

EXHIBIT 30

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In re: Watts Coordinated
Pretrial Proceedings Case Number 1:2019cv01717

Deposition of Kenneth Mann

Thursday

December 17th, 2020

-at-

Zoom Remote Deposition

1 APPEARANCES

2

3 For the Plaintiffs:

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1 For Individual Defendant Officers:

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8 For Defendant Ronald Watts:

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1 For Defendant Kallatt Mohammed:

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8 For Kenneth Mann:

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15 Also present:

16 Dimitri Diagne

17 Debra Westfall

18

19 RECORDER: Zoom is recording. Good morning.

20 We are now on the record. Today is Thursday, December

21 17th, 2020. The time is now 10:05 a.m. We are meeting

22 remotely today for the deposition of Mr. Kenneth Mann

23 in regards Watts Coordinated Pretrial Proceedings, case

24 number 1:2019cv01717. The venue is Northern District

25 of Illinois, Eastern Division. Mr. Kenneth Mann, my

1 name is Katie Jasinski and I'm a notary public and I'm
2 recording this deposition on behalf of Exhibit 5, LLC.
3 This deposition is being recorded remotely via Zoom in
4 accordance with Illinois Public Act 101-0640. Mr.
5 Kenneth Mann, would you please confirm your identity by
6 placing a valid picture ID in front of the camera
7 briefly?

8 MR. MANN: It's not valid. It expired, but
9 the Secretary of State's Office --

10 RECORDER: Understand. If -- if -- if I
11 could just see for your face. Yeah. Perfect. Thank
12 you, sir. And, Mr. Kenneth Mann, are you physically
13 located within the state of Illinois today?

14 MR. MANN: Yes. 0:01:07

15 RECORDER: Thank you. At this time, would
16 you please raise your right hand for the oath? Just
17 move over just a little bit to the screen. Thank you,
18 sir.

19 (Witness sworn)

20 RECORDER: Thank you. Would the attorneys
21 please state their appearance for the record?

22 MR. RAUSCHER: Scott Rauscher on behalf of
23 the Plaintiffs represented by Loevy and Loevy in the
24 Watts coordinated proceedings.

25 MR. FLAXMAN: Joel Flaxman on behalf of the

1 Plaintiffs represented by the Flaxman Law Office in the
2 coordinated proceedings.

3 MS. GARCIA: Mariah Garcia on behalf of the

4 Plaintiffs represented by Loevy and Loevy in the
5 coordinated proceedings.

6 MR. PALLE: Eric Palles on behalf of Kallatt
7 Mohammed.

0:01:50

8 MR. KOSOKO: Ahmed Kosoko on behalf of Ronald
9 Watts.

10 MR. BURNS: Terry Burns appearing on behalf
11 of City of Chicago as well as Cline, Kirby, Rowan, and
12 others, I believe. Hillard and Starks have been named
13 in some of these matters as well.

14 MR. BAZAREK: William E. --

15 MS. MCGRATH: Megan McGrath on behalf of
16 Defendants Cadman and Baragen -- Spaargaren.

17 MR. BAZAREK: All right. William E. Bazarek
18 on behalf of the individual Defendants represented by
19 Hale and Monico.

20 RECORDER: Thank you. That completes the
21 required information. We can proceed.

22 EXAMINATION

23 BY MR. RAUSCHER:

24 Q. Can you please say and spell your name?

25 A. Who, me? Okay.

1 Q. Yeah.

2 A. Kenneth Mann, K-e-n-n-e-t-h M-a-n-n.

3 Q. And where are you sitting today for the
4 deposition?

5 A. Law office -- law offices located 20 South
6 Clark, room 1700.

7 Q. And who -- is anyone else in the room with
8 you?

9 A. Yes.

10 Q. Who -- who is in the room with you? 0:03:07

11 WITNESS: Your name -- we started with --

12 MR. BORKAN: He's asking you the question.

13 You're going to give him the answer.

14 WITNESS: The answer. Okay.

15 A. Yes, lawyer representing me, Steve --

16 WITNESS: What's the last --

17 MR. BORKAN: Borkan.

18 A. -- Borkan.

19 RECORDER: So I'm sorry to interrupt, but we
20 are -- we'll -- we'll -- we're having a hard time. I'm
21 going to ask, Mr. Mann, can you just pull your mask
22 forward slightly as you speak?

23 WITNESS: Okay. How --

24 MR. BORKAN: -- that.

25 WITNESS: No? Yeah. Okay.

1 MR. BORKAN: That's going to be a problem.

2 RECORDER: Just -- you can cover your mouth
3 and nose, but just pull it -- pinch it a little forward
4 as you speak. Unfortunately --

5 WITNESS: Okay.

6 RECORDER: -- we are not being able to
7 clearly understand you.

8 WITNESS: Okay.

9 A. Ready? I'm with the lawyer representing me
10 on behalf of the City of Chicago, Steve Borkan.

11 Q. And you -- you said "on behalf of the City of
12 Chicago." Was he hired by the City of Chicago to
13 represent you?

14 A. Yes.

0:04:07

15 Q. Okay. Are you -- do you have to pay him
16 directly?

17 A. No.

18 Q. Okay. Where do you work?

19 A. I'm retired.

20 Q. Okay. Were you -- well, when did you leave
21 the Chicago Police Department?

22 A. October of 2010, I believe. Yeah.

23 Q. And then did you have a job after you left
24 the Chicago Police Department?

25 A. Yes, worked for the Village of Calumet Park

1 as the assistant chief of police, then the chief of
2 police.

3 Q. You said you were the assistant chief and
4 then the chief at Calumet Park?

5 A. Yes. 0:04:57

6 Q. Where is Calumet Park?

7 A. 12409 South Throop.

8 Q. Is that a suburb of Chicago?

9 A. Yes.

10 Q. How big is Calumet Park? How many people?

11 A. 1.5 miles, about 8,500 people.

12 Q. Why did you leave the Chicago Police
13 Department?

14 A. I retired.

15 Q. You leave on good terms?

16 A. Yes.

17 Q. Are -- are you still in touch with some of
18 the people you worked with over the years at the
19 Chicago Police Department?

20 A. I worked with over a thousand people, so
21 yeah. I run into them every now and then.

22 Q. Are you -- are you -- do you socialize with
23 anyone who -- from the Chicago Police Department?

24 A. Not as of late. 0:05:51

25 Q. Do you know anything about the cases that

1 you're here to testify about today?

2 A. I discussed it with my attorney. Some of
3 them I'm aware of, yes.

4 Q. Do you -- do you know anything other than
5 information you got from your attorney?

6 A. No.

7 Q. Do you know the general nature of the
8 allegations in the cases?

9 A. Yes.

10 Q. And what's your understanding, just
11 generally, what the cases are alleging?

12 A. Concerning Sergeant Ronald Watts -- former
13 Sergeant Ronald Watts and former PO Mohammed, Kallatt
14 Mohammed, and other members of the team concerning
15 narcotics sales and charging money to allow dealers to
16 operate in Ida B. Wells.

17 Q. And without getting into specific
18 conversations you had with your lawyer, can you tell me
19 what you did to prepare for your deposition today?

20 A. Attempted to read all the paperwork
21 concerning --

22 Q. Are you talking about the paperwork we sent
23 over yesterday?

24 A. Yeah.

0:07:11

25 Q. It was a lot of -- it was a lot of paper, I

1 think.

2 A. Yep.

3 Q. Did looking at any of that paperwork refresh
4 your recollection about anything in the paperwork or
5 about anything else?

6 A. No, it's just paperwork that I routinely did
7 when I was working for the City.

8 Q. And we'll -- we'll look at some of it
9 specifically later, but when you say paperwork you
10 routinely did, are you talking about the CR files?

11 A. CR files, the injury reports, assignment and
12 attendance, case reports, so yeah. There were a lot of
13 reports.

14 Q. Can you just walk me through briefly what
15 your roles were at the Chicago Police Department? Put
16 time periods around them if you can.

17 A. Okay. Came on the police department 18th
18 October '76. I was assigned to the fifth district --
19 no, I'm sorry -- to the second district for training in
20 the FTO. After I got off probation, I was assigned to
21 what they call an umbrella car, just covering 47th
22 Street from Cottage Grove to State Street, for all
23 illegal activity, including -- including prostitution,
24 narcotics, robberies. Then I was assigned to the
25 tactical team in the second district. They -- after

1 that, I was assigned to the housing TAC team in the
2 second district. That's when I got promoted to gang
3 crimes specialist. So they're still in the same
4 building but down the hall. I played -- got promoted
5 to sergeant. What was that, '85? 1985. And I was
6 reassigned to area two detectives, violent crimes.
7 Then, okay, from there, came back to two, second
8 district as a TAC sergeant.

9 Q. When was that?

0:09:57

10 A. I want to say around '86. Yeah, around '86,
11 came back as TAC sergeant. Then I worked -- you gotta
12 give me a moment. I'm -- I'm trying to refresh.

13 Q. You know what? Can I actually -- while you
14 do that --

15 MR. RAUSCHER: Katie, I don't know if you're
16 picking it up. I'm hearing a ton of feedback. Are you
17 --

18 RECODER: I am hearing feedback as well.
19 I'm not sure if that's -- I assume it's from your
20 conference room you're in. You know, it just went
21 away, so I'm thinking --

22 MR. RAUSCHER: Yeah.

23 RECODER: -- it's happening while the
24 witness speaks.

25 WITNESS: Okay.

1 RECODER: Yeah.

2 MR. RAUSCHER: It is.

3 RECODER: So troubleshooting ideas would be

4 the volume -- are you on a laptop or a desktop, Steve?

5 MR. BORKAN: It's all -- desktop is -- and

6 the -- we're using a large screen TV. We checked the

7 volume earlier. It's not that high. Are you getting

8 feedback with me as well?

9 RECODER: Yes. Yes. 0:11:15

10 MR. BORKAN: Scott?

11 MR. RAUSCHER: Yeah. It's really

12 high-pitched kind of loud feedback.

13 MR. BORKAN: Oh, that's terrible. What about

14 -- is everybody else picking it up as well? Bazarek?

15 McGrath?

16 MR. BAZAREK: Yeah. Yeah, I hear the

17 feedback. Yeah.

18 MS. MCGRATH: I'm getting it as well.

19 MR. BORKAN: All right. What do you

20 recommend?

21 RECODER: What we can --

22 MR. BORKAN: Try and troubleshoot this.

23 RECODER: Sure. The -- try turning down --

24 and, obviously, all phones are muted in that room. Try

25 turning down the volume. My other strong suggestion

1 would be is there any way someone can get Mr. Mann a
2 shield? Because just with trying to --

3 MR. BORKAN: Mann isn't causing the feedback,
4 Katie.

5 RECORDER: No, no, no, I know, sir, but --
6 but having the high-pitched tone in addition to really
7 having to concentrate harder on what he's saying
8 through the mask is very difficult.

9 MR. BORKAN: Well, the feedback can kill you
10 after a couple hours, so I'm really hoping to avoid
11 that.

12 RECORDER: Okay. 0:12:17

13 MR. BORKAN: Let me see. Hold on a sec. Hey
14 --

15 MR. RAUSCHER: What about using phone audio?
16 Would that help instead of computer?

17 RECORDER: He can call in.

18 MR. RAUSCHER: Yeah, that's what I meant.
19 Leave the video on, but silence the audio on the
20 computer.

21 RECORDER: Steve, I have that phone number
22 handy if you would like me -- give it to you.

23 WITNESS: Okay. He left the room to get tech
24 support.

25 MR. RAUSCHER: Oh, thanks.

1 MR. BORKAN: They're -- they're saying --
2 they're -- everybody on the Zoom is -- I've brought in
3 my admin to help us troubleshoot.

4 RECODER: Okay. Great. Thank you.

5 MR. BORKAN: But --

6 RECODER: You know, we could -- we could try
7 and --

8 MR. BORKAN: -- we're not --

9 RECODER: Go ahead.

10 MR. BORKAN: We're not getting any feedback
11 here.

12 RECODER: Right.

13 MR. BORKAN: So we don't hear it, but when we
14 -- I asked everybody on -- so far everybody on Zoom
15 says they can hear it, the high-pitched --

16 RECODER: Feedback.

17 MR. BORKAN: -- feedback. And is it -- is it
18 only when we're speaking? Or is it all the time?

19 RECODER: A little bit of both. 0:13:19

20 MR. RAUSCHER: We -- yeah.

21 RECODER: The thing we can do is mute the
22 computer and have you call in from a phone, whether
23 it's a landline or a cell phone, and we can try that.
24 I have the phone number handy if you want to try.

25 MR. BORKAN: How's that? Is that better?

1 RECODER: No.

2 MR. BORKAN: No, that's not better. So

3 that's not it. I'm going to try the microphone, but

4 that's not it. What about the -- I mean, we've got --

5 he's got a speaker there. I mean, what about that?

6 You can test the speaker and the microphone. We can

7 switch to phone audio, and I would just call in. What

8 do you think?

9 MR. BORKAN'S ASSISTANT: You can try.

10 MR. BORKAN: We can try it. I'll --

11 RECODER: Before you do the phone, though, I

12 think we need to be able to kind of confirm that the

13 mute on the computer is muted. Therefore, we should

14 stop hearing the high pitch, is my guesstimation on

15 that.

16 MR. BORKAN: I mean, here's the -- the

17 microphone is through the USB and the speakers, but I

18 don't understand why we're having this issue.

19 MR. BORKAN'S ASSISTANT: You haven't had that

20 issue before? 0:14:38

21 MR. BORKAN: That -- no.

22 RECODER: The other thing we can just

23 quickly attempt is for you guys to leave the meeting

24 and come back.

25 MR. BORKAN: Oops. Have you had the --

1 RECODER: Is there -- is --

2 MR. BORKAN: -- feedback since we started,

3 Scott?

4 MR. RAUSCHER: Yeah. Yes.

5 RECODER: Is there a landline near the --

6 the desktop? Because that could also --

7 WITNESS: We're --

8 RECODER: -- could be interfering.

9 MR. BORKAN: No. Is there a landline near

10 the desktop? No.

11 RECODER: Very Likely.

12 MR. BORKAN'S ASSISTANT: I mean, not -- I'm

13 -- I'm calling in on speakerphone now.

14 RECODER: Okay. Still getting the

15 high-pitched feedback.

16 MR. RAUSCHER: You probably need to leave

17 audio from your Zoom setting.

18 RECODER: Yeah. I would -- I would perhaps

19 just log out and log back in.

20 MR. BORKAN'S ASSISTANT: I'm calling in and

21 going back in. Leave the room.

22 MR. BORKAN: Yeah?

23 MR. BORKAN'S ASSISTANT: Yes.

24 RECODER: Why don't we go off record? Is

25 that okay with everybody?

1 MR. RAUSCHER: Yeah, that makes sense. Thank
2 you.

3 RECORDER: Okay. Off record, 10:20 a.m. 0:15:40

4 (Off the record)

5 RECORDER: On the record, 10:24 a.m.

6 Q. So we were going through your roles at CPD,

7 and I think according to --

8 A. Correct.

9 Q. The last thing I had written down was TAC
10 sergeant in the second district in about --

11 A. Okay.

12 | 0. -- 1986. Is that --

13 A. Then I got -- yeah.

14 Q. Can we pick up from -- from there, and just
15 tell me --

16 A Yes

17 Q -- what your roles were?

18 A. Okay. Okay. I was reassigned to area two
19 detective division, violent crimes. And from there, I
20 was promoted to lieutenant in 1998, assigned to public
21 housing south as the commanding officer. Then I was
22 reassigned from there to area one detectives, to --
23 task force. Then from there, reassigned to -- back to
24 housing, but this time out in Altgeld Gardens.

25 Q. I'm sorry. Which gardens?

1 A. And -- Altgeld. 0:17:06

2 Q. Can you spell that? I -- it wasn't clear to
3 me.

4 A. Okay. There you go. A-t-g-e-l-d [sic].

5 Q. Thanks.

6 A. Okay. And the unit was disbanded, so I went
7 to the fifth district for about less than a year. Then
8 I was reassigned back to the second district as the
9 tactical lieutenant, and I retired out of the second
10 district in 2010.

11 Q. And when -- that last time when you were
12 reassigned back to the second district as the tactical
13 lieutenant, what year did that reassignment happen?

14 A. I -- maybe 2002, '03, around there. I don't
15 -- I don't really -- okay. I don't -- I don't recall
16 --

17 Q. But I just want your best --

18 A. -- the exact time.

19 Q. -- estimate.

20 A. Best estimate, around '02, '03 -- 2002 or
21 '03.

22 Q. So about seven, eight years or so, you were
23 the lieutenant -- the tactical lieutenant in the second
24 district before your retirement?

25 A. Yes. 0:18:27

1 Q. Okay. In -- I want to go back. You had
2 mentioned that one of your first -- one of your early
3 assignments was on the second district tactical team?

4 A. Yes.

5 Q. Do you know about what years you served on
6 the second district tactical team?

7 A. Oh, it's gotta be, I want to say, around '79,
8 '80, '81.

9 Q. Was it a couple-year period about?

10 A. Say again?

11 Q. Were -- were you on the tactical team for a
12 couple years about, or were you just -- you're
13 estimating that it was --

14 A. Yeah, for --

15 Q. -- in the -- okay.

16 A. For a couple of years.

17 Q. And where did the second district tactical
18 team operate at that -- at that time?

19 A. Okay. 60th Street on the south, 35th Street
20 on the north, Cottage Grove on the east, Dan Ryan
21 Expressway on the west.

22 Q. Was that the same area that the second
23 district tactical teams covered when you were the
24 lieutenant in the 2000s?

25 A. Yes.

0:19:41

1 Q. What were your main responsibilities as an
2 officer on the second district tactical team back
3 around that '79, '80 period?

4 MR. BORKAN: Objection. Form.

5 Q. Oh, you can still answer. Unless your
6 attorney instructs you not to for privilege, you should
7 still answer after he objects.

8 MR. BORKAN: That's correct.

9 A. Okay. Duties, vice, being prostitution; drug
10 sales and use; gambling. Then you would have what they
11 called hot spots and concentrated police presence on
12 those areas for gang activity, robberies, burglaries.
13 That's -- yeah -- about covers it.

14 Q. Was your role more reactive or proactive? 0:20:55

15 A. Proactive.

16 Q. And were you doing any kind of undercover
17 work in the TAC team?

18 A. Well, since everybody knew our cars and knew
19 us, it was kind of difficult to do undercover work, but
20 --

21 Q. Okay.

22 A. -- every now and then, we -- we were able to
23 sneak up on somebody.

24 Q. And when you say you were able to sneak up on
25 somebody, can you give me an example of how you would

1 have done that when you were on the TAC team?

2 A. Like climbing up on a roof, observing
3 activity below, then moving in to make an arrest.

4 Q. Were there public housing developments in the
5 second district when you were on the TAC team?

6 A. Yes.

0:21:40

7 Q. And did you operate in those housing
8 developments?

9 A. Yes.

10 Q. And can you identify --

11 A. At one time --

12 Q. I'm sorry. Go ahead.

13 A. Go ahead. Okay. Yes, but then they got
14 their own police department for about five years, and
15 we kind of, more or less, let them handle their
16 business.

