

EXHIBIT 24



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Transcript of Alvin Jones

Date: February 26, 2020

Case: Watts Coordinated Cases

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1 IN THE UNITED STATES DISTRICT COURT FOR THE
2 NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

3
4 -----x

5 : Master Docket Case No.

6 : 19-cv-01717

7 In re: WATTS COORDINATED :

8 PRETRIAL PROCEEDINGS : Judge Andrea R. Wood

9 :

10 : Magistrate Judge

11 : Sheila M. Finnegan

12 -----x

13
14 VOLUME 1

15 Videotaped Deposition of SERGEANT ALVIN JONES

16 CHICAGO, ILLINOIS

17 Wednesday, February 26, 2020

18 10:12 a.m.

19
20
21
22 Job: 291160

23 Pages: 1 - 325

24 Transcribed by: Jerome E. Harris, CLDT-204

Transcript of Alvin Jones
Conducted on February 26, 2020

2

1 Videotaped Deposition of SERGEANT ALVIN JONES,
2 held at the offices of:

3 LOEVY & LOEVY
4 311 N. Aberdeen Street
5 3rd Floor
6 Chicago, IL 60607
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15 Pursuant to notice, before Ryan Grzelak, Notary
16 Public in and for the State of Illinois.
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ALSO PRESENT:
Rick Kosberg, Videographer

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BY MR. RAUSCHER:	8

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1 P R O C E E D I N G S

2 THE VIDEOGRAPHER: This the video deposition of
3 Alvin Jones, taken by Loevy & Loevy, in the matter of
4 the Watts Coordinated Pre-Trial Proceedings, Master
5 Docket Case No. 19-cv-01717, held at Loevy & Loevy, 311
6 North Aberdeen Street, Chicago, Illinois.

7 Today is February 26, 2020. The time is 10:12.
8 The court reporter is Ryan Grzelak of Planet Depos. The
9 videographer is Rick Kosberg.

10 Counsel can now introduce themselves, and the
11 court reporter is free to administer the oath.

12 MR. RAUSCHER: Scott Rauscher for the
13 plaintiffs, represented by Loevy & Loevy in the
14 Coordinated Proceedings.

15 MR. FLAXMAN: Joel Flaxman for the Flaxman
16 plaintiffs.

17 MR. RAUSCHER: Let me just briefly. We do have
18 a couple of interns who are here for the week who are
19 sitting in for at least part of today's deposition.

20 MR. SCHALKA: I'm Michael Schalka for
21 defendants, Cadman and Spaargaren.

22 MR. RAVITZ: Gary Ravitz for Kallatt Mohammed.

23 MR. KOSOKO: I'm Ed Kosoko on behalf of Ronald
24 Watts.

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1 MR. MICHALIK: Paul Michalik for defendant,
2 City and certain supervisory officials.

3 MR. BAZAREK: William E. Bazarek for Sergeant
4 Alvin Jones as well as the other individual defendants
5 represented by Hale & Monico.

6 THE REPORTER: Please raise your right hand.
7 Whereupon,

8 ALVIN JONES,
9 being first duly sworn or affirmed to testify to the
10 truth, the whole truth, and nothing but the truth, was
11 examined and testified as follows:

12 EXAMINATION BY COUNSEL FOR THE PLAINTIFFS:
13 BY MR. RAUSCHER:

14 Q Could you say and spell your name, please.

15 A Alvin Jones. A-L-V-I-N J-O-N-E-S.

16 Q Were you surprised when Ronald Watts and
17 Kallatt Mohammed were arrested?

18 A Yes, I was.

19 Q Why were you surprised?

20 A Because a police officer had been arrested for
21 wrongdoing.

22 Q Did you have any suspicions that they had been
23 engaged in wrongdoing over the years?

24 A I didn't have any suspicion that I can --

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1 confirmed to be accurate, no.

2 Q Well, let me try to ask that again.

3 Did you have any suspicions over the years that
4 Kallatt Mohammed and Ronald Watts had engaged in
5 wrongdoing?

6 A A suspicion? What do you mean by the word,
7 suspicion?

8 Q Are you -- do you have an understanding of what
9 the word, suspicion, means?

10 A It means you think something may be happening
11 but it's not actually factual.

12 Q That's -- I would agree with that definition.

13 A Okay.

14 Q So let's use that definition of suspicion.

15 A That definition of suspicion? I can't say that
16 I did.

17 Q Are there any other definitions of suspicion
18 you could use that would -- you would answer it
19 differently?

20 A No.

21 Q Okay. When I first asked you, I think you said
22 you had nothing that you could confirm was true?

23 A Well, a lot of times you would hear things
24 about Watts. You'd hear things about Kallatt Mohammed

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1 But there was nothing that would say concrete that would
2 -- that what was going on.

3 Q Tell me what you would hear about Watts and
4 Mohammed.

5 A Um --

6 Q And when you'd hear it.

7 A You'd hear -- was walking around down in the
8 area, you would hear that Watts was a dirty officer.
9 But it was more in the sense of people trying to trash
10 his name.

11 Q All right. When you say down in the area, can
12 you tell us what area you're talking about?

13 A The Ida B. Wells area.

14 Q And over what time period would you be hearing
15 that Watts was a dirty officers in the Ida B. Wells
16 area?

17 A I'm trying to figure out how long. I worked
18 down in Ida B. Wells from about 2003 till 2012.

19 Q Did you hear that whole nine year or so period
20 that Watts was dirty?

21 A It wasn't the whole nine-year period. From
22 time to time, you'd hear people with what I felt were
23 complacent grumps against him personally.

24 Q Complacent, you said?

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1 A Personally.

2 Q Okay. You felt that the -- well, tell me --
3 tell me what you mean by that.

4 A Someone might have been arrested or someone
5 might have been not arrested, and they felt that
6 somebody should have been arrested, and they would say
7 Watts wasn't shit.

8 Q Was a what?

9 A Wasn't shit.

10 Q Wasn't shit?

11 A Yes. You'd hear things like that.

12 Q And what did -- what did you understand that to
13 mean?

14 A That they had a negative feelings toward him.

15 Q How frequently over the years did you hear that
16 Watts was a dirty officer?

17 A It wasn't like on a regular basis. I guess it
18 would define by what was going on in the area was, I
19 don't know. I can't put a specific time on it that it
20 like it always occurred because it didn't always occur.
21 But from time to time --

22 Q And who -- can you name any specific people you
23 heard this from, nicknames or otherwise?

24 A I don't recall any of those.

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1 Q Do you recall any of their actual names?

2 A No.

3 Q Did you know the people at the time?

4 A By face, some of them.

5 Q So I'm just going to ask you if you can, if you
6 remember as we you go this deposition today and
7 tomorrow, and then further cases, if you see a picture
8 during the deposition, and that causes you to remember
9 that one of those people told you that Watts was dirty,
10 will you let me know that?

11 A Yes, I will.

12 Q All right. You said you heard -- you said that
13 they would say Watts wasn't shit. Did they say anything
14 else?

15 A No, pretty much that's what -- that's what it
16 was.

17 Q And can you give me specifics as to what you
18 thought that meant.

19 A They were mad at him for even them being locked
20 up or someone being locked up.

21 Q Them or someone else being locked up?

22 A Yes.

23 Q Or not being locked up?

24 A Yes.

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1 Q Tell me about that part of it about people
2 being mad because Watts wasn't locking others up?

3 A Because they wasn't locking others up? People
4 sometimes felt like that people that should have been
5 locked up for certain crimes, they never were.

6 Q Can you tell me more about that.

7 A That's just specifically what it was.
8 Sometimes -- if you described the Ida B. Wells area,
9 there were like seven different buildings down there.
10 And those seven different buildings were like individual
11 cliques. So if you have a bunch of people hanging out
12 in one area, and they get locked, they don't get locked
13 up. Or you come over to another area where there are
14 where you are not over there locking anybody up for
15 trespassing or maybe most of those people that lived
16 over there were from that area. That's what I mean.

17 Q So trespassing is an example. What about drug
18 s, did they ever say anything about drugs?

19 A Not specifically.

20 Q Do you remember specifically someone telling
21 you or hearing from someone that other people should
22 have been arrested for trespassing?

23 A Yes.

24 Q All right. Can you tell me about some examples

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1 of that.

2 A Like I said, the different various buildings
3 because they were located, couple of them were close
4 together, they were spaced out. So it was like working
5 with dealing with different cliques, well, you're not
6 over there fucking with them, why you over here fucking
7 with us.

8 Q And is that -- were people saying that to you
9 or did you hear them say that to Watts?

10 A Hear them just say that. You hear them say it
11 in passing. Sometimes people would say it to you. So
12 say it to members of the -- other members of the team.

13 Q And did you hear people say that specifically
14 about Watts?

15 A They would say it about Watts, they'd say it
16 about myself, they'd say is about other members of the
17 team.

18 Q And all right. So you also you had said that
19 you heard over the years rumors about Mohammed being a
20 dirty officer also?

21 A Well, people would say that, you know, he like
22 hanging out with the guys down there.

23 Q All right. Do you remember anybody that told
24 you Mohammed liked hanging out with the guys down there?

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1 A Not that I can actually name, no.

2 Q And who -- can you tell me like were there
3 other officers saying that or was it citizens or both?

4 A Both.

5 Q All right. Tell me what officers would say
6 that.

7 A There were officers at a table felt like
8 Mohammed was a little too close with the people who
9 lived down there.

10 Q All right. Which officers on the team and felt
11 that way and when did you hear them express that view?

12 A We'll start with myself some days.

13 Q Okay.

14 A I'll start with myself some days. I thought he
15 was too close with the individuals who were down there
16 in that area.

17 Q All right. So let's start with you like you --
18 like you said, you thought he was too close. Why do you
19 think he was too close with the individuals in that
20 area?

21 A Because in doing his job, sometimes you have to
22 communication with those people in the area to actually
23 get a field for what's going on. But you can't be to
24 the point where you feel like you admiring what they

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1 doing.

2 Q Okay.

3 A And I thought that he felt like man, it's
4 great, they -- whatever they're getting or however much
5 money they're are making, they're doing, it was
6 exciting.

7 Q And why did you think he felt that it was
8 exciting to see how much money people were making down
9 at Ida B. Wells?

10 A I can't -- no, I can't think of what his
11 mindset was. I had no idea. It was just my opinion.

12 Q Why did you come to that conclusion? Was it
13 observations?

14 A Observation. Listen, I mean, you got a
15 conversation with someone and you can as we call
16 bullshit, but the bullshit isn't always laughter with
17 that person. Always okay, it was it just seemed a
18 little too close for me.

19 Q You mean you observed Mohammed talking to
20 residents?

21 A Residents or people who I considered were in
22 the drug gang, and sometimes like in the admiration of
23 them.

24 Q And when earlier you had said that Mohammed --

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1 I think you said kind of he admired how much people were
2 making?

3 A Yeah, because they would -- you know, they
4 would brag about how -- other people would brag about
5 how much money the building would be making, or who
6 would be making money in the building.

7 Q And you're talking about drug sales when you're
8 talking --

9 A Drug sales, yes.

10 Q Were there any people who you considered to be
11 part of a drug -- did you say drug game? Is that what
12 you said?

13 A Yeah, drug gang.

14 Q Would -- anyone you considered to be part of
15 the drug gang who you thought Mohammed seemed too close
16 to?

17 A No one specifically. I mean, just anywhere we
18 went. It was like an admiration of if somebody prefer
19 -- if for instance, there might be a bunch of people out
20 there talking and people that we believed to be in the
21 drug gang or knew to be in a drug gang, and how much
22 this building would make on this particular day per day.
23 And he may, wow, they getting that money good. That's
24 not admiration what's going on. It shouldn't have.

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1 Q You mean he was they -- that is admiration?

2 A That is -- that was his admiration and it
3 shouldn't have been.

4 Q And how many times did you hear Mohammed say
5 something like that?

6 A Oh, I can't put a number on it, but I heard it
7 enough times that at sometimes I was asking what his
8 problem was.

9 Q And how many times did you ask him what his
10 problem is?

11 A I can't say specifically.

12 Q More than ten times?

13 A I'm not sure.

14 Q Was it more than once?

15 A It was more than once.

16 Q Do you know if it was more than five times?

17 A May have been.

18 Q And was it over a --a bunch of different years?

19 A Well over a period of time, yes.

20 Q Which period of time?

21 A Um. I'm not sure what period of time it was.

22 Q Was it kind of scattered throughout the 2003 to
23 2012 time period?

24 A Yes.

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1 Q Was there ever a time when you don't remember
2 having that concern about Mohammed that he was admiring
3 the drug trade?

4 A Yes, sometimes he'd come to work and act like a
5 normal person. A normal police officer actually out
6 there trying to observe what's going on to do whatever
7 it is we were trying to do.

8 Q So I'm going to ask a follow-up on that, but
9 before let me just try to rephrase that the question
10 that I asked. So I understand you're saying there were
11 days when he would act normal. What I was trying to ask
12 was there any period of, like a substantial period of
13 time where you could oh, yeah, those couple years I
14 didn't -- I had no concern?

15 A I wouldn't say it was couple of years. I mean
16 it would -- it would vary sometimes in days.

17 Q All right. And so tell me the difference in
18 Mohammed's behavior on days when he would act like a
19 normal person and when he would act like someone who
20 admired the drug trade?

