

# **EXHIBIT 2**

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

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<p>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</p> <p>IN RE: WATTS COORDINATED PRETRIAL PROCEEDINGS</p> <p>DEPONENT: CALVIN HOLLIDAY DATE: NOVEMBER 14, 2022 REPORTER: VICTORIA JADICK</p>	<p>1 APPEARANCES 2 3 ON BEHALF OF THE PLAINTIFFS IN THE COORDINATED 4 PROCEEDINGS REPRESENTED BY LOEY &amp; LOEY: 5 Wallace Hike, Esquire 6 Loevy &amp; 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</p>
	<p>Page 3</p> <p>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 &amp; 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</p>
	<p>Page 4</p> <p>1 APPEARANCES (CONTINUED) 2 3 ON BEHALF OF THE DEFENDANT, RONALD WATTS: 4 Ahmed Kosoko, Esquire 5 Genevieve LeFevour, Esquire 6 Johnson &amp; 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</p>

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15	SUPERVISORY OFFICIALS, AND THE WITNESS, CALVIN	15	018627 63
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3	10 - Report dated June 2005 PLA10947 98	3	The VIDEO deposition of CALVIN HOLLIDAY was taken at
4	11 - Report of Investigation PLA 018618 100	4	CHURCHILL COURT REPORTING, 110 NORTH WACKER DRIVE,
5	12 - Illinois State Police Report PLA 010911 131	5	CHICAGO, ILLINOIS 60606, via videoconference in which
6	13 - Report dated PLA206 133	6	all participants attended remotely, on MONDAY the 14th
7	14 - Case Supplementary Report EG23980 134	7	day of NOVEMBER 2022 at 9:15 a.m. (CT); said deposition
8	15 - Summary Report dated June 1, 2006 CITY-BG	8	was taken pursuant to the Rules of Civil Procedure for
9	12432 137	9	the United States District Court for the Northern
10	16 - CL Report PLA9959 137	10	District of Illinois, Eastern Division. The oath in
11	17 - Time Line BG23849 138	11	this matter was sworn remotely pursuant to FRCP 30.
12	18 - Summary Report dated November 3, 2005	12	
13	CITY-BG 012903 143	13	It is agreed that VICTORIA JADICK, being a Notary Public
14	19 - Application for Pen register and Caller ID	14	and Court Reporter for the State of ILLINOIS, may swear
15	Trap and Trace Device BG23842 144	15	the witness.
16	20 - Complaint Register March 12, 2004 CITY-BG	16	
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18		18	
19	WATTS EXHIBITS	19	
20	*1 - FBI Report 210	20	
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22	CITY EXHIBITS	22	
23	*1 - BAKER GLEN 10942 222	23	
24		24	
25	*Will forward upon receipt.	25	