17 Q. Okay. Was that a CHA -- did CHA handle that?

18 When you say they had their own department, Chicago

19 Housing --

20 A. Right.

21 Q. -- Authority?

22 A. Right. Chicago Housing Authority, but it
23 only lasted about five years.

24 Q. Do you -- which five-year period, about, did
25 CHA have its own police in there?

1 A. Okay. Wow. I -- I -- I really can't put a
2 time frame on there. I want to say from, maybe, '90s
3 -- '90s, '95, and then they disbanded.

4 Q. So during that two- to three-year period
5 where you were on the TAC team in the second district,
6 you were operating in those -- in the housing
7 developments that whole period, right?

8 | A. Yes.

0:23:07

9 Q. Can you identify which housing developments
10 you operated in on the second district TAC team in that
11 '79 to '81 time period?

12 A. Okay. Robert Taylor, Stateway, Ida B. Wells,
13 and then they had scattered sites all over the
14 district.

15 Q. And were -- was your -- were there multiple
16 TAC teams in the second district during that '79 to '81
17 time frame?

18 A. Well, there were two housing TAC teams
19 working out of the second district, and then there were
20 three TAC teams that I was on. I was on -- actually, I
21 was on both.

22 Q. So let me make sure I understand. Were there
23 five total TAC teams in the second district?

24 A. At that time, yes, five.

25 0. And two concentrated on the housing

1 developments, and three didn't?

2 A. For -- for the -- right. They worked the
3 regular district, but if you got a call to go in, you
4 -- you went in.

5 Q. Got it. And were you saying you were -- for
6 part of the time, you were on one of the housing ones,
7 and part of the time you were on the regular district
8 one?

9 A. Regular -- right -- district ones, yes.

0:24:34

10 Q. And when you were on the housing one, was it
11 assigned to a particular housing development, or did
12 you roam between them?

13 A. Roamed between them.

14 Q. Did you spend more time at one of the
15 developments than others?

16 A. Robert Taylor for me.

17 Q. And was there any particular reason that you
18 spent more time at Robert Taylor than the other ones?

19 A. The gangs that I was dealing with, they were
20 there. Gangster Disciples and the Cobra Stones, which
21 later became Mickey Cobras.

22 Q. Did you ever -- are you familiar with the
23 term "reverse sting"?

24 A. Yes, I've heard the term.

0:25:25

25 Q. Do you know what a reverse sting is?

1 A. That's when either a confidential informant
2 or an undercover officer put themselves out to be
3 approached by other police officers, an integrity
4 check.

5 Q. Have you used -- so is the only context
6 you've heard "reverse sting" used in is to try to catch
7 other officers doing something wrong?

8 A. Yes.

9 Q. Okay. Were you ever involved in any reverse
10 stings, as you're using that term?

11 A. I made an arrest on 47th Street, drug dealer
12 offered to pay me off, and I advised him of his rights
13 and told him to use them. Got him into the station for
14 processing, and then when I went to get his CD number,
15 he wasn't in lockup anymore. So I went in to the watch
16 commander and he informed me that that was an integrity
17 stop and "you passed."

18 Q. When did that happen? 0:26:52

19 A. 100 years ago. Okay. Seventy -- come out
20 '76, '78, '79 -- about '79 or '80.

21 Q. And was it your understanding that was just a
22 random integrity check, or was that targeted at you
23 specifically?

24 A. Well, my partner and I was putting so much
25 pressure on the dope dealers. I'm pretty sure that

1 they called it in.

2 Q. Meaning you think that drug dealers were
3 saying you were doing something wrong?

4 A. Yes.

5 Q. And are -- did someone tell you that, or do
6 you just suspect that's what happened?

7 A. I suspect it because there's nothing else
8 there. I -- my partner and I were a nuisance to them.
9 They couldn't operate so they were losing money so
10 that's how they do it.

11 Q. Who was your partner who you're referring to?

12 A. Joaquin Wilindez.

0:27:58

13 Q. Do you know how to spell that?

14 A. Okay. J-o-a-q-u-i-n W-i-l-b-e-z [sic]. But
15 he's passed.

16 Q. Okay. Were -- were you ever -- other than
17 the integrity check you just mentioned where you, it
18 sounds like, were the target, were you ever involved in
19 any other integrity checks, planning or carrying out or
20 reviewing?

21 A. No.

22 Q. Did being involved in that integrity check
23 color how you viewed citizen complaints?

24 A. No.

25 Q. Is it safe to say that if drug dealers were

1 saying you were taking money from them, they were
2 falsely accusing you of that?

3 A. Yes. 0:29:05

4 Q. And was it your experience that citizens of
5 Chicago frequently made false complaints about
6 officers?

7 MR. BORKAN: Objection. Form.

8 A. Could you repeat the question?

9 Q. Yeah. My question is was it your experience
10 that citizens of Chicago frequently made false
11 complaints about Chicago police officers?

12 MR. BORKAN: Objection. Form.

13 A. Okay. I would say certain elements, not
14 necessarily all citizens.

15 Q. When you say certain elements made false
16 complaints about police officers, can you explain what
17 you mean by "certain elements"?

18 A. Okay. You're in a gang, you have certain
19 locations that you operate around, and you really don't
20 want the police there, so if you make enough
21 complaints, usually, they may move that officer because
22 of the complaint.

23 Q. Do you have any specific recollections of
24 officers getting moved based on citizen complaints?

25 A. No. 0:30:27

1 Q. All right. Are you certain that that ever
2 happened, or are you just making an assumption that
3 that would happen?

4 A. No --

5 MR. BORKAN: Objection. Form. You can
6 answer.

7 A. Okay. No, I know or in conversation, these
8 other people, different districts' TAC officers
9 complain about they got reassigned to another part of
10 the district because too many complaints.

11 Q. Did you say "TAC officers"? You heard that?

12 A. Any officer.

13 Q. I -- I just didn't --

14 A. And they --

15 Q. -- hear you. I -- sorry.

16 A. Okay. Any officer -- any officer, but that
17 includes tactical officers.

18 Q. Got it. And do you remember any specific
19 officers you heard that from or about or any specific
20 conversations?

21 A. No, not at -- no.

22 Q. And --

23 A. Not at this time.

0:31:26

24 Q. Do you know if -- if that was true, that
25 officers actually did get moved based on citizen

1 complaints?

2 A. Yes.

3 Q. And how do you know that that was true?

4 A. Like I just said, in conversation.

5 Q. Were -- were the officers told that they were
6 moved based on citizen complaints?

7 A. No, I -- that's beyond me. I don't know. I
8 just know we had conversation.

9 Q. What was the highest rank you held at CPD?
10 Was it lieutenant?

11 A. Lieutenant.

12 Q. As a lieutenant, would it have been in your
13 power to move people around?

14 MR. BORKAN: Objection. Form.

15 Q. Let me rephrase that.

16 A. It's not my call. Okay. Not my call. It
17 would have -- I'd have to take it to the district
18 commander.

19 Q. So as a lieutenant, you would have had the
20 power to recommend a move to the commander?

21 A. Yes. Yes.

0:32:30

22 Q. Did you ever --

23 A. Would --

24 Q. -- recommend that an officer have a different
25 -- be assigned to a different job, as a lieutenant?

1 A. No. No.

2 Q. In any other -- I'm sorry. In any other role
3 at the CPD, did you ever recommend an officer be
4 reassigned?

5 A. No.

6 Q. Do you know if there was any set level of
7 number of complaints that would cause an officer to get
8 moved?

9 A. No.

10 Q. In your experience as a tactical officer, did
11 -- did you ever pose as a drug dealer to try to catch
12 people buying drugs?

13 A. No.

0:33:17

14 Q. Do you know if other members of your tactical
15 team ever posed as drug dealers to try to catch people
16 buying drugs?

17 A. Yes.

18 Q. How frequently did it happen that members of
19 your TAC teams posed as drug dealers to catch people
20 buying drugs?

21 A. Well, they were attempt -- they would attempt
22 to make a buy, and since the second district was so
23 small, the -- and unless you brand new, they know you.
24 They know us. They know our cars. They know -- they
25 know us. So they would try. So it wasn't that

1 frequent, but they'd make an attempt, especially if we
2 got a new TAC officer.

3 Q. They would go try to buy drugs from dealers
4 but not pretend to be a dealer and sell drugs?

5 A. Correct.

0:34:11

6 Q. And is -- is that the -- when you said
7 everyone knew you, everyone knew the TAC team, did that
8 hold true both during the time when you were a TAC team
9 officer and also when you were the lieutenant for the
10 TAC team?

11 A. Yes.

12 Q. And so during that seven- to eight-year
13 period, fair to say that the officers on the TAC teams
14 were widely known in the second district?

15 A. Yes.

16 Q. And it -- it would have probably been
17 difficult for them to try to pose as drug dealers to
18 sell drugs?

19 A. Correct.

20 MR. BAZAREK: Object to the form of the
21 question. Speculation.

22 MR. KOSOKO: Join. And could we just --

23 Q. When --

24 MR. KOSOKO: -- for the record just --

25 Q. When you were the --

1 MR. KOSOKO: This is --

2 Q. -- lieutenant --

3 MR. KOSOKO: Hang on. Hang on for just a
4 second, Scott. I just want to make sure the record is
5 clear because we know this, but we're dealing with a
6 new court reporter. Could we make it for the record
7 that an objection by any of the Defendants is
8 applicable to all the Defendants?

9 MR. RAUSCHER: Agreed. Yep.

10 MR. KOSOKO: Okay.

11 RECODER: That's fine. And then just one
12 quick note, again, if we can just say your first name.
13 So, Steve, I believe you've done the objections on the
14 forms, is that correct?

15 MR. BORKAN: That's correct.

16 RECODER: Great. I assumed that was you,
17 but the new -- the last objection, Bill, was that you?

18 MR. BAZAREK: That -- that was me, Bazarek.
19 Right.

20 RECODER: Bill. Okay. Great. So if you --
21 and I know it's difficult, but if you can just say,
22 "Bill. Object," whatever you're objecting to, that
23 would help us on our end. And then, Ahmed, I've just
24 noted that from you as well. Thank you.

25 MR. KOSOKO: Thank you.

0:35:48

1 Q. As the tactical team lieutenant from that
2 2002, 2003 to 2010 time frame, did you have an
3 understanding of what the tactical team was doing?

4 A. Yes.

5 Q. And did you have oversight over their
6 operations?

7 A. Yes.

8 Q. Would you say you were familiar with how they
9 conducted their operations during that time frame?

10 A. Yes.

11 Q. Did you know any of -- well, let me ask you
12 this. Do you know if you know any of the Plaintiffs in
13 these cases?

14 A. No.

15 Q. Okay. Did the -- were there TAC -- when you
16 were the lieutenant in the second district over the TAC
17 teams, were there any TAC teams that operated in Ida B.
18 Wells?

19 A. Yes.

20 Q. And were there other TAC teams in the second
21 district when you were the lieutenant?

22 A. Yes.

23 Q. And did any of those other TAC teams also
24 operate in Ida B. Wells?

25 A. Yes.

1 Q. Was there one TAC team that was more active
2 in Ida B. Wells than others?

3 A. Yes. 0:37:24

4 Q. And was -- which TAC team was that that was
5 more active in Ida B. Wells?

6 A. Believe that's the 264 team with Sergeant
7 Watts.

8 Q. So that -- that 264 team was led by Sergeant
9 Watts when you were the lieutenant, right?

10 A. Yes.

11 Q. Was the 264 team specifically assigned to Ida
12 B. Wells?

13 A. No.

14 Q. Do you know why they were more active in Ida
15 B. Wells than other TAC teams?

16 A. Well, citizen complaints about drug -- drug
17 and gang activity and I -- I just assume, or whatever,
18 they felt comfortable working down there and there was
19 calls there was activity all over the place, so.

20 Q. But you never -- is it fair to say you never
21 told that -- Watts and his team that they should
22 concentrate on Ida B. Wells?

23 MR. KOSOKO: Ahmed. 0:38:40

24 A. No.

25 MR. KOSOKO: Object to the form.

1 MR. RAUSCHER: What was the -- what's wrong
2 with that form?

3 MR. KOSOKO: It's my objection, Scott, but
4 I'll explain. It's -- it's speculative. It's vague,
5 as far as "told." If you want me to go into it, if --
6 if Lieutenant Mann received a citizen complaint, he
7 would relay it down the chain of command and thus
8 instructing them to go to the Ida B. Wells.

9 Q. Okay. I -- I still would -- I think you
10 have, maybe, already answered, but let -- let's have a
11 clear -- I know there's an objection to the form, but
12 did you ever tell Sergeant Watts that him and his team
13 should concentrate their efforts on Ida B. Wells as
14 opposed to other areas of the second district?

15 A. Okay. In the second district, we identified
16 locations within the district, and we call them hot
17 spots. So all the teams were aware of where the hot
18 spots were. Ida B. Wells was a hot spot, so they felt
19 comfortable working there. So that's where they went.

20 Q. And when you say "they felt comfortable
21 working there," can you explain what you mean by "felt
22 comfortable"?

23 A. Activity, drug sales, weapons, robberies, you
24 know. So they get to know the players, and then you go
25 -- and then they make the arrest.

1 Q. Can you tell me who you remember working on
2 Watts's team when you were the lieutenant over the
3 second district TAC teams?

4 A. Since there were 70 of them, it's kind of
5 hard. We're talking 15 years ago. You know, Watts,
6 you know, Mohammed, from the newspaper, they seemed to
7 be at it quite a bit, and -- oh, I'd be lying. I mean,
8 not lying. I'd be remiss in the fact that I can't
9 remember their names.

10 Q. When you said there were 70 of them, were you
11 talking about all of the TAC officers or just the ones
12 that served on Watts' team?

13 A. All the TAC officers.

0:41:22

14 Q. You know Al Jones?

15 A. Yes.

16 Q. Do you know if he was on Watts's team?

17 A. Yes.

18 Q. Do you know Kenny Young? Kenneth Young?

19 A. Yes.

20 Q. Was he on Watts's team?

21 A. Yes. Yes.

22 Q. Do you know Lamonica Lewis?

23 A. Yes.

24 Q. Do you know if she was on Watts's team?

25 A. Yes.

1 Q. Manny Leano, do you know who that is?

2 A. Yeah.

3 Q. Was he on Watts's team?

4 A. Yes.

5 Q. Brian Bolton?

6 A. That name really doesn't come out at me.

7 Q. Okay.

8 A. So --

9 Q. Was there a Gonzalez, Officer Gonzalez,
10 served on that team?

11 A. Same with Bolton. I know a lot of
12 Gonzalezes.

13 Q. Sure.

14 A. But -- okay. I -- I really -- I can't see
15 his face. Okay.

16 Q. Do -- do you know Shannon Spalding?

17 A. No.

0:42:31

18 Q. Do you know the name, or is this the first
19 you're hearing of it when I say it?

20 A. No, I know the name from the article.

21 Q. You -- you know anything about her or her
22 efforts to expose Watts other than what you've read
23 publicly?

24 A. Other than public record, no.

25 Q. Have you ever talked to anyone about Shannon

1 Spalding?

2 A. No.

3 Q. Do you know Danny Echeverria?

4 A. No. No.

5 Q. What about Officer Spaargaren? Do you know
6 who that is?

7 A. No.

8 Q. What about Cadman?

9 A. Who?

10 Q. Cadman. Do you --

11 A. Say again? Does not -- no, sir.

12 Q. As we've gone through some of these names,
13 are there any others you've thought of, while we're
14 talking through the list, who you might not have
15 remembered at first?

16 A. You're talking about on the entire TAC team
17 or just --

18 Q. Just on Watts's --

19 A. -- with Watts?

20 Q. -- TAC team.

21 A. That's it.

22 Q. When --

23 A. You know --

24 Q. And so how many TAC teams -- I'm sorry if I
25 already asked you this, but how many TAC teams were

1 there when you were the lieutenant over the second
2 district TAC teams?

3 A. We got three district TAC teams, two gang
4 teams, and two housing teams.

5 Q. And which one of those was Watts's team?

6 A. One of the housing teams.

0:44:02

7 Q. Who -- do you remember who led the other
8 housing team?

9 A. I want to say Sergeant Boone, Elvin Boone.

10 Q. Boone?

11 A. Yes. B-o-o-n-e.

12 Q. Do you remember the other sergeants who led
13 the other teams, the non-TAC -- the non-housing teams?

14 A. Up in the gang teams, McCaster -- Sergeant
15 Maurice McCaster. I can't -- I can't remember. If I
16 had something in front of me --

17 Q. Okay. Anyone -- any of the other -- the
18 district teams?

19 A. I'm thinking. Well, at this time, do you --
20 do you got any reference? Any A&A sheets or anything?
21 Do you got everything up?

22 Q. That's okay. We can maybe go through them
23 later. I -- I was just -- I wanted to just see if you
24 remembered any.

25 A. No.

1 Q. Now, the two housing --

2 A. Not that jump off --

3 Q. -- teams, did they have distinct
4 responsibilities from each other?

5 A. Yes.

0:45:29

6 Q. And I -- and when I say that, I should -- let
7 me try to ask it a different way. Were there
8 differences in the responsibilities between the two
9 housing TAC teams?

10 A. No.

11 Q. Generally, what were the TAC teams
12 responsible for doing while you were the lieutenant?

13 A. Like I said, the hot spots, the -- the hot
14 spot being because there's a series of robberies, drug
15 sales, or weapons violations. They were directed by me
16 to check the hot spots, and the hot spots varied
17 throughout the whole district.

18 Q. And I know you said Ida B. Wells was a hot
19 spot. Were there any other --

20 A. Right.

21 Q. -- any other hot spots that you remember?

0:46:22

22 A. Be perfectly honest, all of CHA.

23 Q. Were there any particular crimes that were
24 more prevalent than other crimes while you were the
25 lieutenant over the TAC teams?

1 A. Drug sales.

2 Q. Drug sales was the main one?

3 A. Drug sales motivated most all the other
4 crime, the shootings, the robberies.

5 Q. Do you remember any of the main people
6 involved in the drug trade during the time period when
7 you were the lieutenant in the second district over the
8 TAC teams?

9 A. No, not --

10 Q. What was your -- what -- what was your role
11 as lieutenant over the TAC teams?

12 A. To supervise the teams and the sergeants,
13 review all the reports, case reports, arrest reports,
14 give them the -- the assignments, search warrants,
15 review. And, at that point, I believe all search
16 warrants had to have a lieutenant with them -- and CR
17 investigations.

18 Q. And when you say "review," was reviewing
19 arrest reports one of your responsibilities?

20 A. Yes.

0:48:16

21 Q. Did you review those reports for substance,
22 or was it to make sure that they were filled out
23 correctly?

24 A. Make sure they were filled out correctly.

25 Q. As the lieutenant, would you have any way of

1 knowing whether the reports were false?

2 A. No.

3 Q. Same way you'd have no way to know they were
4 true as the lieutenant?

5 A. Correct.

6 Q. Were you out on the streets helping run
7 operations and make arrests when you were lieutenant?

8 A. Yes.

9 Q. How frequently were you doing things like
10 going out on operations, making arrests, while you were
11 the lieutenant over the TAC teams?