21 A It just varied. I mean it's not like this
22 week, okay, today, this is what he's acting like, or I
23 mean it might be just in a moment. And in a moment, I
24 just didn't find it admirable for what he was saying of

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1 when, specifically when he hearing about how much money
2 these buildings are making.

3 Q And who would he hear from?

4 A I mean, people from down there in that area
5 would speak and walk about, or just happen in general
6 conversation that might be talking to each other. And
7 they say -- they'd say well, you know, we make this kind
8 of money or they said they making that kind of money
9 over in that building. Those are things you would hear
10 not just from the suspected drug dealers themselves, but
11 you'd hear it also from just residents that walked by in
12 the area. They would say different things like that.

13 Q When you confronted Mohammed and said what's
14 your problem on various times, how did that conversation
15 go?

16 A I don't think it went negatively a lot of
17 times. I mean but really this is what you think of
18 them, this is -- and that would be it. And I guess for
19 the most part he would pretty much calm down or whatever
20 it is he was talking about, but it was just not cool to
21 look like that.

22 Q Did you raise your voice when you had those
23 conversations with him?

24 A I didn't have to raise my voice with him at

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1 that time, those times. You know, sometimes you just
2 speak and it's not having it. Somebody need to pull
3 your coattail.

4 Q What do you mean by that?

5 A They think that something that you're doing or
6 saying may not be correct thing to be doing or saying at
7 that particular time.

8 Q How did he react to you when you'd confront
9 him?

10 A He was always positive about it, you know. He
11 -- it wasn't like we'd get into a verbal debate about
12 it.

13 Q He was fine, he was --

14 A Yeah.

15 Q Yeah. Did he respond at all?

16 A I can't say remember exactly what kind of
17 response he would give me. But it was never nothing
18 where we got into a overly verb -- heated, verbal or
19 physical situation about it.

20 Q Did you ever confront Watts with any other
21 rumors about him being a dirty officer?

22 A I -- trying to remember. I would ask him how
23 to -- how would he -- how could he talk to these people
24 down here and knowing that they accusing you of certain

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1 things.

2 Q So tell me more about those conversations.

3 A I was like you know they saying that you doing
4 this or you've done that. And he was like Al, you know
5 they gon' say what they want to say. We gon' keep on
6 working down here doing what we do.

7 Q Did you feel like you had a good grasp of what
8 was going on down at Ida B. Wells?

9 MR. BAZAREK: Object to just the form of that
10 question. And like vague and ambiguous.

11 A Grasped by the cop?

12 Q As in did you know what was going on down
13 there? You already said, for example, you'd hear drug
14 dealers or people talking about how much money they
15 made, yet seems like -- doesn't seem like you had a
16 sense of who was selling drugs, when they were doing it,
17 where they were doing, that sort of thing.

18 A Pretty much knew who some of the players were
19 down there. You knew that they always when they were up
20 selling. It was never in one area, let's say that.
21 Because it could be on the first floor, it could be on
22 the second floor, it could be on the third floor of the
23 building, it could be on the fourth floor of the
24 building. How high they felt safe in doing it. And how

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1 far they wanted to make the customers come up in the
2 building.

3 Q Did you think you had a sense of who all the
4 big players were?

5 A I wouldn't say all of them, but we knew who
6 some of them were.

7 Q Have you learned of anyone since you left there
8 that you think is a big player but you didn't know it at
9 the time?

10 A No.

11 Q How do you think you missed the fact that Watts
12 and Mohammed were taking bribes?

13 MR. BAZAREK: I'd object to the form of the
14 question and foundation.

15 MR. RAVITZ: I'll join.

16 MR. KOSOKO: I join, and also argumentative.

17 A Excuse me?

18 Q How do you think you missed the fact that Watts
19 and Mohammed were taking bribes?

20 MR. KOSOKO: Also assumes facts not in
21 evidence.

22 MR. RAVITZ: Join.

23 MR. SCHALKA: Join.

24 A I don't know.

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1 MR. KOSOKO: As to form.

2 Q Have you thought about that over the years?

3 A Not often.

4 Q Have you ever thought about it?

5 A Briefly when it happened. I just don't know.

6 Q And do you agree -- well, let me ask you this:
7 Do you know that Watts and Mohammed were taking bribes?

8 A Do I know? I won't say I knew they were taking
9 bribes but I know -- I know that they were arrested for
10 theft of government property.

11 Q And do you know any of the facts or the basis
12 for the charge of theft of government property?

13 A No.

14 Q Do you have any understanding of what they're
15 accused of stealing?

16 A No.

17 Q Do you think it has something to do with money
18 that they believed was connected to the drug trade?

19 A I'm not sure.

20 Q Well, it wasn't like printer paper or something
21 that they walked into a government building and took
22 out, right?

23 MR. BAZAREK: Object to the argumentative
24 nature of that question.

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1 A I don't know.

2 Q Do you think that is even a remote possibility
3 that that's what they were charged with?

4 MR. BAZAREK: Objection to form.

5 MR. KOSOKO: Join.

6 A That what they were charged with what?

7 Q Taking something like printer paper out of a
8 government office?

9 A No.

10 Q Well, tell me what your understanding is of
11 what they were charged with beyond government property
12 generally?

13 A That they were taking some money from someone
14 they thought was a drug courier.

15 Q What was your reaction to learning of that
16 charge?

17 A Like I said, initial surprise like in what
18 else.

19 Q When you learned about the charge, did it cause
20 you to go back and think about any of the experiences
21 you had with Watts or Mohammed over the years and put
22 those in a different light?

23 MR. KOSOKO: Object to form.

24 A I think the initial -- initially, it's like

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1 well, I went back and thought when -- how this could
2 been -- could have been possible.

3 Q And did you think well, all those people over
4 the years saying Watts was dirty were right?

5 A I didn't look at it that way. I don't know how
6 -- I didn't -- I just like I said, when -- when and how
7 this could have happened.

8 Q Any did you come to any conclusions about when
9 and how it could have happened?

10 A No, to my understanding, it was on their off
11 day, and that was as far as I knew.

12 Q Do you now think that maybe some of the people
13 over the years who were telling you that what the and
14 Mohammed were dirty were right?

15 A I'm not sure. I'm not sure because I heard
16 some -- one time, I think it was a young lady trying to
17 -- trying to tell her about -- trying to tell Watts
18 about himself, and she didn't even know she was talking
19 to Watts.

20 Q Tell me about that.

21 A She said you knew cops down here? I don't know
22 who she was. You all don't know Watts? She said, I
23 know what the. You'll get to know Watts. What the'
24 crew, they run things down here. Watts' crew run

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1 things. Yeah, they lock everybody up. And if you get
2 in their way, you gon' have problems. You all ain't
3 gon' have no room down here to lock nobody up.

4 She was actually talking to Watts, telling what
5 the this. And I just cracked up laughing because here
6 is how someone's spread something that they don't know
7 and you'd be down here talking to this guy.

8 Q But she didn't say Watts arrested her?

9 A No, she didn't. No, she didn't. But she was
10 trying to as I like to say at that point in time, she
11 was badmouthing him, and she didn't even know who he
12 was.

13 Q But she knew of him, right?

14 A That's what she said, she knew of him.

15 Q And do you know that she was wrong?

16 A Do I know that she was wrong? She was wrong
17 because she didn't know who he was. If she would have
18 known who he was, I don't think she would have been
19 saying that to him. So therefore, at that particular
20 time in that particular instance, it was like maybe
21 people down there trying to live up to the hype of
22 spreading the negative about him.

23 Q Can you tell me one thing that she said that
24 was factually incorrect?

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1 A Watts go like every -- Watts never made an
2 arrest.

3 Q Tell me -- Ronald Watts never made one arrest?

4 A No.

5 Q Okay. Tell me more about that.

6 A He was a sergeant.

7 Q So he just never made an arrest?

8 A No, he didn't make the arrest.

9 Q What is an arrest? What do you mean when you
10 say he never made an arrest?

11 A He would be the one who would have to process
12 the person who was in custody with the facts and prepare
13 the reports. He didn't make that -- he didn't make
14 arrests. He approved arrests.

15 Q Was he ever on scene for arrests?

16 A He was on scene for arrests.

17 Q Did he ever tell others go arrest that person?

18 A I wouldn't say he said go arrest anyone. He
19 would go -- he would say okay, all of those over there
20 who are trespassers, we gon' take all the trespassers
21 today. Or they're solicitation -- solicitation for
22 unlawful business, we gonna take those today.

23 Q So he'd go by group solicitation of drugs,
24 trespassing, selling, that sort of thing, and decide

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1 who's going to jail?

2 A In some circumstances, yes.

3 Q All right. So how does what you just described
4 conflict with that woman thinking that Watts' team
5 arrest everybody?

6 MR. BAZAREK: Object to the --

7 MR. KOSOKO: Object --

8 MR. BAZAREK: Yeah, object to the form of the
9 question.

10 MR. KOSOKO: Misstates prior testimony also.

11 MR. RAUSCHER: Okay. We can put on the record
12 that one objection is going to count for all?

13 MR. BAZAREK: We can.

14 MR. FLAXMAN: Yeah. Yeah, if it's not covered,
15 the point is you can have one attorney making an
16 objection, but I agree. We can do like we could do one
17 voice and cover all the attorneys --

18 MR. RAUSCHER: Yes, agreed.

19 MR. FLAXMAN: Like if someone else wants to
20 pipe in --

21 MR. RAUSCHER: If they have a different
22 objection --

23 MR. BAZAREK: I'll object that it's
24 argumentative.

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1 MR. FLAXMAN: No, we don't join, join, join.
2 We don't need that.

3 MR. BAZAREK: Yeah.

4 MR. RAUSCHER: I can't even -- I can't tell you
5 what I just asked you, so can I have the last question.

6 THE REPORTER: Yes, of course.

7 MR. RAUSCHER: I'll just ask a different one or
8 the same one again.

9 Q Can you tell me how the thing you just
10 described conflicts with that woman's story that Watts
11 arrested everybody?

12 MR. BAZAREK: Object to the form of the
13 question. Vague, ambiguous, compound.

14 A She was saying that he was making arrests that
15 he didn't make.

16 Q So you think that a layperson should know the
17 difference between a sergeant saying go take that person
18 to jail and someone somehow otherwise effectuating an
19 arrest --

20 MR. BAZAREK: Object --

21 Q -- is that your testimony?

22 MR. BAZAREK: Object to the form of the
23 question. It's also argumentative.

24 A I think that at that point for what she was

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1 saying, if she knew Watts, she should have known who she
2 was talking to.

3 Q But that's a different -- I think that's a
4 different point. You -- I -- we've established --
5 you've established she didn't know who Watts was.

6 A Okay.

7 Q But what I want to know is what she said that
8 was wrong? She didn't say you -- Watts arrested me?

9 A I don't understand really what you trying to
10 get at.

11 Q Well, I think you're saying people were just
12 spreading rumors and she was wrong about what she said,
13 right?

14 A Part of, yes.

15 Q And I'm trying to -- I want to know what was --
16 what she said that was wrong?

17 A Because Watts didn't have to give a order to go
18 make an arrest. Anybody could make an arrest on their
19 own freewill. If we had a call of disturbance, or
20 someone else on the team had a call of a disturbance and
21 went down there, and they made the choice to make their
22 arrest, that's the difference.

23 Q How does that conflict with what she was
24 telling Watts?

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1 A Because she made it seem like Watts did
2 everything.

3 Q So was it your understanding she was saying
4 that Watts is the only person out here who can arrest
5 everybody?

6 A Yes.

7 Q And so I think let's get back to you said Watts
8 never made arrests. Now, let just try to get a time
9 frame down here. When you say that, what period of time
10 are you talking about?

11 A He was the supervisor. The officers, they work
12 to make the arrest.

13 Q I want to know what time period you're talking
14 about.

15 A From the time -- I would say 2003, 2004 that I
16 was on the team until he left.

17 Q Okay. When did he leave?

18 A When was it? 2012.

19 Q All right. So who's the person -- what does it
20 mean to say to you someone made an arrest?

21 A That means the officer made an arrest of
22 someone who had done something illegal.

23 Q Well, what is the part of the whole interaction
24 with someone that you consider the arrest?

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1 MR. KOSOKO: Objection. Calls for legal
2 conclusion. And it's argumentative.

3 A That would be the person who is going to take
4 the lead of what actually happened and do the processing
5 of that person.

6 Q What -- can you tell me more of what you mean
7 the lead of what happened?

8 A Yeah, you have a first arresting officer and a
9 second arresting officer.

10 Q Okay.

11 A So the first arresting officer would be the one
12 who has -- who has the probable cause to place that
13 person in custody.

14 Q So what did first -- who do they do with them?
15 Like their -- they place cuffs on the person? What is
16 that? What do you mean?

17 A Yeah, they place cuffs on them. They don't
18 have to be the person who -- the first person to put
19 cuffs on him. But officers process their arrests.

20 Q So the first person who place cuffs on the
21 person may not be the arresting officer?

22 A May not be.

23 Q What's the -- what's the purpose of the
24 arresting officer?

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1 A If you are not --

2 MR. MICHALIK: Object to form.

3 A If you and I were in the room, and there was an
4 illegal activity going on, you might have been closer to
5 him than I was, but you saw the same thing I did, but I
6 put the cuffs on him. That's the difference. But would
7 it be your arrest?

