

# **EXHIBIT 68**

**Expert Opinions of Jeffrey Danik**

*Lionel White, Plaintiff,*

**v.**

**City Of Chicago, Ronald Watts, Phillip Cline, Debra Kirby, Alvin Jones, Elsworth Smith, Jr., Kallatt Mohammed, Manuel Leano, Brian Bolton, Robert Gonzalez, And Douglas Nichols, Defendants**

**Case No. 1:17-Cv-02877**

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*Leonard Gipson, Plaintiff,*

**v.**

**City Of Chicago, Former Chicago Police Sergeant Ronald Watts, Former Officer Kallatt Mohammed, Sergeant Alvin Jones, Officer Elsworth Smith Jr., Officer Douglas Nichols Jr., Officer Brian Bolton, Officer Manuel Leano, Officer Kenneth Young, Officer Darrel Edwards, Officer Matthew Cadman, Michael Spaargaren, Officer George Summers, Officer Calvin Ridgell, Officer Robert Gonzalez, Officer Lamonica Lewis, Philip Cline, Debra Kirby, Karen Rowan, And Any Other Yet-Identified Officers Of The Chicago Police Department, Defendants**

**Case No. 1:18-Cv-05120**

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***Ben Baker and Clarissa Glenn***

**v.**

**City Of Chicago, Former Chicago Police Sergeant Ronald Watts, Officer Kallatt Mohammed, Sergeant Alvin Jones, Officer Robert Gonzalez, Officer Cabrales, Officer Douglas Nichols, Jr., Officer Manuel S. Leano, Officer Brian Bolton, Officer Kenneth Young, Jr., Officer Elsworth J. Smith, Jr., Philip J. Cline, Karen Rowan, Debra Kirby, and Other as Yet-Identified Officers of The Chicago Police Department, Defendants**

**Case No: 1:16-Cv-08940**

### **Introduction**

I was asked to review a record of materials and provide an opinion on two issues related to a 2011 Memorandum of Understanding (MOU) between the Chicago Division of the FBI and the Chicago Police Department (CPD). The opinion was to be based on my training and experience and my observations regarding details from the provided record which might support my opinions.

After a brief statement of research prompts and findings, I will present perspective and information I believe is crucial to understanding and orienting oneself to the broad issues at controversy (the purpose of MOUs, public corruption investigations in general, how the FBI public corruption program operates and followed by a lengthy analysis of how the facts in the record impact my opinion.

I would be remiss if I did not begin by stating I was shocked and saddened by what I read in the record. The extreme recklessness of leaving demonstrably corrupt officers loose in a particularly vulnerable segment of the community is so far removed from anything I've ever experienced in my law enforcement career; its negative impact cannot be overstated. The worst possible allegations that can be made against police officers

were being corroborated in part for several years. The CPD received accusations of selling drugs into the community and dealing in firearms by multiple separate people telling near identical stories and who do not appear to have known the others were cooperating. An officer was accused of shooting at persons as part of their bribe and extortion payment racket and suspicion even arose about one officer's involvement in a homicide of a drug dealer who might cooperate against him. The officers received cash bribes or stole funds and falsified police evidence records eight times over the course of years, much of it documented via audio or video recordings. Instead of removing them administratively, the CPD command staff claims to have instead outsourced the entire matter for several years to an often-bungling group of officials outside their department. Inexplicably, CPD took no ownership of the matter and allowed the targets to remain as officers in the very community they were known to be victimizing. Perhaps the most egregious thing is CPD then did nothing to identify and attempt to correct possible false arrests of the people the target officers had victimized during those previous years.

### **My qualifications**

I was a Special Agent (SA) and Supervisory Special Agent (SSA) at the Federal Bureau of Investigation for twenty-eight years, retiring in 2015. I was the lead investigator (case agent) in numerous successful public corruption investigations resulting in convictions by plea or jury trial. As a case agent I used the FBI Group II undercover technique in multiple successful public corruption matters and was the affiant and administrator for seven intercepted telephone lines (Title III applications) as well as operated confidential human sources targeting public corruption. I was promoted and served as a public corruption task force Supervisory Special Agent where I identified numerous police, judicial and public official matters for investigative priority and instituted sophisticated techniques in those cases as well. In one law enforcement corruption matter, Operation Blind Justice, I successfully planned and executed a large-scale FBI undercover investigation resulting in the indictment, arrest, and conviction of nineteen defendants. As an FBI public corruption Supervisor, I oversaw a federal task force that also obtained numerous convictions for public corruption, and which won numerous awards from the DOJ, FBI and state and local agencies. I had an extensive assignment in the FBI's Counterterrorism Division as a Supervisor and in the FBI's Legal Attache program with two-year assignments at Saudi Arabia and Kuwait and a temporary assignment at U.S. Embassy, Addis Ababa, Ethiopia. One of my career-long specialties was vetting, evaluating, investigating, and assisting the FBI, the Department of Justice (DOJ) and state and local agencies in the investigation of multiple dozens of public corruption allegations in

the areas of police corruption, judicial corruption and misconduct by public officials. Additionally, I served terms as an FBI acting public corruption program coordinator and election crimes liaison for the Southern District of Florida with a counterpart from the DOJ. I was certified as an FBI General Police Instructor chosen to design and deliver training internationally, including courses about public corruption, on behalf of the FBI at overseas law enforcement training facilities such as the International Law Enforcement Academy (ILEA)-Gaborone, Botswana, in Moscow and Chelyabinsk, Russia and Skopje, Macedonia. I utilized Memorandum of Understanding (MOUs) many times throughout my career operating under them, assisting in drafting them and executing supervision over them. I was also an FBI violent crime program squad supervisor and at several points over a two-year period was Acting Assistant Special Agent in Charge of the violent crime branch of the Miami Division overseeing seven violent crime squads and related task force operations (approximately 150 sworn federal, state and local officers, all of which made extensive use of MOUs). In retirement I provide expert assistance in sophisticated white-collar crime matters and terrorism matters. My complete C.V. is attached as Appendix A.

### **Research questions**

1. Did the Memorandum of Understanding between the City of Chicago and the FBI, or anything else, prevent the City of Chicago from taking administrative action against the officers under investigation or from reassigning them to other assignments?
2. Would it be expected in a joint FBI investigation involving activity over a seven-year period—from September 2004 to November 2011—that the FBI would require a cooperating municipality to allow police officers accused of “taxing” drug dealers and planting drugs on suspects to remain in narcotics investigation roles where they would continue to have opportunities to continue to commit such misconduct?

In answering these questions I based my opinion on my experience investigating public corruption matters since at least 2002 through 2015 as an FBI Special Agent lead investigator, public corruption supervisor, FBI task force Supervisor, being a police instructor and preparing curriculum and delivering training internationally for the FBI and Department of Justice regarding investigating public corruption on behalf of the FBI, participation as an adjunct investigator at the field division for the FBI’s Office of Professional Responsibility (OPR), my experience drafting and compliantly executing MOUs with numerous law enforcement agencies and other United States government agencies, my experience vetting

hundreds of public corruption and police misconduct complaints as a public corruption coordinator for the FBI, extensive investigative activity regarding federal public corruption matters including being the affiant on numerous Title III intercepts and either case agent or FBI supervisor of multiple FBI public corruption undercover operations. A more detailed listing of my public corruption experience is attached at Appendix A. Additionally, a list of materials I have reviewed is attached as Appendix B.

### **Research question response-overview**

The Memorandum of Understanding ("MOU") was not effective until January 20, 2011. It did not exist prior to that date, therefore, it cannot possibly be the basis to support CPD's abandonment of critical administrative control over CPD officers before that date.

Even if the Chicago City PCTF MOU had existed between 2004 and January 2011, the plain language of the MOU does not prohibit the CPD from acting administratively against its employees. Rather, the MOU provides simple mechanisms empowering CPD to act administratively against any CPD employee who is a target of the investigation (see paragraph 23 below). Juan Rivera, the head of the CPD's internal affairs unit during much of the relevant time period, confirmed during his testimony in the *Watts Coordinated Proceedings*, that the MOU merely confirmed the existing state of affairs. Assuming he was testifying accurately, then CPD knew that it always maintained the right to take administrative action. That is consistent with my many years of service with the FBI. Additionally, the acts alleged to have been perpetrated were of such grave public safety concern, it is nearly incomprehensible any police department commander would not take immediate steps to intervene and protect the public but instead allow the activity to continue for several years.

#### **MOU Paragraph 23 states:**

*The FBI recognizes that the CPD will often need or desire to take concurrent administrative action against a CPD employee engaging in misconduct or criminal behavior. In the event a particular CPD employee is the focus of an active or ongoing CG City PCTF investigation, the CG City PCTF should be consulted in advance of any administrative action taking place, whenever possible. (emphasis added).*

In my experience, the FBI places a high value on writing with clarity and using plain, concise language. The MOU's language is in line with that experience, plainly explaining that CPD maintained the right to discipline its own officers while they were under investigation by the FBI. This is consistent with standards of which I am aware. For example, using funding from the Department of Justice, the LAPD and 11 other major law enforcement organizations, including the Chicago Police Department,

worked together to "to share and develop standards, recommendations, and best practices in Internal Affairs work, discuss differences and similarities in practice, and look at various approaches to improving individual and collective agencies' Internal Affairs practices." Standards and Guidelines for Internal Affairs: Recommendations from a Community of Practice at 6, 80 (<https://portal.cops.usdoj.gov/resourcecenter/ric/Publications/cops-p164-pub.pdf>). They issued a report as a result of their work. *Id.* Pages 21-27 and 30-34 discuss various scenarios and opinions regarding conducting parallel or consecutive criminal and administrative inquiries. I note that the MOU is consistent with the report. Neither the MOU nor the report from those large law enforcement agencies displaces the important concept that police departments should make their own determinations based on a serious consideration of each of the allegations, their gravity and impact on public safety, while balancing the potential prejudice of delaying those investigations.

I am aware that CPD leaders have testified that they believed the Department could have or would have been charged with obstruction of justice if they initiated administrative action against Watts, Mohammed, or the members of their team. Based on the plain language of the MOU and my experience, there was no reasonable basis for that belief. I note that the City hired an expert witness to testify on FBI-related issues in a related case, *Waddy v. City of Chicago*, where their expert stated that he did not believe the FBI would have brought obstruction of justice charges if CPD took administrative action against Watts or Mohammed. Deposition of Michael Brown at pages 99-101. In this case, the City's representative who testified on confidential investigations by CPD likewise testified that he had no basis to state that obstruction of justice charges would result if CPD moved administratively against an officer who was the subject of a joint FBI-CPD investigation. Deposition of Timothy Moore at 223:21-224:11.

### **The FBI Public Corruption Program:**

Public corruption is the FBI's top criminal priority.<sup>1</sup> It is outranked as the highest overall FBI priority only by programs dealing with threats to U.S. National Security. The Public Corruption Program is managed within the FBI's broader White Collar Crime efforts however, combatting public corruption is of such a high priority, that year-after-year, the program is delineated separately in reports to Congress, prioritized above not only all other White Collar Crime enforcement efforts (stock frauds, Medicare fraud, Theft from Defense funds, COVID fraud etc.) but

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<sup>1</sup> James B. Comey, Director FBI, testimony before U.S. Senate Judiciary Committee, December 09, 2015 <https://www.fbi.gov/news/testimony/oversight-of-the-federal-bureau-of-investigation-8>

ranking public corruption above other major FBI Programs such as the Violent Crime Program which includes violations such as kidnappings, bank robbery and narcotics trafficking.