12 A. That depended upon how much paperwork I had
13 piled up, but for the most part, let's say spring,
14 summer, and fall, I was usually detailed to all the
15 festivals around the city.

16 Q. Were you frequently -- well, let me ask this,
17 not frequently, were -- did you ever go out with
18 Watts's TAC team on operations?

19 A. I've gone out to in-progress calls at Ida B.
20 Wells, and Watts was there, you know, but --

21 Q. And --

22 A. Remember --

23 Q. -- how -- how -- how often -- I'm sorry. Go
24 ahead.

25 A. Okay. I rolled -- what we call "in-progress

1 calls," burglary in progress, robbery in progress, man
2 with a gun, shots fired, man down. So that happened
3 quite a bit down there in Ida B. Wells. So that's
4 where I saw him most of the time when I'm responding to
5 what we call "in-progress calls."

6 Q. Did you ever go out with them to make drug
7 arrests?

8 A. No.

0:50:13

9 Q. Did you ever observe Watts or his team making
10 a drug arrest?

11 A. Not observe, no.

12 Q. When you -- you said "not observe," it
13 sounded like you might have hesitated a little. Is
14 there something else that you saw?

15 A. No.

16 Q. Okay.

17 A. No, not -- not observe. Nothing.

18 Q. Did you have any understanding one way or the
19 other whether Watts was a hands-on sergeant?

20 MR. KOSOKO: Object to form.

21 A. Hands on, what do you -- could you clarify?

22 Q. Sure. Do -- do you know if he personally
23 made arrests while he was the sergeant over his
24 tactical team?

25 MR. KOSOKO: Object -- Ahmed. Object --

1 A. Yes.

2 MR. KOSOKO: -- to foundation.

3 Q. Yes, he did?

4 A. Yes, he did. 0:51:09

5 Q. And how do you know that he was personally

6 arresting people while he was the sergeant of the

7 tactical team?

8 A. His name would be on the arrest report.

9 Q. And what's your understanding, based on your

10 experience at the Chicago Police Department, of whose

11 name should be on arrest reports?

12 A. The arresting officers.

13 Q. And so there's -- the reports -- and we can

14 pull an example if we need to, but reports typically

15 have a slot for the first and second arresting officer,

16 is that right?

17 A. Correct.

18 Q. And what does it mean, in your experience, to

19 put a name in the first or second slot for arresting

20 officer?

21 A. Those were the ones that initiated the -- the

22 arrest.

23 Q. And when you say "initiated the arrest," can

24 you explain what you mean by "initiated"?

25 A. You see the crime. You make the arrest. 0:52:09

1 Q. Would it -- would it be within the practice
2 or policy of CPD for the second arresting officer to be
3 someone who had nothing to do with the arrest but just
4 was the partner of the person who made the arrest?

5 MR. BAZAREK: Object to the form --

6 A. He --

7 MR. BAZAREK: -- of the -- object to the --
8 William. Object to the form of the question.
9 Compound. Speculative. And no foundation.

10 MR. BORKAN: You can answer the question.

11 WITNESS: Okay.

12 MR. BORKAN: Mr. Mann, you can answer any
13 question unless you're directed otherwise, so --

14 WITNESS: Okay.

15 MR. BORKAN: -- once the objections are
16 completed, then you feel free to answer. If you have a
17 question for Mr. Rauscher, you can certainly ask him
18 that.

19 WITNESS: Ask him that.

20 MR. BORKAN: If you have a question for me,
21 we can step outside. But, otherwise, unless you're
22 directed, feel free to -- to focus on the question and
23 answer the question that Mr. Rauscher is asking you.

24 WITNESS: Okay.

25 A. Well, if he's my partner, we're all part of

1 the same arrest.

2 Q. All right. Well, let's -- let's say your
3 partner was actually not with you. He was separated --
4 he or she was separated from you for some reason.

5 Would you still put your partner's name as an arresting
6 officer?

7 A. Yeah. You're still a team, yes.

8 Q. So you -- so it's not necessarily the person
9 who initiated or witnessed the arrest?

10 A. Who made the physical arrest?

11 Q. Well, I thought when you first answered the
12 question of what the arresting officer was, it was the
13 person who initiated the arrest?

14 A. Correct.

0:53:48

15 Q. And then I asked you a different question,
16 got a pretty lengthy objection, and now I guess I'm
17 trying to understand. You're saying, I think, that --
18 well, let me ask you this, if you're the first
19 arresting officer, you put the handcuffs on somebody,
20 when you fill out the report, do you automatically put
21 your partner as the second arresting officer?

22 A. Yes.

23 Q. What if your partner didn't see what
24 happened?

25 A. Then he'll make a statement. "I wasn't --

1 Q. Where would --

2 A. -- there."

3 Q. I'm sorry. Where would he make the

4 statement?

5 A. Probably in court.

6 Q. The -- your partner would go to court and

7 report that he did not see the arrest?

8 A. Yeah.

9 Q. Do you remember that ever happening?

10 A. Yes.

11 Q. How many times did it happen where you --

12 where the first arresting officer and then you wrote

13 your partner's name as the second and then he went to

14 the court and made a statement that he didn't see the

15 arrest?

16 A. He didn't physically see the arrest, but he

17 know that the arrest occurred.

18 Q. Right. I want to know how many times you --

19 that happened in your experience.

20 A. I -- I'd have to say, and these are my

21 arrests that I'm talking about, where I chased someone,

22 make the physical arrest, my partner drives around the

23 corner and joins me. He did not see me make the

24 arrest, but he's my partner. So if he goes to court,

25 he would tell the state's attorney that he had nothing

1 to say about the physical arrest itself. So then it
2 would come back to the person in box one, but this is
3 all just procedure.

4 Q. If there are three or four people there --
5 let's say you chased him with someone else who wasn't
6 your partner. Would you put the other person who
7 chased him with you as number two?

8 A. Yes.

0:55:55

9 Q. And you -- it's not -- you wouldn't
10 automatically put your partner there if there was
11 someone else who assisted you with the arrest, is that
12 fair?

13 A. Correct.

14 Q. If -- if the second arresting officer didn't
15 see the arrest, should you put that in the report so
16 that everybody knows?

17 MR. KOSOKO: Ahmed. Object to form.

18 A. I think --

19 MR. KOSOKO: Foundation.

20 A. I can't answer for everybody, okay, all
21 supervisors. But, with me, you have to put the
22 probable cause in there and the events that led to the
23 arrest.

24 Q. So does that mean that you would -- if you
25 were writing the report, in the situation you describe,

1 where you chase someone and then your partner later
2 joins you, would you write that you observed what
3 happened, you chased the person, and then your partner
4 joined you? Is that how you'd write the report?

5 A. Yes. 0:56:58

6 Q. And that way, you could look at the report,
7 and your partner wouldn't, later, have to guess because
8 you arrest a lot of people, I think, right?

9 A. Yes.

10 Q. Presumably, you don't remember all of them
11 forever?

12 A. No.

13 Q. So when you go to court, you need something
14 to reference often, right?

15 A. Correct.

16 Q. And so it's important to have accurate
17 reports that reflect what happened?

18 A. Correct.

19 Q. And which is why you would describe who saw
20 what during the reports?

21 MR. KOSOKO: Ahmed. Object --

22 A. Correct.

23 MR. KOSOKO: -- to form. Foundation.

24 Q. And do you expect the same from your
25 subordinates?

1 A. Yes. 0:57:34

2 Q. Does the -- does the first versus second
3 arresting officer mean something different?

4 A. No.

5 Q. And so in the situation you describe where
6 you chase someone down and put the cuffs on, could you
7 just easily put yourself as the second arresting
8 officer?

9 A. No. Well, we're talking an administrative
10 form, okay.

11 Q. I'm not sure what that means.

12 A. It mean it's -- I don't know how they do it
13 now, but back in the day, there was a report form for
14 every -- just about five different categories. And the
15 arrest report and the -- and the general offense case
16 report, that has to be filled out with the physical
17 arrest. Each box has to be filled out.

18 Q. In your experience, does it mean -- does it
19 -- does putting someone as the first arresting officer
20 signify anything to people who are going to read the
21 report?

22 A. It usually means that this is the person that
23 initiated the arrest.

24 Q. And -- and when you're using "initiated"
25 there, you mean is the one who witnessed what happened

1 and arrested the person?

2 A. Okay. Usually, if I may, partners will sit
3 -- whatever. If you go in box one, that's who is going
4 to get the subpoena --

5 Q. Meaning

6 A. -- to court.

7 Q. -- that that's the person who's likely going
8 to testify in court if it goes to trial or has a
9 hearing?

10 A. Yes.

0:59:27

11 Q. And you wouldn't put someone in there then
12 who has no knowledge of what happened?

13 A. He would testify to the point where he did
14 not see anything --

15 Q. That -- that would be --

16 A. -- but I'm sure -- go ahead.

17 Q. No, I'm sorry. I thought you were done. I
18 didn't mean to cut you off. It's tough on video
19 sometimes.

20 A. No, go ahead.

21 Q. It -- it would be -- it would -- it would not
22 serve any purpose to put someone in box one who was
23 going to get a subpoena if they had no personal
24 knowledge of what happened, right?

25 MR. BAZAREK: All right. This is William.

1 A. This is correct.

2 MR. BAZAREK: Object to the form of the
3 question. It's argumentative. It's compound. And it
4 also describes some incomplete hypothetical. Those are
5 my objections.

6 Q. I think you already answered --

7 A. No, you would not --

8 Q. Yeah.

9 A. Okay.

10 Q. But then it got cut off by the objection.

11 Did -- it would not serve any purpose to put someone in
12 box one who was going to have to testify just to say
13 they didn't observe anything, right?

14 MR. BAZAREK: Same objection.

15 A. Right.

16 MR. BAZAREK: William.

1:00:47

17 Q. Correct.

18 Q. And getting -- getting back to the Watts-led
19 team, did you have -- did you meet with Watts
20 frequently when he was the sergeant?

21 MR. BORKAN: Objection. Steve. Objection.

22 Form. You may answer.

23 A. Okay. Well, at roll calls and then when I
24 called the sergeants' meeting for all the sergeants.

25 Q. How often were the -- did you have sergeant

1 meetings?

2 A. At least once a month.

3 Q. What topics did you cover at sergeant

4 meetings?

5 A. Their concerns, my concerns, criminal
6 activity, the commanders' concerns.

7 Q. Which -- how many commanders were there in
8 the second district when you were the lieutenant over
9 the TAC team -- TAC teams?

10 A. Three.

11 Q. And which --

12 A. Three.

13 Q. -- commanders? Yeah.

14 A. Walter Green, Helm -- I'm trying to think of
15 her first name -- Lynette Helm, and Genessa Lewis.

16 Q. And were there other lieutenants over the --
17 who had responsibility for the TAC teams besides you
18 during this -- that time period?

19 A. When I -- I came there, I came and I replaced
20 Lieutenant Carruthers [phonetic], but we didn't have
21 any interaction because --

22 Q. Okay.

23 A. -- he was gone when I got there.

24 Q. And then when you got there, you were the
25 only lieutenant over the TAC teams, is that right?

1 A. Correct.

2 Q. And did you report to the commanders in the
3 second district?

4 A. Yes.

1:02:58

5 Q. Who did they report to?

6 A. The area deputy chief.

7 Q. Do you know who the area deputy chief or
8 chiefs were during that time period?

9 A. No.

10 Q. And then who do the area deputy chiefs report
11 to?

12 A. Chief of patrol.

13 Q. Do you remember who the chief of patrol was
14 during that time period?

15 A. I'm not sure. I'm -- I'm really not sure.

16 Q. Who did the chief of patrol report to?

17 A. First deputy.

18 Q. And then who does the first deputy report to?

19 A. The superintendent.

1:03:55

20 Q. Do you remember who the first deputy or first
21 deputies were when you were the lieutenant over the TAC
22 teams?

23 A. You know, I can see his face, but I can't
24 think of his name. Oh. I don't remember.

25 Q. Okay. What -- what -- how would you describe

1 Sergeant Watts's main responsibilities as the sergeant
2 over one of the housing TAC teams?

3 A. I'm -- I'm formulating how to answer that,
4 his responsibilities. Responsibilities for the safety
5 of the citizens of Chicago, his team safety, and
6 whatever his assignment was. If I got the case
7 reports, I would give him one for whatever, armed
8 robbery in the area and have him look into it. I'd
9 give him citizens' complaints about drug activity, you
10 know. So that -- that's about it.

11 Q. You say you would give him citizen
12 complaints?

13 A. Yes.

1:05:29

14 Q. Meaning if people complained that there was
15 drug activity or something going on, you'd go tell
16 Watts about it?

17 A. Yes.

18 Q. How would those complaints get to you?

19 A. It could come over 311, 911, and they put it
20 on a form -- I can't remember the name of the form --
21 and -- and sent out to the district of responsibility.
22 It's reviewed and given to me. If it involved
23 narcotics, robberies -- well, just about all of them we
24 got.

25 Q. Who reviews them before they get to you, if

1 you know?

2 A. I'm sure there was somebody in the
3 commander's office that reviewed it because they have
4 to log it, and we have to give a response back. It was
5 part of the -- that was part of the CAPS program, so
6 I'm sure it was from downtown. Other than that, that's

7 --

8 Q. All right. That's --

9 A. That's about all I know.

10 Q. Did you get them electronically, or were they
11 sent by the --

12 A. Paper.

13 Q. Yeah.

14 A. Paper.

15 Q. Paper. And then you said you had to respond
16 to them?

17 A. Yes.

1:07:00

18 Q. And did you send those responses back in
19 paper?

20 A. Yes.

21 Q. Who did the responses go back to?

22 A. Well, back up the same way it came down, like
23 to the commander's office. They send it to the deputy
24 chief. Deputy chief sends it to chief.

25 Q. And what would the responses say?

1 A. Well, whatever activity you observed or -- of
2 what action you've taken, if you made an arrest, you
3 know, and for what.

4 Q. So -- so would you wait to send the responses
5 until whatever action you were going to take was
6 completed?

7 A. Yes.

1:07:48

8 Q. And then was that sort of the end of it from
9 your end, or did you get some sort of -- did you ever
10 get a response back again?

11 A. No. That was --

12 Q. That --

13 A. -- it from us.

14 Q. Did you interact directly with members of
15 Watts's tactical team?

16 A. Interact? Other than passing, "How you
17 doing?" or asking them "Whatcha got?" you know, as far
18 as, you know, an arrest, if they're in there
19 processing, but for the most part, that's it. Keep a
20 distance.

21 Q. And were you -- did you have an office when
22 you were in the second district TAC team lieutenant?

23 A. Yes.

24 Q. Where was your office located?

1:08:50

25 A. We had a section of the building. I had the

1 main office where my secretary was, my office, then the
2 sergeants' office.

3 Q. And when you said "the building," which
4 building are you talking -- where was the office?
5 Which building?

6 A. 5101 South Wentworth.

7 Q. That's a Chicago Police Station, right?

8 A. Correct.

9 Q. What floor of that building is your office
10 on?

11 A. First floor.

12 Q. And you said -- it -- it sounds like the way
13 you're describing it, the sergeants' office was
14 basically next to your office?

15 A. Correct.

16 Q. And did Watts use the sergeant office? 1:09:44

17 A. All the sergeants used the sergeants' office.

18 Q. Was there also --

19 A. That's where their mail was. Go ahead.

20 Q. No, I'm sorry. Keep -- keep going, please.

21 A. I said that's where they received their mail,
22 interdepartment mail, you know. So everybody had
23 either a locker -- not a locker -- file cabinet and a
24 tray for their incoming stuff.

25 Q. Did each sergeant have their own file

1 cabinet?

2 A. Yes. 1:10:23

3 Q. And were they able to lock the file cabinets?

4 A. Yes.

5 Q. Did -- did the sergeants have desks in the

6 office?

7 A. There were -- memory serves me correct, there

8 were three desks in their office.

9 Q. Did the desks have locks on them?

10 A. Not really, raggedy. We got the tail end of

11 the equipment.

12 Q. How big, about, were the file cabinets that

13 each sergeant had?

14 A. Standard size.

15 Q. One level? Two? Three?

16 A. Four.

17 Q. Four levels?

18 A. Mm-hmm.

19 Q. And then was there an area, other than the

20 sergeants' office, where members of the TAC team would

21 prepare reports?

22 A. Yes. 1:11:24

23 Q. And where -- where did -- in the police

24 station, where would members of the tactical team

25 prepare police reports?

1 A. There was a large area in -- I'm going back
2 to my gang crimes days -- that was gang south, along
3 with the former special operations -- and we had steel
4 benches, handcuff rings that went along a long wall.
5 This is also where the roll call -- because it had a
6 platform stage, wasn't that big, but there was a stage
7 and two rows of desks with all the equipment on it, the
8 computers, printers. So that was right outside the
9 area where the sergeants' office and my office were.

10 Q. Was -- could you see that area from your
11 office?

12 A. No.

1:12:34

13 Q. Could you hear what was going on in that area
14 from your office?

15 A. Most of the time. If the door was open
16 because there's a door that separated the two sections.

17 Q. So was there -- did your office have a door?

18 A. Yes.

19 Q. Did -- did you share your office with anyone,
20 or did you have your own office?

21 A. My own office.

22 Q. Did you typically work with the door open or
23 the door shut?

24 A. Door open.

25 Q. And then that area where the officers would

1 write reports, was that door typically open or shut?

2 A. It's usually open.

1:13:14

3 Q. And could you hear -- if someone was just
4 talking in a normal voice, having a normal
5 conversation, could you hear that from your office?

6 A. No.

7 Q. Could you hear what happened in the
8 sergeants' office from your office?

9 A. If the door was open.

10 Q. And -- but same -- same question, if they
11 were just talking in a normal voice, would you be able
12 to hear that from your office to the sergeants' office?

13 A. No.

14 Q. Did you have any sense, when you were the
15 lieutenant, about whether members of Watts's tactical
16 team respected him as a leader?

17 MR. BORKAN: Objection. Form. Steve.

18 Objection. Form. You can answer.

19 A. Yes, it -- they had respect for him.

20 Q. And what are you basing that answer on?

1:14:14

21 A. Well, nobody asked me to go to another team
22 or leave the unit, so. No -- no one came to me with
23 any complaints. I see them bullshitting with him all
24 the time, you know, so I didn't see any animosity or
25 distrust or whatever.

1 Q. Did -- did any -- did others -- did other
2 people come to you to ask to get off of different TAC
3 teams, not Watts's team?

4 A. No.

5 Q. Were there differences that you observed in
6 how Watts led his team versus how other sergeants led
7 their TAC teams that you oversaw?

8 A. No.

9 Q. And a couple questions ago, you answered that
10 no one has to -- no one brought complaints to you, and
11 you were talking about officers -- right -- not
12 citizens?

13 A. Correct. Officers, at that time.

1:15:29

14 Q. Did -- did officers, at some other time,
15 bring complaints to you?

16 A. Well, I got called into the commander's
17 office. I don't remember the date or time and
18 whatever, but Officer Monica [sic] --

19 Q. Lewis?

20 A. Yes. She was in the office with the
21 commander. Now, the commander told me that she was
22 reassigning Officer Lewis to the -- to the watch, to
23 the patrol, and that she was going to put her on days.
24 And I ask her, "What's the problem?" and Lewis said she
25 just didn't want to work with Watts and them -- the

1 team anymore. So it was a done deal when I got to the
2 office. I guess it was just a courtesy to let me know.

