

EXHIBIT 2

The Deposition of JASMIN RAMIC, taken on November 14, 2022

Page 1 IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION JUDGE FRANKLIN U. VALDERRAMA MAGISTRATE JUDGE SHEILA M. FINNEGAN MASTER DOCKET CASE NO. 19-CV-01717 IN RE: WATTS COORDINATED PRETRIAL PROCEEDINGS DEPONENT: CALVIN HOLLIDAY DATE: NOVEMBER 14, 2022 REPORTER: VICTORIA JADICK	Page 2 1 APPEARANCES 2 3 ON BEHALF OF THE PLAINTIFFS IN THE COORDINATED 4 PROCEEDINGS REPRESENTED BY LOEVY & LOEVY: 5 Wallace Hike, Esquire 6 Loevy & Loevy 7 311 North Aberdeen Street 8 Third Floor 9 Chicago, Illinois 60607 10 Telephone No.: (312) 243-5900 11 E-mail: hilke@loevy.com 12 (Appeared via videoconference) 13 14 ON BEHALF OF THE FLAXMAN PLAINTIFFS: 15 Kenneth Flaxman, Esquire 16 Law Offices of Kenneth N. Flaxman P.C. 17 200 South Michigan Avenue 18 Suite 201 19 Chicago, Illinois 60604 20 Telephone No.: (312) 427-3200 21 E-mail: knf@kenlaw.com 22 (Appeared via videoconference) 23 24 25
Page 3 1 APPEARANCES (CONTINUED) 2 3 ON BEHALF OF THE DEFENDANTS, OFFICERS BRIAN BOLTON, 4 DARRYL EDWARDS, ROBERT GONZALEZ, ALVIN JONES, CALVIN 5 RIDGELL, JOHN RODRIGUEZ, KENNETH YOUNG, JR., MANUEL 6 LEANO, DOUGLAS NICHOLS, ELSWORTH SMITH, LAMONICA LEWIS, 7 GEROME SUMMERS, MIGUEL CABRALES, AND FRANKIE LANE: 8 Brian Stefanich, Esquire 9 Hale & Monico LLC 10 53 West Jackson Boulevard 11 Suite 330 12 Chicago, Illinois 60604 13 Telephone No.: (312) 341-9646 14 E-mail: bstefanich@halemonico.com 15 (Appeared via videoconference) 16 17 18 19 20 21 22 23 24 25	Page 4 1 APPEARANCES (CONTINUED) 2 3 ON BEHALF OF THE DEFENDANT, RONALD WATTS: 4 Ahmed Kosoko, Esquire 5 Genevieve LeFevour, Esquire 6 Johnson & Bell, LTD 7 33 West Monroe Street 8 Suite 2700 9 Chicago, Illinois 60603 10 Telephone No.: (312) 372-0770 11 E-mail: kosoko@jbltd.com 12 (Appeared via videoconference) 13 ON BEHALF OF THE DEFENDANT, KALLAT MOHAMMED: 14 Gary Ravitz, Esquire 15 Daley Mohan Groble, PC 16 55 West Monroe 17 Suite 1600 18 Chicago, Illinois 60603 19 Telephone No.: (312) 422-9999 20 E-mail: gravitz@daleymohan.com 21 (Appeared via videoconference) 22 23 24 25

