Examination by Mr. Gainer 280</p> <p>36 Cross-Examination by Mr. Noland 330</p> <p>37</p> <p>38 * * * * *</p> <p>39</p> <p>40 EXHIBITS</p> <p>41 NUMBER DESCRIPTION PAGE</p> <p>42 Exhibit 9 COPA Watts 43407 - 43409 312</p> <p>43 Exhibit 11 Bates DO Joint 5282-5286 60</p> <p>44 Exhibit 12 Rap Sheet for Chewbacca 64</p> <p>45 Exhibit 13 Vice Case Report - DO Joint 69</p> <p>46 5287-5288</p> <p>47</p> <p>48 Exhibit 14 Photograph of William Carter 99</p> <p>49 Exhibit 15 Photograph of Milton 99</p> <p>50 Delaney, Jr.</p> <p>51 Exhibit 16 Photograph of Marc Giles 100</p> <p>52 Exhibit 17 Photograph of Leonard Gipson 100</p> <p>53 Exhibit 18 Photograph of Stefon Harrison 102</p> <p>54 Exhibit 19 Photograph of Tyrone Herron 103</p> <p>55 Exhibit 20 Photograph of Allen Jackson 103</p> <p>56 Exhibit 21 Photograph of Jesse Lockett 104</p> <p>57 Exhibit 22 Photograph of Larry Lomax 104</p>
<p>1 APPEARANCES: 2 For the Loevy Plaintiffs: 3 JOSHUA TEPFER, ESQUIRE 4 Loevy & Loevy 5 311 N. Aberdeen Street, Third Floor Chicago, Illinois 60607 josh@loevy.com</p> <p>6 For the Deponent: 7 TOM DEVINE, ESQUIRE 8 Government Accountability Project 1612 K Street NW, #1100 Washington, D.C. 20006 9 tomd@whistleblower.org</p> <p>10 For the Defendant Officers: 11 KELLY OLIVIER, ESQUIRE 12 Hale & Monico, LLC 13 Assistant Corporation Counsel 53 W. Jackson Boulevard, Suite 330 14 Chicago, Illinois 60604 kolivier@halemonico.com</p> <p>15 For Defendant Watts: 16 BRIAN P. GAINER, ESQUIRE 17 Johnson & Bell, Ltd. 18 Special Assistant Corporation Counsel 33 West Monroe Street, Suite 2700 19 Chicago, Illinois 60603 gainerb@jbltd.com 20 (Present via videoconference.)</p> <p>21 For Defendant Mohammed: 22 ERIC S. PALLE, ESQUIRE 23 Daley Mohan Groble P.C. 24 Special Assistant Corporation Counsel 55 West Monroe, Suite 1600 25 Chicago, Illinois 60603 epalles@daleymohan.com 26 (Present via videoconference.)</p>	<p>2</p> <p>1 INDEX</p> <p>2 WITNESS</p> <p>3 SHANNON SPALDING</p> <p>4 Cross-Examination by Ms. Olivier 7</p> <p>5 Cross-Examination by Mr. Gainer 280</p> <p>6 Cross-Examination by Mr. Noland 330</p> <p>7</p> <p>8 * * * * *</p> <p>9</p> <p>10 EXHIBITS</p> <p>11 NUMBER DESCRIPTION PAGE</p> <p>12 Exhibit 9 COPA Watts 43407 - 43409 312</p> <p>13 Exhibit 11 Bates DO Joint 5282-5286 60</p> <p>14 Exhibit 12 Rap Sheet for Chewbacca 64</p> <p>15 Exhibit 13 Vice Case Report - DO Joint 69</p> <p>16 5287-5288</p> <p>17</p> <p>18 Exhibit 14 Photograph of William Carter 99</p> <p>19 Exhibit 15 Photograph of Milton 99</p> <p>20 Delaney, Jr.</p> <p>21 Exhibit 16 Photograph of Marc Giles 100</p> <p>22 Exhibit 17 Photograph of Leonard Gipson 100</p> <p>23 Exhibit 18 Photograph of Stefon Harrison 102</p> <p>24 Exhibit 19 Photograph of Tyrone Herron 103</p> <p>25 Exhibit 20 Photograph of Allen Jackson 103</p> <p>26 Exhibit 21 Photograph of Jesse Lockett 104</p> <p>27 Exhibit 22 Photograph of Larry Lomax 104</p>

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

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<p>149</p> <p>1 meeting or coming to know who Brian Bolton was?</p> <p>2 A I do remember, and I thought we were assigned</p> <p>3 to the Second District at the same time. I do remember</p> <p>4 being on a call, plain clothes. Maybe I was in Public</p> <p>5 Housing. And Brian -- and, again, his partner's name</p> <p>6 was Matt Cadman -- Matt Cadman, they responded to a</p> <p>7 call. I remember I was working with CHA officers. We</p> <p>8 were in Ida B. Wells. I struck up a conversation with</p> <p>9 his partner, Matt. I remember that we were on, like,</p> <p>10 the Roc-Block. The reason I remember this is his</p> <p>11 partner, Matt, was telling me that they had just been</p> <p>12 reassigned from, like, the 25th District.