3 Q. And it sounded like you said "Watts" in the
4 middle, but I think you said something else. Did you
5 say "watch"? What was Lewis being reassigned to?

6 A. To the watch. That's back to patrol. Back
7 in the marked car in uniform.

8 Q. Do you remember who the commander was?

9 A. Yeah. Genessa Lewis.

1:16:57

10 Q. And do you remember when this conversation
11 happened?

12 A. I'd be lying. I don't know.

13 Q. Did they get into any more detail about why
14 Lewis didn't want to work with Watts and his team?

15 A. It was something about their security detail,
16 and she just didn't want to be a part of that or with
17 him anymore.

18 Q. What's a security detail?

19 A. Well, they were doing private security down
20 in Ida B. after -- after they got off duty or whatever,
21 down at Wells.

22 Q. Who were they doing private security for?

23 A. Management. Whoever management was at that
24 time. I don't know if it was CHA or the new management
25 for the new structures. That was the new manager.

1 Q. Who was --
2 A. I don't know who they were --
3 Q. Okay. And do you know who was doing the
4 private security at Ida B. Wells?

5 A. Watts's team.

6 Q. Do you know which members of the team?

1:18:12

7 A. I believe all of them. I'm not sure.

8 Q. And did you ask what her concern was about
9 the private security?

10 A. Yes.

11 Q. And did you get an answer?

12 A. She said she didn't want to have anything
13 else to do with it.

14 Q. That -- was it a job responsibility that she
15 had to do private security?

16 A. No. This is all something that they arranged
17 with management.

18 Q. And so did -- did you suggest she could just
19 not do the private security?

20 A. No. Like I said, the decision had been
21 already made by the time I got to the office.

22 Q. Was there anything else that they expressed
23 was a concern to Ms. -- to Lamonica Lewis that led her
24 to want to leave the team other than the private
25 security that wasn't part of her job?

1 A. Nothing else that I'm aware of. I don't know
2 what conversation she had with Lewis.

3 Q. With Genessa Lewis?

4 A. Right. Correct.

1:19:27

5 Q. And was there any paperwork memorializing the
6 move that you know of?

7 A. Not that I'm aware of.

8 Q. Was there any paperwork memorializing
9 Lamonica Lewis's concerns?

10 A. Not that I'm aware of.

11 Q. Did you have any -- well, let me ask this,
12 did you -- did you know, before this meeting that you
13 got called into, that Watts and his team were doing
14 private security at Ida B. Wells?

15 A. Yes.

16 Q. And did you have any concerns about them
17 doing private security at Ida B. Wells?

18 A. No.

1:20:08

19 Q. Do you know what they were doing for private
20 security?

21 A. No.

22 Q. What -- what would it mean for an officer to
23 be providing private security off duty at the same
24 location where they usually work?

25 MR. BORKAN: Steve. Objection. Form. You

1 can answer.

2 A. Okay. Honestly, I have no idea. But,
3 secondly, they're there all the time, and they know the
4 players. I believe this is when Ida B. Wells was being
5 torn down, and the new structures and condominiums were
6 going up, were probably, you know, protecting the
7 equipment, was what -- I'm just speculating. I have no
8 idea.

9 Q. Okay. Had you ever heard of other officers
10 in -- elsewhere, other than the Watts team, doing
11 private security in the same location they work at?

12 A. Yes.

1:21:12

13 Q. Where else did officers do private security
14 that you're aware of?

15 A. The one officer that was killed in a liquor
16 store on the West Side. That's the same area he
17 worked. Let's see. What's -- what's that -- 47th and
18 Michigan, what's that place there? The -- there's a
19 big building there, apartment complex, private security
20 -- they worked private security there.

21 Q. Okay. I can't think of the name of that
22 place. Okay, but anyway. Okay. That's a few
23 examples.

24 Q. And when officers -- in -- in the situations
25 you're describing, when officers are working private

1 security, do they still have police powers?

2 A. Yes, but it's very limited. Okay. Yeah. I
3 know about three, four bank guards that are police
4 officers. Yeah, they still have the police powers.

5 Q. Are they expected to exercise those police
6 powers if they see a crime?

7 A. Yes.

1:22:31

8 Q. Do you know how long the Watts team did
9 private security at Ida B. Wells?

10 MR. BAZAREK: You know, I'm -- I'm --

11 A. No.

12 MR. BAZAREK: -- just -- wait. I'm -- this
13 is William. I'm going to make an objection here
14 because as I understand the testimony, it's -- it's
15 unclear that there -- there's questions now about, oh,
16 they all worked security. So my -- here's my
17 objection. I object to foundation. I object to
18 speculation. That's my objection.

19 Q. When you were the lieutenant over the second
20 district TAC teams, was there anybody else who would
21 have been a direct supervisor of Watts?

22 A. Watch commander and the commander.

1:23:27

23 Q. And would Watts have reported directly to the
24 watch supervisor?

25 A. Well, he had to. All the rest has to go

1 through the watch commander.

2 Q. How many people acted as watch commander
3 while you were the second district tactical team
4 lieutenant?

5 A. Besides me, okay. Okay. There's a watch
6 commander assigned to each watch, there's three
7 watches, and if they don't have a captain -- or they
8 did -- could -- they could have a captain. Most of
9 them are lieutenants, so it varies. At this time,
10 there was a short -- shortage of lieutenants, and I did
11 a lot of traveling around area one, ninth district,
12 seventh district, third district, being the watch
13 commander because we were short at that time, so.

14 Q. And so what is it -- was it also possible
15 that people were coming in from other districts to be
16 the watch commander in the second district?

17 A. Yes.

1:24:41

18 Q. And where would you look to see who was watch
19 commander at any given time? Would it be A&A sheets?

20 A. Roll call. And he's usually there an hour
21 before the roll call, so the door is always open.

22 Q. I -- yeah. I -- that was a not well-worded
23 question. If you wanted to go back in time and look
24 and -- if you wanted -- today, if you wanted to see who
25 was a watch commander at a particular time, would you

1 go back and look at A&A sheets?

2 A. A&A sheets, yes.

3 Q. Did you ever -- have you ever heard the term
4 "code of silence"?

5 A. I've heard the term, yes.

6 Q. And do you have an understanding of what that
7 term means?

8 A. Well --

9 MR. BORKAN: Objection -- withdrawn. Go
10 ahead. That was Steve, by the way.

11 A. Okay. It alleges that police activity is
12 kept among police.

13 Q. I -- I'm sorry. I -- it alleges that --
14 something, and I -- I apologize. I couldn't hear the
15 answer.

16 A. Okay. Police activity be -- remain among
17 police officers.

18 Q. Meaning that if an officer doesn't see
19 something wrong, they won't report it?

20 A. Allegedly. I'm not sure.

1:26:26

21 Q. Do you believe that there was a code of
22 silence at the Chicago Police Department when you
23 worked there?

24 A. No.

25 Q. Did you ever witness wrongdoing to any

1 officers at the Chicago Police Department?

2 A. No.

3 MR. BORKAN: Objection. Form --

4 A. No.

5 MR. BORKAN: -- the question.

6 Q. Would you agree that -- that if a code of
7 silence exists in a police department, that's not a
8 good thing?

9 MR. BURNS: Objection --

10 A. Yes.

11 MR. BURNS: -- to form of the question.

12 Terry.

13 Q. Did you say, yes, you would agree it's not --
14 a code of silence is not good?

15 A. I -- that's what I agree.

16 Q. As a second district tactical team
17 lieutenant, if an officer was taking money from
18 civilians, would you let that officer continue working
19 for you?

20 A. No.

1:27:47

21 Q. What kind of -- what -- what would -- why
22 would you not let an officer who was taking money from
23 civilians continue working for you?

24 A. I'm a big stickler on integrity.

25 Q. Did you ever have to fire officers in Calumet

1 Park for doing anything wrong?

2 A. No.

3 Q. Was there anything you did at Calumet Park
4 that you -- you did differently because you didn't like
5 the way it was done at CPD?

6 A. No.

7 Q. Was there any things you took from CPD and
8 brought them over to Calumet Park because you thought
9 they were positives and a good way of doing things?

10 A. Yes.

11 Q. Can you give me some examples of those
12 things?

1:28:53

13 A. Well, being only 1.5 miles, there's very
14 little activity. Most of the action and activity in
15 Calumet Park was at the -- the bars that we had, and
16 that's usually at night. But more the -- for -- but
17 for the most part, I emphasized the integrity and unit
18 cohesion in that we gotta support each other. It's
19 such a small place, and at times I might only have
20 three officers on the street, so they have to look out
21 for each other. So, paramount, integrity and officer
22 safety, to me, and that's what I brought to them.

23 Q. If -- if, while you were at Calumet Park, an
24 officer took \$1,000 out of a civilian's car, would you
25 immediately fire that officer?

1 A. I'd have to go through protocol, but I would
2 strip him and put him on the desk till I could get the
3 paperwork complete.

4 Q. In -- in your course of -- the course of your
5 long career as a police officer, have you ever arrested
6 people for stealing?

7 A. Regular people? You mean --

8 Q. Yeah.

9 A. -- retail theft?

10 Q. Any people.

11 A. Oh, I never did -- no, I didn't never do
12 retail theft.

13 Q. Okay. What about burglary? Robberies?

14 A. Yes.

1:30:48

15 Q. Yes, you've arrested people for robberies or
16 burglaries?

17 A. Yes.

18 Q. Did you ever watch a --

19 A. I --

20 Q. -- civilian commit a robbery or burglary and
21 then let them go, not arrest them?

22 A. No.

23 Q. Why -- why not?

24 A. He broke the law.

25 Q. And would you agree that a police officer who

1 steals and robs should also be arrested?

2 A. Yes.

3 Q. Were you involved at all in -- in any
4 internal or other type of investigation into Watts or
5 Mohammed or any other members of that team?

6 A. Internal investigation other than the CR
7 numbers? No.

8 Q. Right. So separate from the CRs that you
9 might have processed, you weren't involved in any sort
10 of investigation?

11 A. Correct. I was not involved.

1:32:01

12 Q. Did you know -- while you were the lieutenant
13 of the tactical team in the second district,
14 supervising Watts and his team, were you aware that
15 there was an investigation for some -- or all of that
16 time?

17 A. No.

18 Q. Okay. Before today, have you ever heard that
19 there was an investigation into Watts and Mohammed and
20 maybe others?

21 A. Only what I read in the paper.

22 Q. The newspaper?

23 A. Newspaper. Correct.

24 Q. Were you surprised when you first read about
25 Watts and Mohammed in the papers?

1 A. Surprised and disappointed.

2 Q. And when I say "first read," I -- I think you
3 probably know, but I'm talking about when they got
4 arrested.

5 A. Correct.

6 Q. Was -- was their arrest the first time you
7 heard about them doing anything illegal?

8 A. Correct. Yes.

9 Q. And why were you surprised to find out they
10 had been arrested?

11 A. Like I said, integrity, you know, and -- and
12 disappointed in them. I thought they were, you know,
13 good police officers. They did good work, but yeah,
14 disappointment.

15 Q. Did you know Mohammed personally?

16 A. No.

1:33:22

17 Q. Did you know Watts personally?

18 A. No, only interacting on the job.

19 Q. Did you interact much with Mohammed over the
20 years?

21 A. No.

22 Q. Did you ever observe Mohammed out in Ida B.
23 Wells?

24 A. Well, I see all of them down in Ida B. Wells,
25 when I go through there riding, and so -- place is not

1 that big.

2 Q. Did you see how Mohammed interacted with
3 people who lived in Ida B. Wells?

4 A. Yes.

1:34:08

5 Q. And just can you describe what you -- how you
6 saw him interact with people?

7 A. Talking to them. That's -- that's about it.
8 I didn't see any -- anything else.

9 Q. And when -- when would you see him interact
10 with people in Ida B. Wells? Was it when you -- be
11 responding to calls in progress that you described
12 earlier?

13 A. Right. Calls in progress or if I'm driving
14 through there because that's one of the hot spots and I
15 gotta check the hot spots. And I see him either, you
16 know, walking through, in the car, you know, setting
17 up, observing, but for the most part, that's -- that's
18 about it.

19 Q. Do you happen to remember if Watts or Jones
20 or anyone else on his team used to smoke cigars on
21 duty?

22 A. No.

1:35:07

23 Q. They didn't, or you don't remember?

24 A. No. No, I -- no, I don't remember.

25 Q. Okay. Do you have any understanding of what

1 Watts and Mohammed were convicted of doing?

2 A. Only what I read, that --

3 Q. Tell me what you read, I guess, please.

4 A. Well, read in the paper that they ripped off
5 FBI informant for X amount of dollars. I don't know.

6 Q. Have you ever talked to anybody about Watts'
7 and Mohammed's convictions or illegal activities?

8 A. No.

9 Q. Did reading about that make you wonder if
10 that happened while you were the lieutenant, and you
11 just didn't know about it?

12 A. Wonder? You know, I really didn't dwell on
13 it.

14 Q. Well, maybe -- maybe "wonder" is not the
15 right word. Did it make you curious? Did it make you
16 think about it?

17 A. Of course. Yes.

1:36:27

18 Q. Are there -- is there anything, you know,
19 looking back that you'd say, "I wish I would have done
20 this differently as a supervisor over those guys"?

21 A. No.

22 Q. And why is that?

23 A. Well, being a supervisor of a specialized
24 unit, you have to rely on those individuals that work
25 for you, and I supervised them, but they have

1 demonstrated that they can work independently of
2 supervision. That's why they were on the teams. But I
3 really count on the supervisors, the sergeants, to
4 bring to me any problems or requests, but I don't know
5 what to say with Ronnie [phonetic] -- totally, with
6 Sergeant Watts. It totally caught me off guard and by
7 surprise.

8 Q. So if you rely on the supervisor and the --
9 the -- the sergeant and the sergeant is a criminal, is
10 there some -- is there a backstop in the system to find
11 problems with the sergeant?

12 A. I -- I don't know.

1:37:56

13 Q. Do you know, one way or the other, whether
14 Watts and Mohammed were stealing money while they
15 worked under your supervision?

16 A. Okay. I caught the last part, but all after
17 --

18 Q. Do you know --

19 A. Can you repeat the question?

20 Q. -- one way or the other, whether Watts or
21 Mohammed were stealing money while they worked under
22 your supervision?

23 MR. PALLES: Objection.

24 A. No.

25 MR. PALLES: Lack -- Eric. Lack of

1 foundation.

2 A. No, I did not.

3 Q. You don't know, one way or the other?

4 A. No, I -- I didn't know they were stealing
5 money.

6 MR. RAUSCHER: Okay. Would it be all right
7 if we take about a five-minute break everyone?

8 MR. BURNS: Can we make it ten?

9 MR. BORKAN: Sure. That's fine.

10 MR. RAUSCHER: Okay. Ten works too.

11 MR. BURNS: Yeah.

12 RECORDER: Great.

13 MR. BURNS: Okay.

14 RECORDER: Before we go off --

15 MS. MCGRATH: That'd be great. Thanks.

16 MR. RAUSCHER: Thank you.

17 RECORDER: Yep. Before we go off record,
18 Dimitri joined in on the call. I just want to put you
19 on the record as being in our virtual room. Dimitri,
20 can you identify yourself?

21 MR. FLAXMAN: Dimitri is a legal assistant
22 from my office.

23 RECORDER: Great. Thank you.

24 WITNESS: Oh, okay.

25 RECORDER: Off record, 11:48 a.m.

1 (off the record)

2 RECORDER: On the record, 11:59 a.m.

3 Q. Mr. Mann, you understand you're still under
4 oath?

5 A. Yes.

1:39:23

6 Q. Have you ever heard of officers at the
7 Chicago Police Department raising money for other
8 officers who are suspended for misconduct?

9 A. I've heard of it.

10 Q. And have you ever been involved in that, in
11 doing that?

12 A. No.

13 Q. Do you have a view as to whether that's a
14 good practice?

15 A. No.

16 Q. No view either way?

17 A. Either way.

18 Q. Why have you not participated in raising
19 money for officers suspended for misconduct?

20 A. Holds back -- okay. I really don't have an
21 answer for that.

22 Q. Do you think it sends a bad message to raise
23 money for people suspended for misconduct?

24 MR. BORKAN: Objection -- Steve. Objection.

25 Form. You can answer the question.

1 A. Okay. Could you repeat the question, please? 1:40:30

2 Q. Sure. Do you think it sends a bad message
3 when police officers raise money for other officers who
4 are suspended for misconduct?

5 A. Yes.

6 Q. Why do you think it sends a bad -- a bad
7 message?

8 A. I don't really have a response to that
9 question.

10 Q. Have you heard of the term "clipping"?

11 MR. BURNS: Could you repeat that again,
12 Scott?

13 MR. RAUSCHER: Yeah, I was asking if he's
14 heard --

15 Q. Have you heard the term "clipping,"
16 c-l-i-p-p-i-n-g?

17 A. No, I have not.

18 Q. When you were the TAC team lieutenant in the
19 second district, did you ever hear rumors of officers
20 taking money from drug dealers?

21 A. No. 1:41:21

22 Q. When you were the lieutenant in the second
23 district over the TAC teams, did you ever hear rumors
24 of officers taking money from anybody?

25 A. Okay. You said "rumors." Okay. I had a

1 direct interaction with a couple of civilians that told
2 me that Watts was charging a tariff or a tax, but when
3 I asked him if they were making a formal complaint,
4 they walked away from me.

5 Q. Do you know who those civilians were who made
6 that accusation?

7 A. I could only remember the names of two. One
8 was -- not the whole name, but Patterson and -- yeah,
9 that's his whole name -- Fred Hampton, Jr.

10 Q. So someone named Patterson and Greg [sic]
11 Hampton, Jr.?

12 A. Fred. 1:42:36

13 Q. Fred Hampton, Jr.?

14 A. Yes.

15 Q. When did -- did -- was this one conversation
16 with the three of you or multiple conversations?

17 A. Well, it was just one conversation with a
18 group of them. And, like I said, once they made --
19 uttered that and I asked them if they wanted to make a
20 formal complaint, they walked away from me.

21 Q. Was there -- were there other people around
22 other than Fred Hampton, Jr., Patterson, and you?

23 A. Yeah, there was about four others.

24 Q. Four other people?

25 A. Yeah.

1 Q. Did you know any of the other people?

2 A. No.

3 Q. Where did this conversation take place?

4 A. It took place at the annual Bud Billiken
5 Parade.

6 Q. And do you remember what year this took
7 place?

8 A. Since I been to all of them since I was a
9 police officer, no, I don't remember which one it was,
10 but I do know that this group follows the former Mayor
11 Daley around to harass him, for whatever reason. And
12 anytime an event happens in the second district and
13 they're to show up, I get assigned to keep an eye on
14 them.