The FBI's Public Corruption (PC) Program breaks down into three sub-categories<sup>2</sup>:

1. corruption by Elected/appointed officials,
2. corruption by judicial officers and
3. corruption by law enforcement personnel.

An FBI field office has a compressed management structure. At the top of the field office is a singular agent responsible for all FBI operations within a designated geographical area. In 53 of the 56 FBI field divisions in the United States, this singular position is referred to as, "Special Agent in Charge" (SAC). Each SAC is chosen by the FBI Director and reports directly to the Deputy Director of the FBI (the 2nd highest position within the FBI, just below the FBI Director). The Chicago Division is overseen by an SAC.

Below an SAC in a field division is a position termed, "Assistant Special Agent in Charge" (ASAC). Larger field divisions are allocated more ASACs but the allocation per field division is usually between two and six and this would include the Chicago field division.

ASACs are tasked with managing large general program matters at a supervisory level, executing the approved strategic goals of the SAC and FBIHQ, and not being directly involved in operations (arrests, investigations, conducting surveillance etc.). ASACs report directly to the SAC. Usually, one ASAC is responsible for White-Collar Crime, one for Counterterrorism, one for Violent Crime, etc. From the documents I reviewed in the record, Chicago field division had an ASAC over the White-Collar Crime Program which included management of the Public Corruption Program. An ASAC typically has several squads of agents below them with each squad led by a Supervisory Special Agent (SSA).

Directly managing oversight of investigations by groups (called "Squads") of FBI agents and task force officers, is a position termed, "Supervisory Special Agent" (SSA). SSAs report directly to ASACs. An SSA doesn't usually conduct investigations, make arrests etc., although they might participate occasionally as an adjunct in those tasks. An SSA primarily aligns the squads' investigative efforts with the ASACs program-wide goals and within the national threat matrix of FBIHQ. An SSA is responsible for approving the day-to-day operational activities of agents and task force officers often engaging in investigative planning and close monitoring of compliance matters, especially in sensitive operations such as high-risk arrests etc. The Public Corruption task force in Chicago was headed by an SSA and had the

numerical designation, "WC-3". The "WC" would stand for "White Collar". And the "3" would mean that there are at least 3 (most likely more) white collar crime squads in the Chicago field division, with each squad headed by an SSA and each SSA reporting to the White-Collar Crime Program ASAC. An SSA position functions similar to that of the more common "Sergeant" designation in a police department or military unit.

Comprising squads are "Special Agents" (SA). The SA is the critical lynchpin of FBI success. It is only an SA that is authorized to conduct investigations. An SA is entrusted with considerable latitude and freedom to choose an investigative plan for a case, recruit and operate informants, conduct surveillance, plan undercover operations and generally are the singular point of success or failure for any investigative matter. An SA reports directly to the SSA of their squad. Although the Watts case had several case agents, one in particular was responsible for the case for the majority of the years the case languished. Once that long term SA was replaced, the investigation then proceeded at a greatly enhanced tempo and was resolved within approximately five months.

The FBI PC program is unique from all other FBI criminal investigations in several ways. First, to initiate most FBI investigations, a squad supervisor is empowered to unilaterally approve the investigation to commence based solely on their own evaluation of those allegations. However, investigation of allegations related to public corruption cannot be initiated by a line-level supervisor. Nor can the matter be initiated by the next higher ranking FBI field office executive (usually an Assistant Special Agent in Charge who is the Public Corruption Program Manager). Public corruption allegations usually (except for very minor police misconduct) must be approved personally by the Special Agent in Charge. Second, predication (the strength of the allegation) is almost always higher for a public corruption case than other FBI criminal cases. Public corruption allegations must be specific and actionable. In other words, cases are rarely approved for investigation unless there are allegations clear enough that articulable steps can be reasonably taken in as timely a manner as possible to corroborate or refute the allegations. Third, timing can greatly affect the initiation of a corruption matter even when clear prediction exists. For example, for decades the DOJ has maintained an election interference policy cautioning against initiating or undertaking "...overt investigative steps near the time of a primary or general election." Other FBI investigations are almost never subjected to this "timing" issue prior to their initiation.

Taken together, the high-ranking priority the public corruption program has in the FBI's National Threat Matrix<sup>3</sup>, the enhanced administrative approvals needed to undertake investigations, the specificity of allegations and the environmental sensitivities unique to corruption

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<sup>3</sup> US DOJ OIG Audit report 05-37 Sept 2005 Page 94, Para. 1 (Chapter 10)

matters<sup>4</sup> should serve to orient those outside the FBI and DOJ that public corruption investigations are far from routine matters.

### **Orienting to the uniqueness of police corruption investigations:**

Police corruption investigations have unique attributes compared to elected official or judicial corruption. They must be studied and managed by experienced personnel who fundamentally are excellent investigators but also trained and experienced in the unique legal and operational challenges inherent in investigating corrupt law enforcement officers. Other forms of corruption have a much longer arc and less of an immediate impact on the public.

The key hallmark of any police corruption case is the timely, high-tempo resolution of allegations. The reason necessitating this crucial imperative is that no other public official in our society can exercise such an immediate, outsized, and unpredictable victimization of members of the public as a police officer.

Additionally, many elected, appointed, and judicial corruption targets are not street wise, whereas police officers are highly aware of suspicious activity occurring around them, trained at spotting surveillances, knowledgeable about technical devices such as video and audio recorders and adept at protecting themselves from exploitation by persons such as informants. Lastly, legal factors that are unique to police corruption investigations must be navigated by experienced personnel. These include criminal investigators avoiding exposure to evidence obtained under immunity agreements (Garrity statements) and navigating an investigation while there are parallel criminal and administrative inquiries. These factors make police officers extremely challenging to investigate but it is critical to balance these concerns with quick resolution and the removal of corrupt police officers from the street and mitigate their impact on the public.

### **FBI/DOJ MOUs-General**

The FBI/CPD PCTF MOU at issue in this matter is not a unique agreement. MOUs similar or identical to this one have been a staple operationally for the FBI and DOJ for decades. An MOU's format, identified issues, approval processes, and language have been mostly uniform throughout decades of use. At any one time, an FBI field division such as Chicago is typically operating under a half-dozen different MOUs with various

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<sup>4</sup> <https://www.justice.gov/jm/jm-9-85000-protection-government-integrity#9-85.110> Section 110 and 500

federal and state agencies, demonstrating their routine adoption and use. Finally, and importantly, MOUs usually address a broad crime problem, such as "public corruption," rather than a specific singular case, such as the singular Watts police corruption investigation. And this is the case with the FBI/CPD Chicago City PCTF; it addresses public corruption broadly, beginning in January 2011, as opposed to being singular to Watts or officers on his team.

Operating under an MOU has significant benefits in an investigation but MOUs function primarily to address purely administrative and legal issues. For example, without an MOU, personnel who are not FBI employees (CPD task force officers) are not permitted to have unescorted access on FBI property, they cannot drive FBI vehicles and they cannot have access to FBI computer systems to write investigative reports, review investigative files or have access to internal FBI email systems. Additionally, law enforcement agencies often have differing regulations regarding administrative documentation for informant use, report writing, time keeping, deadly force policies, liability for accidents with government vehicles, overtime payments and how forfeitures are handled. With an MOU, the separate agencies can streamline and agree on how their differing procedures will interface. Federal deputization and security clearance process agreements for non-FBI employee Task Force members are another key administrative function fulfilled through an MOU. To illustrate this point, the Chicago PCTF MOU contains eighty-five paragraphs across twelve pages, however only four of those paragraphs address operational matters (paragraphs 21-24) under the Title, "Operations". The remaining eighty-one paragraphs regard administrative issues.

### **The Chicago City PCTF MOU**

**The MOU was not effective until January 20, 2011. It did not exist prior to that date, therefore, cannot possibly be the basis to support CPD's abandonment of critical administrative control over CPD officers before that date.**

The Watts investigation spanned almost eight years, from 2004 into 2012. The MOU was not effective until January 20, 2011. Setting aside that the MOU does not prohibit concurrent administrative action regarding targets of the investigation, its effective date of January 20, 2011, eliminates it as having any bearing on the relationship between CPD Internal Affairs and the FBI prior to that date. Clear evidence of corruption by Watts and Mohammed was collected and known to agents/officers and command staff of CPD beginning in 2003 but CPD became aware of independent proof from the FBI that corruption existed at the latest between December 2007 and June 2008 by being provided with details regarding bribes paid to Watt's partner, officer Kallet Mohammed, by an informant working at the direction of the FBI. These payments were

documented by audiovisual means, and CPD was provided with confirmation that the payments had been made. The CPD provided no documentation evidencing that they confronted the FBI to resolve the case during those critical years and instead, when the FBI failed to act, CPD allowed the target officers to have full police powers until 2012.

The Chicago City Public Corruption Task Force ("PCTF"), which is the subject of the MOU, was responsible for the entire public corruption program, not just police corruption and clearly not just one police corruption matter (Watts). Paragraph 3 details that the PCTF mission was, "to identify and target.... federal, state, and local elected officials and appointed public officials, law enforcement officers (and) government employees....". Fraud against the government was also part of the new task force's mandate (paragraph 4).

**Even if the Chicago City PCTF MOU had existed between 2004 and January 2011, the plain language of the MOU provides simple mechanisms empowering CPD to act administratively against any CPD employee who is a target of the investigation.**

**MOU Paragraph 23 states:**

*The FBI recognizes that the CPD will often need or desire to take concurrent administrative action against a CPD employee engaging in misconduct or criminal behavior. In the event a particular CPD employee is the focus of an active or ongoing CG City PCTF investigation, the CG City PCTF should be consulted in advance of any administrative action taking place, whenever possible. (emphasis added).*

MOU paragraph 23 precisely addresses the situation between CPD and the Watts investigation. Even if the MOU had been in existence, the MOU clearly only requests a consultation with the FBI to take place prior to CPD taking administrative action and only if possible (presumably only justifying any consultation requirement if it did not affect or interfere with public safety). If any such consultation between CPD and the FBI during the seven years of the investigation had taken place, I would have expected significant documentation from CPD in the record regarding that consultation detailing the FBI asking that Watts and Mohammed be left on the street all those years. The memo would include dates, meeting participants and CPD's concerns and the FBI's directive and who provided it. None of that documentation was in the record I reviewed. Instead, numerous CPD officials could not testify during their respective depositions that such a request had ever occurred.

**"Official cut date, whatever it is we're going to do, ...one way or the other, get it done."**

*Former CPD Superintendent Garry McCarthy deposition, June 14, 2023; p.34/L. 25.*

Executive management at CPD were fully briefed and advised of developments in the FBI investigation between 2004 and February 2012. The record I reviewed contained abundant documentation that CPD personnel were participating in the operational aspects and then routinely and fully briefing CPD Command staff. There were numerous CPD "To/From" memos and reports from the FBI case file which documented the progress, and often the lack of progress in the investigation. Additionally, deposition testimony by current and former CPD officials corroborated CPD's robust knowledge of and participation in the investigation.

The MOU signed in January 2011 contemplated a collaborative and inclusive environment where CPD is being fully advised of task force case developments regarding CPD targets and are considered a partner in task force investigations. The MOU goes as far as to require CPD's Internal Affairs Division (IAD) to ensure they are "fully apprised of all investigative developments by...subordinates." (MOU paragraph 40). Although the MOU was not in effect between 2004 and January 2011, its wording is instructive and corroborates the substantial written record I reviewed that clearly indicates that between 2004 and February 2012, CPD was fully aware of specifics regarding the Watts and Mohammed allegations, the substantial evidence being compiled corroborating the allegations, the stunning brazenness of the targets over several years, and the numerous administrative issues and investigative gaffes befalling the case.