</p> <p>13 Q Okay.</p> <p>14 A And I thought, what the hell did you guys do</p> <p>15 to get reassigned from the 25th District to the Second</p> <p>16 District? You must have done something wrong.</p> <p>17 And he said, "Yeah, we pissed off the bosses,</p> <p>18 and we got reassigned." And I didn't know if they were</p> <p>19 joking or not, but that's quite a stretch to go, and</p> <p>20 that always stood out in my mind. And then Matt told me</p> <p>21 he lived in the Beverly area, which was my neighborhood,</p> <p>22 so that initial conversation stood out to me. And that</p> <p>23 is the only reason I remember, like, where I ran into</p> <p>24 them was because of that conversation --</p> <p>25 Q Sure.</p>	<p>151</p> <p>1 South from approximately 1996 to 2004ish, and then your</p> <p>2 involvement with Operation Brass Tax was through 2012 --</p> <p>3 A Uh-huh, yes.</p> <p>4 Q -- during that time period, when I asked you</p> <p>5 before, you never observed him observe [sic] criminal</p> <p>6 activity, we're talking about that time period of when</p> <p>7 you would be around Officer Bolton, correct?</p> <p>8 A That's correct.</p> <p>9 Q Okay. Same for my question about falsely</p> <p>10 arresting anyone, during that time period, you never</p> <p>11 observed him falsely arrest anyone, correct?</p> <p>12 A No, I did not.</p> <p>13 Q Okay. Did you ever observe him framing</p> <p>14 anyone?</p> <p>15 A No, I did not.</p> <p>16 Q Plant narcotics on anyone?</p> <p>17 A No, I did not.</p> <p>18 Q Stealing money from anyone?</p> <p>19 A No, I did not.</p> <p>20 Q Officer Douglas Nichols, you know -- that name</p> <p>21 came up as well yesterday, correct?</p> <p>22 A That is correct.</p> <p>23 Q All right. And did you ever work directly</p> <p>24 with Officer Nichols?</p> <p>25 A No, I did not.</p>
<p>150</p> <p>1 A -- with his partner.</p> <p>2 Q And where in the City of Chicago is the 25th</p> <p>3 District located?</p> <p>4 A Way on the north side. I can't even tell you,</p> <p>5 but it was like the -- to me it might as well be in</p> <p>6 Wisconsin.</p> <p>7 Q When was the last time you saw or had any</p> <p>8 interactions with Brian Bolton?</p> <p>9 A Oh, my gosh. I can't tell you that.</p> <p>10 Q Okay.</p> <p>11 A It -- you know, when we were -- Danny and --</p> <p>12 when I say "we" -- whenever I say we, I'm referring to</p> <p>13 Danny and I --</p> <p>14 Q Okay.</p> <p>15 A -- were working for Operation Brass Tax, or</p> <p>16 maybe it was in Fugitive, we would cross paths in, you</p> <p>17 know, the Second District. I want to say it was</p> <p>18 probably Brass Tax. You know, it's not like I directly</p> <p>19 worked with him, but we would induce situations to put</p> <p>20 ourselves in proximity with them. And to best of my</p> <p>21 recollection, I would say it was probably then, and that</p> <p>22 would put us around maybe 20, I don't know, '13 -- '12,</p> <p>23 '13, something like that.</p> <p>24 Q And to the extent that you were in the Second</p> <p>25 District from approximately -- and then Public Housing</p>	<p>152</p> <p>1 Q Never partnered with him?</p> <p>2 A Never.</p> <p>3 Q Never on the same team?</p> <p>4 A Never.</p> <p>5 Q Okay. Do you recall ever working within the</p> <p>6 same unit as him?</p> <p>7 A Never.