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1 APPEARANCES (CONTINUED) 2 3 ON BEHALF OF THE DEFENDANTS, OFFICERS CARDMAN AND 4 SPAARGAREN: 5 Megan McGrath, Esquire 6 Leinenweber Baroni and Daffada, LLC 7 120 North LaSalle Street 8 Suite 2000 9 Chicago, Illinois 60602 10 Telephone No.: (312) 217-8357 11 E-mail: mkm@ilesq.com 12 (Appeared via videoconference) 13 14 ON BEHALF OF THE DEFENDANT, CITY OF CHICAGO, SOME 15 SUPERVISORY OFFICIALS, AND THE WITNESS, CALVIN 16 HOLLIDAY: 17 Daniel Noland, Esquire 18 Reiter Burns LLP 19 311 South Wacker Drive 20 Suite 5200 21 Chicago, Illinois 60602 22 Telephone No.: (312) 982-0090 23 E-mail: dnoland@reiterburns.com 24 (Appeared via videoconference) 25	1 INDEX 2 Page 3 PROCEEDINGS 9 4 DIRECT EXAMINATION BY MR. HILKE 11 5 EXAMINATION BY MR. FLAXMAN 154 6 CROSS EXAMINATION BY MR. RAVITZ 177 7 EXAMINATION BY MR. KOSOKO 197 8 EXAMINATION BY MR. STEFANICH 212 9 EXAMINATION BY MR. NOLAND 213 10 REDIRECT EXAMINATION BY MR. HILKE 226 11 12 EXHIBITS 13 Exhibit Page 14 1 - Report dated September 17, 2004 PLA JOINT 15 018627 63 16 2 - Report dated September 21, 2004 PLA 18628 68 17 3 - Complaint Against Department member report CR 18 300778 75 19 4 - Statement dated July 21, 2004 PLA 010863 77 20 5 - Report dated September 27, 2004 PLA 10877 79 21 6 - Letter from Ron Henley dated 22 September 22, 2004 PLA 10861 81 23 7 - Request for Photos dated May 24, 2005 PL163 84 24 8 - BG 7777 86 25 9 - Report dated March 9, 2005 PLA 16829 91
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1 EXHIBITS (CONTINUED) 2 Exhibit Page 3 10 - Report dated June 2005 PLA10947 98 4 11 - Report of Investigation PLA 018618 100 5 12 - Illinois State Police Report PLA 010911 131 6 13 - Report dated PLA206 133 7 14 - Case Supplementary Report EG23980 134 8 15 - Summary Report dated June 1, 2006 CITY-BG 9 12432 137 10 16 - CL Report PLA9959 137 11 17 - Time Line BG23849 138 12 18 - Summary Report dated November 3, 2005 13 CITY-BG 012903 143 14 19 - Application for Pen register and Caller ID 15 Trap and Trace Device BG23842 144 16 20 - Complaint Register March 12, 2004 CITY-BG 17 10303 150 18 19 WATTS EXHIBITS 20 *1 - FBI Report 210 21 22 CITY EXHIBITS 23 *1 - BAKER GLEN 10942 222 24 25 *Will forward upon receipt.	1 STIPULATION 2 3 The VIDEO deposition of CALVIN HOLLIDAY was taken at 4 CHURCHILL COURT REPORTING, 110 NORTH WACKER DRIVE, 5 CHICAGO, ILLINOIS 60606, via videoconference in which 6 all participants attended remotely, on MONDAY the 14th 7 day of NOVEMBER 2022 at 9:15 a.m. (CT); said deposition 8 was taken pursuant to the Rules of Civil Procedure for 9 the United States District Court for the Northern 10 District of Illinois, Eastern Division. The oath in 11 this matter was sworn remotely pursuant to FRCP 30. 12 13 It is agreed that VICTORIA JADICK, being a Notary Public 14 and Court Reporter for the State of ILLINOIS, may swear 15 the witness. 16 17 18 19 20 21 22 23 24 25

