

EXHIBIT 51

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1 CPD and the federal government into a CP officer doesn't
2 lead to charges, does CPD ever still do anything?
3 Do they still ever act?

4 MR. BATTLE: Going to object to the fact that
5 incomplete hypothetical. Go ahead and answer,
6 if you can.

7 A So if it didn't lead to criminal charges, then
8 sometimes CPD would do internal investigation. Because
9 it might not lead to any criminal charges, but it could
10 be something that was a violation of policy, or things
11 of that nature. So we would still look at the
12 investigation at the conclusion of the criminal portion.

13 Q Were you ever given any specifics about any of
14 the evidence that the federal government with CPD
15 developed against Watts and other members of this team?

16 A No.

17 Q Did you ever ask for that information?

18 A So with Watts and Mohammad, they were -- prior
19 to me becoming superintendent, as far as I knew, they
20 had been indicted, went to prison. I don't know if they
21 were out of prison at the time that I became
22 superintendent. So, there would've been no need for me
23 to inquire about them. As far as the other members of
24 the team goes, when we got notification from the state's
25 attorney's office concerning their credibility issues,

1 I knew that I personally reached out to the
2 US Attorney's office and the FBI to ask them, did they
3 have anything at that point that would suggest that I
4 should take further action against those officers?
5 If they could share it with me, fine.
6 If not, I understood. But if I were to take a job
7 action against them, was -- did they have any reason to
8 think that they had evidence that would suggest that?
9 And they said, no.

10 Q Who did you talk to at the US Attorney's
11 office?

12 A It would've been -- I can't remember if Zach
13 Fardon was the US Attorney at the time or John Lausch,
14 but whichever one of them was in charge, I would've
15 reached out to that person.

16 Q Did you talk directly to the US Attorney at
17 the time?

18 A Yes.

19 Q When did you make that -- was it a call or a
20 letter or --

21 A No, it was a phone call.

22 Q And about what time period did you make that
23 call?

24 A It would've been around the time we received
25 those documents.

1 Q November 2017?

2 A Yes.

3 Q Is it a call that had been set up by, like, a
4 staff member or did you just pick up the phone and call?

5 A No, we had personal relationships, so I
6 would've just picked up the phone and called.

7 Q About how long was the conversation or
8 conversations?

9 A My best recollection, maybe 10 minutes or so.

10 Q Was it just one phone call?

11 A Phone call for me asking if there was anything
12 I should be concerned with, and then the phone -- the
13 return call saying no.

14 Q So it wasn't like you called, they said
15 immediately no. They looked into it.

16 A No, they looked -- they -- I'm going to
17 assume they looked into it because they -- it was a few
18 days before both of them got back to me.

19 Q Who did you talk to at the FBI?

20 A It would've been [REDACTED]

21 Q I'm sorry. Could you spell that last name?

22 A [REDACTED], I believe. He might get me
23 if I misspell his name.

24 Q [REDACTED], though?

25 A Yes.

1 Q Okay.

2 A To the best of my knowledge.

3 Q He's the special agent in charge of the
4 Chicago office at the time?

5 A Correct.

6 Q Was it the same process? You just picked up
7 the phone, called and he called you back later?

8 A Correct.

9 Q And what specifically did you ask either
10 Fardon or Lausch, and then [REDACTED]?

11 A I don't remember specifically how the
12 conversation went, but I would have said, "Listen,
13 I have these officers that can no longer testify at
14 court that were involved in the Watts case. If there's
15 any reason I should have a concern about any criminal
16 activity or any evidence that might come forward later,
17 that would suggest they shouldn't be on the street.
18 You don't have to share it with me if you can't, but at
19 the very least, I need to know so that I can relieve
20 them of their police powers if that's appropriate."

21 Q Did you just ask them about criminal activity?

22 A Any activity that would suggest relieving them
23 of their police powers.

24 Q Did you give them any guidelines about what
25 activity would warrant relieving them of police powers?

1 A No.

2 Q In your mind, what types of activity would you
3 have been looking for that would've justified relieving
4 those officers of their police powers?

5 MR. BURNS: Objection to form of question.

6 MS. WEST: Join.

7 A It wouldn't have been anything specifically,
8 but if there's a criminal investigation, it would be
9 criminal allegations, I would imagine. So, I -- there
10 was nothing that specifically, because I didn't want to
11 taint that response from them. I just wanted to know if
12 there was something that I should be concerned about.

13 Q Did you go back and ask anyone in Internal
14 Affairs the same question?

15 A So when you say same question, was there
16 anything that CPD should be concerned with?

17 Q Yeah. So, did you go back to -- it was a
18 joint investigation, right? So, I -- let me back up a
19 sec. I was making an assumption but tell me if I'm
20 right about this. You called the FBI and the US
21 Attorney's office because you knew they did a joint
22 investigation into, at least Watts and Mohammad, right?

23 A Correct.

24 Q And you are aware that, and would've, at a
25 minimum included looking at other officers' activities?

1 A Correct.

2 Q That's the reason you called them to ask if
3 there was anything they knew about the other officers
4 that would warrant relieving them of police powers,
5 right?

6 A Correct.

7 Q And the joint investigation included the
8 Chicago Police Department?

9 A Correct.

10 Q So did you go back and talk to the division or
11 divisions at CPD that were involved in the joint
12 investigation?

13 A Yeah. I spoke to them prior to reaching out
14 to the US Attorney and the FBI.

15 Q Okay. Who did you speak to at the CPD before
16 you reached out to the FBI and the US Attorney?

17 A I would have asked the General Counsel if she
18 had any information. And I don't recall if Eddie Welch
19 or Keith Callaway were the chiefs, both of them at
20 different times were Chiefs of Internal Affairs, but
21 whoever the Chief was at the time, I would have inquired
22 to that person if there was something there that we had
23 internally that would suggest relieving them of their
24 police powers.

25 Q And were those -- did you get no answer for