Special mention must be made of the failure by IAD to recognize or acknowledge three extreme alleged acts being perpetrated by Watts and Mohammed: a) stealing and then selling narcotics; b) planting narcotics on citizens then falsely arresting them, and c) Watts' use of firearms to commit violent acts (shooting at citizens, evidence that he may have been involved in one or more murders and statements that drug dealers would drop gun deliveries to him as part of their business arrangement). Any one of these three circumstances should have triggered an immediate "all-hands on deck" response reflex from CPD to ensure the safety of the public. Instead, evidence of these extreme acts surfaced time and again over several years without eliciting any sense that the public was potentially in imminent danger from Watts and Mohammed.

### **From the review of the record**

Below are significant incidents from the record noting critical junctures where CPD command staff intervention in my opinion would have been expected, as a minimum standard of care for the safety of a community. As former CPD Superintendent McCarthy is quoted above, CPD could have demanded the FBI set an "Official cut date, whatever it is we're going to do, let's get it -- one way or the other, get it done." The extreme

seriousness and alleged violence regarding Watts and Mohammed's predatory acts combined with the corroborating evidence collected over several years demanded nothing less.

As background to the below phases, IAD had received allegations regarding the taxing of drug dealers and the planting of evidence in public housing units during 2003 and 2004. At that early stage, the allegations, although specific, originated from a singular source and lacked corroboration. Starting in Phase One, below, multiple independent sources corroborated allegations of corruption and misconduct by Sergeant Watts and the officers he supervised.

## Phase One

### July 2004 through January 2007

**(July 21, 2004 Ron Henley letter).** Stunning information about Watts was received by CPD in mid-2004. A private citizen presented a written statement and multiple photographs documenting damage caused by a police chase culminating by police crashing into his parked vehicle at IBW. According to Henley, the female responding officer falsified the report to remove mention of the police involvement. Henley complained and Watts intervened by responding rudely and dismissively to the IBW area resident. When Henley attempted to escalate his claim of a false police report, Watts intervened again. Watts admitted he knew the owner of the (undamaged) van that CPD was chasing when CPD crashed into Henley's vehicle. Watts brought the person to meet Henley, Patrick Noonier, a heroin dealer in the IBW area. Watts mediated that Noonier would pay for Henley's repair and if he did not, Watts would intervene with Noonier. Henley claimed Watts encouraged him to not pursue the official process through CPD and instead, more quickly, have Noonier pay for the damages. *This incident contains two serious red-flags of corruption: 1) filing of false police reports and 2) that Watts had such a close familiarization with a known heroin dealer (Noonier). The record contains no indication any follow-up occurred on these serious red-flags of corruption because there is no follow-up investigation detailed in a 2006 (at least 18 months later) draft Application for Order Authorizing Pen Registers related to Watts and Mohammed. No action was taken despite the allegations being easily distinguishable for investigation from the allegations of taxing and robbing drug dealers because the Henley vehicle accident and resultant false report were a singular and discreet occurrence and could be investigated by CPD IAD as standalone matters without raising suspicion by Watts and Mohammed, who would have expected any private citizen complaint about a vehicle accident to be followed up on. (CITY-BG-023845) .*

**(Holliday To/From dated 09/17/2004)**. On September 16, 2004, an apparent federal cooperator tells IAD Lieutenant Juan Rivera and two other IAD officers that he personally was shaken down for a tax to allow continued drug dealing and that many of the larger drug dealers pay the officers on an ongoing basis. Significantly, the cooperator states he was shot at by one of the officers the prior year. **A federal cooperator is a person who has entered into an agreement to plead guilty and is discreetly cooperating with federal authorities. The most serious admonishment they are given by DOJ via written agreement is that their cooperation agreement will become null and void if they are caught lying. A federal cooperator has almost no motivation to lie during the investigative phase because they know law enforcement is usually actively following up on their information and confronting them with the results. Additionally, this cooperator was working for a federal task force officer assigned to the High Intensity Drug Trafficking Area (HIDTA). The TFO appears to be a CPD Sergeant which could enhance the information's credibility in that TFO thinks enough of the cooperator and the information that he expeditiously passed to CPD IAD command staff.**

**(Holliday To/From 09/21/2004)**. Four days later, on September 20, 2004 CPD meets with the FBI, United States Attorney's Office, DEA and the ATF to institute a joint investigation. Apparently CPD IAD is significantly alarmed by the cooperator's information because within four days CPD IAD is meeting with these multiple federal partners to establish a partnership and investigative plan using the assistance of the federal cooperator. **This is the operational tempo expected when such serious allegations are received that an officer was shooting at a citizen (the cooperator) and taxing drug dealers.**

**(Holliday To/From 09/21/2004)**.

*During depositions some twenty-years after this Holliday To/From, some CPD personnel highlighted one sentence as evidence CPD had no control over any aspect of the Watts corruption investigation from 2004 through 2012. Their assertion is refuted via the plain language of the MOU and what I have experienced as common practice on hundreds of other federal matters. The sentence in question is, "The Cooperating Individual is to be prosecuted in federal court and the United States Attorneys office believe they should be in control of everything that results from his cooperation". Federal prosecutors routinely exercise their discretion over certain individual defendants. Presumably the "cooperator" mentioned in the sentence is the same cooperator from the HIDTA matter who had meet with IAD on September 16, 2004. My experience is that it was more likely that the USAO would need to agree to be in control of any sentencing credit resulting from the cooperation. My experience is*

*that U.S Attorneys and Assistant U.S. Attorneys explicitly in written agreements (limited Use Immunity letters) with cooperators caution them that the particular office in fact does not have authority to control the use of the source's information by other offices.*

**(03/09/2005 Holliday To-From memo; Baker-Glenn 018629) .**

In March 2005 CPD unilaterally authors a plan (which contains no participation by the FBI of DOJ) to conduct their own CPD "Integrity Check" against Watts. The plan is approved by CPD IAD command staff. The plan is substantial, appears to be planned to take place over weeks not days, and includes sophisticated investigative methods such as use of an undercover officer, a large contingent of covert surveillance officers, extensive support equipment and a significant amount of U.S. currency with pre-recorded serial numbers. Tellingly, the Integrity Check specifically addresses the circumstance of a potential unintended false arrest being affected by Watts or his team, stating, "If an attempt is made to transport him (the undercover) any place other than the 2<sup>nd</sup> District, a tactical unit from Internal Affairs Division will make the stop on the transporting unit." *By March 2005, the FBI case has been open and active for almost a full year (PL Joint 002142-FBI email 11/21/2011) yet in March 2005, CPD appears to have no concerns about planning a major CPD enforcement effort against Watts without mentioning the FBI in their operational plan. Most significantly, CPD IAD clearly and precisely identifies a critical aspect of the plan by addressing potential false arrests being made, planning to not only intervene but to do so in an overt, obvious manner which would "burn" the operation and the undercover officers cover with Watts and his team. In my opinion, this clearly indicates CPD was knowledgeable and on notice activity involving theft and taxing of drug dealers by Watts (exactly what was articulated in the integrity check plan) could clearly trigger the dangerous consequence of a false arrest occurring. CPD should have planned for similar interventions during the next six years where the falsely arrested victims could be citizens.*

**(Interview report of Wilbert Moore 04/07/2005) .**

**Stunning statement detailing long-term corruption and violent acts by Watts.**

Wilbert Moore a.k.a. "Big Shorty", admitted to 15-20 years of heroin and cocaine dealing on a daily basis at IBW and to being a member of the drug gang, Gangster Disciples. Moore was interviewed by ATF and DEA. Present at the meeting were two CPD Sergeants and a gang specialist. No FBI presence is documented during the lengthy meeting during which Moore provides a sweeping, detailed account of

the massive illicit drug market operated unfettered in the IBW's housing complex mostly because Watts is paid with cash and guns by dealers like him to allow it to thrive. At the time, the FBI investigation had been open for almost one year, but CPD apparently didn't ensure the FBI attended the Moore interview and again appears to have acted unilaterally in the Watts corruption case which is wholly inconsistent with numerous statements by CPD IAD in deposition in this matter that no action could be taken or decisions made without the FBI being fully informed and making those decisions.

Moore offered CPD a stunning, detailed witness statement regarding Watts and Mohammed's corruption, much of it from firsthand perspective. Moore had credibility because he implicated himself in several serious crimes not involving Watts directly including a shooting Moore implicated himself in. Moore was a crucial interview for the FBI to attend if CPD considered the FBI the lead agency and decision maker in the Watts corruption probe.

Moore relayed that Watts took money from drug dealers at IBW to allow dealers to remain in business. Patrick Noon (who CPD IAD knew as a close acquaintance of Watts) requested Moore demonstrate how to mix heroin and operate heroin distribution operations and details about Noon's significant drug operations and importantly, Moore corroborated through firsthand observation that Noon and Watts were friends; Moore said Watts shot at a drug dealer, [REDACTED] for not paying protection money, and made allegations that some of the officers working under Watt's supervision also took money from the drug dealers. Additionally, Moore once paid Watts \$7,000.00 for protection and Roy Bennet a.k.a. 'Shock' had also paid Watts and police officers that worked for him. Watts met Moore and Shock and Moore provided Watts (2) rifles and Shock paid him \$10,000.00. Also, Watts took (40) bags of marijuana from a drug dealer nicknamed "Chingey" and sold the marijuana to Shock. Moore also stated that Sgt. Watts is known to have a gambling problem. It should also be noted that on 20 APR 99, Sgt. Watts purchased \$10,100.00 gambling chips from the Empress Casino.

**(June 28, 2005 To/From Holliday-Baker Glenn 010947-010948)**

CPD IAD Sgt. Holliday interviewed drug dealer [REDACTED] who Moore had said was the victim of a shooting by Watts. [REDACTED] was interviewed without notice to or participation by the FBI public corruption squad. [REDACTED] interview held great potential to be a critical break in the Watts case and is concerning a dangerous incident that might have immediate impact on CPD, such as [REDACTED] knowing of physical evidence corroborating his allegations or have an incriminating recording. There is no indication the FBI public corruption squad is notified or invited to participate, even by telephone. The fact the FBI public

corruption squad wasn't notified, consulted, invited to participate, or invited to help set strategy for the interview greatly undercuts a narrative that the FBI was the sole decision maker and final authority regarding the Watts investigation. [REDACTED] corroborates that he was the victim of Watts shooting at him for [REDACTED] refusing to pay protection money to sell drugs at IBW housing projects and [REDACTED] spoke of other drug dealers paying Watts. Incredibly, CPD IAD does not pursue using [REDACTED] further because he was cooperating with another investigation and Holliday apparently never escalates this important issue to the FBI, requesting they intervene to obtain access to [REDACTED] as Holliday writes, [REDACTED] was never able to assist the undersigned as he was being worked by the Narcotics and Gang Investigation Section<sup>5</sup>. Also, Ben Baker and his attorney met with Holliday and provided detailed information about Watts demanding payments from Baker, planting drugs and falsely arresting Baker and his wife/girlfriend. Holliday notes in his memo, "Baker's allegations against...Watts are essentially the same as those told by two other known drug dealers...These three men had no knowledge the other was talking to Law Enforcement Agents". Holliday's memo is approved by CPD IAD Command Staff. *CPD IAD claims the FBI had the operational control and all decision-making authority regarding Watts throughout the 2004-2011 period however, there is no documentation that they escalated to FBI or DOJ the significant, critical issue that [REDACTED] who was already a documented informant, was apparently not available or not permitted to assist in the Watts investigation. Normal law enforcement processes would have been to make a written request for use of the source and then agree on a cooperation plan related to both cases. Possibly, cooperation would not be permitted however, I would have expected substantial documentation of who made that decision and the reasons. Instead, CPD IAD and Holliday appeared to unilaterally allow the potential significant benefit [REDACTED] represented to the Watts investigation to slip away without asking the FBI (who they claimed was in charge) to assist.*

Perhaps the most astounding allegation that was known by CPD, FBI and ATF about Watts was that he may have been involved in the targeted killing of an ATF informant to stop the informant from cooperating against Watts and other drug dealers. As documented in the Holliday Memo dated June 28, 2005 (Baker Glenn 010948) CPD knew by June 2005 that an officer working for Watts told Watts that Moore was cooperating against Watts. I have not seen any evidence that CPD conducted any investigation whatsoever into this issue. The fact that Watts possibly knew that there was an investigation into his behavior should have made CPD aware that administrative actions might be more necessary than otherwise because Watts would likely be careful to conceal his criminal behavior given his

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<sup>5</sup> Baker Glenn 010948 top of page-Holliday To-From 28 June 2005.

knowledge of the investigation. Along the same lines, generally accepted standards for conducting investigations would have required CPD to determine who leaked Moore's cooperation to Watts, as well as to assess how the leak was likely to affect the investigation moving forward and most importantly, how it might implicate a serious personal safety concern for Moore.