</p> <p>8 Q Okay. Did you ever observe -- or do you</p> <p>9 recall what was the first year that you became aware of</p> <p>10 Officer Nichols?</p> <p>11 A I don't recall that.</p> <p>12 Q In the context of your career, do you know</p> <p>13 where you would have been assigned when you first either</p> <p>14 heard his name or saw him in any capacity?</p> <p>15 A To the best of my educated guess would be</p> <p>16 either Organized Crime -- I would believe it would be</p> <p>17 Organized Crime.</p> <p>18 Q All right. And do you know what the context</p> <p>19 of that introduction potentially would have been?</p> <p>20 A I believe it would be when we started to hear</p> <p>21 information about Watts and the team doing illegal</p> <p>22 activity, I believe his name came -- is when --</p> <p>23 potentially is when his name began to surface.</p> <p>24 Q When you say, "We became aware of illegal</p> <p>25 activity," I know that there's a couple different time</p>

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

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<p>157</p> <p>1 Bobby Gonzalez.</p> <p>2 Q Do you remember the substance of any 3 conversations you had with him at that time?</p> <p>4 A I really don't.</p> <p>5 Q Okay. And when was the last time you had any 6 interactions with or observations of Officer Gonzalez?</p> <p>7 A I -- last time with Bobby Gonzalez may have 8 been when we were doing surveillance for Brass Tax.</p> <p>9 Q So --</p> <p>10 A But I didn't -- we didn't interact. He didn't 11 know we were watching him.</p> <p>12 Q Do you know -- do you remember what occurred 13 in that specific surveillance?</p> <p>14 A Gosh, we were following him for so many things 15 for so long. I really don't.</p> <p>16 Q Okay. Did you ever observe Officer Gonzalez 17 engage in any criminal activity?</p> <p>18 A I did not.</p> <p>19 Q Did you ever observe Officer Gonzalez falsely 20 arrest anyone?</p> <p>21 A I did not.</p> <p>22 Q Did you ever observe Officer Gonzalez frame 23 anyone for any crime?</p> <p>24 A I did not.</p> <p>25 Q Did you ever observe Officer Gonzalez plant</p>	<p>159</p> <p>1 A No, not that I can recall.</p> <p>2 Q Okay. Officer Alvin Jones, his name has also 3 come up.</p> <p>4 A Alvin Jones, yes, his name has come up.</p> <p>5 Q Okay. Did you -- were you ever partnered with 6 Officer Jones?</p> <p>7 A Directly, no.</p> <p>8 Q Were you ever on the same team as him?</p> <p>9 A No, not that I can -- to the best of my 10 recollection, I don't believe so.</p> <p>11 Q Okay. And I believe yesterday you testified 12 that your paths crossed with Officer Jones on a regular 13 basis when you were in the Second District.</p> <p>14 A Yes.</p> <p>15 Q Okay. Were you also assigned to Unit 715 16 together?</p> <p>17 A Yes.</p> <p>18 Q Was that the last time you would have worked 19 with Officer Jones?</p> <p>20 A Yes.</p> <p>21 Q When was last time that you had any 22 interactions with or observations of Officer Jones?</p> <p>23 A I'm -- during Operation Brass Tax, and I can't 24 recall exactly. During Operation Brass Tax with the 25 FBI, but I can't -- I can't say exactly what that --</p>