8 Q Let's -- let's try to just -- I want to try to
9 understand this, so let's -- you have a lawyer, your
10 counsel is right there, let's just as a hypothetical,
11 it's obviously just a hypothetical, say we saw him, we
12 both are police officers, we saw him do something
13 illegal. You place the cuffs on him, but I could be the
14 arresting officer?

15 A Yes.

16 Q How -- how is that?

17 A We're partners.

18 Q Okay. Who would decide who is the arresting
19 officer there?

20 MR. BAZAREK: I'll object to foundation, form.

21 A I guess the partners would at that point in
22 time.

23 Q Is that how it worked, whether you or the
24 partners would just decide who's the arresting officer?

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1 MR. KOSOKO: Object to form.

2 A Depending upon the circumstances.

3 Q What -- what -- where are you getting this
4 understanding of what an arresting officer is?

5 A Just through my years of experience, they
6 always wasn't the person who placed handcuffs on the
7 person who was the arresting officer.

8 Q Can you tell me then what you mean by arresting
9 officer?

10 A A person who's going to process a -- the
11 offender that's in custody.

12 Q All right. Well, let me ask you this: In a
13 situation, the hypothetical that we just described, if I
14 placed the cuffs on the person, would you expect that
15 the person who got cuffed would think you were the
16 arresting officer or I was?

17 A I don't know what they would think.

18 Q Why would they possibly think it was you?

19 MR. BAZAREK: Object to form.

20 MR. MICHALIK: And argumentative.

21 A We both are there. We both there saying the
22 same thing.

23 Q All right. You said the arresting officer does
24 the processing?

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1 A They do the lead processing, yes.

2 Q Would you agree that the way that you're using
3 arresting officer is more of an internal thing, the
4 police, versus an external thing that people could know
5 from serving?

6 MR. KOSOKO: Object to form. Vague, ambiguous.

7 A No.

8 Q Why do you disagree with that?

9 A Because when you get in a squad car, you decide
10 who's going to be the paper officer that day. And that
11 paper officer's usually the one who's arresting officer.
12 Whether his partner puts the cuff on him or not, the
13 arrest -- the paper officer is the arresting officer.

14 Q And does the person who's arresting know the
15 paper officer is?

16 MR. KOSOKO: Objection. Form and foundation.

17 A They know.

18 Q So how would someone who is arrested know who
19 the arresting officer is?

20 MR. MICHALIK: Objection. Calls for
21 speculation.

22 A It would be on their arrest report.

23 Q So they would have to read the arrest report
24 to know who?

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1 A They would have to get copies of the arrest
2 report and the case report to know who the arresting
3 officer was.

4 Q And is it always the first person on the report
5 or sometimes is it the second person on the report?

6 A As far as what?

7 Q Who the arresting officer is?

8 A They both are considered the arresting officer.

9 Q All right. What about the times when it lists
10 a partner who isn't actually there?

11 MR. KOSOKO: Object. Form and foundation.
12 Calls for speculative response.

13 A A partner doesn't have to actually be there all
14 the time.

15 Q So someone can be an arresting officer even if
16 they weren't there for the arrest?

17 A At some point, yes.

18 Q What do you mean at some point, yes?

19 A They were partners, and you put your partner in
20 box 2 of an arrest report.

21 Q And that makes your partner an arresting
22 officer?

23 A Yes.

24 Q Even though they had no part in the arrest?

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1 MR. KOSOKO: Object to the form of the
2 question.

3 A They might not have had a part of the initial
4 arrest, but they are there at some point to know and get
5 relaid to what happened, yes. That makes them an
6 arresting officer.

7 Q What do you mean to know and get relaid to what
8 happened?

9 A Sometimes the second officer shows up a short
10 time later or a little later on. They're partners.
11 They go on a case report together, first and second
12 arresting officer. He relays to his partner what he
13 saw.

14 Q And so you are an arresting officer if you show
15 up when the person is already in custody and your
16 partner says to you here is what happened, that makes
17 you an arresting officer?

18 A He tells him what happened. He makes him -- he
19 goes in box 2, yes.

20 Q So that makes him the arresting officer?

21 A Yes.

22 Q Where did you learn that, to do things that
23 way?

24 A At Chicago Police Department.

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1 Q Why pick a partner and not just some random
2 person on the police force?

3 MR. BAZAREK: I'd object. It's argumentative.
4 And sarcastic.

5 MR. RAUSCHER: No, I mean, it's not -- not
6 supposed to be sarcastic. It's like actual -- it's a
7 question.

8 MR. BAZAREK: Okay. I object. I have made my
9 objection.

10 A You have a partner, you working together, you
11 wouldn't choose a -- randomly choose your partner. You
12 working in tandem that day.

13 Q But why do -- what is it -- what's the purpose
14 of having a second arresting officer on the police
15 report?

16 A I don't know. I didn't invent the police
17 report. It's the box for a second arresting officer.

18 Q I'm sorry, I missed part of that answer.

19 A I do not invent the arrest report, but there's
20 a box there for second arresting officer, and usually
21 when two officers are working together, one goes in one
22 box, the other goes in a second box.

23 Q Did you ever split up from your partners when
24 you were working?

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1 A Yes.

2 Q All right. And what happened -- what would
3 happen if you split up from your partner and you were
4 with a different second person when the arrest happened,
5 who would go on the second box?

6 A Your partner.

7 Q Do you have any understanding of what, if
8 anything, police reports are used for after you've
9 created them?

10 A Yes.

11 Q Okay. What are they used -- what are police
12 reports used for?

13 A They are used to prosecute individuals based
14 upon what's in those reports.

15 Q All right. Well, do you think that listing
16 someone who wasn't there for the arrest as an arresting
17 officer interferes with that process of prosecuting a
18 case?

19 MR. BAZAREK: Object to the form of the
20 question. Compound.

21 A No, I don't. I think that what happens is when
22 you'd be an interview for the processing of him, if the
23 second arresting officer can't say what he knew, then he
24 can't testify to that. But putting him on a paper

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1 because you are a partner is what and how it's done.

2 Q So the second officer can only testify if he
3 saw what happened?

4 A He can only testify to what he saw. Or what he
5 was told.

6 Q All right. Then, how would -- how would a
7 defendant know who they should be asking questions to in
8 a criminal case if the report doesn't list the person
9 who's actually there?

10 MR. BAZAREK: Object to the form of the
11 question. Also calls for speculation.

12 A I don't know.

13 Q Do you think that might be problematic?

14 MR. BAZAREK: Objection. Argumentative.

15 A I don't know.

16 Q How many police reports have you completed or
17 reviewed in your years on the police force?

18 A Lots of them.

19 Q Yeah, I understand you can't give an exact
20 number today but what's your best estimate? Hundreds,
21 thousands?

22 A Of what kind of police?

23 Q Police reports, arrest reports?

24 A Arrest reports?

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1 Q Or vice case reports?

2 A Voice case reports? At least 200.

3 Q And in complete as things you completed and
4 also just things you reviewed that you didn't
5 complete --

6 A I don't understand.

7 Q So what -- there were -- there's a category of
8 arrest reports and vice case reports that you personally
9 completed, correct?

10 A Yes.

11 Q And is the 200 number just those or are you
12 counting other ones where in your job you reviewed the
13 report even though you weren't the one who created it?

14 A In the 200, there has been some that I didn't
15 create.

16 Q Okay. And in looking at or creating those 200
17 or so reports, did you ever wonder what the second box
18 was for?

19 A No.

20 Q And you said you learned how to do those police
21 reports in working for the Chicago Police Department?

22 A Yeah, they train you on how to write a report.

23 Q All right. So do you remember being trained
24 that you've always put your partner in the second box?

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1 A To the best of my recollection.

2 Q Tell me about the training where you were
3 taught to put your partner in the second box?

4 A A report writing class during the training
5 academy.

6 Q Do you remember anything about the class?

7 A No.

8 Q Do you remember when during the academy you
9 took that class?

10 A No.

11 Q Do you remember who taught it?

12 A No.

13 Q Did you ever talk to any of the -- of your
14 partners over the years about how to create police
15 reports?

16 A How to create reports?

17 Q Yeah.

18 A We've talked to other officers on how to
19 prepare a report.

20 Q And was it a uniformed practice, at least on
21 the Watts tactical team, that you list your partner as
22 the second arresting officer even if that person wasn't
23 there for the arrest?

24 A I wouldn't say it was just uniformal to his

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1 team. I think it was uniform across the department.

2 Q So yes, it was uniform on his team but also was
3 a broader practice?

4 A I think so.

5 Q How do you decide if there were -- well, let me
6 ask you this. Were there some days on the Watts Team
7 when you had more than one partner?

8 A Yes.

9 Q And when those situations, were there ever days
10 when you had more than one partner and you arrested
11 somebody?

12 A Yes.

13 Q And on those days, how did you decide who went
14 in box 2 on the report versus box 1 versus not being in
15 either?

16 A Whoever was the paper, who was writing the
17 paper that day.

18 Q Well, how did you decide on who was writing the
19 paper?

20 A I don't know exactly how we decided, but
21 whoever we decide was writing the paper for that day.

22 Q So it's just random who you listed?

23 A Yes.

24 Q Was it one person who wrote the paper for a

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1 whole day?

2 A Depending upon the circumstances.

3 Q All right. Well, tell me about what you mean
4 when you say depending upon the circumstances?

5 A In what instance are you referring to?

6 Q Well, we're -- the situation where you had two
7 partners and you made an arrest. Sorry, let me
8 rephrase.

9 The situation where there are two or more --
10 where you have two or more partners or three or more
11 officers or partners --

12 A Okay.

13 Q -- and you make an arrest, and then you
14 randomly decide between the three of you who would be in
15 which box on the paperwork.

16 A Okay.

17 Q What circumstances dictate who's going to be
18 the paper officer and who goes elsewhere?

19 A I -- I would like to say from my best
20 recollection is that after processing an arrest, if we
21 went out and did another arrest, and someone else would
22 be the paper, write the paper and be the first arresting
23 officer.

24 Q How did you decide who would go on -- who would

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1 go on box 2?

2 A Just it would be whoever was writing the paper
3 would decide.

4 Q How would the person who was writing the paper
5 decide who goes on box 2?

6 A If we were all there for the arrest, whoever
7 was writing the paper decide who would go on box 2 on
8 the paperwork.

9 Q What if only two of the three of you were there
10 for the arrest?

11 A If only two of the three were there, then it
12 would be the two there would be one in box 1 and box 2.

13 Q Why would the two people who were there be in
14 box 1 and box 2 instead of the third person?

15 A Because the third person probably was not there
16 at the time to get to relay the information and you put
17 them up there as part of the arrest in the witness area.

18 Q Why would you do it that way?

19 A Because that's the way the paperwork is set up
20 for you to do.

21 Q What do you mean it's set up for you to do it
22 that way?

23 A You have a first and a second arresting officer
24 up in higher thing, and the box asked for all additional

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1 officers, and that's where you place them.

2 Q But why -- why when you have three partners,
3 and only two of them witnessed the arrest, why do you
4 decide to put both of the two people who witnessed it in
5 box 1 and 2? Why not put the third in there?

6 A Because it only says box 1 and 1, and it goes
7 to box 3. And box 3 if is there is for the third or the
8 fourth or the fifth or higher, meaning officers that
9 were involved.

10 Q I understand that there is only certain number
11 of boxes at least on the vice case report, but I want to
12 know how do you decide who goes in box 2 when there are
13 three partners? Why should it be that the person who
14 witnessed it be in box 2?

15 A Pardon me?

16 Q Why should it be that the person who witnessed
17 the arrest goes in box 2 if there are three partners?

18 A If there are three partners, and two of them
19 there, and the other one comes along from somewhere
20 else, the two there, one of the two there going to write
21 the report. They're going to be the one doing make --
22 doing the arrest and filling it out, and they're going
23 to be in box 1 and 2, and the third person is going to
24 be in the third box.

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1 Q I understand that is what happened, that's how
2 you're testifying. What I'm trying to understand is
3 why? Why should the person who witnessed be in box 2 as
4 opposed to the other person?

5 Is it so obvious that the people who witnessed
6 it should be the ones on the report?

7 A I think it makes it look better since at that
8 point yes, that way.

9 Q All right. Why would it make more sense to
10 have the witnesses to the arrest be the arresting
11 officers?

12 MR. BAZAREK: Object to the form.

13 A I don't understand your question.

14 Q You just said it would make more sense that
15 that --

16 A Yes, it would make more sense.

17 Q All right. Why does it make more sense to have
18 the two people who witnessed the arrest be in box 1 and
19 2 as the arresting officers?

20 A If they are the officers who are processing the
21 arrest, yes.

22 Q What does that mean?

23 A That means if they are the officer there --
24 there, then they should -- they should be in box 1 and

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1 2.

2 Q Right, but why? Why should they be in box 1
3 and 2?

4 A Because I think they give a better account, a
5 better account of what go -- what went on.

6 Q Why is it important that the report lists the
7 people who can give an account of what went on?

8 MR. KOSOKO: Object to the form.

9 Q Why is it important that the arrest report
10 lists people who can give an account of what happened?

11 MR. KOSOKO: Object to the form.

12 A It's important because it should be you be able
13 to justify what went on and what you saw.

14 Q All right. How can you reconcile that with the
15 practice of putting a partner on who didn't witness
16 anything?

17 MR. MICHALIK: Object to the form of the
18 question.

19 A You can make and relay that information to your
20 partner as what had went on, and if you relay the
21 information, you can put it there.