15 Q. So did you already know Fred Hampton, Jr. and
16 Patterson when they --

17 A. Reputation only.

1:44:18

18 Q. By reputation only?

19 A. Mm-hmm.

20 Q. What was their reputation?

21 A. Well, Fred Hampton, Jr. is the son of Fred
22 Hampton, Sr., the Black Panther that was murdered, and
23 the other was -- I think he had an arson charge,
24 Patterson. His name came up, and then when I saw him,
25 you know, "Hey, that's him." That's about it.

1 Q. And did -- how long was the conversation
2 where they told you Watts was charging a tariff?

3 A. Okay. That utterance and me responding, 10,
4 15 seconds.

5 Q. Could you put any time frame around the
6 conversation? Like was it toward the start of your
7 time as a lieutenant, later in the -- your time as a
8 lieutenant at the TAC team?

9 A. Okay. So now this was before Former Mayor
10 Daley left office, so can you tell me when that was?

11 Q. I was just going to look it up because I -- I
12 wish I did know, not offhand.

13 MR. BURNS: Hey, Scott?

1:45:49

14 MR. RAUSCHER: Yeah.

15 MR. BURNS: It's 2011. And since we're
16 talking about this name, can I ask or you ask about
17 that first name on Patterson?

18 MR. RAUSCHER: You can ask. I think he said
19 he didn't know.

20 MR. BURNS: May I -- I just want to --

21 WITNESS: I don't know.

22 MR. BURNS: -- ask if -- is it Aaron
23 Patterson?

24 WITNESS: I -- I -- I really -- like, again,
25 I don't know. I just knew his --

1 MR. BURNS: Okay.

2 WITNESS: -- last name is Patterson.

3 MR. BURNS: All right.

4 WITNESS: Okay.

5 MR. BURNS: Thank you.

6 WITNESS: No problem. So you said 2011? I
7 was gone.

8 Q. Yeah. So we know it happened while you were
9 there, and we know Daley was still there, but that
10 doesn't help us, really, narrow it down.

11 A. No, well, I -- I can't narrow it down. I --
12 I remember the former governor. I remember several of
13 the politicians. That was -- part of my duties was to
14 take care of them.

15 Q. Who -- yeah. So what else do you remember
16 about that particular parade? Who was there in what
17 role?

18 A. That's about it. No -- no one of -- of
19 significance for me --

20 Q. Okay.

21 A. -- no --

22 Q. So you had never talked to Fred Hampton, Jr.
23 or Patterson before, right?

24 A. No.

1:47:20

25 Q. Were there other officers with you?

1 A. I'm -- I'm thinking. No. I had my own
2 little golf cart, and I was right behind them as they
3 were walking.

4 Q. Do -- do they --

5 A. From -- from --

6 Q. Did they --

7 A. -- the service -- King Drive. Hmm?

8 Q. Did they live in or have a connection to Ida
9 B. Wells?

10 A. You know, I don't know. But, like I said,
11 their whole purpose in life was to give the former
12 mayor, you know, drama. And other than that, I don't
13 -- I don't know of any connection, could have. I -- I
14 just don't know.

15 Q. It turned out, in this case, they were right,
16 weren't they?

17 MR. BAZAREK: Object to the form of that
18 question. It's vague. Ambiguous. Compound. And
19 argumentative.

20 A. Okay. Repeat the question, please.

1:48:32

21 Q. Well, you said -- you had said their whole
22 purpose in life was to torment the mayor, I think, were
23 your words. And the question was --

24 A. Yeah.

25 Q. -- it turned out that they were actually

1 right this time when they were saying Watts was
2 charging people money --

3 A. Well, it was alleged. Well, again, nothing
4 came out until after I had left, so be it A or B, but
5 -- okay. We're getting feedback again.

6 Q. I heard it for a second, but I think it's
7 okay.

8 A. Okay. All right. I took it to the next
9 step. Like, I know Walter Green was still a commander,
10 so we find out when that was, then you'll have your
11 date because I told him, and I assume that he might
12 have gotten a confidential --

13 Q. You say he might have gotten --

14 A. Hello? 1:49:40

15 Q. Oh, I'm sorry. Go ahead.

16 MR. BORKAN: Excuse me one second. Mr. Mann,
17 you -- you don't need to -- to do that. You don't need
18 to say, "Hello? Are you still there?" Mr. --

19 WITNESS: Okay.

20 MR. BORKAN: -- Rauscher is going to ask you
21 questions --

22 WITNESS: Okay.

23 MR. BORKAN: -- and you're going to give him
24 answers. That's all.

25 WITNESS: Okay. I -- I didn't know if the

1 speaker was working or --

2 MR. BORKAN: That's all right. I'll be the
3 -- I'll make a determination if something goes wrong.

4 WITNESS: Okay.

5 Q. That's fine. It's working. I wasn't sure --

6 MR. BORKAN: Sorry.

7 Q. -- if you were done.

8 MR. BORKAN: Sorry, Counsel.

9 Q. Didn't want to interrupt. You said you told
10 Commander Walter Green what Fred Hampton, Jr. and
11 Patterson told you about Watts?

12 A. Yes.

13 Q. When did you tell Commander Green?

14 A. I can't -- you know, we're talking 15 years.
15 I don't remember.

16 Q. What I mean is how did you -- was it the same
17 day? Was it a month later or a week later? Do you
18 know that or still no?

19 A. You know, it was the same day.

20 Q. Okay. Was -- was -- was Walter Green at the
21 parade?

22 A. Yes.

1:50:43

23 Q. Did you tell him at the parade what you had
24 learned?

25 A. No.

1 Q. Where -- where were you --

2 A. In his --

3 Q. -- when you told --

4 A. In his office.

5 Q. Okay. Did you tell him verbally, or was
6 there anything in writing?

7 A. Verbally.

8 Q. So by this time, Fred Hampton, Jr. and
9 Patterson had told you they didn't want to file a
10 formal complaint, is that right?

11 A. No, that's -- they walked away.

12 Q. You're right. That's -- that's what you
13 said. You asked them if they want to file a complaint.
14 They walked away?

15 A. Yes.

16 Q. And then later you went and told Water Green
17 that Fred Hampton, Jr. and someone else told you that
18 Watts was charging a tariff, is that right?

19 A. Correct.

20 Q. Why did you tell Green what Hampton and
21 Patterson had told you?

22 A. At my level, I couldn't do anything to check
23 on it, but at his level, well, he could get in -- in
24 touch with the internal affairs to see. It's -- it's a
25 serious matter. Even if they were just harassing

1 Watts, it's still a serious matter.

2 Q. Had you gotten verbal complaints from
3 citizens before?

4 A. Concerning?

5 Q. Anything.

1:52:27

6 A. Yes.

7 Q. And let me -- not anything -- any other --
8 had you ever gotten a citizen complaint about an
9 officer, before this one, from Hampton and Patterson?

10 A. Concerning an officer?

11 Q. Saying, "This officer was rude to me" or did
12 anything wrong.

13 A. Yes.

14 Q. And had you ever -- did any of those
15 complaints come to you verbally?

16 A. Yes.

17 Q. Had you ever, before, passed on a verbal
18 complaint about an officer to a commander?

19 A. No.

20 Q. Was there any particular reason you decided
21 to pass this complaint on to a commander?

22 A. The seriousness of the allegation.

1:53:13

23 Q. Would you have passed it on to the commander
24 if you didn't think there was a chance that it was
25 true?

1 MR. BORKAN: Objection. Form. Steve.

2 Objection. Form. You can answer.

3 WITNESS: Okay.

4 A. Even if I didn't think it was true?

5 Q. Yeah. The question is would you have passed
6 it on, even if you didn't think there was a chance it
7 was true?

8 A. Yes.

9 Q. Did you believe you had an obligation to pass
10 along the information to Walter Green?

11 A. Yes.

12 Q. Do you know if Walter Green wrote a report
13 about what you told him?

14 A. At that time, I did not.

1:54:12

15 Q. Was he taking notes when you --

16 A. But --

17 Q. -- talked to him?

18 A. No.

19 Q. And you said at that time, you did not. Did
20 you sometime -- later learn if he had made a report
21 about it?

22 A. Reading the reports that -- around me now,
23 yes.

24 Q. And which report around you shows that Walter
25 Green made a report of what you told him?

1 A. Well, it actually doesn't, but there was a
2 confidential CR number started within internal affairs,
3 so I'm assuming that's it. I don't know.

4 Q. So you've -- you now know that there was a
5 confidential CR number started at some point?

6 A. Yes.

7 Q. But you don't actually know if that was in
8 any way connected or mentions what you told Water
9 Green, is that right?

10 A. That's right.

1:55:07

11 Q. When you heard the allegation from Hampton
12 and Patterson, did it make you suspicious of Watts, or
13 did it make you change your behavior toward him at all,
14 change the way you supervised him?

15 A. No.

16 MR. BORKAN: Steve. Objection. Form. He
17 answered the question.

18 A. No.

19 Q. How long was your meeting in Walter Green's
20 office where you reported the allegation about Watts
21 taking a tariff?

22 A. Well, I probably was in conversation with him
23 about other things, but maybe 10, 15 minutes.

24 Q. And do you remember if the two of you talked
25 about what to do with the information that you were

1 giving him?

2 A. I don't remember.

1:56:15

3 Q. I may have asked you this, but was he taking
4 notes during the meeting?

5 A. I don't remember.

6 Q. Were you taking notes during the meeting?

7 A. No.

8 Q. When Hampton and Patterson told you that
9 Watts was taking a tariff, did you write that down, or
10 did you just remember and then go tell Walter Green?

11 A. I just remembered it, and I told Walter
12 Green.

13 Q. Did -- did you think that you should go
14 follow up with Hampton and Patterson after you talked
15 to them?

16 A. No.

1:57:05

17 Q. Did you ever try to follow up with them?

18 A. No.

19 Q. And do you know if Walter Green ever tried to
20 follow up with them?

21 A. I don't know.

22 Q. Do you think that someone should have
23 followed up with them?

24 MR. BORKAN: Steve. Objection. Form. You
25 can answer the question.

1 A. Yes.

2 Q. And why do you think someone should have
3 followed up with Patterson and Hampton about what they
4 told you about Watts?

5 A. Well, not necessarily Hampton and Patterson,
6 you know, to initiate a -- an investigation.

7 Q. And, you know, we might be making an
8 assumption, but let's try to be clear for the record.
9 You said that they told you that Watts was charging a
10 tariff. What did you understand that they meant by
11 "charging a tariff"?

12 A. That he was charging money for them to do
13 business -- for the dope dealers to do business in Ida
14 B. Wells.

15 Q. He was taking money from drug dealers to let
16 them continue selling drugs?

17 A. Correct.

1:58:11

18 Q. And if you would have known that to be true,
19 while Watts was under your supervision, would you have
20 taken -- done everything in your power to immediately
21 get him off the street?

22 A. Yes.

23 Q. Why would it have been important for you to
24 try to get Watts immediately off the street if you
25 would have known he was taking money from people in Ida

1 B. Wells?

2 A. Again, integrity.

3 Q. Did you ever hear that members of Watts' team
4 would go into buildings at Ida B. Wells and immediately
5 stop and search everybody who was in the lobby of the
6 building?

7 A. I know this happened, but to single out any
8 one individual or any group or -- I can't answer that.

9 Q. Yeah. And -- and I'm -- I just -- maybe I
10 can clarify. I'm not -- I'm not asking if you know
11 that people were searched over the years. What I'm
12 asking is if you ever heard that officers would just go
13 into the lobby of a building at Ida B. Wells and search
14 everybody who they saw in the lobby?

15 A. Yes, I heard of it.

1:59:32

16 Q. Okay.

17 A. But, again --

18 Q. Yeah. Did you think it was appropriate for
19 officers to stop and search anybody just because they
20 were in the lobby of a building?

21 MR. BORKAN: Steve. Objection. Form. You
22 can answer the question.

23 A. It goes down to officer safety. Most of the
24 people in the lobby are the dope dealers, or they're
25 carrying.

1 Q. So is that a yes, you thought it was okay for
2 officers to stop and search everybody in the lobby?

3 A. Officer safety.

4 Q. I -- I -- I hear you giving a reason for it,
5 but I want to -- I think it's -- I hope it's a yes or
6 no question if -- was it, in your view as the
7 lieutenant, okay for officers to stop and search
8 everybody in the lobby?

9 MR. BURNS: Objection. Form.

10 MR. BORKAN: Objection. Form.

11 MR. KOSOKO: Object to the form. Foundation.
12 Also calls for a legal conclusion. Incomplete
13 hypothetical.

14 MR. BORKAN: You could answer the question.

15 A. Yes.

2:00:41

16 Q. And I know you said you believe that most of
17 the people in there, in the lobby, would have been drug
18 dealers or other people doing something criminal, but
19 were there people who were in the lobby of Ida B. Wells
20 who weren't involved in criminal activity?

21 A. I --

22 MR. BORKAN: Steve. Objection. Form.

23 A. I -- I don't know. I was not there.

24 Q. Well, did everybody who live in Ida B. Wells
25 engage in criminal activity?

1 MR. BORKAN: Steve. Objection. Form.

2 A. No.

3 Q. So if that's the case, then there must have
4 been times when people were in the lobby who were not
5 engaged in criminal activity?

6 MR. BORKAN: Steve. Objection. Form.

7 A. So what time did this occur?

8 Q. Let's say in the middle of the afternoon.

2:01:48

9 A. I don't know. I don't know what they
10 observed and who they observed at that time, so I
11 cannot give an honest answer on that.

12 RECODER: Mr. Mann, can you just scoot over
13 a little bit back towards the middle of the screen if
14 you don't mind, please? Thank you.

15 WITNESS: Okay. Well, is that a small
16 screen? Okay. Yes.

17 Q. Does the time of day matter to you for
18 thinking about whether it was appropriate to stop and
19 search everybody in the lobby of a building at Ida B.
20 Wells?

21 MR. KOSOKO: Objection to form. Foundation.
22 You can answer.

23 MR. BORKAN: Objection. Form. You can
24 answer the question.

25 A. There are different times of day that they

1 bag up the dope, and they bring it downstairs. Then
2 you have a line around the building to buy dope. So I
3 guess I would say, yes, everybody gets searched.

4 Q. And so what about times where that was not
5 happening? Would it still be okay --

6 A. I'd have --

7 Q. -- to search --

8 MR. BORKAN: Steve.

9 A. -- no idea.

10 MR. BORKAN: Objection. You can answer the
11 question.

12 A. I have no idea.

2:03:07

13 Q. So I'm not asking you now to try to remember
14 what times of the day that was or wasn't happening.
15 What -- what I am asking is -- let's say there was a
16 time and a day where the activity you just described of
17 a line of people lining up to buy dope was not
18 obviously happening. Would it still have been okay, in
19 your view, based on your experience, to go into the
20 lobby of a building at Ida B. Wells and stop and search
21 everybody who was in the lobby?

22 MR. KOSOKO: Objection. Form.

23 A. I don't know.

24 MR. KOSOKO: Foundation.

25 MR. BORKAN: Objection.

1 MR. KOSOKO: Calls for a legal conclusion.

2 Incomplete hypothetical.

3 MR. BORKAN: You can answer.

4 A. I have no idea.

5 Q. What would you need to know to be able to
6 answer that question?

7 A. It would be observation, surveillance, those
8 other police factors, you know. So, again, back to
9 officer safety.

10 Q. So are those various -- the things you're
11 talking about, observations and other factors about
12 officer safety, are those different ways of saying
13 you'd want to know if there was a reason to believe
14 that there was criminal activity occurring before you
15 search someone?

16 MR. KOSOKO: Objection. Form.

17 A. Yes.

18 MR. KOSOKO: Foundation. Calls for a legal
19 conclusion.

20 A. Yes.

2:04:24

21 Q. Do you have printed copies of the exhibits in
22 front of you?

23 A. Yes.

24 Q. Can you turn to Exhibit 3? And if it's
25 easier, I'm happy to just share the screen so you can

1 see it on the computer.

2 A. Exhibit 3, where would that be?

3 Q. You know what, let's -- let me try it. I'm
4 going to try to just share the screen with you.

5 A. 1 -- okay -- 2.

6 Q. Is -- is --

7 A. Okay. I --

8 Q. Do you -- if you look --

9 A. I got it.

10 Q. -- at the screen, do you see Exhibit 3?

11 A. Mm-hmm.

12 MR. RAUSCHER: And, for the record, this is
13 marked confidential, City BG 024099 through 024103.

14 MR. BURNS: What are the numbers again,
15 Scott? I'm sorry.

16 MR. RAUSCHER: That's okay. It's City BG
17 024099 through 024103.

18 MR. BURNS: Thank you. 2:06:03

19 Q. And I -- I'll take it down my -- from my
20 screen if you've got it in front of you also. Just let
21 me know when you've had a chance to look through that.

22 MR. BAZAREK: And what exhibit number is
23 that, Scott?

24 MR. RAUSCHER: It's Exhibit 3.

25 MR. BAZAREK: Three. Thanks.

1 MR. RAUSCHER: We pre-marked, as probably
2 everybody knows, so we may not use them all. There may
3 be gaps in the transcript because of that.

4 A. Okay.

5 Q. Have you ever seen this memo before either
6 yesterday or today in preparation for your deposition?

7 A. Today.

2:07:00

8 Q. Okay. Do you see the first page is a memo
9 from -- do you know who Tina Skahill is?

10 A. Yes.

11 Q. And do you know who Thomas Chester is?

12 A. Thomas -- no.

13 Q. Who is Tina Skahill?

14 A. Well, at the time, she was chief of internal
15 affairs, but I know her -- we worked together in the
16 second district TAC team.

17 Q. Okay. You see that the first page of this is
18 an internal affairs memo dated March 17, 2008?

19 A. Yes.

20 Q. And do you see the update that says (as
21 read), "The FBI has made three controlled payments into
22 Mohammed and are attempting to get payments into
23 Watts"?

24 A. Yes.

25 Q. "At present, the FBI, along with IAD, are

1 working on two buyers, one on Watts and one on
2 Mohammed." Do you see that?

3 A. Yes.

4 Q. At this time, you were the lieutenant
5 supervising Watts and Mohammed, is that correct?

6 A. Correct.

2:08:05

7 Q. And you didn't know anything about this
8 investigation?

9 A. Not at all.

10 Q. Would you have wanted to know that the FBI
11 made three payments successfully to Mohammed in March
12 of 2008 -- by March of 2008?

13 A. No.

14 Q. I'm sorry. Did you say, "No"?

15 A. Yes. Correct.

16 Q. You would not have wanted to know that
17 information?

18 A. Correct.

19 Q. Why would you have not wanted to know that
20 information?

21 A. Because I would try to get both of them off
22 the teams.

23 Q. And you would have -- all right. So I guess
24 you anticipated one of my questions. Had you known the
25 -- had you known what you see in this memo, as of March

1 2008, you would have tried to get them off your teams?