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1 Q Same complaint. Yep. What was the next thing
2 you do -- did on the file after you read it?
3 MR. NOLAND: Objection to foundation. Form.
4 You can answer.
5 A I don't remember.
6 Q Okay. And do you recall the FBI becoming
7 involved in the Watts investigation?
8 A Yes.
9 Q And do you recall what the division -- was
10 there a division of responsibility between the CPD and
11 the FBI in that investigation?
12 A This is how I'm going to answer your question.
13 It was a just investigation. There was no division. The
14 FBI was the lead -- the lead in the case. It was
15 theirs. Everything that anybody else did in the case,
16 it probably -- if -- if you've ever worked a case with
17 the FBI, or if you've ever prosecuted one against them,
18 you already know that they were the lead agency.
19 Anything else that they had, people may have been
20 working with them, they weren't privy to what the FBI
21 had. What the FBI had was privy to everything everybody
22 else had. They were the lead, and they were working the
23 case with the U.S. attorney.
24 Q Were there multiple CPD employees from the IAD
25 who helped investigate the allegations against Sergeant

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1 Watts?
2 A There may have been. I don't remember.
3 Q Okay. Do you recall a Keith Calloway
4 (phonetic)?
5 A Yes.
6 Q And did he work on the Watts investigation?
7 A Keith was super -- he was the head of the
8 confidential section. He was a lieutenant, though. And
9 when you say, "worked on it," did he -- did he know what
10 was going on? Yes. Was he somewhat supervising? Yes.
11 Did he have occasion to either make meetings or talk
12 about something? Probably so.
13 Q And what about Sergeant Bigg (phonetic)? Do
14 you recall Sergeant Bigg being involved in the
15 investigation?
16 A Yes. Kenny went with me to one or two of the
17 meetings. Yes, he did.
18 Q And what was his role at those meetings?
19 A He was just -- he was -- I took Kenny with me
20 to -- I took Kenny with me just to keep him apprised
21 just to what was going on, and also, if there was
22 anything that he could do to help me. You know,
23 anything that -- any thoughts or ideas that he had that
24 I might be overlooking.
25 Q Sure. And was this -- was that -- never mind.

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1 Let me ask about Sergeant Broderdorf (phonetic). Do you
2 recall Sergeant Broderdorf being involved?
3 A Ray Broderdorf, he was my supervising sergeant
4 for a while.
5 Q Okay. And do you recall -- do you recall what
6 his involvement was in the Watts investigation?
7 A Other than supervising me, I don't -- I don't
8 remember. I'm not going to say he didn't have any
9 direct business, I just don't remember.
10 Q Okay. And so was there a Sergeant Joe Barnes
11 who you recall being involved in the investigation?
12 A Joe Barnes? I don't remember. I'm not saying
13 it wasn't, I just don't remember right off.
14 Q Okay. Was anyone at -- was there anyone at
15 your level in confidential investigations who also
16 worked on the Watts investigation with you?
17 A No, not -- not while I was there in that --
18 not on -- not on anything that I wrote. The people that
19 were -- that went with me when I did certain interviews
20 or meetings, they're documented. But for the private
21 investigations that I was a -- that I was accountable
22 for, no. I was working by myself.
23 Q Okay. I'm going to share an exhibit with you
24 now. Let's mark this Exhibit number 1. All right. This
25 is at Plaintiff's 018627. Sir, do you recognize this a

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1 report that you wrote -- well, strike that. I -- do
2 you see the date at the upper right, September 17,
3 2004?
4 (EXHIBIT 1 MARKED FOR IDENTIFICATION)
5 A Yes.
6 Q And this is a report from you to the
7 commanding officer of the confidential investigating
8 section?
9 A Yes.
10 Q And does that mean this is a report to Keith
11 Calloway?
12 A Whoever -- this -- okay. Commanding officer,
13 it was -- this was just the format for it, so commanding
14 officer, whoever it was, you know --
15 MR. NOLAND: Wally, if you don't mind. You're
16 only showing him -- you're stating on the record
17 that you're showing him the whole page, but you're
18 not. You're showing him the first three lines. If
19 you showed him the bottom of it, you'll see who --
20 MR. HILKE: Sure. I'll scroll down. I --
21 BY MR. HILKE:
22 Q It says at the bottom, "Approved, Lieutenant
23 Juan Rivera, Commanding Officer." Would -- was Juan
24 Rivera the commanding officer of confidential
25 investigations section at this time?