22 Q Would you think it's a better practice if there
23 were two witnesses to an arrest and one wasn't your
24 partner, that that person should be listed as a second

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1 arresting officer?

2 MR. MICHALIK: Object to the form of the
3 question. Counsel --

4 A As a practice, a lot of things can be done
5 differently and better but I'm not sure if that would
6 make any difference.

7 Q Well, do you think it would be a better
8 practice to list the two people who saw the arrest and
9 were involved in it as opposed to automatically listing
10 your partner?

11 A My opinion?

12 Q Yes.

13 A It could be.

14 Q Okay. Why do you think it could be a better
15 practice to do it that way?

16 A It just could be. I -- there's no reason why
17 it couldn't be.

18 Q Would it be helpful in that situation to have a
19 report explain who saw what?

20 A You can have the person that's listed as a
21 witness help you explain the same way.

22 Q How long have you been a police officer?

23 A 23 years.

24 Q Can you -- how many times -- well, let me ask

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1 you this. Have you been deposed before today?

2 A Once.

3 Q All right. Tell me about that deposition.

4 A It was approximately 18 years ago.

5 Q Was that in connection with your job as a
6 police officer?

7 A Yes.

8 Q Were you a party in the case?

9 A Yes.

10 Q Which case was that, do you remember?

11 A I don't recall the names.

12 Q Do you know why you -- well, were you a
13 defendant?

14 A I was -- yeah, I was accused.

15 Q You were accused of doing something wrong?

16 A Yes.

17 Q What were you accused of doing wrong?

18 A I was accused of -- I'm trying to remember how
19 many people were in the vehicle, but I'm not sure. But
20 there were at least three teenaged girls. One said I
21 pointed a weapon at them. Another said I ran along the
22 side of the car with a weapon. And the third said I got
23 out of the car and walked up to the car with the weapon.

24 Q And I -- I'm going to pause you here.

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1 MR. RAUSCHER: I think this was a subject of a
2 CR also?

3 MR. KOSOKO: Yeah.

4 MR. MICHALIK: And also --

5 MR. RAUSCHER: What we're going to do with
6 that, we're not going -- yeah, go ahead.

7 MR. MICHALIK: I'll also add to the record
8 there was a question about the name of the case. I
9 believe the case is Rubinsky Skanza (phonetic) are two
10 of the plaintiffs, and the defendants were I recollect
11 the City, Sergeant Watts, and an officer. I believe his
12 name was Dan Hoard, H-O-A-R-D.

13 Q And just because of the way these cases are,
14 there are so many of them, we have certain agreements on
15 what to cover during depositions, so I'm not actually
16 going to ask you more questions about that today now
17 that I know what case you're talking about.

18 A Okay.

19 Q What did you do to prepare for your deposition
20 today?

21 Well, we're going to cover that a different
22 day. That's why we're not doing that. I don't want to
23 try to do that piecemeal.

24 What did you do to prepare for your deposition

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1 today?

2 A I looked at some vice case reports, some arrest
3 reports, some mugshots, rap sheets. I believe there
4 were a few affidavits.

5 Q Who did you meet with, if anybody? And I
6 don't -- if you met with your attorneys, I don't want to
7 know about your conversations with them, but I do want
8 to know if you met with them.

9 A Yes, I did.

10 Q Yea. Which attorneys did you meet with?

11 A I met with Bill here Thursday and Friday of
12 last week, and Monday and Tuesday of this week.

13 Q How long about were each of those meetings?

14 A Somewhere between four, five hours.

15 Q Was anybody else at those meetings except for
16 the two of you?

17 A Yes.

18 Q Who else was at those meetings?

19 A A couple of other attorneys at the firm.

20 Q At those firm?

21 A Yes.

22 Q Do you know their names?

23 A Brian, Allison, Tony.

24 Q Anyone else other than those people at the

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1 meetings?

2 A Not at the meetings, no.

3 Q All right. Did you do anything else to prepare
4 other than meeting with your attorneys?

5 A No.

6 Q Have you talked to anybody about your testimony
7 or your upcoming testimony in this case?

8 A No.

9 Q Have you talked to anybody else who has been
10 deposed in this case about their testimony?

11 A No.

12 Q Have you talked to any of your codefendants
13 about any of the events at issue in these cases?

14 A No.

15 Q Did any of the vice case reports, mugshots, rap
16 sheets, affidavits or any other documents you looked at,
17 refresh your recollection about any of the events at
18 issue in these cases?

19 A A few did.

20 Q All right. Can you tell me which documents
21 refreshed your recollection?

22 A Some mugshots, couple of vice case reports.

23 Q Which mugshots refreshed your recollection?

24 A Lionel White.

Transcript of Alvin Jones
Conducted on February 26, 2020

55

1 Q Lionel White, Sr., or Jr.?

2 A Sr.

3 Q Okay.

4 A I believe Rainey. Whoever the codefendant on
5 there with Rainey. The mugshot didn't ring a bell, but
6 the vice case report did.

7 Q Okay.

8 A And Lucky Pearson.

9 Q Which for lucky Lucky Pearson? Vice case or
10 mugshot or both?

11 A Both.

12 Q Is it the same for Lionel White, Sr., both?

13 A Both.

14 Q Anyone else?

15 A Angelo Shenult, Jr.

16 Q What was it that refreshed your recollection --

17 A A co --

18 Q I'm sorry.

19 A A codefendant, I can't think if it. I believe
20 last name is Scott.

21 Q And what was it that refreshed your
22 recollection for those two individuals?

23 A When I looked at the mugshot and the vice case
24 report.

Transcript of Alvin Jones
Conducted on February 26, 2020

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1 Q All right. Anything else?

2 A I can't think of the rest of them off the top
3 of my head.

4 Q And if you do, you know, as we're going along
5 and as we get into some specific cases, which most of
6 which will be tomorrow, would you tell me if you either
7 do get a refreshed recollection or if you're looking at
8 one and you remember oh, I remember seeing this in my
9 deposition and made me remember something?

10 A Yes, I will.

11 MR. RAUSCHER: Let's mark Exhibit 1,
12 DAFWHITE000007.

13 (Exhibit 1, Employee assignment detail history,
14 was marked for identification and is attached to the
15 transcript.)

16 A Yes.

17 Q Do you recognize this document?

18 A Yes.

19 Q Can you tell us what this document is?

20 A That's my employee assignment detail history.

21 Q Does that list all of your assignments over the
22 years?

23 A Yes.

24 Q Is it an accurate list of your assignments?

Transcript of Alvin Jones
Conducted on February 26, 2020

57

1 A An accurate list? Yes, it's accurate.

2 Q So you started in 1996; is that right?

3 A Yes.

4 Q And you were -- you started in training?

5 A Yes.

6 Q And then, you moved immediately after that to
7 District 2?

8 A Yes.

9 Q Can you tell me anything else you -- we talked
10 some about you had some memory of a report writing
11 training?

12 A Yes.

13 Q Is that right?

14 A Yes.

15 Q Would that be during the '96, '97 time period
16 listed here?

17 A Yes.

18 Q What else do you remember getting trained on
19 during that time period?

20 A I got trained on firearms, I got trained on
21 traffic stops, I got trained on how to wear uniforms,
22 how to search.

23 Q What do you remember about training on how to
24 search?

Transcript of Alvin Jones
Conducted on February 26, 2020

58

1 A Vaguely. You always try to make sure there's
2 nothing in a waistband. If nothing harms you, that's
3 the first thing. Make sure their hands are clear in
4 their waistband where a weapon might could be stored.

5 Q Did you receive training on where searches
6 should be conducted if you're arresting people?

7 A I don't recall that.

8 Q Any other topics that you remember receiving
9 training on?

10 A I don't remember all the topics from the
11 academy.

12 Q Do you remember any other topics from the
13 academy that you received training on?

14 A No, not at this time.

15 Q All right. And what was your first assignment
16 after the academy?

17 A The 2nd District.

18 Q Did you ask to go to the second 2nd District?

19 A No.

20 Q Did you want to be in the 2nd District?

21 A I didn't know where I wanted to be. I was just
22 assigned there.

23 Q Before you came to the police station, were you
24 working for the Cook County Sheriff's Office?

Transcript of Alvin Jones
Conducted on February 26, 2020

59

1 A Yes, I was.

2 Q What was your job with the Cook County
3 Sheriff's Office?

4 A I was Cook County Sheriff correctional officer.

5 Q How long were you a Cook County Sheriff's
6 correctional officer?

7 A From approximately '94 to '96.

8 Q What did you do as a correctional officer for
9 Cook County?

10 A Guarded inmates.

11 Q Where did you guard inmates?

12 A On cell blocks.

13 Q Where?

14 Where? What was the location?

15 A 26th and California.

16 Q What did you do to guard inmates in cell blocks
17 at 26th and California?

18 A There's an interlock area where you sit and
19 observe inmates all day.

20 Q Did you like that job?

21 A It was okay.

22 Q Did you ever get accused of using excessive
23 force in that job?

24 A I don't remember.

Transcript of Alvin Jones
Conducted on February 26, 2020

60

1 Q Did you ever get disciplined or reprimanded in
2 any way at that job?

3 A I don't remember.

4 Q You don't remember one way or the other?

5 A I don't remember one way or the other.

6 Q Did you ever use excessive force in that job?

7 A No.

8 Q Did you ever do anything that would have
9 warranted discipline?

10 A Not that I can remember.

11 Q What were your main responsibilities when you
12 worked as a correctional officer?

13 A To observe inmates during the course of the
14 tour to make sure that they were safe inside that --
15 that tier.

16 Q How did you accomplish your job of making sure
17 inmates were safe inside the tier?

18 A By sitting there and observing them for the
19 tour of duty.

20 Q How did you sit and observe them?

21 A After you get there, you do a count, and they
22 -- and a count clear, the doors are open, they are
23 allowed time to come out. Those that want to come out
24 come out. Those that don't, don't. After that, the

Transcript of Alvin Jones
Conducted on February 26, 2020

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1 doors would be locked and everybody would be out for a
2 period of time. And my job was to sit there and watch
3 to make sure that nothing went wrong in there.

4 Q Did you ever have to break up fights at 26th
5 and California?

6 A Yeah, I think I had to break up a fight or two.

7 Q Do you have any specific recollection of doing
8 that?

9 A I remember a couple of fights I had to break
10 up, yes.

11 Q Tell me what you remember about fights that you
12 had to break up as a CO in 26th and California?

13 A As the CO?

14 Q Yeah.

15 MR. BAZAREK: Just object to the relevance of
16 this line of question.

17 A You see a fight break out, you get on the phone
18 and call for help, and then you wait until enough people
19 either come there before you all would go in to break up
20 that fight.

21 Q Why did you leave the Cook County Sheriff's
22 Office?

23 A The City paid more.

24 Q Did you leave voluntarily?

Transcript of Alvin Jones
Conducted on February 26, 2020

62

1 A Yes, I did.

2 Q All right. So you -- it looks like you were in
3 the 2nd District from -- initially from February 1997 to
4 the middle of October 1999?

5 A Actually --

6 Q Or just some of the other things continuing in
7 the 2nd District?

8 A Actually, I was in the 2nd District from --
9 well, no, because it was still assigned active duty.
10 You don't get assigned until after your probation is up,
11 but I was -- I went to the 2nd District in like August
12 of '96.

13 Q Okay.

14 A And after you come off probation, then you
15 actually get assigned to the district.

16 Q Okay. So your official assignment in the 2nd
17 District --

18 A Was in February.

19 Q But you had been there since August --

20 A Yes.

21 Q -- of '97. Got it.

22 And then, there's a --

23 MR. MICHALIK: I just think you missed -- I
24 thought he said August of '90 --

Transcript of Alvin Jones
Conducted on February 26, 2020

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1 MR. RAUSCHER: 6.

2 MR. MICHALIK: -- 6, and I think you just said
3 August of '97.

4 MR. RAUSCHER: Oh, okay. But I --

5 Q But maybe you can -- I'm sorry, I didn't -- let
6 -- if you could just say it again, that might be the
7 cleanest.

8 A I went to the 2nd District in August of 196.

9 Q Okay.

10 A And I was actually assigned there in February
11 of 20 -- of 1997. Because after you leave the academy,
12 you still actually belong to the training academy.
13 That's why.

14 Q Understood. Thank you.

15 And then, Mobile Strike Force and Special
16 Function Support Unit, were those also within the 2nd
17 District?

18 A No.

19 Q Where were you assigned when you were on the
20 Mobile Strike Force?

21 A That was from out of Harrison, out of the Homan
22 Square area.

23 Q And then, where were you assigned when you were
24 in the Special Function Support Unit?

Transcript of Alvin Jones
Conducted on February 26, 2020

64

1 A It was the same thing.

2 Q All right. What were your main
3 responsibilities when you were -- well, what was your
4 job in the 2nd District from August '96 until October
5 13, '99?

6 A I worked on patrol.

7 Q And what were your -- I'm sorry, go ahead.

8 A I worked on patrol on a beat car.

9 Q What were your main responsibilities as the
10 patrol officer in a beat car in the 2nd District?

11 A I answered calls, I worked -- I don't -- if you
12 worked on a beat car, you patrol that beat, you worked
13 on a sector car, you patrolled that sector.