2 A. Correct.

2:08:56

3 Q. You would not have said it's okay for them to
4 stay on the force for another four years?

5 A. No.

6 Q. And why would you have tried to get them off
7 of your teams immediately had you seen this memo?

8 A. The embarrassment of -- again, back to
9 integrity, lack of, can't work for me.

10 Q. How -- how were -- how do you feel seeing
11 this memo now, knowing you didn't know about it, no one
12 told you?

13 MR. BORKAN: Steve. Objection. Form. You
14 can answer the question.

15 A. At this late date in time, it's -- it -- it
16 really doesn't surprise me.

17 Q. Does it make you angry?

18 MR. BORKAN: Steve. Objection. Form. You
19 can answer the question.

20 A. No.

21 Q. Why does it not surprise you that you didn't
22 see it until now?

23 A. Well, that's how IAD, ATF, CIA all work.

2:10:04

24 Q. What do you mean by that?

25 A. The secrecy around -- surrounding their

1 investigations. They try to keep it to a bare minimum
2 of people knowing what they're doing.

3 Q. Did you ever run an investigation where you
4 got -- had a suspect on video committing the crime?

5 A. No.

6 Q. Okay. And when I asked you if you would have
7 wanted to know about this memo, I think you said no,
8 and the reason is because you would have tried to get
9 them off your team immediately?

10 A. Right.

11 Q. Why would that make you not want to see the
12 memo as opposed to making you want to see the memo?

13 A. Because their investigation is ongoing. 2:11:05

14 Q. Do you think the investigation should have
15 stopped?

16 MR. BURNS: Objection. Calls for
17 speculation.

18 MR. BORKAN: Steve. Objection --

19 MR. PALLES: And I would add lack of
20 foundation. Eric.

21 A. That would not be my call, okay. It'd be --

22 Q. But --

23 A. -- higher-ups.

24 Q. I -- I know it may not have been your call
25 ultimately. What I -- I guess, what I'm trying to ask

1 you to do is to reconcile your feeling that you wanted
2 to get -- that if you would have known this, you would
3 have wanted him off your team, but also that you didn't
4 want to know it.

5 A. Well --

6 MR. BORKAN: Steve. Objection. Form. You
7 can answer.

8 A. It seems like you're trying to elicit
9 emotion, that this somehow would affect me. Nothing
10 surprises me at all, be it on the police department, in
11 the world today, so I got that under control as far as
12 emotion. So they stepped in it. That's on them.

13 Q. I guess what -- I -- and I did ask you if it
14 made you angry. I wasn't --

15 A. Well, no, not -- or I know you did ask me
16 that, but I said no.

17 Q. Right. I mean, I'm just --

18 A. I'm not surprised.

19 Q. I -- I'm sorry. I don't mean to revisit that
20 question now, but is it --

21 A. Okay.

2:12:28

22 Q. -- fair to say that you think, based on your
23 experience and as the lieutenant at the time, the right
24 thing to do would have been to take them off the street
25 when they got caught taking money in two thousand -- by

1 2008?

2 MR. KOSOKO: Objection. Form.

3 MR. BORKAN: Steve. Objection --

4 A. Yes.

5 Q. You also -- I'm going to shift gears a little
6 bit. Can you pull up Exhibit 1? And this doesn't have
7 Bates stamps. It's Defendant Kallatt Mohammed's
8 responses to Plaintiff Allen Jackson's first set of
9 interrogatories to the individual Defendants. Do you
10 see that?

11 A. Yeah. Yes.

12 MR. BURNS: What number is that, Steve [sic]?

13 MR. RAUSCHER: Sorry. What was that, Steve
14 [sic]?

15 MR. BURNS: This is Terry. Is that an object
16 -- or an exhibit marked?

17 MR. RAUSCHER: Yeah, it's Exhibit 1.

18 MR. BURNS: Okay. Thank you.

19 Q. Can you just -- I -- my only question is, I
20 think, going to be about the first interrogatory. So
21 if you could just take a look at that one, and let me
22 know when you've had a chance to do that.

23 A. Okay.

2:14:03

24 Q. And did you have a chance to read that
25 interrogatory, including that quote which came -- came

1 from a blog post?

2 A. Yes.

3 Q. Do you know if you're Lieutenant K.M.

4 identified in this post?

5 A. No, I do not.

6 Q. Do you know of another Lieutenant K.M. who
7 was in the second district?

8 A. No, not to my knowledge.

9 Q. Is there another commander with the initials
10 G.L. other than Genessa Lewis?

11 A. I'm -- I would not know.

12 Q. Were you ever involved in having someone
13 moved from a TAC team and sent to a beat car?

14 A. I was not involved. I was informed of it.

15 Q. And is that Lamonica Lewis? The incident you
16 told me about earlier?

17 A. Yes.

18 Q. Do you know who wrote this blog post?

19 A. No.

2:15:04

20 Q. Does it seem to fit pretty neatly with what
21 you told me earlier about the conversation you had with
22 Lamonica Lewis and Genessa Lewis?

23 MR. BAZAREK: Object -- William. Object to
24 the form of the question. Foundation. Calls for
25 speculation.

1 MR. BORKAN: You can answer the question,
2 sir.

3 A. I'm going to have to have you repeat it
4 again. I'm sorry. But, you know, 71 years old. Go
5 ahead.

6 Q. A lot of people didn't like that question,
7 too, so I lost it too. My -- the question was does
8 this paragraph fit pretty neatly with the incident you
9 described earlier about Genessa Lewis calling you into
10 her office with Lamonica Lewis and telling you that
11 Lamonica was leaving the team?

12 MR. BAZAREK: Object to the form of the
13 question. Foundation. Calls for speculation.
14 Argumentative. This is William.

15 A. Okay. Yes.

2:16:04

16 Q. And did Lamonica Lewis, to your knowledge,
17 ever tell you or Genessa Lewis about Watts or Mohammed
18 taking money?

19 A. Not to my knowledge.

20 Q. And you don't know, one way or the other,
21 whether she told Genessa Lewis anything like that?

22 A. Correct.

23 Q. Do you know who Clarissa Glenn is?

24 A. Calis [sic] -- who?

25 Q. Clarissa Glenn.

1 A. Oh, that's -- that's one of the CR numbers,
2 you know.

3 Q. Yeah. And I was going to point you there,
4 but do you have -- do you know who she is
5 independently?

6 A. No.

2:17:02

7 Q. Other than -- she's the one in this -- is --
8 well, let me ask you. Is she the -- is it her CR that
9 had -- mentions the confidential CR that led you to
10 believe your complaint may have initiated a
11 confidential complaint?

12 MR. BURNS: Can I hear the question again,
13 please, Steve? Or Scott --

14 MR. RAUSCHER: Who?

15 MR. BURNS: I'm sorry. Excuse me.

16 MR. RAUSCHER: Oh, that's -- that's okay. It
17 wasn't a great question. I'm going to try a different
18 way.

19 Q. Earlier you mentioned you looked at a CR,
20 which mentioned a new confidential CR being opened. Is
21 that Clarissa Glenn's CR?

22 A. All I have is the summary digest. I'm trying
23 to find --

24 O. It's Exhibit --

25 A. Okay.

1 Q. Oh, sorry. It's not. There's a reference in
2 Exhibit 2, but it's not Exhibit 2. It's Exhibit 8, I
3 think.

4 A. Mine does not have an exhibit number on it.

5 Q. Do you see Bates Number City BG on the
6 bottom?

7 A. All right. BG 012903. 2:18:20

8 Q. Yeah, that's what we're -- we're talking
9 about the same one. So that's Exhibit 8 on our exhibit
10 list, and that's also marked as confidential.

11 A. Okay. Hold on. I found your 8. Okay. I'm
12 looking for --

13 Q. Actually -- I'm sorry -- one second. That
14 one may not be marked as confidential. We can look at
15 that later, but keep -- you can continue.

16 A. Okay. This is 2010, so I leave. Okay. Your
17 question? I -- I don't know if this is the one that
18 sparked the confidential, but --

19 Q. Do you know if this is the --

20 A. -- if it is --

21 Q. Oh, I'm sorry.

22 A. I believe this is -- they got more than one
23 confidential.

24 Q. So Clarissa's complaint is -- if you look at
25 it, her complaint was made in 2005. Do you see that?

1 A. Yes. 2:19:21

2 Q. But agree -- I agree the reference to the
3 confidential is 2010.

4 A. Okay. Okay.

5 Q. You know what? Let me -- let me -- I'm going
6 to share one page on the screen so we can all look at
7 it together. If -- can -- can you see the page that's
8 up on -- that I put on the screen now, Mr. Mann?

9 A. Yes.

10 MR. PALLES: What page, Scott?

11 MR. RAUSCHER: It's -- it's 15 of the
12 document, City BG 12917.

13 MR. PALLES: Okay.

14 Q. Do you see that page? 2:20:24

15 A. Yes.

16 Q. Yeah. That's a page from 2006. Is that what
17 you saw that referenced the confidential CR being
18 opened?

19 A. I'm not sure, the dates or whatever, but
20 could be in that time. I'm not sure.

21 Q. Did you know, at any point when you were
22 still with the Chicago Police Department, that a
23 confidential investigation had been opened into Ronald
24 Watts?

25 A. No, I did not.

1 Q. And would you have been aware, typically, in
2 your role through the CR process, if one of your -- one
3 of the CRs you had been assigned was moved into a
4 confidential investigation section?

5 A. No, they would not inform me. 2:21:23

6 Q. Can you also just -- can you take a look at
7 the page -- so the next page after the one we looked at
8 and the page after that is a handwritten letter.

9 A. Mm-hmm.

10 Q. Do you recall seeing this letter before?

11 A. No.

12 Q. And have you had a chance to look through
13 this CR from Clarissa Glenn?

14 A. Yes.

15 Q. Does it -- do you remember anything about the
16 CR?

17 A. No.

18 Q. And do you remember either meeting or trying
19 to meet Clarissa?

20 A. Well, through the paperwork I see here,
21 certified letters were sent, phone calls were made, but
22 no response.

23 Q. And then the letter -- it looks like, the
24 letter, she is trying to follow up, right?

25 MR. PALLES: Objection. Lack of foundation.

1 Eric. 2:22:24

2 A. Okay.

3 Q. Are you still looking through the CR? 2:24:15

4 A. I'm -- I'm done.

5 Q. Oh, okay. Do -- do you read that letter from
6 Clarissa as her trying to follow up on her CR?

7 A. Yes.

8 Q. Did you say yes?

9 A. I said -- did -- did I read the letter? Yes.

10 Q. And do you read it as her trying to follow up
11 on her CR?

12 MR. PALLES: Lack of foundation. Eric.

13 A. Yes.

14 Q. In your experience as a Chicago police
15 officer and supervisor, did you have to read
16 correspondence from people at times and interpret it
17 and decide whether it required follow up?

18 A. No.

19 Q. No, you did not?

20 A. No. I usually get all of my -- they usually
21 go through OPS or IPRA or IAD.

22 Q. When you say --

23 A. When they get letters -- when -- when they
24 mail --

25 Q. I'm --

1 A. -- letters like that, like this. 2:25:21

2 Q. They usually get routed to somebody else?

3 A. Yeah, to another organization. I only get
4 what IAD or COPA wants to be investigated at the
5 district level. I don't have any control of how all
6 that comes. So they send me a package, or a package
7 comes to the district.

8 Q. If the packet has a letter like this one, you
9 -- based on your experience, do you interpret that as
10 something you should follow up on?

11 A. Correct. But a letter like this would not
12 probably make it to the district level. It'd probably
13 stay up in the IAD.

14 Q. And why -- why is that? Why would it stay at
15 IAD and not get to the district?

16 A. The allegations, threatening her life and
17 whatever. She moved because of that.

18 Q. And so do you -- are you saying that the
19 letter would have been different than the rest of the
20 CR? Is that what you're trying to say?

21 MR. BURNS: Objection. Form. 2:26:40

22 A. She's alleging --

23 MR. BURNS: Terry.

24 A. Okay. She's alleging that a police officer
25 threatened her life, okay? I really don't think they

1 want us to investigate it at the district level.

2 Q. So can you look at page 3 of this document,
3 which is City BG 012905? Should be the third page, and
4 I can put it up on the screen if that's easier for you
5 to look at.

6 A. Go ahead.

7 Q. All right. It's on the screen now. I -- it
8 should be. Do you see it?

9 A. Yes.

10 Q. And let me --

11 A. I'm looking for --

12 Q. You see how it says complainant alleges that
13 her house was searched without a warrant or her
14 permission and that one of the accused officers gave
15 the witness a threatening message?

16 A. Mm-hmm.

17 Q. Do you see that? And it looks like it was
18 assigned to you, is that correct?

19 A. I'm looking.

2:27:51

20 Q. Under the "investigator assigned" column --
21 or row.

22 A. Okay. Or -- or, once again, I -- I got the
23 wrong report or -- hold on.

24 Q. It's still up on the screen, that page, if --
25 you could look at it that --

1 A. Yeah.

2 Q. -- way.

3 A. Oh, but I can't read too good. Your eyes are
4 better than mine.

5 Q. Understood.

6 A. And I got glasses -- and I got glasses.

7 Okay. Here we go. All right. Here we go. Entered
8 her -- searched the residence --

9 Q. And then can you just tell me, so we have a
10 clear record of what pages you're looking at, if they
11 have a Bates number on them?

12 A. Exhibit A, no page number, but it's City BG
13 012905.

14 Q. Okay. I think, substantively --

15 A. Okay.

16 Q. -- that's the same as the other one.

17 A. Okay. Basically. So what's the question?

18 Q. So the question is were you assigned to
19 investigate this CR?

20 A. Initial investigation, yes.

2:29:29

21 Q. And was it unusual for this type of CR to be
22 assigned to you as opposed to IAD?

23 A. Well, I'm looking at it. Yeah. I think it
24 should have been handled by IAD.

25 Q. And IAD is -- that's the internal affairs?

1 A. Division, yes.

2 Q. And you think it should have been handled by
3 IAD because it involved a serious allegation of a
4 threat to --

5 A. Allegation. Correct. Correct.

6 Q. So, you know, we've touched on CRs some
7 during this dep and -- deposition, and we've talked
8 about this one a little bit. Can you just tell me what
9 -- what a CR is, what it stands for?

10 A. Complaint register.

11 Q. And what is a CR?

2:30:24

12 A. Complaint register, and it's assigned the
13 number. So that's all that it is. It's a digest,
14 summary digest, this one, of the allegation and the
15 complaint. Going forward, the conduct of the
16 investigation, following that protocol, and that's it.

17 Q. When --

18 A. Okay.

19 Q. When we say -- when you say "complaint
20 register," that's a complaint, and it can come from
21 either a civilian or another officer or a supervisor
22 against an officer, is that right?

23 A. That's right.

24 Q. And throughout your career at the Chicago
25 Police Department, were you involved in investigating

1 CRs?

2 A. Yes.

3 Q. About how many CRs did you investigate in
4 your career?

5 A. Too many to count.

2:31:24

6 Q. Hundreds?

7 A. I -- hundreds.

8 Q. And there -- there are a set of potential
9 outcomes for CRs, is that right?

10 A. Correct.

11 Q. Sustained? Not sustained? Unfounded?

12 A. Exonerated.

13 Q. Anything else?

14 A. That's all that I can remember.

15 Q. And the only ones that can result in
16 discipline are sustained, is that right?

17 A. Correct.

18 Q. Of the hundreds that you investigated
19 yourself, how many of them did you sustain?

20 A. None.

2:32:20

21 Q. Do you know if your sustain rate was similar
22 to others?

23 A. No, I don't.

24 Q. When you were investigating CRs against a
25 particular officer, did you have access to the other

1 CRs that were filed against that officer?

2 A. No.

3 Q. Would you have wanted access to the other CRs
4 against that officer?

5 MR. BORKAN: Steve. Objection. Form. You
6 can answer the question.

7 A. If it was sustained, I have to obtain both
8 the complementary and disciplinary history of the
9 officer, so -- but that's only if it's sustained.

10 Q. So you wouldn't know about other CRs until
11 after you made a decision to sustain an allegation?

12 A. Correct.

13 Q. And that -- in your particular -- in your
14 case, that never happened?

15 A. As far as -- right. Correct.

2:33:25

16 Q. Do you -- were you ever the accused in a CR?

17 A. Yes.

18 Q. And were any of those ever sustained against
19 you?

20 A. I had two sustained.

21 Q. And just -- can you just give me briefly what
22 the two were that were sustained?

23 A. Lost radio. Actually, it was stolen, but
24 whatever. And the other one was that I refused to give
25 a report to a lady that I witnessed scratching herself

1 and trying to blame her husband for it.

2 Q. And were those, in your opinion, rightfully
3 sustained?

4 A. No.

5 Q. Did you think the CR -- when you were
6 accused, did you think the CR investigation process was
7 fair?

8 A. Yes.

2:34:33

9 Q. Did you think the outcome was fair in the
10 cases where you had been investigated?

11 A. I made a decision and that -- on -- on not
12 making a report, and so I have to live with whatever
13 came about.

14 Q. Is it fair to say that you -- it -- it was
15 correct that you didn't make a report, and you believed
16 it was justified because you knew that she was trying
17 to report something that wasn't true?

18 A. Correct.

19 Q. So where -- did you -- were all of the
20 hundreds of CRs that you investigated done in your
21 capacity as the lieutenant of the second district TAC
22 team?

23 A. No.

2:35:36

24 Q. In --

25 A. I --

1 Q. -- what other roles -- in what other roles
2 were you investigating --

3 A. Well, when I was a TAC sergeant. When I was
4 a sergeant in the area -- area two detectives.

5 Q. In -- in any of those roles -- well, in your
6 roles as a sergeant, were you tasked with investigating
7 CRs involving your subordinates?

8 A. Yes.

9 Q. And was that standard protocol that CRs were
10 assigned to the sergeant?

11 A. Yes.

12 Q. Okay. Do you -- do you have any
13 understanding of why the system was set up to have
14 sergeants investigate their subordinates?

15 A. No.

16 Q. And did you think it was a good policy to
17 have sergeants investigating their subordinates?

18 MR. BORKAN: Steve. Objection. Form. You
19 can answer the question.

20 A. I have -- I have no opinion.

21 Q. Were you ever tasked with investigating a CR
22 that alleged you did something wrong?

23 A. No.

2:36:47

24 Q. And do you think it would be appropriate to
25 investigate a CR into your own alleged wrongdoing?

1 A. Again, could you repeat it?

2 Q. Do you think it would be appropriate for an
3 officer to investigate a CR that alleged the officer
4 did something wrong?

5 A. No.

6 Q. And why would it not be appropriate for an
7 officer to investigate a CR into their own alleged
8 wrongdoing?

9 A. Bias.

10 Q. Do you think that -- did you have a bias in
11 favor of believing the police version of events when
12 you were investigating CRs?

13 A. No.

2:37:51

14 Q. Do you know why you didn't sustain any of the
15 CRs you investigated?

16 A. Following protocol, interviews, and the
17 outcome of the investigation, that's what I relied
18 upon.

19 Q. How did you make -- if you had, on the one
20 hand, a complainant saying something happened to them,
21 and on the other hand, an officer saying that didn't
22 happen, how did you make the decision?

23 A. That would --

24 MR. BURNS: Objection.

25 A. -- be a --

1 MR. BURNS: Incomplete hypothetical. Terry
2 speaking.

3 MR. BORKAN: You can answer the question,
4 sir.

5 A. Okay. Under the not sustained, it -- it is
6 you cannot prove or disprove the allegation.

7 Q. And so is it the case that if there is, on
8 the one hand, a civilian saying, "Police officer did
9 something to me," on the other hand, the police officer
10 is saying, "I didn't do that," that ends up with --
11 basically, it's a tie, which means not sustained?