When Moore was killed, the FBI documented its knowledge and familiarity with the incident in a Memorandum officially recorded to their case file (as Serial 39)-(FBI000405), writing:

*"Wilbur Moore was killed on January 19, 2006. Moore had been arrested in a joint DEA/ATF sting targeting drug dealers in the Ida B. Wells housing complex. During his debriefing, Moore implicated Sergeant Ronald Watts in an extortion scheme in Ida B. Wells. Moore was released back into the Wells under a cooperation agreement with ATF. After Moore 's murder, ATF began investigating a possible leak in their task force officers. Interviews of witnesses at the Ida B. Wells housing complex place Ronald Watts at the scene of the murder shortly after Moore 's body was discovered. A review of the CPD documents does not reveal Watts as a responding or reporting officer on the scene".*

In February 2008, at least one person was arrested for killing Moore, Arnold Council, who, according to FBI 000405, is a member of gang specializing in providing contract killings. I would have expected the record to detail how this allegation regarding Watts was resolved and that an intense investigation into Watts' alleged role had been completed. Instead, I was appalled to find not only no conclusive resolution information, but the record was empty as to any investigation at all being conducted.

I would have expected that at an absolute minimum to see in the record that CPD IAD or ATF, or the FBI, would have obtained recorded statements from the homicide investigation of those witnesses finding Moore's body or obtained their own witness statements if Watts was at the scene, whether an untraceable firearm had been used in the murder, that they would have used cell tower data which most likely existed at the time that might place Watts at the scene and that a thorough investigation of the links from Moore's interview at the ATF office, tracing through the dissemination of his debriefing to ATF's CPD TFOs had been examined for evidence to either prove or disprove Watts involvement. Disturbingly, after Watts and Mohammed are arrested, Mohammed enters a proffer session with DOJ and the FBI where Mohammed is never asked about the Moore murder nor is he confronted about any of the allegations that he and Watts were obtaining presumably untraceable firearms from drug dealers.

**(CPD Chigaros Supp. Report 08/09/2005 CITY-BG-023980)**

Watts filed a CPD theft report as a private citizen alleging his girlfriend stole \$12,400 in U.S. currency from his residence. The information that Watts had such a large amount of cash at his home causes concern because the report is provided to CPD IAD. CPD Agent Holliday documents he and IAD Sgt. Bigg check one address in an attempt to interview the girlfriend, writing in a report she would be a witness regarding any corruption activities by Watts, but then CPD IAD appears to have abandoned attempting to locate her except for requesting her photo from a state agency. *It is extraordinary that the CPD did not locate the girlfriend or document numerous subsequent efforts to do so when taken against the high probability she could have very relevant information related to identifying the source of the cash. This source of information could be crucial to incriminating Watts or exculpating him as well as being a potentially rich indicator of new leads and possibly even having the girlfriend cooperate with making recordings with Watts. The record contains no indication of any follow up by CPD or that the significant importance of the information is passed to the FBI (the girlfriend's name is not in any of the more than 1,300 FBI documents I reviewed). A police department with the experience and resources the size of CPD in my view is a highly suspicious circumstance weighing heavily against CPD engaging in a reasonable and expected investigation related to Watts.*

**(FBI000405) .**

A major IBW's drug dealer (Moore) cooperates with ATF and DEA and agrees to also cooperate against Watts, naming him specifically as a police officer who he has been paying cash to for years for protection from arrest. Soon after, on January 19, 2006, Moore is murdered. Witnesses at IBW's claim Watts was at the scene of the murder shortly after Moore's body is discovered. The FBI documents CPD advised them Watts was not a responding officer on the scene indicating he was unexpectedly present off-duty at the exact time of the murder. Disturbingly, evidence is provided by ATF that an ATF CPD task force officer might have possibly advised other CPD officers about Moore's cooperation against Watts. *This singular allegation is of extreme magnitude and my experience is that most police agencies would have removed the subject officer from duty pending an administrative inquiry. Shockingly, it appears that this circumstance is never followed up upon as the record I reviewed has no other mention of it. The failure to investigate such an incendiary lead about a homicide where a federal law enforcement agency (ATF) is providing significant lead information alone demonstrates, without the future discovery of mitigating investigation by CPD, serious concerns about the entire federal inquiry into Watts and its oversight and commitment to a professional, timely resolution. Notably, those responsible for shooting Moore are convicted but no documentation exists in either*

*the CPD IAD or the FBI record that they are interviewed or declined an interview for information related to if Watts was possibly involved. Furthermore, no other inquiry is disclosed as being undertaken by CPD regarding their ATF task force officers being questioned.*

**(FBI000394) .**

The FBI closes their investigation in January 2006 taking no action against Watts, including never attempting to disrupt his potentially corrupt activities such as interviewing him or his team. Their case is reopened in January 2007. This leaves CPD IAD as the only law enforcement agency remaining between Watts, Mohammed, and citizens they were entrusted to protect but instead were victimizing. CPD drafted an application in state court for a Pen Register, but the Application does appear to have been activated. Pen Registers can be effective, however, generally they are a very weak stand-alone investigative tool. Additionally, court-authorized Pen Registers are very easy to obtain and the fact the draft wasn't acted on is troubling. Perhaps the draft was used by DEA in a parallel case or by the FBI (FBI000396), but nothing in the record I reviewed establishes that was the case. Little appears to have been done by CPD IAD to prove, disprove, or disrupt Watts while the FBI investigation was closed between January 2006 and January 2007 (one-year).

*This one-year period was a critical time when CPD would have been expected to conduct an aggressive administrative inquiry into Watts' corruption and to mitigate and protect the public from his activities. By January 2006 when the FBI case was closed, the amount of information CPD IAD was in possession of was truly extraordinary. Numerous witnesses had provided detailed, specific instances of Watts taking protection money from them so that they could continue their narcotics trafficking without police enforcement being taken against them, , that he had received guns from drug dealers, that he maintained a close association with a known heroin dealer and had instructed the heroin dealer to pay for an accident involving police vehicles, that he had a penchant to gamble large amounts of money, that he admitted to storing large quantities of cash at his residence, that he had discharged firearms at persons who refused to pay him protection money. Yet, despite this overwhelming evidence of corruption, they failed to track any of Watts cases for possible civil rights violations (false arrests), failed to interview the persons he arrested (to determine if unsolicited, they would offer that they had been paying Watts protection money or that they were framed), failed to conduct the integrity check to corroborate or refute his corruption allegations or conduct any informant activities directed at Watts to document or disprove the allegations.*

**Phase two-Watts investigation**  
**January 18, 2007 through November 2011**

The second phase of the investigation began January 18, 2007 (FBI000394). Watts and Mohammed had apparently continued their corrupt activities unabated in the interim eleven-month period (from the close of FBI case to the reopening of the FBI case). The corrupt acts resulted in sufficient enough new allegations that CPD and the FBI began cooperating and the FBI reopened its investigation. Phase two lasted between January 2007 through approximately November 2010. In that four-year period, the record I reviewed indicated CPD failed to document any attempt to protect or insulate the public from Watts or to confront the FBI to resolve the case so that Watts' criminal enterprise could be dismantled administratively. Phase two produced an extraordinary amount of direct evidence that Watts and others were robbing drug dealers or taking bribe money, and circumstantial evidence he was possibly involved in a homicide of an individual when word of the individual's cooperation was thought by ATF to have been leaked and possibly discovered by Watts. A cooperator in phase two became critical but then was inexplicably not used against Watts. CPD officers testified in their depositions that they were told by an identified CPD employee that the cooperator was not used because if the cooperator was successful, it risked they would testify, and it could come out that the cooperator was firm in their belief Watts was involved in the ambush murder of the cooperator. Having delayed another incredible four-years and despite documenting an extraordinary number of specific corrupt acts (discussed below), CPD again failed to take action to protect the public, attempt to redress past by arrests or attempt to mitigate the reasonable conclusion that innocent persons were either incarcerated or facing serious drug allegations which may have been fabricated.

**(FBI000357-September 10, 2007).** An IAD Sergeant, despite knowing the FBI had reopened its case, unilaterally took specific actions establishing an operation targeting Watts and did not inform the FBI about anything. Two cooperators told CPD IAD Watts was extorting them for protection money of \$3,000. CPD planned the bribe payment and scheduled it for September 04, 2007. They did not inform the lead FBI agent on the Watts case until the following day (and only after the planned operation failed to materialize). **A major operational incident was planned and intended by CPD without any input or knowledge of the FBI which refutes CPD command staff testimony that they could take no action without the approval of the FBI, even asserting they**

*would be arrested for obstruction of justice if they had. Clearly, four years into CPD's efforts regarding Watts, that was not the case.*

**December 2007 through June 2008:** The FBI makes controlled cash bribes to Mohammed of \$1,000 on December 11, 2007; of \$700 on December 18, 2007; \$1,000 on January 04, 2008, \$1,000 on January 21, 2008; \$500 on May 22, 2008 and \$500 on June 05, 2008. There is a notation that "potential administrative issues" exist regarding these bribe payments (CITY-BG-023858). *Notwithstanding the high bar that must be met to use evidence collected in a criminal trial, nothing precludes the use of that evidence to be used in a proceeding against Watts or Mohammed with a lower, or no bar for its use, such as in an IAD administrative action against the officers. This incident adds to an alarming and growing number of complete investigative missteps that should have sparked any responsible command staff officer to intervene and take action to improve quality or to use the evidence in an administrative proceeding instead because the extreme seriousness of the crimes being perpetrated by Watts and Mohammed.*

**April 12, 2008**, CPD receives a complaint Watts entered a specific apartment without a warrant and beat *up a minor aged male including striking him with a gun (FBI000210)*. *I find no evidence that CPD ever incorporated this allegation into its joint investigation with the FBI or confidential investigation of corruption by Watts, Mohammed, or the officers they worked with.*

**April 18, 2008** CPD and FBI botch an attempt to record conversations with drug dealers after a CPD informant apparently absconds and either sells or discards the recording devices (FBI000460). *Based on my training and experience and the way the recording devices are described I believe this equipment loss cost would have amounted to several thousand dollars.*

**July 13, 2008**, the FBI loads \$31,000 in currency in a covert FBI controlled residence and records Watts and his team executing a search warrant of the premises. Watts had coordinated preparing the warrant himself. FBI installed video recorders to document the search and the discovery of the \$31,000 in currency by Watts and his team. All the currency is found during the search, however, only \$26,000 is inventoried by Watts and his team. No information exists in the record as to any further action regarding this substantial theft of funds and the related creation of false reports and false evidence receipts other than the recovery of the \$26,000 from CPD's depository bank. A cryptic notation in the record that the video of the currency recovery suddenly terminated brings into question if this another failed operation. Incredibly, the theft of this \$5,000 is never explained or addressed in the record I reviewed.