14 Q And did you rotate between beat car and sector
15 car?

16 A Well, sector cars were because of rapid
17 response vehicle. Sect -- beat car is a beat, that
18 specific beat. That wherever that block radius was.

19 Q What did you do day-to-day as a beat officer?

20 A Drove around, answered radio calls, responded
21 to radio calls. Responded to hand wavers.

22 Q What were the main types of calls you responded
23 to as a patrol officer in the 2nd District from August
24 '96 to middle of October '99?

Transcript of Alvin Jones
Conducted on February 26, 2020

65

1 A It varied. Domestics, battery in progress,
2 burglary in progress, narcotics calls, persons with gun.
3 It varied. Day-to-day.

4 Q Did you have a lot of calls about drugs?

5 A I would say it all varied out to equal out the
6 same.

7 Q So some about drugs?

8 A Some about drugs.

9 Q Did you have a partner at the time?

10 A Many. I had different partner day-to-day.
11 Until you actually assigned to a car.

12 Q Did you at some point as a patrol officer in
13 the 2nd District get assigned to a car with a more
14 permanent partner?

15 A Yes.

16 Q And when did that happen?

17 A I'm not exactly sure when.

18 Q What's your best estimate?

19 A Sometimes after -- sometime after that February
20 27th date of 1997.

21 Q Who was the first partner -- well, how many
22 partners did you have in the 2nd District when you were
23 a patrol officer?

24 A The first partner I can remember having was

Transcript of Alvin Jones
Conducted on February 26, 2020

66

1 Aaron Long.

2 Q Aaron Long?

3 A Yes.

4 Q And how long was Aaron Long your partner?

5 A I don't remember.

6 Q Do you have any other partners you remember
7 from your time as patrol officer in the 2nd District?

8 A Yes.

9 Q Who else do you remember being partners with?

10 A Leonard Watts.

11 Q Any relation?

12 A No.

13 Q Any other partners you remember from your time
14 as a patrol officer in the 2nd District?

15 A Kurtisa Curtis.

16 Q Okay. Anyone else?

17 A I'm not sure what her name is. Tiana Woods.

18 Q Anyone else?

19 A No.

20 Q During your time as patrol officer in the 2nd
21 District from August '96 to the middle of October 1999,
22 did you ever hear rumors about dirty police officer?

23 A No.

24 Q All right. And then you moved over to Mobile

Transcript of Alvin Jones
Conducted on February 26, 2020

67

1 Strike Force?

2 A Yes.

3 Q And let me -- actually, let's back up one step.

4 When you were a patrol officer, were the Ida B.
5 Wells Homes in the 2nd District?

6 A Yes.

7 Q Did you patrol Ida B. Wells?

8 A I didn't patrol but I take calls down there. I
9 take some calls down there.

10 Q How many calls, if you can even remember, did
11 you take at Ida B. Wells during your time as a patrol
12 officer in the 2nd District?

13 A I don't know.

14 Q Was it one of the more active places you'd get
15 calls from?

16 A Not necessarily.

17 Q Did you know the bigs players -- well, were
18 drugs a problem at Ida B. Wells during that time period
19 when you were a patrol officer?

20 A I don't know.

21 Q All right. So then, you moved over to the --
22 tell me about moving over to the Mobile Strike Force?

23 A There was a position opening, and I asked the
24 commander at the time about moving over there.

Transcript of Alvin Jones
Conducted on February 26, 2020

68

1 Q Who was the commander whom you asked about
2 moving over to Mobile Strike Force?

3 A I believe it was Maryann Perry.

4 Q What was the Mobile Strike Force?

5 A It was a special operations section.

6 Q What was the Mobile Strike Force responsible
7 for?

8 A They would send extra patrol cars to various
9 districts on various days. They helped that district
10 with their problems.

11 Q They went to hot spots?

12 A Some.

13 Q Were there any specific types of crimes that
14 the Mobile Strike Force concentrated on?

15 A No, it's the same things like patrol.

16 Q Why did you want to move over to Mobile Strike
17 Force?

18 A It was something different.

19 Q Why did you want something different?

20 A It wasn't necessarily something different. It
21 was just something different other than being in the
22 district where you moved around from place to place.
23 Because they department have a specific district to be
24 in every at a. They might be in two districts, covered

Transcript of Alvin Jones
Conducted on February 26, 2020

69

1 two districts this day, then another two districts over
2 here another day.

3 Q You liked the idea of having a variety of
4 places to go?

5 A Move around and see the city.

6 Q Any other reasons you want to move to the
7 Mobile Strike Force?

8 A It was a choice. My wife was at the 2nd
9 District at the time, I had just gotten married, and we
10 had to go. One of us had to leave the District.

11 Q She wanted to stay?

12 A She wanted to stay.

13 Q What's your -- are you still married?

14 A Yes, I am.

15 Q What's your wife's name?

16 A Nedra.

17 Q Is she still a police officer?

18 A Yes.

19 Q What rank does she hold?

20 A She's a sergeant.

21 Q Was she a patrol officer at the time?

22 A Yes.

23 Q How did you land on the -- well, let me
24 rephrase that.

Transcript of Alvin Jones
Conducted on February 26, 2020

70

1 How did you decide to try to move to the Mobile
2 Strike Force as opposed to some other place?

3 A I'm not really sure how that conversation went
4 about. But I remember between the commander and the
5 tactical lieutenant, that's what I came up with.

6 Q Who was the tactical lieutenant?

7 A Krumps.

8 Q Do you have a first name?

9 A I'm trying to remember her first name but I
10 know it's Krumps.

11 Q Were there other units or jobs that you were
12 interested in at the time?

13 A The Mass Transit Unit, but there was no
14 openings there.

15 Q What does the Mass Transit Unit do?

16 A They are the patrol officers who patrol the CTA
17 lots.

18 Q What was it about the Mass Transit Unit that
19 was appealing to you?

20 A Riding the trains.

21 Q And why was riding the trains appealing?

22 A Because at one point in time I worked for CTA
23 as a conductor. So it was appealing to me to ride the
24 trains.

Transcript of Alvin Jones
Conducted on February 26, 2020

71

1 Q Did you like that conductor job?

2 A It had its ups and downs.

3 Q Why did you leave the CTA?

4 A Because I got a full-time job.

5 Q That was --

6 A And it was a part-time job.

7 Q All right. Tell me about what your main
8 responsibilities were on the Mobile Strike Force.

9 A To patrol whatever districts we were assigned
10 to just as we were a beat car in that district.

11 Q So you just had the same responsibilities as a
12 patrol officer like you did before but you'd go to
13 different places?

14 A Yes.

15 Q All right. And then, what's the Special
16 Functions Support Unit?

17 A It was the same thing.

18 Q Same thing. It's the same time period, I
19 guess, right?

20 A Yes.

21 Q So it's just a different title?

22 A Yes.

23 Q But there's no difference in the job? It
24 wasn't like one day --

Transcript of Alvin Jones
Conducted on February 26, 2020

72

1 A No.

2 Q -- they said you're are on the desk unit and
3 one day you're on this one?

4 A Correct.

5 Q All right. Then you moved over to Public
6 Housing South April 27, 2000?

7 A Yes.

8 Q Why did you leave the Mobile Strike Force/
9 Special Functions Support Unit?

10 A The travel getting there back and forth was not
11 good.

12 Q Did you live closer to the 2nd District?

13 A No, I lived farther than the 2nd District.

14 Q So what was it about the travel?

15 A I was coming from the far South Side all the
16 way to the West Side in rush hour traffic. Back and
17 forth.

18 Q So it was getting to Holman Square that was
19 difficult?

20 A Yes, it was.

21 Q And it was easier -- I guess what I'm trying to
22 understand it was easier for you to get to the 2nd
23 District, or no?

24 A To the -- it's closer.

Transcript of Alvin Jones
Conducted on February 26, 2020

73

1 Q Yeah, that's right. So the 2nd District was
2 closer to your home than Holman Square was?

3 A Yes.

4 Q Was there any other reason that you left that
5 Mobile Strike Force besides the commute?

6 A No.

7 Q It was a voluntary decision by you?

8 A Yes, it was.

9 Q How did you decide on Public Housing South?

10 A They were getting a new commander.

11 Q Did you know that commander?

12 A Yes; Ernie Brown.

13 Q You wanted to work under Ernie Brown?

14 A Yes.

15 Q Id you know Ernie Brown?

16 A I met him at the police academy.

17 Q And how did you -- what was the circumstance of
18 you meeting him at the police academy?

19 A I believe he -- at that time, he was a
20 supervisor at the academy.

21 Q And you hit it off with him?

22 A Yes, pretty much.

23 Q Did you keep in touch with him over the years?

24 A No.

Transcript of Alvin Jones
Conducted on February 26, 2020

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1 Q Did you talk to him about coming over to Public
2 Housing South?

3 A Yes.

4 Q How did that conversation come about?

5 A I asked him were there any openings over there,
6 and he said yes.

7 Q What was his title at the time you asked him if
8 there were openings?

9 A He was the commander.

10 Q Of Public Housing South?

11 A Of Public Housing South.

12 Q And how was it that you came to talk to him?

13 A I went to see him and asked him.

14 Q Were you particularly interested in Public
15 Housing South or was it more that you wanted to be under
16 his command, or both or neither?

17 A It was more of I wanted to be closer to home
18 coming to work.

19 Q Did you try to go back to being a patrol
20 officer in the 2nd District?

21 A No.

22 Q Why not?

23 A I didn't have any thoughts about it.

24 Q Was there something that was more appealing

Transcript of Alvin Jones
Conducted on February 26, 2020

75

1 about being in Public Housing South than being a patrol
2 officer?

3 A No.

4 Q Was the job different in Public Housing South
5 versus patrol officer?

6 A A little bit.

7 Q What was the job like in Public Housing South?

8 A It was same as patrol. You answered calls,
9 various calls that they received that end in that area.
10 Just like you would in the district. You just wasn't
11 assigned to a district. You were assigned to a unit.

12 Q All right. So what is -- what was the Public
13 Housing South Unit?

14 A What was it?

15 Q Yeah.

16 A It covered -- it covered all of the projects
17 within the 2nd District.

18 Q Housing projects?

19 A Housing projects, yes.

20 Q Were there tactical teams that were part of
21 Public Housing South?

22 A Yes.

23 Q And were there also officers who weren't on
24 tactical teams who were assigned to Public Housing

Transcript of Alvin Jones
Conducted on February 26, 2020

76

1 South?

2 A Yes.

3 Q And which one of those were you?

4 A I went there as a tactical officer.

5 Q Were you a tactical officer the whole time you
6 were in Public Housing South?

7 A No, for a short time I was riding around in the
8 van with everyone else.

9 Q What do you mean? What does it mean, riding
10 around in the vans with everyone else?

11 A There were more like they weren't tactical.
12 They were more like a beat car. For a short time.

13 Q And was that at the start of your tenure in
14 Public Housing South or did that sometime while you were
15 already there?

16 A That happened at sometime while I was already
17 there.

18 Q And did -- was that your choice or did someone
19 put you in that role?

20 A I think someone put me in that role.

21 Q Who put you in that role?

22 A I don't remember who it was.

23 Q Do you know why you were put in that role?

24 A No.

Transcript of Alvin Jones
Conducted on February 26, 2020

77

1 Q Did you like being in that role?

2 A It was okay.

3 Q Did you prefer being a tactical officer?

4 A It really didn't make a difference.

5 Q When you were in the vans, were you in uniform
6 or plainclothes?

7 A In uniform.

8 Q When you were on the tact team, were you in
9 uniform or plainclothes?

10 A Plainclothes most of the time.

11 Q Were there -- there were times when as a tact
12 officer, you were in uniform though?

13 A Yes.

14 Q When would it be that you would be in uniform?
15 When -- let me rephrase that.

16 When as a tactical team officer on Public
17 Housing South would you be in uniform.

18 A An order would come down for everyone in the
19 city to be in uniform and you had to put a uniform on.

20 Q Other than some sort of city-wide order that
21 everyone needs to be in uniform, were there times when
22 you'd be in uniform when you were a tact officer in
23 Public Housing South?

24 A Yes.

Transcript of Alvin Jones
Conducted on February 26, 2020

78

1 Q And tell me about those.

2 A It had to be some special circumstance
3 situation where the commander decided that everyone
4 needed to be in uniform.

5 Q How frequently did it happen where you'd be in
6 uniform as a tactical team officer?

7 A I don't know.

8 Q Was it rare?

9 A It was rare.

10 Q And when you were in uniform, did you do the
11 same things that you did when you were in plainclothes?

12 A Yes.

13 Q And so you'd -- well, okay.

14 You'd go out on patrol in Ida B. Wells in
15 uniform sometimes?

16 A Yes.

17 Q But presumably, you could not do a reverse
18 sting in a uniform?

19 A No.

20 Q Right?

21 Are there any other examples of things that you
22 can think of that you would do in plainclothes as a
23 tactical team officer but that you couldn't do in
24 uniform?

Transcript of Alvin Jones
Conducted on February 26, 2020

79

1 A No.

2 Q All right. So in November of 2004, that's the
3 end of your time on Possible Housing South. Is because
4 Public Housing South was disbanded?