<p>158</p> <p>1 narcotics on anyone?</p> <p>2 A I did not.</p> <p>3 Q Did you ever observe Officer Gonzalez steal 4 money from anyone?</p> <p>5 A Me personally observe it?</p> <p>6 Q Correct.</p> <p>7 A I did not.</p> <p>8 Q When you say "me personally," is there -- do 9 you have a different story? Do you know of someone else 10 that did?</p> <p>11 A No, I did not.</p> <p>12 Q Okay. But my question is a little bit 13 different. Do you know of someone that did observe him 14 steal money from someone?</p> <p>15 A No. I'm just thinking about, like, videos and 16 stuff.</p> <p>17 Q Okay. Do you recall seeing a video where 18 Officer Gonzalez was stealing money?</p> <p>19 A I was just trying to recall the videos from 20 search warrants.</p> <p>21 Q Okay. So you've never observed him stealing 22 money?</p> <p>23 A No.</p> <p>24 Q And you've never learned from someone else 25 that they observed him stealing money?</p>	<p>160</p> <p>1 what it would have been.</p> <p>2 Q Okay. Did you ever observe Officer Jones 3 engage in criminal activity?</p> <p>4 A I did not.</p> <p>5 Q Did you ever observe Officer Jones falsely 6 arrest anyone?</p> <p>7 A I did not.</p> <p>8 Q Did you ever observe Officer Jones frame 9 anyone?</p> <p>10 A I did not.</p> <p>11 Q Did you ever observe Officer Jones planting 12 narcotics on anyone?</p> <p>13 A I did not.</p> <p>14 Q Did you ever observe Officer Jones stealing 15 money?</p> <p>16 A I did not.</p> <p>17 Q The next officer I'm going to ask you about is 18 Manuel Leano. Are you familiar with that officer? His 19 name has not come up.</p> <p>20 A I know that he was listed as a target of 21 Operation Brass Tax, but I am not very familiar with 22 him. I have no personal knowledge of him.</p> <p>23 Q Okay. Do you -- I know that yesterday we 24 discussed how when you began the investigation and went 25 to the FBI, the list of individuals or "the targets" was</p>

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<p>161</p> <p>1 the term that was used, was smaller than what it 2 eventually had become, true?</p> <p>3 A True.</p> <p>4 Q Do you recall when Officer Leano was added to 5 that list of targets? Because he was not on the initial 6 list that you had given yesterday.</p> <p>7 A I was not familiar with him, and as 8 individuals would make allegations, we would do photo 9 array lineups. As other individuals that were alleging 10 that they were victims or targets of the crimes or 11 from -- you know, Watts and the team members would 12 identify these subjects. He could have potentially been 13 identified, or we need to remember that there was 14 already an existing file that was ongoing prior to us 15 going there. He may have already been existing on that 16 file. I can't say for certainty at what point he was 17 put into that file. He is not someone that we gave as a 18 name but somebody that was identified through one of the 19 victims or Patrick Smith.</p> <p>20 Q Okay. But as you're testifying, you don't 21 have any recollection of how he made it onto the list of 22 targets. You're explaining these are the ways that he 23 could have made it onto that list?</p> <p>24 A Yeah. I didn't -- I don't -- I personally, as 25 I sit here today, don't recall someone giving me that</p>	<p>163</p> <p>1 Q The next officer is Elsworth Smith, Jr., who 2 has come up in the deposition. Were you partnered with 3 Officer Smith?</p> <p>4 A No, I wasn't.</p> <p>5 Q Were you ever on the same team as Officer 6 Smith?</p> <p>7 A No.</p> <p>8 Q Did you ever serve in the same unit as Officer 9 Smith?</p> <p>10 A No.</p> <p>11 Q When did you first become aware of Officer 12 Smith?</p> <p>13 A When -- I would say when I was working -- let 14 me see. That's a good question. I'm -- it may have 15 been before Brass Tax.</p> <p>16 Q Okay.</p> <p>17 A I may have become -- just because I was, you 18 know, still friendly with Watts and those officers, I 19 believe I became aware of who he was by, you know, just 20 knowing them and before Brass Tax or that. That's, I'm 21 thinking, potentially how that happened.</p> <p>22 Q Do you remember the context of that initial 23 introduction or how you would have come to know him or 24 be aware of him?</p> <p>25 A Probably -- I think probably in passing, like,</p>