***The record contains little investigative activity between July 2008 and August 2009 (over one-year). Watts is apparently on medical leave during at least part of this time and CPD IAD takes no action to discreetly mitigate or review any of Watt's arrests for evidence of false arrest, planting evidence or other civil rights violations.***

**August 07, 2009,** the FBI and IAD interview and obtain stunning information from a prolific drug dealer who was active for a long period in IBW area. The individual knows Watts as a former gang member who now robs and extorts drug dealers to protect their drug trade as well as engaging in drug distribution himself. The witness claimed knowledge that Watts operated his own drug line prior to becoming an officer and employed coconspirators who now not only pay him to protect their drug trade but incredibly that Watts operated his own drug distribution organization and that he and coconspirators accepted firearms as bribe payments. The allegations obtained from this witness by CPD are another instance where an immediate escalation of the command staff and prosecutorial attention should have reached a fever pitch. The record should be chock-full of documentation that CPD unleashed a frenzy of at a minimum discreet background checking to corroborate these allegations. The witness statement contained many actionable items, none of which are documented to have even been considered. Instead, the investigative team finally begins planning to exploit the source they have known about for at least five-months. However, the record indicates even this plan dragged on without a sense of urgency for at least another seven months, despite alarm bells being sounded by two CPD police officers handling the informant regarding the benefit of this informant, another informant they had and that wasn't being used, and the extreme morass of leadership and slow pace of the matter.

**A spectacularly failed operation-CPD appears unconcerned. The investigation goes dark and CPD does nothing to protect the public.**

**March 31, 2010.** More than one-year after an extensive interview with an informant [REDACTED] the informant is finally utilized in a direct operation targeting Watts and Mohammed. It appears clear that Watts ended up successfully stealing \$11,050 in marked U.S currency from the informant, which had been provided to them by the FBI. However, more incredible bungling of the operation results in no direct observation by law enforcement of Watts taking the money from the informant despite it occurring in what was designed to be the direct line of sight of two FBI agents observing separately from two

different angles. Through an inexplicable combination of amateurism, one agent is believed to have unilaterally decided to leave the surveillance during the most critical moments and while they were assigned to have the critical view of the exchange while the other agent, at the exact same time, decided to leave his observation post to attend to a personal matter. The result is an audio recording of the theft (and possibly a video) but the federal prosecutor declines to charge presumably because the exchange failed to be observed by an independent FBI agent. *CPD command staff seems to have no reaction to this incredible operational failure, and it is inescapable that CPD now, on top of all the previous documented payments to Mohammed, have direct evidence via audio and possibly video, which could easily be utilized in an administrative proceeding take no action. CPD command staff documents no meetings or communications voicing any concerns to the FBI or, more incredibly, any consideration being documented as to procedures to insulate the public from the activity or initiate any review of the continuing, clear impact the documented corruption has on the civil rights and due process of persons previously arrested by Watts and Mohammed. Ominously, the investigation not only fails to increase in urgency but instead apparently goes dormant. The deposition of Shannon Spalding contains disturbing details as to possibly why (discussed below).*

**November 2010: possible corruption discovered by the lead FBI agent**

After the botched March 31, 2010 operation resulting in Watts becoming \$11,050 richer and no criminally prosecutable federal case, CPD and FBI resume their slow walk, leisurely investigative pace doing little more than administrative work assembling a formalized task force. I see no record that CPD is pushing for resolution to protect the public from these two corrupt officers. On November 03, 2010 the informant from the botched March 31, 2010 operation, leaves a voicemail near midnight for a CPD officer. Although the timing isn't clear from the deposition of Shannon Spalding, she appears to obtain stunning information from the informant that the lead FBI agent has been overtly disclosing his official position to people in the housing projects while attempting to locate the informant. The FBI agent has also been using the informant to illegally purchase prescription drugs from drug dealers in the projects reportedly for use by a family member. Spalding reports this to both the FBI and the CPD command staff. On November 19, 2010, the FBI agent is removed from the investigation (**FBI000883**). If accurate, this might partially explain why the investigation had not been concluded by the FBI by that point. Regardless, it provides no reason and no excuse for CPD not taking administrative action against the officers.

**February 18, 2011**, the new FBI lead investigator regroups with CPD

to form an investigative plan led by him and CPD Sgt. AB. The written FBI document states that the FBI has been conducting "a full field investigation since 1/18/2007", that the main target is Watts and that allegations among other things specifically include, "planting" drugs on subjects and paying informants with drugs". (**FBI000887-8**).

**March 2011**, another cooperator comes forward and offers to cooperate against Watts (Monk). Monk has first-hand experience with Watts regarding extortion/protection payments to deal narcotics in the IBW projects. The information is passed to CPD Sgt. AB and the new FBI lead agent, as well as documented in a CPD To/From memo to CPD IAD Chief Juan Rivera. **Although interest is shown in the information, no follow-up action is taken by any FBI or CPD personnel.**

**Incredible further delay from March until October 2011: despite two separate informants offering to make recordings with Watts, one of which, [REDACTED] reports constant harassment by Watts to allow himself to be robbed by Watts of drug courier money. Unbelievably the FBI has no investigator assigned between July 14, 2011 and October 01, 2011 during what should be a critical period (see further below). CPD appears to take no action during this time either to protect the public from Watts and Mohammed's predatory behavior throughout the summer of 2011. Instead, despite ample operational opportunities, CPD allows a slow-paced liaison based approach, meeting occasionally with other government agencies (DEA) and the USAO about the case.**

**July 13, 2011, FBI Electronic Communication (FBI000909).**

Separate mention is made of what exemplifies CPD's lack of investigative interest in and laissez-faire approach to the Watts case. Although CPD has command staff assigned full-time to the FBI's public corruption effort and is a full-fledged member of the FBI, they do nothing when the case has no lead FBI agent. On July 13, 2011, the lead FBI agent has the Watts case removed from his assignment list due to his receipt of transfer orders to Washington, D.C. Tellingly, the FBI Supervisor, in removing the lead agent from the Watts case, makes the following notation on the request, "Please remove SA (MP) as case agent. This matter will be assigned to another WCC-2 agent in the future" (emphasis added). According to **FBI000001**, that reassignment did not occur until October 01, 2011. **In the intervening months, CPD did nothing to protest the lack of operational action, that no lead FBI agent was assigned nor move to mitigate the clear immediate public safety threat Watts posed to the public.**

**Final phase**  
**November 2011 - February 2012**

November 2011 operational tempo suddenly takes on a fever pitch, resources are surged, and the investigation executes three substantial operational plans against Watts and Mohammed. They contemplate application of Title III coverage,<sup>6</sup> which would delay the date the case could be resolved, reject the Title III plan and instead arrest Watts and Mohammed in early February 2012. A total of less than 90 days elapses.

***Early November 2011.***

Just after the new FBI case agent is assigned, the CPD recontacts their informant [REDACTED] who had proven reliable in the past having made multiple recorded conversations with Watts and Mohammed and who had been robbed of FBI provided marked money by them. This time, [REDACTED] becomes actively engaged by the CPD and FBI team and CPD officers and their informant become intimately involved in planning and executing three back-to-back complex operations targeting Watts and Mohammed (12/01/2011 To/From Memo-Echeverria).

***November 21, 2011***

A successfully documented money rip by Mohammed and Watts was recorded through several means. It is clear the operation is carefully planned. Watts and Mohammed are properly documented as having stolen \$5,200 of marked government funds that Watts and Mohammed believed were the proceeds of a drug trafficking operation. The incident is provable through multiple visual observations, an enhanced specialized surveillance team is employed that is professionally trained and equipped to conduct such surveillances, the use of two undercover law enforcement officers, recorded audio, recorded video, Pen Register devices, tracking devices and informant usage. The approach is markedly different than the multiple prior failed attempts to document eight other bribe payments or thefts between ***December 2007 and March 2010 which were plagued with investigative bungling and missteps by CPD and FBI.***

***Late November 2011***

The FBI evaluates drafting Title III intercept coverage in the case but appears to reject that investigative technique. My experience is that the application period for a Title III can be very lengthy between the stringent requirements, the exhaustion phase of the affidavit, the approval process and the installation of the technical equipment once approved. This usually greatly slows an investigative pace for a number of months. Except for an emergency situation of

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<sup>6</sup> Title III coverage is the federal court authorized listening and recording of telephone conversations (or other "oral" conversations). This plan is noted in a 11/29/2011 FBI email (Baker Glenn 002141).

life and death, a Title III often isn't an option when there is a strategy needed to address where significant evidence has already been obtained without the use of Title III and especially where there is such a significant concern, as with the Watts case, that the targets pose perhaps not an immediate threat to the public but certainly a proximate and very significant threat. Apparently, the slower tempo, Title III option is abandoned for the higher tempo, technique of direct, hand-to-hand corrupt acts being executed in operational scenarios. This investigation, after almost a full eight years of misfires and bungling while Watts and Mohammed were permitted to continue their corrupt acts in the community, was finally making professional progress in those final three-months. (Baker-Glenn 002141).

***January and February 2012.***

A second undercover drug currency rip operation is planned by CPD and FBI for January 18, 2012. The outcome of that planned operation is not detailed in the record I reviewed but it does not become part of the charges faced the next month by Watts and Mohammed.

Mohammed is arrested and charged in early February 2012. He requests legal counsel and does not "flip" on Watts at that initial approach. Watts is arrested just after that.

***Important observation about the final FBI/CPD undercover drug rips:***

The written approved plan for these operations contains an extensive "Contingency" section addressing a foreseeable unintended, "false" arrest of the informant or the UCEs by Watts and Mohammed. Tellingly, the plan is apparently so sensitive to the extreme circumstance that placing an innocent individual (the informant or UCEs) into the criminal justice system, even for a very brief of time, is wholly unacceptable. The Contingency is so sensitive to this possibility that the Department of Justice authorizes probable cause arrests to be made by CPD task force officers upon their discovery that the circumstance has arisen and that false arrests were made.

In my firm opinion, such "false arrest" sensitivities finally exhibited by CPD and FBI in the very late stage operations plans in December 2011 and January 2012, should have been the cornerstone and hallmark in every aspect of this police corruption investigation since its inception long-ago in 2004, and applied not only to police officers, but included all innocent citizens potentially victimized and incarcerated by Watts and Mohammed during the pendency of the

2004-2011, long, bungled investigation. **The citizens of Chicago deserved nothing less.**

My rate for reviewing materials, preparing this report and testimony for deposition and trial is \$150 per hour.

*Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.*

*Dated: April 1, 2024*



Jeffrey Danik

**APPENDIX A: CV**

## APPENDIX B: MATERIALS REVIEWED

DOCUMENTS	TYPE
1. White Sr., Complaint	White Sr. Complaint
61. Amended Complaint	Gipson Complaint
238. 2nd Amended Complaint (Baker Glenn)	Baker-Glenn Complaint
Keith Calloway 27 Calloway 23	Dep Exhibits
Keith Calloway 26 Calloway 22	Dep Exhibits
Keith Calloway 25 Calloway 21	Dep Exhibits
Keith Calloway 24 Calloway 20	Dep Exhibits
Keith Calloway 23 Calloway 19	Dep Exhibits
Keith Calloway 22 Calloway 18	Dep Exhibits
Keith Calloway 21 Calloway 17	Dep Exhibits
Keith Calloway 20 Calloway 16	Dep Exhibits
Keith Calloway 19 Calloway 15	Dep Exhibits
Keith Calloway 18 Calloway 14	Dep Exhibits
Keith Calloway 17 Calloway 13	Dep Exhibits
Keith Calloway 16 Calloway 12	Dep Exhibits
Keith Calloway 15 Calloway 11	Dep Exhibits
Keith Calloway 14 Calloway 10	Dep Exhibits
Keith Calloway 13 Calloway 09	Dep Exhibits
Keith Calloway 12 Calloway 08	Dep Exhibits
Keith Calloway 11 Calloway 07	Dep Exhibits
Keith Calloway 10 Calloway 06	Dep Exhibits
Keith Calloway 09 Calloway 05	Dep Exhibits
Keith Calloway 08 Calloway 04	Dep Exhibits
Keith Calloway 07 Calloway 03	Dep Exhibits
Keith Calloway 06 Calloway 02	Dep Exhibits
Keith Calloway 05 Calloway 01	Dep Exhibits
Keith Calloway 01 Calloway, Keith 050619 Full Size (Full)	Deposition
Barbara West 10 West 07	Dep Exhibits

Barbara West 09 West 06	Dep Exhibits
Barbara West 08 West 05	Dep Exhibits
Barbara West 07 West 04	Dep Exhibits
Barbara West 06 West 03	Dep Exhibits
Barbara West 05 West 02	Dep Exhibits
Barbara West 04 West 01	Dep Exhibits
Barbara West 03 West, Barbara 091719 Non-Timestamped ASCII.txt	Deposition
Barbara West 02 West, Barbara 091719 Condensed	Deposition
Barbara West 01 West, Barbara 091719 Full Size	Deposition
Philip Cline PHILIP CLINE 12-8-2023_full_ex	Deposition
Philip Cline Exhibit 8_Cline	Dep Exhibits
Philip Cline Exhibit 7_Cline	Dep Exhibits
Philip Cline Exhibit 6_Cline	Dep Exhibits
Philip Cline Exhibit 5_Cline	Dep Exhibits
Philip Cline Exhibit 4_Cline	Dep Exhibits
Philip Cline Exhibit 3_Cline	Dep Exhibits
Michael Spaargaren MICHAEL SPAARGAREN 3-7-2022_full_ex	Deposition
Eddie Johnson Exhibit 9_Johnson	Dep Exhibits
Eddie Johnson Exhibit 8_Johnson	Dep Exhibits
Eddie Johnson Exhibit 3_Johnson	Dep Exhibits
Eddie Johnson Exhibit 2_Johnson	Dep Exhibits
Eddie Johnson Exhibit 17_Johnson	Dep Exhibits
Eddie Johnson EDDIE JOHNSON 8-31-2022_full_ex	Deposition
Juan Rivera JUAN RIVERA 9-6-2023_full_ex	Deposition
Juan Rivera JUAN RIVERA 9-6-2023 CONFIDENTIAL PORTIONS_full_ex	Deposition
Juan Rivera Exhibits Exhibit 9_Rivera CONFIDENTIAL	Dep Exhibits
Juan Rivera Exhibits Exhibit 8_Rivera CONFIDENTIAL	Dep Exhibits
Juan Rivera Exhibits Exhibit 7_Rivera CONFIDENTIAL	Dep Exhibits
Juan Rivera Exhibits Exhibit 6_Rivera	Dep Exhibits
Juan Rivera Exhibits Exhibit 5_Rivera CONFIDENTIAL	Dep Exhibits
Juan Rivera Exhibits Exhibit 4_Rivera	Dep Exhibits
Juan Rivera Exhibits Exhibit 3_Rivera	Dep Exhibits

Juan Rivera Exhibits Exhibit 2_Rivera	Dep Exhibits
Juan Rivera Exhibits Exhibit 25_Rivera CONFIDENTIAL	Dep Exhibits
Juan Rivera Exhibits Exhibit 24_Rivera CONFIDENTIAL	Dep Exhibits
Juan Rivera Exhibits Exhibit 23_Rivera CONFIDENTIAL	Dep Exhibits
Juan Rivera Exhibits Exhibit 22_Rivera CONFIDENTIAL	Dep Exhibits
Juan Rivera Exhibits Exhibit 21_Rivera CONFIDENTIAL	Dep Exhibits
Juan Rivera Exhibits Exhibit 20_Rivera CONFIDENTIAL	Dep Exhibits
Juan Rivera Exhibits Exhibit 1_Rivera	Dep Exhibits
Juan Rivera Exhibits Exhibit 19_Rivera CONFIDENTIAL	Dep Exhibits
Juan Rivera Exhibits Exhibit 18_Rivera CONFIDENTIAL	Dep Exhibits
Juan Rivera Exhibits Exhibit 17_Rivera CONFIDENTIAL	Dep Exhibits
Juan Rivera Exhibits Exhibit 16_Rivera CONFIDENTIAL	Dep Exhibits
Juan Rivera Exhibits Exhibit 15_Rivera CONFIDENTIAL	Dep Exhibits
Juan Rivera Exhibits Exhibit 14_Rivera CONFIDENTIAL	Dep Exhibits
Juan Rivera Exhibits Exhibit 13_Rivera CONFIDENTIAL	Dep Exhibits
Juan Rivera Exhibits Exhibit 12_Rivera CONFIDENTIAL	Dep Exhibits
Juan Rivera Exhibits Exhibit 11_Rivera	Dep Exhibits
Juan Rivera Exhibits Exhibit 10_Rivera CONFIDENTIAL	Deposition
Tina Skahill TINA SKAHILL 7-19-2023_full_ex	Deposition
Tina Skahill Exhibits Exhibit 9_SKAHILL (CONFIDENTIAL)	Dep Exhibits
Tina Skahill Exhibits Exhibit 8_SKAHILL (CONFIDENTIAL)	Dep Exhibits
Tina Skahill Exhibits Exhibit 7_SKAHILL (CONFIDENTIAL)	Dep Exhibits
Tina Skahill Exhibits Exhibit 6_SKAHILL (CONFIDENTIAL)	Dep Exhibits
Tina Skahill Exhibits Exhibit 5_SKAHILL (CONFIDENTIAL)	Dep Exhibits
Tina Skahill Exhibits Exhibit 4_SKAHILL (CONFIDENTIAL)	Dep Exhibits
Tina Skahill Exhibits Exhibit 3_SKAHILL (CONFIDENTIAL)	Dep Exhibits
Tina Skahill Exhibits Exhibit 2_SKAHILL (CONFIDENTIAL)	Dep Exhibits
Tina Skahill Exhibits Exhibit 20_SKAHILL (CONFIDENTIAL)	Dep Exhibits
Tina Skahill Exhibits Exhibit 1_SKAHILL (CONFIDENTIAL)	Dep Exhibits
Tina Skahill Exhibits Exhibit 19_SKAHILL (CONFIDENTIAL)	Dep Exhibits
Tina Skahill Exhibits Exhibit 18_SKAHILL	Dep Exhibits
Tina Skahill Exhibits Exhibit 17_SKAHILL (CONFIDENTIAL)	Dep Exhibits
Tina Skahill Exhibits Exhibit 16_SKAHILL	Dep Exhibits

Tina Skahill Exhibits Exhibit 15_SKAHILL	Dep Exhibits
Tina Skahill Exhibits Exhibit 14_SKAHILL (CONFIDENTIAL)	Dep Exhibits
Tina Skahill Exhibits Exhibit 13_SKAHILL (CONFIDENTIAL)	Dep Exhibits
Tina Skahill Exhibits Exhibit 12_SKAHILL (CONFIDENTIAL)	Dep Exhibits
Tina Skahill Exhibits Exhibit 11_SKAHILL (CONFIDENTIAL)	Dep Exhibits
Tina Skahill Exhibits Exhibit 10_SKAHILL (CONFIDENTIAL)	Dep Exhibits
Garry McCarthy GARRY MCCARTHY 6-14-2023_full_ex	Deposition
Garry McCarthy Exhibit 1_McCarthy	Dep Exhibits
Garry McCarthy Exhibit 2_McCarthy CONFIDENTIAL	Dep Exhibits
Garry McCarthy Exhibit 3_McCarthy	Dep Exhibits
Garry McCarthy Exhibit 4_McCarthy CONFIDENTIAL	Dep Exhibits
Garry McCarthy Exhibit 5_McCarthy	Dep Exhibits
Garry McCarthy GARRY MCCARTHY 6-14-2023 CONFIDENTIAL PORTION_full_ex	Deposition
Shannon Spalding 06-06-23WattsPretrial_Nonconfidential_full_ex	Deposition
Shannon Spalding Ex. 50 - Att. 350 -- Spalding retaliation documents	Dep Exhibits
Shannon Spalding Exhibit 55 - FBI 1272-1274	Dep Exhibits
Shannon Spalding Exhibit 54 - FBI 909-911	Dep Exhibits
Shannon Spalding Exhibit 53 - FBI 357-358	Dep Exhibits
Shannon Spalding Ex. 9	Dep Exhibits
Shannon Spalding 06-06-23WattsPretrial_Confidential_full_ex	Deposition
Shannon Spalding Ex. 52 - Second City Article	Dep Exhibits
Shannon Spalding Ex. 51 - FBI 001000-1009 - Spalding highlight	Dep Exhibits
Shannon Spalding Ex. 30 - Allen, Crystal - DO-JOINT 047535	Dep Exhibits
Shannon Spalding Ex. 29 - DO-JOINT 031387-031388 -- Terrence Moye Mugshots (CB 017307727)	Dep Exhibits
Shannon Spalding Ex. 12 - DO-JOINT 047970-047999_Criminal History (2023, 05-23) [REDACTED] IR 526765	Dep Exhibits
Shannon Spalding Ex. 13 - DO-JOINT 005287-005288_06.21.2008 VCR HP408169 [REDACTED]	Dep Exhibits
Shannon Spalding Ex. 11 - DO-JOINT 005282-005286_06.21.2008 Arrest Report [REDACTED] CB 17280245 HP408169	Dep Exhibits
Daniel Echeverria Exhibit 5_Echeverria	Dep Exhibits
Daniel Echeverria Exhibit 4_Echeverria	Dep Exhibits
Daniel Echeverria Exhibit 3_Echeverria	Dep Exhibits

Daniel Echeverria Exhibit 2_Echeverria	Dep Exhibits
Daniel Echeverria Exhibit 1_Echeverria	Dep Exhibits
Daniel Echeverria DANIEL ECHEVARRIA 5-30-2023_full_ex	Deposition
Daniel Echeverria DANIEL ECHEVARRIA 5-30-2023 - CONFIDENTIAL PORTION_full_ex	Deposition
Calvin Holliday Exhibit 1_Holliday	Dep Exhibits
Calvin Holliday Exhibit 12_Holliday	Dep Exhibits
Calvin Holliday Exhibit 10_Holliday	Dep Exhibits
Calvin Holliday Exhibit 11_Holliday	Dep Exhibits
Calvin Holliday Exhibit 13_Holliday	Dep Exhibits
Calvin Holliday Exhibit 14_Holliday	Dep Exhibits
Calvin Holliday Exhibit 15_Holliday	Dep Exhibits
Calvin Holliday Exhibit 16_Holliday	Dep Exhibits
Calvin Holliday Exhibit 17_Holliday	Dep Exhibits
Calvin Holliday Exhibit 18_Holliday	Dep Exhibits
Calvin Holliday Exhibit 19_Holliday	Dep Exhibits
Calvin Holliday Exhibit 2_Holliday	Dep Exhibits
Calvin Holliday Exhibit 20_Holliday	Dep Exhibits
Calvin Holliday Exhibit 3_Holliday	Dep Exhibits
Calvin Holliday Exhibit 4_Holliday	Dep Exhibits
Calvin Holliday Exhibit 5_Holliday	Dep Exhibits
Calvin Holliday Exhibit 6_Holliday	Dep Exhibits
Calvin Holliday Exhibit 7_Holliday	Dep Exhibits
Calvin Holliday Exhibit 8_Holliday	Dep Exhibits
Calvin Holliday Exhibit 9_Holliday	Dep Exhibits
Calvin Holliday CALVIN HOLLIDAY 11-14-2022_full_ex	Deposition
BAKER GLENN 001092-001106	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002080	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)