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<p>1       Q   Same complaint. Yep. What was the next thing 2   you do -- did on the file after you read it?</p> <p>3       MR. NOLAND: Objection to foundation. Form. 4   You can answer.</p> <p>5       A   I don't remember.</p> <p>6       Q   Okay. And do you recall the FBI becoming 7   involved in the Watts investigation?</p> <p>8       A   Yes.</p> <p>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?</p> <p>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.</p> <p>24      Q   Were there multiple CPD employees from the IAD 25   who helped investigate the allegations against Sergeant</p>	<p>1       Watts?</p> <p>2       A   There may have been. I don't remember.</p> <p>3       Q   Okay. Do you recall a Keith Calloway 4   (phonetic)?</p> <p>5       A   Yes.</p> <p>6       Q   And did he work on the Watts investigation?</p> <p>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.</p> <p>13      Q   And what about Sergeant Bigg (phonetic)? Do 14   you recall Sergeant Bigg being involved in the 15   investigation?</p> <p>16      A   Yes. Kenny went with me to one or two of the 17   meetings. Yes, he did.</p> <p>18      Q   And what was his role at those meetings?</p> <p>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.</p> <p>25      Q   Sure. And was this -- was that -- never mind.</p>
<p style="text-align: center;">Page 63</p> <p>1   Let me ask about Sergeant Broderdorf (phonetic). Do you 2   recall Sergeant Broderdorf being involved?</p> <p>3       A   Ray Broderdorf, he was my supervising sergeant 4   for a while.</p> <p>5       Q   Okay. And do you recall -- do you recall what 6   his involvement was in the Watts investigation?</p> <p>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.</p> <p>10      Q   Okay. And so was there a Sergeant Joe Barnes 11   who you recall being involved in the investigation?</p> <p>12      A   Joe Barnes? I don't remember. I'm not saying 13   it wasn't, I just don't remember right off.</p> <p>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?</p> <p>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.</p> <p>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</p>	<p style="text-align: center;">Page 64</p> <p>1   report that you wrote -- well, strike that. I - - do 2   you see the date at the upper right, September 17, 3   2004?</p> <p>4       (EXHIBIT 1 MARKED FOR IDENTIFICATION)</p> <p>5       A   Yes.</p> <p>6       Q   And this is a report from you to the 7   commanding officer of the confidential investigating 8   section?</p> <p>9       A   Yes.</p> <p>10      Q   And does that mean this is a report to Keith 11   Calloway?</p> <p>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 --</p> <p>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 --</p> <p>20      MR. HILKE: Sure. I'll scroll down. I --</p> <p>21   BY MR. HILKE:</p> <p>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?</p>