5 A Yes.

6 Q And then, you stayed in the 2nd District until
7 December 2012, right?

8 A Yes.

9 Q Were you still a tactical team officer?

10 A Yes.

11 Q For that whole time period?

12 A Yes.

13 Q And then, you moved over to District 5 as a
14 sergeant; is that right?

15 A Yes.

16 Q Looks like were you also a sergeant for some
17 period of time in the 2nd District?

18 A No.

19 Q When did you become sergeant?

20 A November 11th -- no, that's not it. Let's see.
21 December -- November I got promote in November of 2012.

22 Q And you had sat for the sergeant exam before
23 that couple times; is that right?

24 A Yes, I had.

Transcript of Alvin Jones
Conducted on February 26, 2020

80

1 Q And did you pass either of those times?

2 A Yes.

3 Q But you had not been promoted through that
4 process?

5 A No.

6 Q How did it -- how did you get promoted to
7 sergeant?

8 A Through the meritorious process.

9 Q Tell me about the meritorious process.

10 A They were getting ready to promote sergeants.
11 In the CO book there was an announcement that they were
12 taking to from reports for meritorious sergeants, and I
13 put in a to form report.

14 Q What's the CO book?

15 A Commanding officer's book.

16 Q Who did you submit the to from report to?

17 A The commander of the 2nd District.

18 Q And who was the commander of the 2nd District
19 at the time?

20 A Fred Waller.

21 Q What did you say in your to from to Fred
22 Waller?

23 A I don't remember.

24 Q Did you get a response to your to from?

Transcript of Alvin Jones
Conducted on February 26, 2020

81

1 A Yes.

2 Q And who did the response come from?

3 A Fred Waller.

4 Q What did the response look like?

5 A It wasn't. It was verbal.

6 Q Okay. What did Fred Waller say to you in
7 response?

8 A That he was going to put me in for nomination
9 for meritorious sergeant.

10 Q When did you have that conversation with Fred
11 Waller?

12 A I don't recall.

13 Q When did you write the to from report?

14 A I don't recall when it was either.

15 Q Do you recall anything you said in the to from
16 report?

17 A No. Other than probably what was in the CO
18 book that they requested information, and I don't
19 remember what that information was.

20 Q Was it generally did you have to promote
21 yourself and say here good things I have done?

22 A No, they would do that.

23 Q I'm sorry, what?

24 A They would do that in a meritorious package.

Transcript of Alvin Jones
Conducted on February 26, 2020

82

1 Q Who would do that in --

2 A Whatever -- whoever prepared the meritorious
3 package.

4 Q What is a meritorious package?

5 A When they decide who their nominee is going to
6 be, then they go look at their work history, and they
7 put together what is called a meritorious package that
8 goes to a merit board.

9 Q And so you were Fred Waller's nominee?

10 A Yes.

11 Q Did Fred Waller put anybody else up at the time
12 or did you only get one?

13 A I don't know.

14 Q Did you see the meritorious package he put
15 together?

16 A Yes.

17 Q And tell me what that package looked like?

18 A It consisted of several pages of a lot of
19 information.

20 Q What was in the information?

21 A I really don't remember.

22 Q Do you have any idea what was in it?

23 A It had the work or work I had done, and I think
24 the award information.

Transcript of Alvin Jones
Conducted on February 26, 2020

83

1 Q What do you mean it had the work you had done?

2 A Just like you pulled this sheet here of my work
3 history, they pulled a record of what your -- what kind
4 of activity you had done as a police officer. I.e., how
5 many arrests you had made, how many police reports you
6 had written, guns you had recovered, cars you had
7 recovered, stolen cars recovered.

8 Q All right. So did you see that information all
9 in there? Number of arrests, number of guns recovered,
10 that sort of thing?

11 A I don't remember it.

12 Q You don't remember one way or the other?

13 A One way or the other.

14 Q But you know that is information that can be
15 pulled?

16 A Yes.

17 Q Have you ever pulled that by yourself?

18 A Sometimes.

19 Q Of your own information?

20 A Yes.

21 Q When did you pull that information?

22 A When I requested to go to tact the first time I
23 was in the 2nd District.

24 Q Why -- what information did you pull?

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1 A You pull your -- what they call your activity
2 history for however long it appeared that the tactical
3 team he said he want to see your activity for.

4 Q So someone asked you for it?

5 A Yes.

6 Q Okay. Who is the person who asked you for your
7 activity history when you were trying to go over to the
8 tactical team?

9 A Who was the tact sergeant then, lieutenant
10 then?

11 Last name Johnson.

12 Q Do you remember first name?

13 A Not offhand.

14 Q Male or female?

15 A Male.

16 Q Do you know about how -- like height and
17 weight?

18 A Six feet maybe, 165, 70 pounds.

19 Q Did you know what ethnicity?

20 A Male black.

21 Q What was your height and weight when you were
22 on the 2nd District tact team?

23 A I don't know. I haven't grown too much in
24 height.

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1 Q That makes sense.

2 About how tall are you?

3 A Approximately 5'7".

4 Q And about -- can you ballpark your weight?

5 A Right now?

6 Q No. Well, maybe to compare it.

7 A When?

8 Q During your time on the tact team, did it
9 fluctuate?

10 A Yeah, it would fluctuate.

11 Q What was the range?

12 A I don't know. Bad eating habits, it
13 fluctuates.

14 Q I'm sorry, I don't mean why did it fluctuate.
15 I just want to know the range of.

16 A I don't know. It was I was fresh out of the
17 academy then, so I don't know. Maybe between 205 and
18 220.

19 Q And did you lift weights? Were you --

20 A Nope.

21 Q Were you the biggest member of the tact team?

22 A What -- when?

23 Q When -- were there other members of the tact
24 team who were bigger than you?

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1 MR. MICHALIK: I just object. Are you -- we
2 talking height, weight? That's all. Bigger.

3 MR. RAUSCHER: Yeah, okay.

4 Q I mean, not -- all right. We can do it one at
5 a time.

6 Were there members of the tact team who were
7 taller than you?

8 A Most of the time, yes.

9 Q And then, were there members of the tact team
10 who weighed more than you?

11 A Probably.

12 Q Who can you think of on the tact team who
13 weighed more than you?

14 A When?

15 Q At any time.

16 A My partner did at the time. Aaron Long, he
17 weighed more than I did.

18 Q Who was that?

19 A Aaron Long.

20 Q Aaron Long. He was on the 2nd District tact
21 team with you?

22 A Yes.

23 Q Anyone else other than Aaron Long?

24 A Not that I could remember.

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1 Q All right. Do you remember anything else about
2 your conversation with Fred Waller when he said he was
3 putting you up for merit review, beyond just him telling
4 you he was doing it?

5 A No.

6 Q And when did you -- after that conversation,
7 when did you next talk to him about the merit review
8 process?

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

10 Q How did he -- well, how did you see the
11 meritorious package?

12 A Because I had to sign it before it went down.

13 Q And then, did he -- did he come bring it to you
14 or did he --

15 A I went into the office and looked at it.

16 Q You went into his office and looked at it?

17 A Yes.

18 Q And what were you signing?

19 A I was signing my name to the bottom of the
20 meritorious package.

21 Q What were you saying --

22 A Accepting the meritorious nomination.

23 Q I got it.

24 Were you signing off on the accuracy of the

Transcript of Alvin Jones
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1 information?

2 A Yes.

3 Q Did that package have any information about
4 your CRs?

5 A I don't know.

6 Q Did you see any information on your CRs in
7 there?

8 A I don't remember.

9 Q About how big was the packet?

10 A I don't recall.

11 Q Like are you -- are we saying like a small
12 stack like three, four pages, or like hundreds and
13 hundreds?

14 A No, it wasn't hundreds and hundreds of pages.

15 Q Smaller stack?

16 A Yes.

17 Q After you signed that paper, did you get a copy
18 of your meritorious package?

19 A I don't remember if I got a package or not.

20 Q Do you remember if you ever got a copy of it --

21 A I don't.

22 Q -- for yourself.

23 You don't?

24 A I don't remember.

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Conducted on February 26, 2020

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1 Q You don't remember either way?

2 A Either way.

3 Q Okay. Did you ever see the meritorious package
4 again after you signed it that day?

5 A I don't remember.

6 Q What happened to it, if you know, after you
7 left Waller's office?

8 A I don't know.

9 Q Do you know what the process was to complete
10 the merit review?

11 A The process?

12 Q Yes. So Waller recommended you, you signed the
13 meritorious package, he did something with that, but
14 you're not sure what?

15 A I guess to -- I guess to the meritorious board.

16 Q And do you know when it got sent to the
17 meritorious board?

18 A No.

19 Q Do you know who is on the meritorious board?

20 A No.

21 Q Do you know how the meritorious board made its
22 decision?

23 A No.

24 Q Do you know anybody else who got a merit

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Conducted on February 26, 2020

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1 promotion to sergeant?

2 A Do I know anyone who has a merit -- not
3 offhand, but I know there have been people who have been
4 promoted meritoriously.

5 Q Since you got promoted to sergeant, have you
6 seen any records of the promotion or any records
7 reflecting the promotion?

8 A No.

9 Q Are you surprised -- would you -- well, do you
10 know if the City has any records?

11 A I don't know.

12 Q Are you -- would you be surprised to learn they
13 have said they cannot find any records of your merit
14 promotion?

15 A They can't?

16 Q Yeah.

17 A I don't know. First time I've heard that.

18 Q Is that surprising to you?

19 A I wouldn't say surprising.

20 Q Would you expect a record showing something
21 about the merit process to be in your personal file or
22 somewhere else in the City?

23 MR. BAZAREK: Object to form.

24 A I don't know. I don't know what they do with

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1 it, how they worked it out. I don't know.

2 Q Has the -- did CPD recently end the merit
3 process?

4 A I don't know if they ended it.

5 Q Or they put it on hiatus or something like
6 that?

7 A Something like that. I'm not sure what it is.

8 Q Do you think that was a good decision?

9 MR. MICHALIK: Objection. Foundation.

10 A No. Meritorious promotions are good.

11 Q And why do you think meritorious promotions are
12 good at CPD?

13 A Because you can earn your right to be promoted.
14 Everybody doesn't test well, and some people that earn
15 the right to be promoted should be promoted. So it
16 shouldn't be just based off a test.

17 Q How come you got the merit promotion as opposed
18 to getting it based on your test results?

19 MR. KOSOKO: Objection. Foundation.

20 A Whatever rank I was on that listing, I -- it
21 hadn't got to my number yet.

22 Q What did you do to earn your merit promotion to
23 sergeant?

24 A What did I do?

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1 Q Well, do you think it was deserved? Do you
2 think you deserved to be promoted as a sergeant when you
3 got promoted?

4 A Yes.

5 Q And why did you deserve to be promoted to
6 sergeant in 2012?

7 A Because I had come to work, I worked, I made a
8 lot of arrests, I made a lot of -- wrote a lot of case
9 reports, I did a lot of various things for the
10 department. As a -- as a officer.

11 Q Have you ever done anything as an officer that
12 you regret?

13 A Not that I can think of.

14 Q Do you regret not saying anything about what
15 you heard about Watts or Mohammed over the years?

16 A Would I regret it?

17 Q Do you regret it?

18 A Regret? I can't say that I was factual about
19 anything that I knew about Watts and Mohammed going on
20 at the time. I can't say that.

21 Q So no, you don't regret not saying anything?

22 A I didn't say I didn't regret it. I'm saying I
23 just department have anything -- I can't say one way or
24 the other because I didn't have any factual basis to say

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1 one way or the other.

2 Q What type of factual basis would you have
3 needed to feel comfortable reporting what you had heard
4 about Watts and Mohammed?

5 A Actually, seeing something that warranted that
6 fact.

7 Q Like seeing it with your own eyes?

8 A Yes.

9 Q Firsthand?

10 A Firsthand. People in that area down here, as I
11 said, they would say a whole lot of things about all the
12 officers that worked down there. Not just the people on
13 Watts' team. Any other teams that came down there.
14 Teams that didn't time come down there often. The
15 special operations team. So no.

16 Q But what you're saying is today you're not --
17 you can't really say one way or the other whether you --

18 A I can't say one way or the other.

19 Q Hold on. I just want to make sure we're
20 answering the question I was asking.

21 You can't say one way or the other whether you
22 regret not saying anything about what you were hearing
23 about Watts and Mohammed?

24 A I didn't know if that was true what was being

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1 said. I had no basis or foundation for that to be
2 actual fact be able to say to have a regret or not a
3 regret. It could go either way.

4 Q So if you found out that some of it was true,
5 would you then say you regret not saying anything about
6 it?

7 A If I found out some of it was true?

8 Q If you found out -- if you found out now that
9 something one of those people were saying was true,
10 would you regret not having said something at the time?

11 A Yes.

12 Q And why -- why would you regret not having said
13 something if you found out that one of the accusations
14 against Watts or Mohammed was true?

15 A Because it would have been the correct thing to
16 do.

17 Q Why would it have been a correct thing to do?

18 A Because if I knew factually what they were
19 doing, then something should have been done about it.

20 Q Why were you comfortable relying on things that
21 your colleagues and your partners told you treating that
22 as fact but not relying on things that citizens told you
23 and treating that as fact?

24 MR. KOSOKO: Objection. Misstates prior

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1 testimony.