12 A. In the basic sense, yes, but I go for more
13 investigation into reliability, credibility for both,
14 the officer and the complainant.

15 Q. And does the fact that you never found a
16 sustained CR against an officer suggest that you found
17 officers more credible, generally, than complainants?

18 MR. BORKAN: Steve. Objection. Form. You
19 can answer the question, sir.

20 A. The evidence. That's all -- all I follow is
21 the evidence.

22 Q. Typically, in your experience for CRS, would
23 there be evidence beyond what was written down by
24 police officers and then what civilians were saying on
25 the other side?

1 MR. BORKAN: Steve. Objection. Form. You
2 can answer, sir.

3 A. Okay. Some occasions, other witnesses. Most
4 of the time, it's one on one.

5 Q. If you would have gotten a CR, and I -- I
6 know you've said that this isn't how it worked, but if
7 -- let's say you were -- you had access to officer CRs
8 while you were investigating, and you saw that an
9 officer had hundreds of CRs, would that have impacted
10 your credibility determinations?

11 A. I can't --

12 MR. KOSOKO: Ahmed. Object to form. 2:40:41

13 MR. BORKAN: You can answer, sir.

14 A. Okay. If I had access, I wouldn't access
15 because that would set up that bias I was talking
16 about.

17 Q. What do you mean by the "bias"?

18 A. Being that whatever the -- the complaints and
19 reading it, it may change thought process, thinking,
20 whatever, and so they could bias toward the officer or
21 favorable for the complainant. So that's why you only
22 get it at the end.

23 Q. So you're using the phrase "bias," but
24 another way to look at it, be that it would just give
25 you more information from which to form the basis for

1 deciding --

2 A. A conclusion --

3 Q. -- what to do?

4 MR. KOSOKO: Objection.

5 A. No.

6 MR. KOSOKO: Form.

7 Q. I think you already answered anyway. It was
8 a no, right?

9 A. Right.

2:41:39

10 Q. All right. I'm going to ask you to take a
11 look at another one, but I know you don't have
12 exhibits. So it's ours. It's Exhibit 6. Starts with
13 --

14 A. Eight, 10.

15 Q. -- City BG 018774?

16 A. All right. 10. This doesn't have anything
17 on it.

18 MR. BORKAN: Right. Counsel?

19 MR. RAUSCHER: Yeah?

20 MR. BORKAN: The issue is that insofar as I
21 -- and I don't know if you're aware of this or not, but
22 your exhibits were not received until 11:50 p.m., and I
23 did not get them until I got in the office this morning
24 when I promptly had them -- I had them printed off. On
25 multiple of the exhibits, the printings do not -- do

1 not include -- because it cuts off from the screen on
2 the printing, it doesn't include the exhibit number,
3 and it doesn't include the Bates number, so I am doing
4 my best with Mr. Mann to figure out where your exhibit
5 is. For example, I know what Plaintiffs' Exhibit
6 Number 1 is. I know Plaintiffs' Exhibit Number 2
7 because that printing came out.

8 MR. RAUSCHER: So --

9 MR. BORKAN: I know -- I have all -- so
10 Plaintiffs' 8 came out, but not at all, and -- and I --
11 I wish that we had gotten them sooner --

12 MR. RAUSCHER: I -- I got it. I got it. 2:43:36

13 MR. BORKAN: -- but I don't --

14 MR. RAUSCHER: Steve, I got it.

15 MR. BORKAN: And so we're not going to solve
16 this. So tell me what -- describe what the exhibit is.
17 I know you can put it on the screen, but why don't you
18 describe what it is, and we -- and Mr. Mann and I will
19 try and find it. I also have a set in front of me.

20 MR. RAUSCHER: So this is a CR. It's got,
21 like, a yellow first page and a kind of grayscale
22 second page.

23 MR. BORKAN: All right. And I did have them
24 printed in color for that very reason.

25 MR. RAUSCHER: And I appreciate you getting

1 them, and I know it was tight -- tight timing. We're
2 all doing the best --

3 MR. BORKAN: All right. What's the --

4 MR. RAUSCHER: -- we can with --

5 MR. BORKAN: What's the number on the front
6 page, Counsel? Is it 0 -- I -- I'm sorry. Is it
7 1028321?

8 MR. RAUSCHER: No. I'm looking at 1 --
9 018774. Why don't I -- I'm going to pull a page up
10 because I -- I don't think you need the whole thing to
11 look at, what I'm -- what I want to ask first --

12 MR. BORKAN: Okay.

13 MR. RAUSCHER: -- but you can --

14 MR. BORKAN: All right.

15 MR. RAUSCHER: -- take your time --

16 MR. BORKAN: And -- and I'll try and find it
17 so that -- I'm sorry, Counsel. I'll try and find it so
18 that I can make sure that Mr. Mann has it in front of
19 him. And what exhibit is it? Is it Exhibit 6?

20 MR. RAUSCHER: It's Exhibit 6.

2:44:51

21 MR. BORKAN: Okay. Because I -- I found
22 Exhibit --

23 WITNESS: Six.

24 MR. BORKAN: -- 7.

25 MR. RAUSCHER: I think he has it, Steve. It

1 sounds like he has it.

2 WITNESS: I've got 6, but the number is not
3 the one you just read off.

4 MR. RAUSCHER: What does your 6 start with?

5 MR. PALLES: It's --

6 MR. BORKAN: Yep, the CR.

7 MR. PALLES: -- 1028321.

8 WITNESS: One.

9 MR. PALLES: Yeah. 10283 --

10 MR. BORKAN: Okay. I believe -- I believe he
11 has it, Counsel.

12 MR. RAUSCHER: Oh, 1028321 is the CR number.
13 I was looking at the Bates number.

14 MR. BORKAN: Oh.

15 WITNESS: The who? Page number?

16 MR. BORKAN: No, I don't have any of the
17 Bates --

18 MR. RAUSCHER: Okay. So you're right.

19 MR. BORKAN: -- numbers.

20 MR. RAUSCHER: You said it -- you said it
21 didn't print on that one. I didn't know. Yes, we're
22 looking at the same document now.

23 MR. PALLES: This probably --

24 MR. BORKAN: Okay. All right. You have it.

25 And he has it in front of him, and he has the entire

1 document stapled. So I apologize for the delay.

2 Please inquire.

3 Q. All right. So I am at the fourth page of
4 this document, and I put it up on the screen in case
5 you can see it that way.

6 A. All right. It's just the one redacted. Got
7 it. But it's not 4. It's 3.

8 WITNESS: That's the one you got in your hand
9 there. Turn it over.

10 Q. Okay.

2:46:21

11 MR. BORKAN: No -- it -- it is page 4. That
12 would be page 4 because you -- remember, the one?
13 That's page 1 in your hand, right?

14 WITNESS: That's right.

15 MR. BORKAN: And then the -- on the back is
16 page 2, remember? We printed them at night.

17 WITNESS: Oh, oh, double-sided.

18 MR. BORKAN: Page 3, page 4. There --

19 WITNESS: Oh, there you go.

20 MR. BORKAN: Okay.

21 WITNESS: All right.

22 Q. All right.

23 A. We're here --

24 Q. So I --

25 A. -- looking at --

1 Q. Because yours doesn't have a Bates number,
2 I'm just going to read the Bates number for the record
3 even though it is also on the screen. This page is
4 City BG 018777. And I just want -- tell me when you've
5 had a chance to look over this page.

6 A. Just the front page, right? Okay.

7 Q. So the -- this is -- it says "summary report
8 digest" on this page 4 we're looking at, right?

9 A. Right.

10 Q. And you've got -- is this -- you're -- it
11 says "from, investigator's name," and that's got your
12 name in there, right?

13 A. Correct.

14 Q. Is this -- did you complete this report?

15 A. Yes.

2:47:39

16 Q. And did you -- are you the one who identifies
17 who the accused are?

18 A. Yes.

19 Q. And if it accuses a sergeant, is there any
20 way that the CR should ever be assigned to a sergeant
21 to -- to investigate?

22 A. Normally, no.

23 Q. Are there exceptions to that rule?

24 A. I don't know.

25 Q. None that you know of?

1 A. Say again?

2 Q. No exceptions that you know of?

3 A. That I know of. Right.

4 Q. If you could look at what is the -- I think

5 the 11th page of this document, which I'm going to also

6 bring up on the screen -- or if you look at 10 and 11.

7 And, for -- for our record, it's City BG 018783 and

8 18784. So do you see page 10? That's -- looks like a

9 memo from Ronald Watts to Genessa Lewis?

10 A. Okay.

2:49:08

11 Q. Was it appropriate for him to be contacting

12 the complainant by phone and sending a letter for this

13 CR?

14 A. I can't answer that. I don't know.

15 Q. Well, if he was accused of wrongdoing in the

16 CR, was it appropriate for him to be involved in

17 investigating it?

18 A. The CR says, "unknown sergeant."

19 Q. If the -- there are two complaint -- the --

20 the two other officers who were named were members of

21 Watts's team?

22 A. Correct.

23 Q. And so was it a mistake to assign the

24 sergeant of that team if it also accused the sergeant

25 of wrongdoing?

1 MR. BURNS: Objection.

2 A. I don't know what --

3 MR. BURNS: Terry.

4 A. I don't know what IPRA or IAD did, why he
5 ended up with it.

6 Q. Should he have looked at it and said, "I
7 better not call someone about this one because it might
8 be accusing me of wrongdoing"?

9 MR. KOSOKO: Objection -- Ahmed. Objection.
10 Form. Foundation.

11 A. I really don't know his rationale.

2:50:19

12 Q. Well, I understand you -- you don't know his
13 rationale, but you were his supervisor at the time,
14 right?

15 A. Yes. Yeah.

16 Q. Your -- in your view as his supervisor,
17 should he have contacted the witness to the CR?

18 MR. BORKAN: Steve. Objection. Form. You
19 can answer the question, sir.

20 A. Okay. I would have asked for a reassignment
21 right away, if it was me.

22 Q. And you would have asked for a reassignment
23 right away as --

24 A. Right. If I --

25 Q. -- his supervisor, if you would -- if you

1 would have known he was doing that, right?

2 A. Okay. Are you -- I'm confused. I thought
3 you were asking me as a supervisor, would I do my own
4 investigation?

5 Q. So I -- you may have answered it. So I think
6 -- or were you saying that, as Watts's supervisor, had
7 you known that he had been assigned and was going to
8 contact the witness, you would have asked that it be
9 reassigned right away before he did that?

10 A. Yes. 2:51:20

11 Q. I'm going to shift the gears a little bit for
12 a minute. Did you ever conduct training when you were
13 at the Chicago Police Department?

14 A. Roll call training, yes.

15 Q. Did you ever give anyone training on how to
16 prepare police reports?

17 A. No. That's done at the academy.

18 Q. Did you receive training on police reports?

19 A. Yes.

20 Q. Were you ever trained to put certain words in
21 quotes to describe offender -- things the offender said
22 if they didn't say the words you were quoting?

23 A. No.

24 Q. Is that something you ever did?

25 A. No. 2:52:12

1 MR. RAUSCHER: Is it all right, everyone, if
2 we take another five- or ten-minute break?

3 MR. BURNS: Scott, can I ask you, what's your
4 plan in terms of the afternoon? I mean, we may take a
5 lunch break here, but if you're not going to be all
6 that long, maybe makes sense to only take a ten-minute
7 break or so now.

8 MR. RAUSCHER: Yeah. Let -- let's take a
9 ten-minute break. Let me regroup a little bit, but I
10 -- I don't think I'm going to be all that long. But I
11 don't know, obviously, what Joel's got. So let me --
12 I'll -- I'll give him a call on this break and then
13 let's come back and we can decide that, if that's okay.

14 MR. BURNS: So why don't we come back at --

15 MR. BORKAN: Okay.

16 MR. BURNS: -- 1:30 then? It's about 1:15
17 now.

18 MR. RAUSCHER: Sure.

19 MR. BURNS: All right. Good. Thanks.

20 WITNESS: Okay.

21 RECORDER: Off record --

22 MR. BORKAN: All right. Thank you.

23 MR. RAUSCHER: Yep. Off record.

24 WITNESS: Thank you.

2:52:57

25 RECORDER: Off record, 1:13 p.m.

1 MR. RAUSCHER: Thanks.

2 (Off the record)

3 RECORDER: On the record, 1:32 p.m.

4 Q. Mr. Mann, are you aware that the Plaintiffs
5 in these cases are alleging that they were framed for
6 crimes that they didn't commit?

7 MR. BURNS: Scott, I couldn't hear you.

8 Would you mind repeating it?

9 MR. RAUSCHER: Yeah, of course.

10 Q. Are you aware that the Plaintiffs in these
11 cases are alleging they were framed for crimes that
12 they did not commit?

13 A. Now.

14 Q. And do you have --

15 A. I'm aware of it now.

16 Q. Do you have any personal knowledge, one way
17 or the other, as to whether the Plaintiff's allegations
18 are true?

19 A. No, I do not.

2:53:39

20 Q. And I think just briefly, we -- we've talked
21 about CRs and about how you investigated hundreds of
22 CRs in your career. Can you tell me, when you were the
23 lieutenant in the second district on the -- over the
24 tactical teams, what types of CRs would you be
25 typically asked to investigate?

1 A. Excessive use of force, verbal abuse. That's
2 -- that's about it for the most part.

3 Q. And then were other -- did other kinds of
4 reports go to other -- other units or other
5 investigators?

6 MR. BORKAN: Steve. Objection. Form. You
7 can answer, sir.

8 Q. No, let me try -- let me ask --

9 A. Okay.

10 Q. Let me ask that a different -- a different
11 way. Were there certain allegations that got routed to
12 different areas, in your experience?

13 A. Yes.

2:54:37

14 Q. And can you tell me about that process?

15 A. Well, usually, I'm not even aware of it, but
16 if it involves allegations of taking money or drugs or
17 failure -- failure to -- to do those things, that
18 usually go right to IAD.

19 Q. Got it. And as the lieutenant, you -- you're
20 not -- IAD doesn't tell you when they're doing an
21 investigation or that they got a CR or anything like
22 that?

23 A. That's correct.

24 MR. RAUSCHER: Okay. That -- that -- that's
25 all that I have.

1 MR. FLAXMAN: This is Joel Flaxman. I don't
2 have any questions. Thank you, sir.

3 WITNESS: Thank you.

4 MR. KOSOKO: Actually, Sergeant Watts has
5 just a few questions, Lieutenant Mann.

6 A. Okay.

7 MR. KOSOKO: Is everyone good, ready?

8 MR. BORKAN: Yes.

2:55:38

9 EXAMINATION

10 BY MR. KOSOKO:

11 Q. All right. Lieutenant Mann, I'm going to
12 direct your attention back to Exhibit Number 6 --

13 A. Okay.

14 Q. -- Powell and Rochelle Powell [phonetic] CR.
15 Is it correct for me to say that either a general order
16 or a special order indicates that field sergeants are
17 the ones that initiate CRs?

18 A. Well, any supervisor -- any supervisor can
19 initiate a CR.

20 Q. Okay. And in this -- in this case, Sergeant
21 Watts initiated this CR against his own -- against
22 department members, correct?

23 A. I'm looking. Six, which one is that?

24 Q. City BG 1 -- 18775 through 18826.

25 MR. RAUSCHER: Ahmed, he didn't have the

1 Bates on that. Do you want to give him the CR number?

2 Sorry. I don't mean to interrupt.

3 MR. KOSOKO: Yeah, yeah. No worries. No
4 worries. I'm actually going to direct your attention
5 -- the Bates -- I actually want to direct him to a
6 specific Bates, but it would be --

7 MR. BORKAN: Excuse me, Counsel. Which CR?

8 Is it -- is it CR 1028321?

9 MR. KOSOKO: That is correct.

2:57:02

10 MR. BORKAN: Okay. So that -- Mr. Mann, that
11 was the -- that's Exhibit -- Plaintiffs' Exhibit 6, and
12 that is the one, I believe, that you were referring to.
13 So what -- what page, Counsel, would you like Mr. Mann
14 to refer to?

15 MR. KOSOKO: I know you guys don't have the
16 Bates. For me, it's -- it ends with 18809.

17 MR. BORKAN: I'm not going to know --

18 MR. KOSOKO: So that would be -- that would
19 be page 36 of the 53-page exhibit.

20 MR. BORKAN: Oh, geez.

21 WITNESS: Oh.

22 MR. KOSOKO: So --

23 MR. BORKAN: All right. Well --

24 MR. KOSOKO: All right. Well, let me see if
25 I can -- hang on. Hang on. So if we take a look at --

1 at the certified mail receipt requested from Mr.
2 Powell's sister, the very -- I'm talking about the very
3 next page after that. So if you go kind of, I guess,
4 to the middle.

5 MR. BORKAN: Can you put it up on the screen
6 or no?

7 MR. KOSOKO: Sure. Sure. Let me -- let me
8 --

9 WITNESS: Which one?

10 MR. KOSOKO: Let me -- let me see if I can
11 put it up on the -- do a screen share.

12 WITNESS: Thirty-six, but most of them are
13 not numbered.

14 MR. KOSOKO: Just give me just a moment,
15 Lieutenant Mann. Here we go.

16 WITNESS: What --

17 MR. KOSOKO: All right.

18 MR. BORKAN: I found that page.

19 MR. KOSOKO: Here you go. You see that?

20 MR. BORKAN: That is a certified mail receipt
21 for Rochelle Powell?

22 MR. KOSOKO: Okay. The very next page. I --
23 I'm sharing the screen now, I think --

24 WITNESS: That there --

25 MR. KOSOKO: -- if everybody can take a look

1 at it.

2 WITNESS: -- "reassignment of log." That's
3 -- that's a whole other -- never mind.

4 MR. BORKAN: Okay. I have that page --

5 WITNESS: Yes. I got it too.

6 MR. BORKAN: Do you have that page, Mr. Mann?

7 WITNESS: Correct.

8 MR. BORKAN: Okay. Find that page, and then
9 Counsel will ask you questions.

10 Q. In your experience as -- as a lieutenant,
11 this -- does this memo indicate that Sergeant Watts
12 asked that the matter be reassigned because a sergeant
13 was accused?

14 A. Right. 2:58:50

15 Q. Okay.

16 A. Against an unknown sergeant.

17 Q. Okay. And so Sergeant Watts actually asked
18 not to be -- to, essentially, be recused from this
19 investigation?

20 MR. FLAXMAN: Objection. Foundation.

21 A. Correct.

22 MR. FLAXMAN: Joel.

23 A. Correct.

24 Q. All right. All right. Just to -- so a
25 foundation. What does this document indicate to you as

1 a lieutenant? What -- what was the request from
2 Sergeant -- from Sergeant Watts to Commander Lewis?

3 A. Okay. What -- sergeants don't investigate
4 sergeants. Everything is a step higher, rank-wise.
5 Lieutenants, bottom line, sergeants, patrolmen,
6 detectives, so forth, we can investigate that.