BAKER GLENN 002081	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002082	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002084-88	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002086-002092	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002093-94	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002095	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002102	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002103-002104	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002106-002107	Pulled from Baker & Glenn_2017.06.0

	7_ATI From City (Amended)
BAKER GLENN 002108	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002109-002111	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002112-14	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002115-16	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002120-21	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002132-34	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002135	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002139 (1)	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002139	Pulled from Baker &

	Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002141-42	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002152	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002153	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002154	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002155	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002156	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002157	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002159	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)

BAKER GLENN 002160	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002161	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002162	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002164	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002165	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002166	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002167	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002170	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002171	Pulled from Baker & Glenn_2017.06.0

	7_ATI From City (Amended)
BAKER GLENN 002172	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002173	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002175	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002176	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002177	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002179	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002180	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002181	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002182	Pulled from Baker &

	Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002183	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002185	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002187	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002192(1)	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002192	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002196	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002198	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002221	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)

BAKER GLENN 002222	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002223	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002224	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002225	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002226	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002245	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002246	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002247	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002248	Pulled from Baker & Glenn_2017.06.0

	7_ATI From City (Amended)
BAKER GLENN 002249	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002250	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002251	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002252	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002253	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002254	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002259	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002260	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002261	Pulled from Baker &

	Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002267	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002439	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002451	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002589-92	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002595	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002595-97	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002596	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002597	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)

BAKER GLENN 002615-17	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002618-20	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002622-24	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002675	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002680	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002690-92	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002693-97	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002701	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002702-04	Pulled from Baker & Glenn_2017.06.0

	7_ATI From City (Amended)
BAKER GLENN 002708	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002713	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002716	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002717	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002718	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002720	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002721	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002722	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002724-25	Pulled from Baker &

	Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002728	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002728-30	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002729	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002730	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002731-33	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002737	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002738	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002740-41	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)

BAKER GLENN 002753-62	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002763	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002767	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002768	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002769	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002770	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002771	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002772	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002773	Pulled from Baker & Glenn_2017.06.0

	7_ATI From City (Amended)
BAKER GLENN 002773-80	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002774	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002775	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002776	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002777	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002778	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002779	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002780	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002781-83	Pulled from Baker &

	Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002786-92	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002796	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002800	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002810-11	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002812	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002817-18	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002819-20	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002822	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)

BAKER GLENN 002824	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002839	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002841-002842	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002843	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002844	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002848	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002853	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002856	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002857	Pulled from Baker & Glenn_2017.06.0

	7_ATI From City (Amended)
BAKER GLENN 002858	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002859	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002860	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002862	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002863	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002864	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002865	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002866	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002867	Pulled from Baker &

	Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002868	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002869	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002874-78	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002880	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002881	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002885-86	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002890-92	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002895	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)

BAKER GLENN 002898	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002899	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002900	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002901	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002902	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002911	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002917-19	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002920	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002922	Pulled from Baker & Glenn_2017.06.0

	7_ATI From City (Amended)
BAKER GLENN 002924-26	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002927	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002929	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002932-33	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002933	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002935-38	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002939	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002940	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002940-41	Pulled from Baker &

	Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002941	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002942	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002942-43	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002943	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002944	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002944-45	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002945	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 002946	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)

BAKER GLENN 002946-47	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002947	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002948	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002950	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002951	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002956	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 002959-61	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 004151-004159	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 009959	Pulled from Baker & Glenn_2017.06.0

	7_ATI From City (Amended)
BAKER GLENN 010074	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 010672	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 010833	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 010844	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 010850	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 010856-010859	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 010860-010911	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 010861	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 010863	Pulled from Baker &

	Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 010877	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 010912-010935	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 010923	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 010925	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 010935	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 010941	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 010942-010943	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
BAKER GLENN 010945-010946	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)

BAKER GLENN 010946	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 010947-010948	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 010958-010964	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 010973-010978	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 023959-023963	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
BAKER GLENN 023974-023981	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
CITY-BG-000196-261	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
CITY-BG-000200	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
CITY-BG-000213	Pulled from Baker & Glenn_2017.06.0

	7_ATI From City (Amended)
CITY-BG-000216-20	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
CITY-BG-000216-000220	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
CITY-BG-000249-51	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
CITY-BG-00249-00251	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
CITY-BG-000257-58	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
CITY-BG-000262-301	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
CITY-BG-000273	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
CITY-BG-000276-80	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
CITY-BG-000276-000280	Pulled from Baker &

	Glenn_2017.06.0 7_ATI From City (Amended)
CITY-BG-000281-91	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
CITY-BG-000281-000291	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
CITY-BG-000295-96	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
CITY-BG-000299	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
CITY-BG-011614-15	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
CITY-BG-011616	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
CITY-BG-011620	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
CITY-BG-012912-13	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)

CITY-BG-012925	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
CITY-BG-017609-752	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
CITY-BG-023833-023836	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
CITY-BG-023839-023840	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
CITY-BG-023841-023848	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
CITY-BG-023849-023851	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
CITY-BG-023850	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
CITY-BG-023852	Pulled from Baker & Glenn_2017.06.07_ATI From City (Amended)
CITY-BG-023858	Pulled from Baker & Glenn_2017.06.0

	7_ATI From City (Amended)
CITY-BG-023902-023904	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
CITY-BG-023905-023906	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
CITY-BG-023909-023919	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
CITY-BG-023936-023939	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
CITY-BG-023992-024000	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
CITY-BG-024099	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
CITY-BG-024103	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
CITY-BG-028596-028598	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
CITY-BG-028602	Pulled from Baker &

	Glenn_2017.06.0 7_ATI From City (Amended)
FBI 5-9	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
FBI 14-16	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
FBI 19	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
FBI 19-22	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
FBI 20	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
FBI 21-22	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
FBI 31-32	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
FBI 36	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)

FBI 42	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
FBI 44-49	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
FBI 51-63	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
FBI 63	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
FBI 77-88	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
FBI 129-131	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
FBI 139	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
FBI 150-171	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
FBI 176-185	Pulled from Baker & Glenn_2017.06.0

	7_ATI From City (Amended)
FBI 189-199	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
FBI 201-216	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
FBI 218-237	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
FBI 240-265	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
FBI 267-276	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
FBI 267-285	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
FBI 277-280	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
FBI 281-283	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
FBI 284-285	Pulled from Baker &

	Glenn_2017.06.0 7_ATI From City (Amended)
FBI 290-291	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
FBI 290-322	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
FBI 292-294	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
FBI 299-304	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
FBI 314-316	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
FBI 317-318	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
FBI 319-322	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
SPALDING 000008-000022	Pulled from Baker & Glenn_2017.06.0 7_ATI From City (Amended)
03.09.2005 Holliday integrity check	Other IAD Docs

04.07.2005 Bray Memo on Moore	Other IAD Docs
05.24.05 Holliday photo requests	Other IAD Docs
05.24.06 Epplen to Starks RE attempted Shock to Watts bribe	Other IAD Docs
07.19.2005 - Holliday doc request to ISP	Other IAD Docs
08.11.05 Holliday to-from on Jackson Watts theft	Other IAD Docs
09.17.04 Holliday to-from	Other IAD Docs
09.21.04 Holliday to-from	Other IAD Docs
09.22.04 Henley Letter	Other IAD Docs
09.27.04 Holliday RE Quince Campbell	Other IAD Docs
10.17.2005 OPS CR	Other IAD Docs
10.21.2005 and 10.31.2005 - Holliday investigation steps	Other IAD Docs
11.16.06 FBI and IAD interviews	Other IAD Docs
2023.09.11 City Def Michael Brown Expert Disclosure Under Rule 213(f)(3)-Waddy	Other
Baker & Glenn_2017.06.07_ATI From City (Amended)	Other
CITY-BG-062266-062278 FBI and CPD Memorandum of Understanding	Other
Cline Ex 2 - CITY-BG-059013-059075_CPD General Order_Complaint and Disciplinary_01.13.1993_93-3	Other
FBI-OCR (Entire FBI Production)	Other
hawk Ex n-29\03-12-08 Video_002.mp4 <sup>7</sup>	FBI/DEA Recordings
hawk Ex n-29\03-12-08 Video_001.mp4	FBI/DEA Recordings
hawk Ex n-27\03-12-2008_001.wav	FBI/DEA Recordings
hawk Ex n-26\DW_A0134.wav	FBI/DEA Recordings
hawk Ex n-23\DW_A0132.wav	FBI/DEA Recordings
hawk Ex n-18\N-6_002.mp4	FBI/DEA Recordings
hawk Ex n-18\N-6_001.mp4	FBI/DEA Recordings
hawk Ex n-17\N-_001.wav	FBI/DEA Recordings

<sup>7</sup> These recordings were made available to me, but at the time of this report, I have relied on written summaries of the recordings contained in the documents and not a review of the recordings themselves.

hawk - Ex n-5\05-22-2007_001.wav	FBI/DEA Recordings
hawk - Ex n-28\20080312145004.mpg	FBI/DEA Recordings
hawk - EX n-20\12-12-07 Video_002.mp4	FBI/DEA Recordings
hawk - EX n-20\12-12-07 Video_001.mp4	FBI/DEA Recordings
194D-CG-122761-1D -3\194_001.wav	FBI/DEA Recordings
194D-CG-122761-1D - ID -26\194d_001.wav	FBI/DEA Recordings
194D-CG-122761-1D - ID - 5\194d.001.wav	FBI/DEA Recordings
194D-CG-122761-1D - ID - 4\194_001.wav	FBI/DEA Recordings
194D-CG-122761-1D - ID - 3\194_001.wav	FBI/DEA Recordings
194D-CG-122761-1D - ID - 23\194d.006.wav	FBI/DEA Recordings
194D-CG-122761-1D - ID - 23\194d.005.wav	FBI/DEA Recordings
194D-CG-122761-1D - ID - 23\194d.004.wav	FBI/DEA Recordings
194D-CG-122761-1D - ID - 23\194d.003.wav	FBI/DEA Recordings
194D-CG-122761-1D - ID - 23\194d.002_Redacted.wav	FBI/DEA Recordings
194D-CG-122761-1D - ID - 23\194d.001.wav	FBI/DEA Recordings
194D-CG-122761-1D - 9\194d_002.mp4	FBI/DEA Recordings
194D-CG-122761-1D - 9\194d_001.mp4	FBI/DEA Recordings
194D-CG-122761-1D - 8\194d.001.wav	FBI/DEA Recordings
194D-CG-122761-1D - 7\194d_003.mp4	FBI/DEA Recordings
194D-CG-122761-1D - 7\194d_002.mp4	FBI/DEA Recordings