2 Q Did I -- does that misstate your testimony? I
3 don't want to do that.

4 A I think you have.

5 Q Okay. Tell me what I -- what did I say that
6 was wrong?

7 A Individuals down there were lied to each other.
8 They were lied to each other and on each other. So you
9 couldn't take what they said as value either. Unless
10 you saw it for yourself. And I know that you would see
11 at times we knew what would happen when it happened when
12 an arrest situation, how it went down, whatever. In
13 order for them to save face with their people, they
14 would lie on the other ones. They would lie back to
15 each other. So a couple of days later you'd come back
16 and say oh, man, you didn't lock him up. Ah, you locked
17 him up and you said you take his money. You know that's
18 not true because you saw money inventory. So he gon'
19 lie so he can keep the money or whatever, who he gave it
20 off to.

21 That would happen. So you never could really
22 trust most of the things that were being said down there
23 because they would lie on each other, to each other.

24 Q But you could trust your partners?

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1 A You should have trusted your partners.

2 Q And so I guess what -- I do still want to
3 understand though did I say that was misstating your
4 testimony? I was just asking why you trust your
5 partners instead of citizens?

6 A Citizens not always going to be truthful to you
7 either. And I don't know if my partners were not being
8 truthful to me, but I do know that citizens would not be
9 truthful also. I knew that for a fact, because I had
10 been in situations where, like I said, two or three days
11 later, they are coming around and saying oh, you all
12 took -- you all? Who the hell is you all? I didn't
13 take no money off anybody. Nobody know was -- how much
14 narcotics was taken, know how much money was recovered.
15 And they go back and say they did this, or someone did
16 that. No.

17 Q Sometimes you know what happened because your
18 partner told and sometimes you know because you saw
19 firsthand, right?

20 A No, sometimes I know because I'd be the person
21 making the arrest.

22 Q Right sometimes.

23 A That's -- that's what would make you mad
24 because you know in those situations that they aren't

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1 telling the truth.

2 Q And sometimes your -- your basis for believing
3 you know what happened in an arrest is because your
4 partner or someone else on your team has told you?

5 A Sometimes that may be the case.

6 Q And when that's the case, you don't actually
7 know, right?

8 A Probably not.

9 Q Had you ever made any decisions on promoting
10 people?

11 A No.

12 Q Do you -- would you like to know the good and
13 the bad for people working under you?

14 A You should.

15 Q And why should you know good and bad?

16 A Because the bad may sometimes you might be able
17 to help them with that, straighten it out. They might
18 be falling short somewhere. And the bad meaning you
19 bad, you bad at writing report. You're bad at observing
20 what you should be observing. That's the bad I'm
21 talking about.

22 The good, sometimes the good is well but they
23 need to take that, help spread it throughout the team.
24 Help the team out to learn can grow.

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1 Q And do you like to know when your team members
2 are accused of wrongdoing?

3 A Do I want to know?

4 Q Yes.

5 A Yeah, you should know.

6 Q Why should you know as a leader if your team
7 members are accused of wrongdoing?

8 A Because you should know. That's the part of if
9 someone makes an accusation against your team, you
10 should know that. And as a supervisor, I'm not sure
11 how, depending upon the allegation, the supervisor
12 usually the one who has to investigate the allegation.

13 Q Do you sometimes have to investigate your team
14 members?

15 A Not presently.

16 Q Because you are on desk duty?

17 A Not just that but not presently. The position
18 that what I do they don't -- we don't have -- we do
19 community engagement.

20 Q Have you ever had to investigate CRs involving
21 subordinates?

22 A Yes.

23 Q What is your process for investigating
24 subordinate CRs?

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1 A I haven't done one in a while, so I think the
2 first thing you do is try to contact complainant.

3 Q How do you go about contacting the complainant?

4 A You get a -- the complaint, you start the
5 process of acknowledging who the department that you
6 receive the complaint, send that back, and then you try
7 to reach out to the complainant to schedule an interview
8 with them.

9 Q Why is that the first step in the process?

10 A That's the way it was taught to me.

11 Q Do you ever go talk to the officers who are
12 accused first?

13 A No.

14 Q And if you can't hear -- if you don't hear back
15 from the complainant, do you just close the CR?

16 A No.

17 Q What do you do if you don't hear back from the
18 complainant?

19 A You try a second time.

20 Q And what if you don't hear back a second time?

21 A You send a certified letter.

22 Q And what if the certified letter does not get
23 answered?

24 A Initially, you would close it out.

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1 Q What do you mean initially, you'd close it out?

2 A I think recently in the past couple of years,
3 you actually have to go to that location to try to
4 locate that complainant.

5 Q All right. But if you can't after some
6 reasonable effort get in touch with the complainant, is
7 the CR closed?

8 A Yes.

9 Q Without ever talking to the officer about it?

10 A Yes.

11 Q And do you think that's a good policy?

12 MR. KOSOKO: Objection.

13 A My personal belief?

14 Q Yes.

15 A Depending upon what the allegation is.

16 Q All right. What allegations does it make sense
17 to do that with, what allegations does it not make sense
18 to do that with?

19 A I don't know. It's just depends on what --
20 what the allegation is.

21 Q Can you think of any allegations where you
22 think it's not a good idea to close out a CR without at
23 least talking to the officer?

24 And by talking to the officer, I mean the

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1 officer who was accused of wrongdoing?

2 A Sometimes it may be. Sometimes -- I'm -- it
3 might be a verbal abuse beef, but the complainant might
4 have felt a verbal abuse beef because the officer talks
5 loud. There's no reason to go talk to an officer about
6 that.

7 Q What about an excessive force complaint,
8 someone, a citizen, says this officer beat me up for no
9 reason, you can't find the citizen.

10 MR. MICHALIK: Just going to make an objection
11 there for the foundation as to the questioning officer
12 who investigates excessive force complaints within the
13 Chicago Police Department.

14 A A regular sergeant on leave would not
15 investigate one of those.

16 Q Okay. Can you answer the question though.

17 A Do I think you should -- yeah, you should.

18 Q Why should you go talk to the officer before
19 you close out an excessive force complaint?

20 MR. KOSOKO: Objection. Foundation.

21 A Because that's a serious accusation, and you
22 should at least go get their side of the story. Because
23 you already have the complainant's side of the story.

24 Q As a sergeant, were you ever assigned to

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1 investigate a CR where you are on the scene of the
2 incident?

3 A No.

4 Q Do you think that would be problematic?

5 MR. KOSOKO: Objection to the form.

6 A No.

7 Q What would you -- well, okay.

8 What would investigate if you had already been
9 on the scene and seen everything?

10 MR. KOSOKO: Objection.

11 Q What would you investigate as the sergeant if
12 you were also on scene when the incident happened?

13 MR. MICHALIK: Objection. Form. Incomplete
14 hypothetical.

15 A What would -- what would you investigate? You
16 would investigate whatever the complaint was.

17 Q All right. But you have never done that,
18 right?

19 A No.

20 MR. RAUSCHER: Take a quick break.

21 MR. BAZAREK: Sure.

22 THE VIDEOGRAPHER: Off the record. 11:55.

23 (A brief recess was taken.)

24 THE VIDEOGRAPHER: Back on the record. 12:04.

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1 (Exhibit 2, Jones' Responses to
2 Interrogatories, was marked for identification and is
3 attached to the transcript.)

4 MR. RAUSCHER: We just marked as Exhibit 2
5 right before we came back on the record, Defendant,
6 Jones', Responses to Plaintiff, Lionel White, First Set
7 of Interrogatories. That's Lionel White, Sr.

8 BY MR. RAUSCHER:

9 Q And I may have some specific questions, but the
10 first general question is have you seen this document
11 before?

12 A Not recently.

13 Q Did you review the responses before it was
14 submitted?

15 A I don't recall.

16 Q Can you take sometime to look it over and let
17 me know if you can swear under oath that the substantive
18 responses are true?

19 A Yes.

20 Q Yes, they're true?

21 A Yes, I will take my time and look it over for
22 you.

23 Q Got it. Thank you.

24 (Pause.)

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1 Q Have you had sufficient time to review all the
2 responses you gave in those Interrogatories?

3 A Yes, sir.

4 Q And can you say under oath that the substantive
5 responses are true?

6 A Yes.

7 Q And did you make some changes or additions in
8 there?

9 A Yes.

10 Q Can you tell me and what you changed?

11 A Bottom of page 3, number 7, During the time
12 that you worked as a Chicago police officer, did you
13 ever apply for a promotion or higher paid position?

14 It doesn't have on here that I took the
15 lieutenant's exam two years ago.

16 Q Okay. What was the result of you taking the
17 lieutenant's exam?

18 A I'm on the lieutenant's list.

19 Q You passed the exam?

20 A Yes, I did.

21 Q Are there any other changes that you made?

22 A No.

23 Q Do you -- number 5 says you're on
24 administrative duties -- or I'm sorry, it says, In late

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1 2007, defendant, Jones, was assigned to administrative
2 duty.

3 A In 2017? Yes.

4 Q Are you still on administrative duty?

5 A Yes.

6 Q And that was in response to a question asking
7 have you ever been the subject of any disciplinary
8 proceedings?

9 A What number is that?

10 Q Number 5.

11 A Yes.

12 Q Do you consider being on administrative duty to
13 be a form of discipline?

14 A Yes, I do.

15 Q Why do you consider being on administrative
16 duty a form of discipline?

17 A Because I have been falsely accused, and a lot
18 of these, all of these complaints from these defendants,
19 nobody ever asked me anything. I was just taken off the
20 streets and placed on desk duty. Nobody said nothing.
21 Just moved on to desk duty. Took me away from being
22 able to be on the street doing community service that I
23 liked to do now. I have been part of police, and what I
24 do now with community engagement and helping community

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1 and stakeholders merge with the police department is
2 something I really enjoy. And I don't get to do that
3 face-to-face with them anymore.

4 Q What are you allowed to do and not allowed to
5 do on administrative duty?

6 A I am not allowed to go out on the street as a
7 police officer and have person-to-person contact with
8 citizens. I can contact them by phone for the people
9 that my team deals with, which are stakeholders in the
10 community. Be it the organization office, churches,
11 organizations just to keep them in contact with each
12 other.

13 I also oversee ISR reports. I check them to
14 see if they are accurately prepared, and I keep a track
15 on who's deficient in training. Or reports that need to
16 be approved.

17 Q What are ISR reports?

18 A Investigative stock reports.

19 Q And what do you do for investigative stock
20 reports?

21 A I review them to see if all the information is
22 in there that meets the criteria for an investigative
23 stop.

24 Q And what was the next thing? You check for

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1 deficiencies in the training?

2 A Yes, for the unit.

3 Q You mean whether people have met their training
4 requirements?

5 A Right. They have training that needs to be
6 done, then I inform them that they need to get certain
7 training done by a certain period of time, or refer them
8 to the lieutenant for the lieutenant to get them in a
9 training.

10 Q What else do you do since you've been on
11 administrative leave?

12 A What else --

13 MR. MICHALIK: Leave.

14 MR. RAUSCHER: I'm sorry, you're right.
15 Administrative duty. Thanks.

16 A What else do I do? I make sure that the car
17 team comes in on time and go out as they are supposed to
18 and come back in. I make sure they check off at the end
19 of the day as they should. I fill in as the
20 administrative sergeant in the deputy chief's office
21 until the administrative sergeant arrives in the course
22 of the day.

23 Q Anything else?

24 A Check court records and make sure anyone has

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1 court. Approve time off.

2 Q Anything else?

3 A That's about it that I can think of right now.

4 Q So you are still in a supervisory role?

5 A Yes, I am.

6 Q Still a sergeant?

7 A Yes, I am.

8 Q Have you been -- has your pay been reduced at
9 all?

10 A No, it has not.

11 Q Have you been given any indication as to when,
12 if ever, you will come off of administrative duty?

13 A No, I have not.

14 Q Can you arrest people?

15 A No.

16 Q Has someone told you you can't arrest people?

17 A They told me they didn't want me having contact
18 with individuals on the street.

19 Q Who told you they didn't want you having
20 contact with people on the street?

21 A Chief Waller.

22 Q When did Chief Waller tell you that?

23 A November 2017.

24 Q So is Chief Waller the person who told you you

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1 were getting placed on administrative duty?

2 A Yes, he is.

3 Q All right. And that was in November 2017?

4 A Yes.

5 Q Was that in person?

6 A No, it was over the phone.

7 Q Where were you when the phone call came?

8 A Las Vegas, Nevada.

9 Q Were you working or on vacation?

10 A Vacation.

11 Q All right. What did Waller tell you during
12 that call?

13 A Waller told me that I would have to be going on
14 desk duty because of the situation with the case has
15 been overturned and with Watts and Mohammed, I was being
16 assigned to the desk duty.

17 Q So he said both because of all the cases being
18 overturned --

19 A Yes.

20 Q -- and because of Watts and Mohammed?

21 A Yes.

22 Q Did he give you any detail on what he meant?

23 A No.

24 Q Did you have any understanding of what he

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1 meant?