<p>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 7 questions, though, just so it's clear. You were never 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 11 Leano?</p> <p>12 A Correct.</p> <p>13 Q Did you ever observe Officer Leano engage in 14 any criminal activity?</p> <p>15 A No.</p> <p>16 Q Did you observe Officer Leano ever falsely 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 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>164</p> <p>1 you know -- you know, every time I would pass Ronald 2 Watts, he would give me a hug, hi, how are you? How's 3 your daughter? He would be with him. This is so and 4 so. He'd get introduced. You know, I think in that 5 regards potentially is how that would have happened.</p> <p>6 Q Do you know the last time you would have had 7 any interactions with or made observations of Officer 8 Smith?</p> <p>9 A It would have been through Brass Tax.</p> <p>10 Q Okay. Did you ever observe Officer Smith 11 engaged in any criminal activity?</p> <p>12 A I did not.</p> <p>13 Q Did you ever observe Officer Smith falsely 14 arrest anyone?</p> <p>15 A I did not.</p> <p>16 Q Did you ever observe Officer Smith frame 17 anyone?</p> <p>18 A I did not.</p> <p>19 Q Did you ever observe Officer Smith plant 20 narcotics on anyone?</p> <p>21 A I did not.</p> <p>22 Q Did you ever observe Officer Smith stealing 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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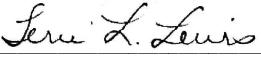
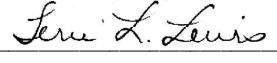
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<p style="text-align: right;">177</p> <p>1 Q Was Public Housing South the last time you 2 worked with Officer Young?</p> <p>3 A Yes, because -- oh, did he -- he might have 4 been in the Organized Crime building capacity for a 5 little while, but then -- but then I believe he went to 6 headquarters. He might have been in Homan Square in 7 Organized Crime for a little while in some capacity. I 8 believe I saw him in the building. I didn't work with 9 him directly. And then he went down to headquarters, 10 but I would see him. So, yes, it was.</p> <p>11 Q When was the last time you interacted with or 12 had any observations of Officer Young?</p> <p>13 A Oh, gosh. I would run into him at 14 headquarters. I didn't -- I didn't run into him at all 15 in Operation Brass Tax, at all. We would see him at 16 headquarters. I think he was inside, because when we 17 were at Detached Services and stuff, we would run into 18 him in headquarters. I would talk to him every single 19 time. He was inside. He wasn't on the street. He said 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 2 interactions with Officer Summers?</p> <p>3 A I did. He used to tell me he -- I mean, he 4 worked at the park district too. I talked to him, I 5 think.</p> <p>6 Q So was Unit 715 the first time that you became 7 aware of Officer Summers?</p> <p>8 A Yes.</p> <p>9 Q All right. And when was the last time you had 10 any interactions with or made observations of Officer 11 Summers?</p> <p>12 A Unit 715, it disbanded. I never saw him 13 again.</p> <p>14 Q Okay. Was he a target of your investigation, 15 Operation Brass Tax?