194D-CG-122761-1D - 7\194d_001.mp4	FBI/DEA Recordings
194D-CG-122761-1D - 5\194d.001.wav	FBI/DEA Recordings
194D-CG-122761-1D - 49\194d_001.wav	FBI/DEA Recordings
194D-CG-122761-1D - 4\194_001.wav	FBI/DEA Recordings
194D-CG-122761-1D - 30\194d_002.wav	FBI/DEA Recordings
194D-CG-122761-1D - 30\194d_001.wav	FBI/DEA Recordings
194D-CG-122761-1D - 27\194d_003.mp4	FBI/DEA Recordings
194D-CG-122761-1D - 27\194d_002.mp4	FBI/DEA Recordings
194D-CG-122761-1D - 26\194d_001.wav	FBI/DEA Recordings
194D-CG-122761-1D - 25\194D_001.wav	FBI/DEA Recordings
194D-CG-122761-1D - 24\194d_004.wav	FBI/DEA Recordings
194D-CG-122761-1D - 24\194d_003.wav	FBI/DEA Recordings
194D-CG-122761-1D - 24\194d_002.wav	FBI/DEA Recordings
194D-CG-122761-1D - 24\194d_001.wav	FBI/DEA Recordings
194D-CG-122761-1D - 206\Out_chewy3129653989_10-27-2011_013642PM.wav	FBI/DEA Recordings
194D-CG-122761-1D - 206\Out_chewy3129653989_10-27-2011_013642PM.txt	FBI/DEA Recordings
194D-CG-122761-1D - 206\Out_chewy3129653989_01-16-2012_124105PM.wav	FBI/DEA Recordings
194D-CG-122761-1D - 206\Out_chewy3129653989_01-16-2012_124105PM.txt	FBI/DEA Recordings
194D-CG-122761-1D - 205\194d.007_part1.wav	FBI/DEA Recordings
194D-CG-122761-1D - 205\194d.006.wav	FBI/DEA Recordings

194D-CG-122761-1D - 205\194d.005.wav	FBI/DEA Recordings
194D-CG-122761-1D - 205\194d.004.wav	FBI/DEA Recordings
194D-CG-122761-1D - 205\194d.003.wav	FBI/DEA Recordings
194D-CG-122761-1D - 205\194d.002.wav	FBI/DEA Recordings
194D-CG-122761-1D - 205\194d.001.wav	FBI/DEA Recordings
194D-CG-122761-1D - 201\773-540-5708 T3 2008-02-08 11-02-48 00064-001.wav	FBI/DEA Recordings
194D-CG-122761-1D - 201\773-540-5708 T3 2008-02-07 15-37-24 00063-001.wav	FBI/DEA Recordings
194D-CG-122761-1D - 201\773-540-5708 T3 2008-02-06 19-33-07 00062-001.wav	FBI/DEA Recordings
194D-CG-122761-1D - 201\773-540-5708 T3 2008-02-05 18-29-25 00061-001.wav	FBI/DEA Recordings
194D-CG-122761-1D - 201\773-540-5708 T3 2008-02-05 14-23-12 00060-001.wav	FBI/DEA Recordings
194D-CG-122761-1D - 201\773-540-5708 T3 2008-02-04 20-08-03 00059-001.wav	FBI/DEA Recordings
194D-CG-122761-1D - 201\773-540-5708 T3 2008-02-04 18-33-21 00058-001.wav	FBI/DEA Recordings
194D-CG-122761-1D - 201\773-540-5708 T3 2008-02-04 16-27-01 00057-001.wav	FBI/DEA Recordings
194D-CG-122761-1D - 201\773-540-5708 T3 2008-02-04 14-36-34 00056-001.wav	FBI/DEA Recordings
194D-CG-122761-1D - 201\773-540-5708 T3 2008-02-04 11-46-41 00055-001.wav	FBI/DEA Recordings
194D-CG-122761-1D - 201\773-540-5708 T3 2008-02-03 13-12-47 00054-001.wav	FBI/DEA Recordings
194D-CG-122761-1D - 201\773-540-5708 T3 2008-02-01 18-22-29 00053-001.wav	FBI/DEA Recordings
194D-CG-122761-1D - 201\773-540-5708 T3 2008-01-31 20-49-11 00052-001.wav	FBI/DEA Recordings
194D-CG-122761-1D - 201\773-540-5708 T3 2008-01-30 20-48-37 00051-001.wav	FBI/DEA Recordings
194D-CG-122761-1D - 201\773-540-5708 T3 2008-01-30 17-46-22 00050-001.wav	FBI/DEA Recordings

194D-CG-122761-1D - 201\773-540-5708 T3 2008-01-30 15-07-51 00049-001.wav	FBI/DEA Recordings
194D-CG-122761-1D - 201\773-540-5708 T3 2008-01-30 14-40-46 00048-001.wav	FBI/DEA Recordings
194D-CG-122761-1D - 201\773-540-5708 T3 2008-01-30 12-39-22 00047-001.wav	FBI/DEA Recordings
194D-CG-122761-1D - 201\773-540-5708 T3 2008-01-29 18-50-04 00046-001.wav	FBI/DEA Recordings
194D-CG-122761-1D - 201\773-540-5708 T3 2008-01-29 17-14-08 00045-001.wav	FBI/DEA Recordings
194D-CG-122761-1D - 201\773-540-5708 T3 2008-01-29 10-26-40 00044-001.wav	FBI/DEA Recordings
194D-CG-122761-1D - 201\773-540-5708 T3 2008-01-28 16-24-03 00043-001.wav	FBI/DEA Recordings
194D-CG-122761-1D - 201\773-540-5708 T3 2008-01-28 16-23-29 00042-001.wav	FBI/DEA Recordings
194D-CG-122761-1D - 201\773-540-5708 T3 2008-01-27 11-36-58 00041-001.wav	FBI/DEA Recordings
194D-CG-122761-1D - 201\773-540-5708 T3 2008-01-25 17-12-07 00040-001.wav	FBI/DEA Recordings
194D-CG-122761-1D - 201\773-540-5708 T3 2008-01-24 16-25-28 00039-001.wav	FBI/DEA Recordings
194D-CG-122761-1D - 201\773-540-5708 T3 2008-01-23 13-04-58 00038-001.wav	FBI/DEA Recordings
194D-CG-122761-1D - 201\773-540-5708 T3 2008-01-21 17-09-54 00037-001.wav	FBI/DEA Recordings
194D-CG-122761-1D - 201\773-540-5708 T3 2008-01-21 17-04-49 00036-001.wav	FBI/DEA Recordings
194D-CG-122761-1D - 201\773-540-5708 T3 2008-01-17 07-59-40 00035-001.wav	FBI/DEA Recordings
194D-CG-122761-1D - 201\773-540-5708 T3 2008-01-15 14-45-07 00034-001.wav	FBI/DEA Recordings
194D-CG-122761-1D - 201\773-540-5708 T3 2008-01-14 13-34-45 00033-001.wav	FBI/DEA Recordings
194D-CG-122761-1D - 201\773-540-5708 T3 2008-01-14 11-44-35 00032-001.wav	FBI/DEA Recordings
194D-CG-122761-1D - 201\773-540-5708 T3 2008-01-13 10-45-49 00031-001.wav	FBI/DEA Recordings
194D-CG-122761-1D - 201\773-540-5708 T3 2008-01-11 18-15-58 00030-001.wav	FBI/DEA Recordings

194D-CG-122761-1D - 201\773-540-5708 T3 2008-01-11 16-41-55 00029-001.wav	FBI/DEA Recordings
194D-CG-122761-1D - 201\773-540-5708 T3 2008-01-11 12-33-21 00028-001.wav	FBI/DEA Recordings
194D-CG-122761-1D - 201\773-540-5708 T3 2008-01-10 11-35-24 00027-001.wav	FBI/DEA Recordings
194D-CG-122761-1D - 201\773-540-5708 T3 2008-01-10 10-15-11 00026-001.wav	FBI/DEA Recordings
194D-CG-122761-1D - 201\773-540-5708 T3 2008-01-09 20-36-07 00025-001.wav	FBI/DEA Recordings
194D-CG-122761-1D - 201\773-540-5708 T3 2008-01-09 17-47-57 00024-001.wav	FBI/DEA Recordings
194D-CG-122761-1D - 201\773-540-5708 T3 2008-01-08 19-02-39 00023-001.wav	FBI/DEA Recordings
194D-CG-122761-1D - 201\773-540-5708 T3 2008-01-08 16-31-41 00022-001.wav	FBI/DEA Recordings
194D-CG-122761-1D - 201\773-540-5708 T3 2008-01-08 16-31-40 00021-001.wav	FBI/DEA Recordings
194D-CG-122761-1D - 201\773-540-5708 T3 2008-01-08 16-27-47 00020-001.wav	FBI/DEA Recordings
194D-CG-122761-1D - 201\773-540-5708 T3 2008-01-08 16-15-52 00019-001.wav	FBI/DEA Recordings
194D-CG-122761-1D - 201\773-540-5708 T3 2008-01-08 16-15-11 00018-001.wav	FBI/DEA Recordings
194D-CG-122761-1D - 201\773-540-5708 T3 2008-01-08 16-15-11 00017-001.wav	FBI/DEA Recordings
194D-CG-122761-1D - 201\773-540-5708 T3 2008-01-08 16-11-49 00016-001.wav	FBI/DEA Recordings
194D-CG-122761-1D - 201\773-540-5708 T3 2008-01-08 16-11-44 00015-001.wav	FBI/DEA Recordings
194D-CG-122761-1D - 201\773-540-5708 T3 2008-01-08 15-57-43 00014-001.wav	FBI/DEA Recordings
194D-CG-122761-1D - 201\773-540-5708 T3 2008-01-08 15-57-43 00013-001.wav	FBI/DEA Recordings
194D-CG-122761-1D - 201\773-540-5708 T3 2008-01-08 15-54-11 00012-001.wav	FBI/DEA Recordings
194D-CG-122761-1D - 201\773-540-5708 T3 2008-01-08 15-53-28 00011-001.wav	FBI/DEA Recordings
194D-CG-122761-1D - 201\773-540-5708 T3 2008-01-08 15-52-36 00010-001.wav	FBI/DEA Recordings

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194D-CG-122761-1D - 10\194_001.wav	FBI/DEA Recordings
Domestic Investigations Operations Guideline FBI publication December 2011 - <a href="https://vault.fbi.gov/FBI%20Domestic%20Investigations%20and%20Operations%20Guide%20%28DIOG%29">https://vault.fbi.gov/FBI%20Domestic%20Investigations%20and%20Operations%20Guide%20%28DIOG%29</a>	Additional Materials
Federal Criminal Complaint in USA v Watts; Mohammed; USDC, NDIL-ED, 12-cr-00087, dkt# 1	Additional Materials
<b>Federal Sentencing Memorandum by Watts; USDC, NDIL-ED, 12-cr-00087.</b>	Additional Materials
<b>Government's Response to Defendant Watts' Sentencing Memorandum.</b>	Additional Materials

<b>Federal Criminal Docket, USA v Watts et al; NDIL-ED 12-cr-00087.</b>	Additional Materials
<b>FBI Manual of Investigative Operations and Guidelines Part II; Section 18 (Archived)</b> <a href="https://vault.fbi.gov/miog/manual-of-investigative-operations-and-guidelines-miog-part-02-05-of-06/view">https://vault.fbi.gov/miog/manual-of-investigative-operations-and-guidelines-miog-part-02-05-of-06/view</a>	Additional Materials
<b>Testimony Before the Subcommittee on Housing and Community Opportunity, Committee on Banking and Financial Services, House of Representatives</b> HUD's Takeover of the Chicago Housing Authority Statement of Judy A. England-Joseph, Director, Housing and Community Development Issues, Resources, Community, and Economic Development Division, June 1995.	Additional Materials