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<p>1       A Yes, sir. He was.</p> <p>2       Q Okay. Is this a report you reviewed in</p> <p>3       preparation for the deposition today?</p> <p>4       A I -- did I see it? Yes.</p> <p>5       Q Okay. And for the record, I find I have to</p> <p>6       zoom in to make this readable, but anytime you want to</p> <p>7       scroll up or down, just ask me. I had wanted you to</p> <p>8       have access to the full document as I'm asking you</p> <p>9       questions about it. Do you see in the first full</p> <p>10      paragraph, where it says -- the first line is, "On</p> <p>11      September 16, 2004, the undersigned agent was made aware</p> <p>12      of unknown public housing officers taking tax money from</p> <p>13      drug dealers, allowing them to sell their product"?</p> <p>14      A Yes.</p> <p>15      MR. NOLAND: You -- you just misread that, that</p> <p>16      -- I'm sorry. No, you didn't. Sorry about that.</p> <p>17      MR. HILKE: It's okay.</p> <p>18      BY MR. HILKE:</p> <p>19      Q And do you see the next line describing a</p> <p>20      Sergeant Henry Harris, who the information was obtained</p> <p>21      from?</p> <p>22      A Yes.</p> <p>23      Q Did you speak with Sergeant Harris in your</p> <p>24      investigation?</p> <p>25      A Yes.</p>	<p>1       Q Okay. And do you recall having that</p> <p>2       conversation with Ms. -- with Sergeant Harris?</p> <p>3       A Honestly, no.</p> <p>4       Q And do you see that it describes a debriefing</p> <p>5       of a cooperating individual? And specifically looking</p> <p>6       at the last line of that first paragraph, do you see</p> <p>7       where it says, "In the debriefing of a cooperating</p> <p>8       individual, this information was obtained"?</p> <p>9       A Yes.</p> <p>10      Q And did -- on the next paragraph, it describes</p> <p>11      a meeting with Rivera, Bigg, you and the CI. Do you see</p> <p>12      that?</p> <p>13      A Yes.</p> <p>14      Q Do you recall having that meeting?</p> <p>15      A Not really.</p> <p>16      Q And does he -- does the name [REDACTED]</p> <p>17      (phonetic) ring a bell to you in terms of your</p> <p>18      investigation?</p> <p>19      A It rings a bell, but it's -- as far as</p> <p>20      somebody that either I was interested in or spoken with,</p> <p>21      yes.</p> <p>22      Q Yeah. And do you see below it, looking at the</p> <p>23      second paragraph, it says that "The CI reported that the</p> <p>24      officers had approached him and requesting paying for</p> <p>25      his doing business selling drugs in their area"?</p>
<p style="text-align: center;">Page 67</p> <p>1       A Okay.</p> <p>2       Q And do you see below that he also alleged that</p> <p>3       one of the officers had shot at him because he ran away?</p> <p>4       A Yes.</p> <p>5       Q And near the bottom, that the CI reported that</p> <p>6       many of the larger drug dealers paid tax money to these</p> <p>7       officers?</p> <p>8       A Yes.</p> <p>9       Q Okay. And do you have any memory of where you</p> <p>10      met with the confidential informant to get this</p> <p>11      information?</p> <p>12      A No. I met with one, I don't even know who he</p> <p>13      was, probably documented. Well, it is documented. I</p> <p>14      met with one person in the -- at 26th and California, in</p> <p>15      the ASA's office. The ASA was present, his attorney was</p> <p>16      present, myself. I don't know who was with me, but</p> <p>17      yeah.</p> <p>18      Q Yeah. And --</p> <p>19      MR. NOLAND: I think he -- no, I'm -- go ahead.</p> <p>20      MR. HILKE: No, that's okay.</p> <p>21      BY MR. HILKE:</p> <p>22      Q Did you or anyone at this meeting ask the</p> <p>23      confidential informant who were the other larger drug</p> <p>24      dealers paying money to these officers?</p> <p>25      A There were many questions asked, to which we</p>	<p style="text-align: center;">Page 68</p> <p>1       got no answers.</p> <p>2       Q So what do you -- what do you remember about -</p> <p>3       - what do you remember about that interaction in terms</p> <p>4       of asking about other larger drug dealers and not</p> <p>5       getting any answers?</p> <p>6       A What I remember about speaking to all of them,</p> <p>7       all the so-called witnesses, they were all drug dealers,</p> <p>8       they were all current drug dealers, and they - - they</p> <p>9       had something to say, and they probably did have</p> <p>10      knowledge, but they didn't want to give it up. They</p> <p>11      said they would cooperate and they -- at later times,</p> <p>12      they still did not cooperate with me.</p> <p>13      Q And when you say they didn't cooperate, what</p> <p>14      do you mean?</p> <p>15      A They did not provide any information for me.</p> <p>16      Q All right. Was there a reason you didn't</p> <p>17      write in this report that this confidential informant</p> <p>18      had not given you information that had been asked for?</p> <p>19      MR. NOLAND: Object to the form. You can</p> <p>20      answer.</p> <p>21      A No.</p> <p>22      Q I'm going to stop sharing this document. I'll</p> <p>23      mark this Exhibit 2, Plaintiff's 18628. So at the top</p> <p>24      of this document, do you see this is dated</p> <p>25      September 21, 2004 and that it's a report from you?</p>