7 Lieutenants and above, it's gotta be a higher-up --

8 Q. Okay.

9 A. -- to do that. So I can't answer why he did
10 what he did.

11 Q. What -- does it say (as read), "Due to an
12 allegation against a sergeant of police"?

13 A. Yeah.

2:59:54

14 Q. Okay. And it says, "subject, reassignment of
15 log"?

16 A. Right. And he requested a reassignment.

17 Q. Thank you.

18 A. So the commander approved it. Commander just
19 turned around and gave it to me.

20 Q. So it went away from Sergeant Watts to
21 somebody higher up because of chain of command because
22 a sergeant was accused?

23 A. Right.

24 Q. Yeah. Now, you went through your history
25 with CPD. Starting your probational period, you were

1 actually a TAC officer for some time period, is that
2 correct?

3 A. Correct.

4 Q. And you were a TAC sergeant for some time
5 period, is that correct?

6 A. Correct.

7 Q. And eventually, at some point, you were a
8 lieutenant of the tactical teams in the second
9 district?

10 A. Correct.

11 Q. Just in your experience in all those roles
12 you played, how common is it for a sergeant to make an
13 arrest, actual physical arrest?

14 A. It's not common at all.

3:00:53

15 MR. KOSOKO: All right. No further
16 questions.

17 A. Usually --

18 MR. KOSOKO: That's it. That's it from
19 Watts.

20 WITNESS: Okay.

21 MR. BAZAREK: Yeah. I've got -- I've got a
22 few questions.

23 MR. PALLES: Yeah. Go ahead.

24 MR. BAZAREK: What -- what --

25 MR. PALLES: I -- I do, too, Bill.

1 MR. FLAXMAN: Do you want to take down --

2 Ahmed, do you want to take down your screen from
3 sharing?

4 MR. RAUSCHER: Can I -- before the next
5 person goes, can I just make an observation about the
6 exhibits that we should get on the record? Because I
7 don't want to forget. It looks to me like when we
8 circulated the exhibits, sometimes there was a
9 confidential stamp at the top that got stripped out, I
10 think, when the exhibit sticker got put in. I think
11 whenever we talked about -- we can -- we can finish
12 that after. I just want to make note of that because I
13 think I'm going to have to resend the exhibits we used
14 to the court reporter so that we can make sure the --
15 the confidential ones are included with the right
16 stamp.

17 MR. BAZAREK: That's fine with me, Scott.

18 Thank you.

3:02:02

19 MR. KOSOKO: Actually, could I ask one more
20 question? I apologize. Is that okay with everyone?

21 MR. PALLE: Sure.

22 Q. All right. We -- we -- Mr. Rauscher asked
23 you about the term "reverse sting." Do you remember
24 that line of questioning, Lieutenant Mann?

25 A. Yes. Yes.

1 Q. And -- and you stated, to your knowledge,
2 reverse stings are just essentially stings -- integrity
3 stings against officers, is that correct?

4 A. That's the only one I know of.

5 Q. All right. Well --

6 A. Yeah.

7 Q. -- without using the word "reverse sting,"
8 are you -- in your time as a lieutenant at the second
9 district, were there -- the -- operations that were
10 based on having a deterrent effect of buyers of
11 narcotics?

12 MR. RAUSCHER: Object to form.

13 A. That's -- that's a little broad. Could you
14 narrow it down?

15 Q. Okay. Were there ever operations where the
16 officers would arrest the buyers rather than focusing
17 on the sellers?

18 A. Yes.

3:03:06

19 MR. KOSOKO: Okay. That's it. Thanks.

20 MR. PALLE: You -- you want to go first,
21 Bill? I --

22 MR. BAZAREK: Well, you -- go -- go -- Eric,
23 you can -- you can go first.

24 MR. PALLE: Okay.

25 EXAMINATION

1 BY MR. PALLEs:

2 Q. Just one or two clarifications, Mr. Mann --
3 Lieutenant Mann. We were talking before, very early in
4 your deposition, about a group of citizens who might
5 claim that the police officers were acting
6 inappropriately so as to prevent the police officers
7 from patrolling that area. You recall that?

8 A. Yes.

9 Q. Okay. Now -- so that -- the -- that
10 individual -- or, I think, at one point, you -- you
11 talked about certain elements of the citizenry. Those
12 people were involved in the sale and distribution of
13 illegal drugs, is that right?

14 MR. FLAXMAN: Objection. Foundation.

15 A. Yes.

16 MR. FLAXMAN: This is Joel.

17 A. Yes.

18 Q. Okay. And the people who sold and -- and
19 distributed drugs at Ida B. Wells, were they part of
20 organized crime organizations? I mean -- yeah,
21 organized drug --

22 A. Yes. Yes. Gangster Disciples.

23 Q. Gangster Disciplines at Ida B. Wells?

24 A. Yes.

3:04:38

25 Q. Okay. How about the Hobos, or was that after

1 your time?

2 A. Well, I know who the Hobos are. They've been
3 around a while.

4 Q. Okay.

5 A. Okay. But that didn't come up with me. The
6 only other one within the extensions was Black Gangster
7 Goon Squad.

8 Q. Well, now it's -- and it's a fact that each
9 one of those high-rise buildings at Ida B. Wells -- in
10 -- in each of those buildings, the sale and
11 distribution of drugs was supervised and organized by
12 these gangs?

13 MR. RAUSCHER: Object to form.

3:05:21

14 A. Yes.

15 Q. Okay.

16 A. Yes.

17 Q. And would it be the case, in your -- from
18 your knowledge of the operations at that time, that
19 somebody who -- that somebody who sold and distributed
20 drugs at those locations were associated with those
21 gangs?

22 A. Yes.

23 MR. PALLE: That's all the questions I have.
24 Thanks.

25 EXAMINATION

1 BY MR. BAZAREK:

2 Q. Good afternoon, Lieutenant Mann. My name is
3 William Bazarek, and I represent a number of officers
4 that are being sued in this case, and I want to go
5 back. You've -- you've been a tactical officer in your
6 career. You've been a supervisor. You have a breadth
7 of experience in the -- in the -- in the Chicago Police
8 Department, and during your time in the police
9 department, you've had false complaints made against
10 you by criminals, is that correct?

11 A. Yes.

3:06:39

12 Q. And it is not unusual for narcotics
13 traffickers, drug users to make false complaints
14 against members of the Chicago Police Department, is --
15 would you agree?

16 MR. FLAXMAN: Joel. Objection. Foundation.

17 Q. Would you agree?

18 A. I agree.

19 Q. And it -- I -- I don't think this was asked
20 in the deposition. Have you actually been sued during
21 the time when you were a Chicago police officer?

22 A. Yes.

23 Q. Okay. And was it -- was the lawsuit brought
24 by a criminal who was making a false complaint against
25 you?

1 MR. RAUSCHER: Object to form.

2 A. I'm trying to pull up that -- the lawsuit now
3 -- give me a second -- in my brain. Okay. No.

4 Q. Okay.

5 A. The one --

6 Q. I --

7 A. -- that I -- the one -- the one that I can
8 remember, it was a traffic accident and young man had
9 both his legs broken and I was driving the car and that
10 was about it. I believe the City settled.

11 Q. Okay. All right. So want to go back, and
12 you -- you spoke earlier in the deposition, you're a
13 man of integrity, is that correct?

14 A. Correct.

15 Q. And you expect that from the people who work
16 for you as well, is that correct?

17 A. Correct.

3:08:26

18 Q. And during the time when you were the TAC
19 lieutenant in the second district, at any time, did you
20 ever receive evidence that members of Sergeant Watts's
21 tactical team were falsely arresting individuals?

22 A. No, I did not.

23 Q. At any time when you were a tactical
24 lieutenant in the second district, did you ever receive
25 any evidence that members of Sergeant Watts's tactical

1 team were framing innocent individuals?

2 A. No, sir.

3 Q. At any time when you were the TAC lieutenant
4 in the second district, did you ever receive any
5 evidence that members of Sergeant Watts's team were
6 planting illegal narcotics on innocent individuals?

7 A. No, sir.

8 Q. Recall earlier in the deposition, sir, you
9 talked about Ida B. Wells as a hot spot, is that right?

10 A. Correct.

3:09:38

11 Q. And one of the reasons it was a hot spot is
12 because of violence that was occurring there, is that
13 true?

14 A. That was one of the factors, but most of the
15 violence in Ida B. was generated by the drug activity.

16 Q. Okay. And -- and the -- and the reason why
17 you wanted -- or strike that. And the reason why
18 members of Sergeant Watts's team were sent to Ida B.
19 Wells was to arrest people that were involved in
20 illegal narcotics activity, correct?

21 A. Correct.

22 Q. Now, I want to go back to the -- there --
23 there would be times where you would be out in the
24 field, so to speak, when you were the TAC lieutenant
25 over the second district, correct?

1 A. Correct. 3:10:34

2 Q. And you would -- would you agree you would
3 routinely come into contact with just citizens or other
4 individuals in the area of Ida B. Wells?

5 A. Correct.

6 Q. And, sir, in -- in -- and during the time
7 when you were a TAC lieutenant in the second district,
8 at any time when you would have been in the area of the
9 Ida B. Wells, were individuals reporting to you that
10 members of Sergeant Watts's team were framing arrestees
11 for crimes they did not commit?

12 A. At no time. No one approached me.

13 Q. And -- and it would be also true that, at no
14 time during the times when you would have been at Ida
15 B. Wells, did anyone approach you and say that members
16 of Sergeant Watts's team were planting illegal
17 narcotics on individuals?

18 A. Never. At no time. 3:11:38

19 Q. And also at no time were -- would -- would --
20 would individuals at Ida B. Wells be reporting to you
21 that members of Sergeant Watts's tactical team were
22 falsely arresting individuals?

23 A. No one ever approached me.

24 Q. Now, go -- you also said, you know, you --
25 you would have contact with the TAC team inside the

1 police station, is that correct?

2 A. Correct.

3 Q. And would you say you were an observant
4 supervisor, Lieutenant Mann?

5 A. Yes.

6 Q. And are you -- are you proud of the work that
7 you did when you worked in the second district as a
8 tactical lieutenant?

9 A. Yes.

3:12:28

10 Q. And you're proud, sir, of your service as a
11 member of the Chicago Police Department?

12 A. Yes, sir.

13 Q. Now, I know at -- earlier in the deposition,
14 you spoke of you'd have contact with the members of
15 Sergeant Watts's tactical team, say you go into a
16 processing room, "What do you got?" type thing. Do you
17 recall that testimony?

18 A. Yes.

19 Q. So there -- there would be occasions where
20 you would be inside the second district police station
21 where you would have contact with members of Sergeant
22 Watts's tactical team as well as the individuals that
23 they had arrested, is -- is that true?

24 A. Yes.

25 Q. And at any time during the period where you

1 were the TAC lieutenant in the second district, did any
2 of these arrestees report to you that they had been
3 subject of a false arrest or that illegal narcotics was
4 planted on them?

5 A. At no time was I approached. 3:13:43

6 Q. Well, did -- did -- did any of the -- of the
7 arrestees ever say anything like that to you, that they
8 had been falsely arrested, framed, or had illegal
9 narcotics planted on them?

10 A. No, sir.

11 MR. BAZAREK: That's all I have.

12 MR. BURNS: May I just follow up very
13 briefly, if I may?

14 EXAMINATION

15 BY MR. BURNS:

16 Q. Just following up on the questions that were
17 just put to you by Mr. Bazarek, other than the incident
18 where you saw this Patterson and Hampton, Jr., did you
19 ever have any information or receive any information
20 that Watts or any members of his team were taking money
21 or charging a tax to do business in the second district
22 over at Ida B. Wells?

23 A. No, sir. And at no time did I receive any
24 information other than that.

25 MR. BURNS: Thank you, sir. I have no

1 questions beyond that.

2 EXAMINATION

3 BY MR. FLAXMAN:

4 Q. This is Joel Flaxman. I -- I had a couple of
5 follow-ups. Mr. Bazarek asked you about arrestees and
6 whether any of them had ever reported to you that they
7 were the subject of a false arrest. Do you recall that
8 question?

9 A. Yes.

3:15:17

10 Q. How many arrestees who were arrested by Watts
11 or his -- members of his tactical team do you remember
12 speaking to?

13 A. To give a number, I have no idea, but --

14 Q. Okay. Was it --

15 A. -- as part -- I walked through the processing
16 room. They would greet me. My officers would greet
17 me, "Hey, Lieutenant," "Hey, Lieu," "Hey, LT,"
18 whatever. So the arrestees that were there, while
19 being processed, never brought anything to my
20 attention.

21 Q. Okay. So when you were in a room with the
22 officers who had made the arrest and the arrestee, an
23 arrestee never brought to your attention any
24 information that would have said their arrest was not a
25 good arrest?

1 A. Correct. 3:16:10

2 Q. Okay. Another thing that was asked of you of
3 another -- by another attorney was about a CR
4 investigation by a sergeant into the conduct of another
5 sergeant. Do you recall those questions?

6 A. Correct.

7 Q. And was --

8 A. Yes.

9 Q. -- it your -- was it your testimony that if a
10 sergeant was assigned to investigate a CR where one of
11 the accused officers was a sergeant, the correct thing
12 to do is for that sergeant to ask for the assignment to
13 be given to a higher officer?

14 A. Correct.

15 MR. FLAXMAN: And I think I lost my internet
16 connection, so I will wait for a moment for everyone to
17 come back.

18 WITNESS: Okay.

19 MR. FLAXMAN: I'm sorry. I -- did I cut out
20 somewhere in there?

21 MR. BORKAN: No.

22 WITNESS: No, not with -- not on this end.

23 MR. RAUSCHER: I don't think so either. I
24 think --

25 MR. FLAXMAN: Well, I -- well, I didn't hear

1 an answer, so I -- everyone else cut out.

2 RECORDER: Oh, okay.

3 MR. FLAXMAN: Are -- are you able to play it
4 back for me, or should I just reask the question?

5 RECORDER: Why don't you reask the question?

6 MR. FLAXMAN: Okay.

7 Q. Is it correct that a sergeant should not be
8 assigned to investigate a CR if one of the accused
9 officers is a sergeant?

10 A. Correct.

3:17:30

11 Q. And if a sergeant learns that he's been
12 assigned to investigate a CR where the accused officer
13 is a sergeant, should he immediately request that the
14 investigation be reassigned?

15 A. Yes.

16 MR. FLAXMAN: Okay. I don't have any other
17 questions. Sorry about the technical glitches. Thank
18 you for your time.

19 MR. RAUSCHER: I don't have any either.

20 Scott. So I think we're done.

21 MR. BORKAN: Yeah.

22 RECORDER: Signature?

23 MR. BORKAN: Thank you.

24 MR. KOSOKO: Hang on. Hang on. Hang on for
25 just a second. I have a follow-up on Mr. Flaxman's --

1 MR. BORKAN: Okay. All right.

2 MR. KOSOKO: -- just a brief follow-up.

3 EXAMINATION

4 BY MR. KOSOKO:

5 Q. If you could turn your attention again,
6 Lieutenant Mann, to Exhibit Number 6, CR 1038321 [sic].
7 We can go to the following page after the page I
8 referred to before, so page 37 of that exhibit. It's
9 the notification regarding automated complaint.

10 A. Okay. Then that's 5 --

11 MR. BORKAN: Excuse me, Counsel. Can you --
12 can you identify the CR number on that again, please?

13 MR. KOSOKO: Yeah. It's -- it's the same CR.
14 It's 1038321 [sic]. It is the page after the page
15 number --

16 MR. BORKAN: It's 28 -- 1028321? 3:18:43

17 MR. KOSOKO: Correct.

18 MR. BORKAN: It's got the one -- yellow --

19 WITNESS: Yeah.

20 MR. BORKAN: -- on there.

21 WITNESS: I've got it. I got it.

22 MR. BORKAN: Okay.

23 WITNESS: Okay.

24 MR. KOSOKO: Okay.

25 A. Now where is it that you want me to go?

1 Q. If you could reference the comments section.

2 A. Comments.

3 Q. Correct.

4 A. Okay.

5 Q. Based on your experience as a lieutenant, is
6 what's referenced there Sergeant Watts saying that it
7 was determined, during the investigation, that the --

8 MR. FLAXMAN: What -- what page are you
9 looking at?

10 MR. BORKAN: Counsel, he's not at --

11 MR. KOSOKO: It'd be page --

12 MR. BORKAN: -- the page --

13 MR. KOSOKO: -- thirty -- page 37 of the
14 fifty -- 53-page exhibit. "Notification regarding
15 automated complaint; date, August -- 28th August 2009;
16 log number; investigation date; the investigator."

17 Sergeant Mann -- Lieutenant Mann's name is indicated.

18 Are we all at the same place? I can share it. I'll
19 share it.

20 MR. BORKAN: All right. Thank you.

3:19:45

21 MR. KOSOKO: Does everyone see it now?

22 WITNESS: Okay.

23 Q. Okay. If we could take a look at the
24 comments section, Lieutenant Mann --

25 A. Eight --

1 Q. -- did you write that in the comments
2 section?

3 A. Let me find it. 28 August. That's
4 September. September.

5 Q. No, 28 August -- 28 August 2009.

6 A. Okay.

7 Q. It's -- it's the -- it's the page I'm sharing
8 on the screen right now.

9 A. Okay. Okay. 28 August.

10 Q. Correct. Did you author this document?

11 A. Standby.

12 Q. Did you author this document? So it looks
13 like it says --

14 A. Yes.

15 Q. -- "prepared by." Is that your signature?

16 "Lieutenant --

17 A. Yes.

18 Q. -- K.E. Mann," correct? And in the comments
19 section --

20 A. Correct.

3:20:47

21 Q. -- did you -- did you type that (as read)
22 "Investigation was assigned to Sergeant Ronald Watts,
23 star number 2640, when it was determined the allegation
24 includes -- includes a supervisor"?

25 A. Correct.

1 Q. Correct. And so at that point, the -- the
2 matter was assigned to somebody higher than a
3 supervisor?

4 A. Than a sergeant, yes.

5 MR. KOSOKO: Okay. Thank you. No further
6 questions.

7 WITNESS: Okay.

8 MR. PALLE: Eric. No further questions.

9 RECODER: Ahmed, could you unshare the --
10 stop share, please?

11 MR. KOSOKO: Yeah.

12 RECODER: Thank you.

13 MR. KOSOKO: Sorry.

14 RECODER: That's okay.

15 MR. KOSOKO: There we go.

16 MR. BORKAN: Any -- anyone else?

17 MR. RAUSCHER: Oh. No.

18 RECODER: Signature?

19 WITNESS: I'm off.

20 MR. BORKAN: Reserve, please.

21 RECODER: Great. And will anyone be
22 ordering a transcript today?

23 MR. RAUSCHER: Not from us yet.

24 MR. BURNS: No, not at this time.

3:21:48

25 RECODER: Okay. Off record, 2:01 p.m.

1

CERTIFICATION

2

I certify that the deponent was duly sworn by me and
that the recording of the proceeding is a true record
of the testimony given by the deponent or witness in
the above-entitled matter.

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Katie Jasinski

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August 22, 2023

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CERTIFICATION

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I certify that the foregoing is a true and correct
transcript from the recording of the proceedings in the
above-entitled matter.

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Lyn Wheeler

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August 22, 2023

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