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1 A Yes, sir. He was.

2 Q Okay. Is this a report you reviewed in

3 preparation for the deposition today?

4 A I -- did I see it? Yes.

5 Q Okay. And for the record, I find I have to

6 zoom in to make this readable, but anytime you want to

7 scroll up or down, just ask me. I had wanted you to

8 have access to the full document as I'm asking you

9 questions about it. Do you see in the first full

10 paragraph, where it says -- the first line is, "On

11 September 16, 2004, the undersigned agent was made aware

12 of unknown public housing officers taking tax money from

13 drug dealers, allowing them to sell their product"?

14 A Yes.

15 MR. NOLAND: You -- you just misread that, that

16 -- I'm sorry. No, you didn't. Sorry about that.

17 MR. HILKE: It's okay.

18 BY MR. HILKE:

19 Q And do you see the next line describing a

20 Sergeant Henry Harris, who the information was obtained

21 from?

22 A Yes.

23 Q Did you speak with Sergeant Harris in your

24 investigation?

25 A Yes.

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1 A Okay.

2 Q And do you see below that he also alleged that

3 one of the officers had shot at him because he ran away?

4 A Yes.

5 Q And near the bottom, that the CI reported that

6 many of the larger drug dealers paid tax money to these

7 officers?

8 A Yes.

9 Q Okay. And do you have any memory of where you

10 met with the confidential informant to get this

11 information?

12 A No. I met with one, I don't even know who he

13 was, probably documented. Well, it is documented. I

14 met with one person in the -- at 26th and California, in

15 the ASA's office. The ASA was present, his attorney was

16 present, myself. I don't know who was with me, but

17 yeah.

18 Q Yeah. And --

19 MR. NOLAND: I think he -- no, I'm -- go ahead.

20 MR. HILKE: No, that's okay.

21 BY MR. HILKE:

22 Q Did you or anyone at this meeting ask the

23 confidential informant who were the other larger drug

24 dealers paying money to these officers?

25 A There were many questions asked, to which we

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1 Q Okay. And do you recall having that

2 conversation with Ms. -- with Sergeant Harris?

3 A Honestly, no.

4 Q And do you see that it describes a debriefing

5 of a cooperating individual? And specifically looking

6 at the last line of that first paragraph, do you see

7 where it says, "In the debriefing of a cooperating

8 individual, this information was obtained"?

9 A Yes.

10 Q And did -- on the next paragraph, it describes

11 a meeting with Rivera, Bigg, you and the CI. Do you see

12 that?

13 A Yes.

14 Q Do you recall having that meeting?

15 A Not really.

16 Q And does he -- does the name Willie Gaddy

17 (phonetic) ring a bell to you in terms of your

18 investigation?

19 A It rings a bell, but it's -- as far as

20 somebody that either I was interested in or spoken with,

21 yes.

22 Q Yeah. And do you see below it, looking at the

23 second paragraph, it says that "The CI reported that the

24 officers had approached him and requesting paying for

25 his doing business selling drugs in their area"?

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1 got no answers.

2 Q So what do you -- what do you remember about -

3 - what do you remember about that interaction in terms

4 of asking about other larger drug dealers and not

5 getting any answers?

6 A What I remember about speaking to all of them,

7 all the so-called witnesses, they were all drug dealers,

8 they were all current drug dealers, and they -- they

9 had something to say, and they probably did have

10 knowledge, but they didn't want to give it up. They

11 said they would cooperate and they -- at later times,

12 they still did not cooperate with me.

13 Q And when you say they didn't cooperate, what

14 do you mean?

15 A They did not provide any information for me.

16 Q All right. Was there a reason you didn't

17 write in this report that this confidential informant

18 had not given you information that had been asked for?

19 MR. NOLAND: Object to the form. You can

20 answer.