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<p style="text-align: center;">Page 69</p> <p>1                   (EXHIBIT 2 MARKED FOR IDENTIFICATION)</p> <p>2       A Yes, sir.</p> <p>3       Q And at the bottom of your report, is that your</p> <p>4       signature?</p> <p>5       A Yes, sir.</p> <p>6       Q And this again is approved by Lieutenant</p> <p>7       Rivera; is that right?</p> <p>8       A Yes, sir.</p> <p>9       Q And in the bottom, do you see there's a</p> <p>10      confidential number connected with this report?</p> <p>11      A Yes.</p> <p>12      Q What is a -- what is a confidential number?</p> <p>13      A It's the number assigned to the case for the</p> <p>14      confidential section. I mean, just -- it's a -- it's an</p> <p>15      identification number.</p> <p>16      Q Okay. And I'm looking at the body of the</p> <p>17      report now. Is it correct that this describes -- this</p> <p>18      report describes a meeting on September 20, 2004?</p> <p>19      A Okay.</p> <p>20      Q Is it -- and was this -- did you write this</p> <p>21      report about a meeting that occurred on September 20,</p> <p>22      2004?</p> <p>23      A Yes.</p> <p>24      Q And do you see that this report describes a</p> <p>25      meeting with representatives from the United States</p>	<p style="text-align: center;">Page 70</p> <p>1       Attorney's Office, Federal Bureau of Investigations,</p> <p>2       Drug Enforcement Administration, Alcohol, Tobacco, and</p> <p>3       Firearms, and the Chicago Police Department?</p> <p>4       A Yes.</p> <p>5       Q Did you attend this meeting?</p> <p>6       A I'm not sure.</p> <p>7       Q Do you know if any --</p> <p>8       A I don't know that -- I don't know whether I</p> <p>9       attended it or I was made aware.</p> <p>10      Q And do -- sitting here today, do you know who</p> <p>11      attended this meeting?</p> <p>12      A No, sir.</p> <p>13      Q And below it, do you see, starting in the</p> <p>14      second sentence, where it's -- in the middle of it,</p> <p>15      where it says, "It was determined this would be a</p> <p>16      federally prosecuted investigation. The cooperating</p> <p>17      individual is to be prosecuted in federal court, and the</p> <p>18      United States Attorney's Office believe they should be</p> <p>19      in control of everything that results from his</p> <p>20      cooperation"?</p> <p>21      A Yes.</p> <p>22      Q Was it -- am I correct that it was the FBI</p> <p>23      specifically that led this investigation?</p> <p>24      A Yes.</p> <p>25      Q Okay. And what was your understanding of</p>
<p style="text-align: center;">Page 71</p> <p>1       what, if anything, you would do to support the</p> <p>2       information after this meeting?</p> <p>3       A So I assume when you say -- and I -- I want</p> <p>4       you to answer. I assume when you say me, you mean the</p> <p>5       Chicago Police Department, or are you just talking about</p> <p>6       me personally?</p> <p>7       Q Thank you for clarifying. I mean you</p> <p>8       personally. What did you understand about what you</p> <p>9       would be doing?</p> <p>10      A If I did anything, it would be in support of</p> <p>11      the case that was being handled by the United States</p> <p>12      government.</p> <p>13      Q Okay. Does that mean that you would need to</p> <p>14      inform the FBI of the -- what steps you planned to take,</p> <p>15      before you took them?</p> <p>16      A That means anything that I see it -- that I</p> <p>17      put on paper, that they had.</p> <p>18      Q Okay. So it -- you mean that they would</p> <p>19      receive a copy of any report you wrote during your</p> <p>20      investigation?</p> <p>21      A Yes.</p> <p>22      Q Were you free still to take whatever steps you</p> <p>23      thought appropriate to investigate this allegation?</p> <p>24      A No, I --</p> <p>25      MR. NOLAND: (Inaudible). Go ahead. That's</p>	<p style="text-align: center;">Page 72</p> <p>1       fine.</p> <p>2       Q I'm sorry, I didn't hear your answer.</p> <p>3       A No.</p> <p>4       Q Okay. Why not?</p> <p>5       A Again, as I stated earlier, once the FBI takes</p> <p>6       a case, they're working with the U.S. attorney, and they</p> <p>7       go according to what they want to do. Anything that you</p> <p>8       do is in line with what they're doing, in line with what</p> <p>9       they say. And furthermore, most of the things that</p> <p>10      you're doing, as a matter of fact, all of them that</p> <p>11      you're doing after they take control of the case, is</p> <p>12      what they say.</p> <p>13      Q Did you receive instructions originating from</p> <p>14      the FBI, about how to investigate this case?</p> <p>15      A No, I did not.</p> <p>16      Q Did you receive any specific instructions</p> <p>17      about steps you should take to investigate this case?</p> <p>18      A No.</p> <p>19      Q Did you make your own plan for what you could</p> <p>20      do to support the investigation of this case?</p> <p>21      A I followed where the information that I was</p> <p>22      getting at the time took me.</p> <p>23      Q And as you followed the information you got,</p> <p>24      did you have to run your next steps by anyone else</p> <p>25      before you continued to investigate?</p>