</p> <p>16 A You know, I don't -- I don't even know if he 17 is a target -- yes, he is. I think he is, yes. He is 18 a -- he is a target.</p> <p>19 Q Do you know how it came to be that he was a 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 2 Operation Brass Tax?</p> <p>3 A No, zero.</p> <p>4 Q Okay. Did you ever observe Officer Young 5 engaged in any criminal activity?</p> <p>6 A No.</p> <p>7 Q Did you ever observe Officer Young falsely 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 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 Jerome Summers.</p> <p>18 A I know who he is.</p> <p>19 Q All right. And how do you know who Officer 20 Summers is?</p> <p>21 A Public Housing South, Unit 715. He worked for 22 Ronald Watts.</p> <p>23 Q Is that the first time you became aware of 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 2 in any criminal activity?</p> <p>3 A No.</p> <p>4 Q Did you ever observe Officer Summers falsely 5 arrest anyone?</p> <p>6 A No.</p> <p>7 Q Did you ever observe Officer Summers frame 8 anyone?</p> <p>9 A No.</p> <p>10 Q Did you ever observe Officer Summers plant 11 narcotics on anyone?</p> <p>12 A No.</p> <p>13 Q Did you ever observe Officer Summers stealing 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 23 know Calvin from -- let me see -- Organized Crime. I 24 know Calvin from the U.S. Marshals. I know Calvin from 25 Calvin calling me. I know Calvin from you. Calvin</p>

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<p>1 CERTIFICATE OF OATH</p> <p>2</p> <p>3 STATE OF FLORIDA</p> <p>4 COUNTY OF COLLIER</p> <p>5 I, Terri Lewis, Notary Public for the State of</p> <p>6 Florida, certify that SHANNON SPALDING appeared before</p> <p>7 me personally and was duly sworn on the 6th day of June</p> <p>8 2023.</p> <p>9 Signed this 19th day of June 2023.</p> <p>10</p> <p>11</p> <p>12 </p> <p>13</p> <p>14 TERRI L. LEWIS, RPR, FPR-C</p> <p>15 Notary Public, State of Florida</p> <p>16 Commission No: HH 125014</p> <p>17 Commission Expires: August 23, 2025</p> <p>18</p> <p>19</p> <p>20 Under penalties of perjury, I declare that I have read</p> <p>21 the foregoing document and that the facts stated in it</p> <p>22</p> <p>23 SHANNON SPALDING</p> <p>24 CC: Kelly Olivier, Esq.</p> <p>25 Josh Tepfer, Esq.</p>	<p>359</p> <p>1 E R R A T A S H E E T</p> <p>2 IN RE: Watts Coordinated Pretrial</p> <p>3 Deposition of SHANNON SPALDING taken on June 6, 2023</p> <p>4 DO NOT WRITE ON TRANSCRIPT -- ENTER CHANGES HERE</p> <p>5 Page/Line No. Change Reason</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p>360</p>
<p>1 CERTIFICATE OF REPORTER</p> <p>2 STATE OF FLORIDA</p> <p>3 COUNTY OF COLLIER</p> <p>4 I, Terri L. Lewis, Registered Professional</p> <p>5 Reporter and Notary Public, do hereby certify that I was</p> <p>6 authorized to and did stenographically report the</p> <p>7 deposition of SHANNON SPALDING; that a review of the</p> <p>8 transcript was requested; and that the transcript</p> <p>9 consisting of Pages 7 through 358 inclusive, is a true</p> <p>10 record of my stenographic notes.</p> <p>11 I FURTHER CERTIFY that I am not a relative,</p> <p>12 employee, attorney, or counsel of any of the parties,</p> <p>13 nor am I a relative or employee of any of the parties'</p> <p>14 attorney or counsel connected with the action, nor am I</p> <p>15 financially interested in the action.</p> <p>16 DATED this 19th day of June 2023 in Naples,</p> <p>17 Collier County, Florida.</p> <p>18</p> <p>19 </p> <p>20</p> <p>21 Terri L. Lewis, RPR, FPR-C</p> <p>22 and Notary Public</p> <p>23</p> <p>24</p> <p>25</p>	