21 A No.

22 Q I'm going to stop sharing this document. I'll

23 mark this Exhibit 2, Plaintiff's 18628. So at the top

24 of this document, do you see this is dated

25 September 21, 2004 and that it's a report from you?

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1 (EXHIBIT 2 MARKED FOR IDENTIFICATION)

2 A Yes, sir.

3 Q And at the bottom of your report, is that your

4 signature?

5 A Yes, sir.

6 Q And this again is approved by Lieutenant

7 Rivera; is that right?

8 A Yes, sir.

9 Q And in the bottom, do you see there's a

10 confidential number connected with this report?

11 A Yes.

12 Q What is a -- what is a confidential number?

13 A It's the number assigned to the case for the

14 confidential section. I mean, just -- it's a -- it's an

15 identification number.

16 Q Okay. And I'm looking at the body of the

17 report now. Is it correct that this describes -- this

18 report describes a meeting on September 20, 2004?

19 A Okay.

20 Q Is it -- and was this -- did you write this

21 report about a meeting that occurred on September 20,

22 2004?

23 A Yes.

24 Q And do you see that this report describes a

25 meeting with representatives from the United States

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1 what, if anything, you would do to support the

2 information after this meeting?

3 A So I assume when you say -- and I -- I want

4 you to answer. I assume when you say me, you mean the

5 Chicago Police Department, or are you just talking about

6 me personally?

7 Q Thank you for clarifying. I mean you

8 personally. What did you understand about what you

9 would be doing?

10 A If I did anything, it would be in support of

11 the case that was being handled by the United States

12 government.

13 Q Okay. Does that mean that you would need to

14 inform the FBI of the -- what steps you planned to take,

15 before you took them?

16 A That means anything that I see it -- that I

17 put on paper, that they had.

18 Q Okay. So it -- you mean that they would

19 receive a copy of any report you wrote during your

20 investigation?

21 A Yes.

22 Q Were you free still to take whatever steps you

23 thought appropriate to investigate this allegation?

24 A No, I --

25 MR. NOLAND: (Inaudible). Go ahead. That's

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1 Attorney's Office, Federal Bureau of Investigations,

2 Drug Enforcement Administration, Alcohol, Tobacco, and

3 Firearms, and the Chicago Police Department?

4 A Yes.

5 Q Did you attend this meeting?

6 A I'm not sure.

7 Q Do you know if any --

8 A I don't know that -- I don't know whether I

9 attended it or I was made aware.

10 Q And do -- sitting here today, do you know who

11 attended this meeting?

12 A No, sir.

13 Q And below it, do you see, starting in the

14 second sentence, where it's -- in the middle of it,

15 where it says, "It was determined this would be a

16 federally prosecuted investigation. The cooperating

17 individual is to be prosecuted in federal court, and the

18 United States Attorney's Office believe they should be

19 in control of everything that results from his

20 cooperation"?

21 A Yes.

22 Q Was it -- am I correct that it was the FBI

23 specifically that led this investigation?

24 A Yes.

25 Q Okay. And what was your understanding of

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1 fine.

2 Q I'm sorry, I didn't hear your answer.

3 A No.

4 Q Okay. Why not?

5 A Again, as I stated earlier, once the FBI takes

6 a case, they're working with the U.S. attorney, and they

7 go according to what they want to do. Anything that you

8 do is in line with what they're doing, in line with what

9 they say. And furthermore, most of the things that

10 you're doing, as a matter of fact, all of them that

11 you're doing after they take control of the case, is

12 what they say.

13 Q Did you receive instructions originating from

14 the FBI, about how to investigate this case?

15 A No, I did not.

16 Q Did you receive any specific instructions

17 about steps you should take to investigate this case?

18 A No.

19 Q Did you make your own plan for what you could

20 do to support the investigation of this case?

21 A I followed where the information that I was

22 getting at the time took me.

23 Q And as you followed the information you got,

24 did you have to run your next steps by anyone else

25 before you continued to investigate?