2 A Yes.

3 Q What was your understanding of what Waller was
4 talking about?

5 A That I could not go on the streets and I'll be
6 working behind a desk in an office.

7 Q What was your understanding of why you were
8 being put in that position?

9 A Because of the relationship of having worked
10 with Watts and Mohammed.

11 Q Did he tell you anything specific about Watts
12 or Mohammed?

13 A No.

14 Q Did he tell you why it was so many years after
15 they were convicted before they placed you on desk duty?

16 A No.

17 Q Do you think that was a reasonable period of
18 delay?

19 MR. MICHALIK: Objection. Form.

20 Q I'm going to rephrase. I'll try to rephrase
21 that one.

22 Do you think that waiting so many years before
23 -- between when Watts and Mohammed were convicted and
24 placing you on desk duty was reasonable?

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1 A I still don't think --

2 MR. BAZAREK: Objection to form.

3 A -- it's reasonable for me sitting on desk duty
4 now.

5 Q Because you think all the accusations are
6 false; is that right?

7 A Pertaining to who?

8 Q Do you have any opinion as to the accuracy of
9 the allegations made against other officers?

10 A Do I have any what?

11 Q Opinion about whether the accusations made
12 against officers other than you are accurate?

13 A All I know is that the accusations have been
14 made against me are false.

15 Q You don't know one way or the other whether the
16 accusations made against the other officers are true?

17 A What accusation are you referring to?

18 Q Any accusations.

19 A Can you be more specific. I don't know what
20 accusations you're referring to.

21 Q Are you aware that other officers have been
22 sued?

23 A Yes.

24 Q Are you aware of any of the allegations made

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1 against them?

2 A No.

3 Q Have you tried to challenge the decision to
4 place you on desk duty?

5 A No, I haven't.

6 Q Is there a mechanism that would allow you to
7 challenge that decision?

8 A I'm not sure.

9 Q Have you tried to put a grievance in or
10 anything like that?

11 A No, I haven't.

12 Q Are you a member of a union?

13 A Yes, I am.

14 Q What union are you a member of?

15 A PBPA.

16 Q What does that stand for?

17 A Good question -- good question. I don't have
18 my union card in my pocket.

19 Q Are you on duty today?

20 A Yes.

21 Q You get paid to be here?

22 A Yes.

23 Q Do you know why Waller called you when you were
24 on vacation?

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1 A Because I was going on desk duty. He didn't
2 know I was on vacation.

3 Q Got it.

4 How do you know he didn't know you were on
5 vacation?

6 A He did. He just did -- he doesn't call me all
7 the time. He called me randomly that day for whatever
8 the reason specific he did. And he said well, you'll be
9 on desk duty. I said well, I'm on vacation now in Las
10 Vegas. He never knew I was on vacation.

11 Q But I'm saying how do you know he didn't know
12 you were on vacation?

13 A He called me. He said he didn't know. He just
14 called me as he was going down the list of whoever he
15 had to contact.

16 Q When you said I'm on vacation, he said I didn't
17 know you were on vacation?

18 A Yes.

19 Q Got it.

20 You are aware that you're not the only member
21 of the Watts Team that's on desk duty?

22 A Yes.

23 Q Have you talked to anyone else who's on desk
24 duty?

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1 A No.

2 Q So you don't know whether they think it's fair
3 that they are on desk duty?

4 A No.

5 Q Do you know whether being on desk duty impacts
6 your ability to become a lieutenant?

7 A I don't know.

8 Q Have you ever tried to find the answer out to
9 that?

10 A No.

11 Q Why not?

12 A It hadn't crossed my mind.

13 Q Would you like to become a lieutenant?

14 A Possibly.

15 Q Are there any downsides to being a lieutenant
16 over your current job?

17 A No. I think everyone wants to be promoted.

18 Q Do you carry a gun still?

19 A Yes.

20 Q Have you been stripped of your police powers?

21 A No.

22 MR. RAUSCHER: Let's mark this as Exhibit 3,
23 please.

24 (Exhibit 3, Responses to Interrogatories, was

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1 marked for identification and is attached to the
2 transcript.)

3 Q You can look at all of it if you'd like, but
4 actually for today, I'm only going to ask you question
5 about the first one.

6 A Yes.

7 Q Have you had a chance to look at that question
8 to you?

9 A Yes.

10 Q And I see you've stated, This one needs to
11 verify under oath already. At the back. You see that
12 back page. Turn it over.

13 A Yes.

14 Q It's missing a date, but did you verify under
15 penalty of perjury that the answers to this are true and
16 correct to the best of your knowledge, information and
17 belief?

18 A Yes.

19 Q And is that your signature on the last page?

20 A Yes.

21 Q I see that you have said you did not write or
22 play a role in posting -- I'll say comment of blogpost
23 from the Second City blog that's referenced in
24 Interrogatory 1.

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1 A No, I did not.

2 Q And do you -- is there anybody who you know of
3 who fits the description of the person in here, the one
4 who said the description of someone being removed from a
5 tact, a tact team and sent to a beat car?

6 A No, I don't.

7 Q You can't think of anybody who that happened to
8 while you were on the tact team?

9 A No.

10 Q Do you know of anybody complaining to -- do you
11 know who Commander GL is?

12 A I'm not sure.

13 Q Was Genisa Lewis a commander in the 2nd
14 District?

15 A Yes.

16 Q Are there any other GLs who are commanders that
17 you can think of in the 2nd District?

18 A No.

19 Q And what about Lieutenant KM?

20 A I would assume that would be Kenny Mann.

21 Q There's no other Lieutenant KMs that you can
22 think of from the 2nd District?

23 A Not that I remember.

24 Q Do you know of anybody complaining to either of

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1 them about Kallatt Mohammed or Ronald Watts?

2 A No, I don't.

3 Q Are there any other officers from that, your
4 time in the 2nd District who you can think of with the
5 initials Kallatt Mohammed? Not lieutenants just police
6 officers, other than Kallatt Mohammed?

7 A Any other officers? Not that I remember.

8 Q Any other sergeants with the initials, RW,
9 other than Ronald Watts?

10 A Not that I remember.

11 Q When you were switched from the TAC team and
12 being in the vans, would that be considered a move from
13 the tact team to a beat car?

14 MR. BAZAREK: I think I'll throw in an
15 objection. Not sure it's characterizing his prior
16 testimony as to when he was in the van and then becoming
17 a tact.

18 A Question again, sir.

19 Q Yeah. You did testify earlier, I believe, that
20 at some point after you started on the tact team, you
21 were removed to the vans?

22 A Yes.

23 Q And --

24 MR. BAZAREK: I withdraw my objection.

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1 Q When you were moved to the vans from the tact
2 team, would you consider that being placed in a beat
3 car?

4 A It was like working in the beat car, yes.

5 Q Is there -- but just to be clear, this
6 description, even if you didn't post it, doesn't
7 describe you?

8 A No.

9 Q And then, is there anybody else you can think
10 of who was moved from the tact team to the vans while
11 you were there?

12 A While I was where?

13 Q In the 2nd District?

14 A First of all, the vans were assigned to Public
15 Housing.

16 Q Okay.

17 A They weren't assigned to the 2nd District.

18 Q Okay.

19 A They was in Public Housing.

20 Q Thank you for clarifying.

21 A And --

22 Q Let's do still in Public Housing.

23 A It was still in the Public Housing.

24 So not that I could remember. Because the vans

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1 were considered vertical patrol.

2 Q What does vertical patrol mean?

3 A Vertical patrol in the high-rise buildings.
4 They would answer calls in high-rise buildings and
5 low-rise buildings. But they were -- the title for
6 their section was vertical patrol.

7 Q Was Watts the sergeant -- I guess you said
8 Watts was the sergeant the whole time you were on the
9 tact team, correct?

10 A No.

11 Q Oh, I'm sorry.

12 How long was -- well, you did tell. Well,
13 you've answered when he wasn't the sergeant, right?

14 A When he was the sergeant of what?

15 Q Of the tact team?

16 A Which tact team?

17 Q The -- well, were you on multiple tact teams
18 with him?

19 A No, I was on multiple -- I was on two other
20 tactical teams with two other supervisors.

21 Q All right. So what were the years when
22 sergeant Watts was the sergeant of the tact team that
23 you were on with him?

24 A I'm not sure when he took over the tactical

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1 team. But if somewhere maybe around 2003.

2 Q And how -- when did you start on the tact team?

3 A My first assignment was to a tactical team when
4 I went to Public Housing.

5 Q How many sergeants other than Watts did you
6 serve under on tact teams in Public Housing?

7 A Two.

8 Q All right. Who were those and when were they
9 the sergeants?

10 A Mark Moore was the first.

11 Q So when you got over to Public Housing, Mark
12 Moore was the sergeant on the tact team?

13 A Yes, that I worked on.

14 Q All right. And what years -- was he was
15 already in place when -- -

16 A He was already there.

17 Q And then, for how long did he stay as the
18 sergeant at tact team? Or better way to state --

19 A Maybe six, eight months before he moved on, and
20 then I worked for Ed Thomas.

21 Q Same tact team?

22 A Yes.

23 Q All right. How long did Ed Thomas stay in that
24 role?

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1 A Maybe a year, year-and-a-half. A year to two
2 years before the unit was split up and sent to Ida B.
3 Wells.

4 Q So during those first -- when you were under
5 Moore and Thomas, were you in Ida B. Wells at all?

6 A You'd go in either Ida B. Wells, Stateway
7 Gardens, you'd go into all of them.

8 Q All right. So then, what changed after that
9 one to two-year period?

10 A I don't remember, but I ended up working
11 vertical patrol for a while, and then I was placed on
12 another team. Oh, there was another sergeant. Henry
13 Harris.

14 Q When were you under Henry Harris?

15 A For a short period, I would assume, before
16 sergeant Watts took over.

17 Q So you were put on the vans during vertical
18 patrol when Ed Thomas was a sergeant?

19 A I'm trying to figure. Was put on the van, and
20 we had just filled in at times from the van. I'm not
21 really sure, but it wasn't like a permanent assignment
22 to that.

23 Q But it was while Ed Thomas was a Sergeant?

24 A I believe so.

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1 Q And if not Thomas, it would have been Harris?

2 A After I -- yes, after I went for Ed Thomas.

3 Q And then, you had said something liken then
4 after Ed Thomas was a sergeant and the unit moved over
5 to Ida B. Wells?

6 A Yeah, they moved -- it was like we worked --
7 initially when I worked, I worked out of the Robert
8 Taylor Homes, and then I moved to the Ida B. Wells.

9 Q When you were -- does that mean you were based
10 there?

11 A Yes.

12 Q But when you were at Robert Taylor Homes, would
13 you also go into Ida B. Wells?

14 A Yes.

15 Q And when you were in Ida B. Wells, did you also
16 go into other Public Housing?

17 A Yes.

18 Q Would you spend more time at the base homes?

19 A No, I wouldn't say that.

20 Q When you were -- when the unit moved to Ida B.
21 Wells, did the unit spend more time -- let me -- it's
22 not a unit right, the tact team?

23 A It's the unit.

24 Q The whole unit?

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1 A Yes.

2 Q So when the unit moved to Ida B. Wells, did the
3 unit spend more time in Ida B. Wells?

4 A The office that was in Ida B. Wells.

5 Q You would spend more time in that office?

6 A Yes.

7 Q Did you spend more time doing investigations and
8 patrols in Ida B. Wells as opposed to other homes?

9 A Yes.

10 Q And was that something that started when the
11 unit moved to Ida B. Wells or had it always been the
12 case?

13 A I think it was always the case.

14 Q Why is it that the unit spent more time in Ida
15 B. Wells than in other places?

16 A I think that's the way it was broken down.
17 They had the Ida B. Wells unit, and then they had the
18 Robert Taylor section unit out of 47th Street, 49th
19 Street.

20 Q And were you -- but, well, let me try to
21 understand the time.

22 At some point, were you part of the Robert
23 Taylor unit?

24 A Yes.

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1 Q Can when you were on the Robert Taylor unit,
2 was there also an Ida B. Wells unit?

3 A Yes.

4 Q So you were removed to the Ida B. Wells unit?

5 A Yes.

6 Q It's not that the whole unit moved from --

7 A Right.

8 Q -- Robert Taylor to Ida B. Wells?

9 A Right.

10 Q When you moved over to the Ida B. Wells unit,
11 was Henry Harris the sergeant?

12 A No, Ed Thomas was.

13 Q All right. Who was the sergeant when you were
14 in the Robert Taylor section?

15 A Mark Moore.

16 Q All right. And then, you were -- how long were
17 you in the Robert Taylor section?

18 A Not too long, because I think Mark Moore left
19 the unit and Ed Thomas took over the team.

20 Q And where was Ed Thomas? Where were you based
21 when Ed Thomas took over?

22 A Ida B. Wells.

23 Q So did the whole team move over to Ida B.
24 Wells?

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1 A Yes.

2 Q And then, did a new team come into Robert
3 Taylor?

4 A I don't know.

5 Q But did some team maintain a presence at Robert
6 Taylor?

7 A There were several teams at Robert Taylor.

8 Q Got it.

9 Any other sergeants you worked under on
10 tactical teams under Moore, Thomas, Harris and Watts?

11 A No.

12 Q Can you tell me did they have different
13 leadership styles, the four of them?

14 A I think every sergeant has a different
15 leadership style.

16 Q Did you have a favorite sergeant among that
17 group?

18 A I wouldn't -- I don't -- I wouldn't say a
19 favorite of anybody.

20 Q Did you have one you liked more than others?

21 A I wouldn't say that.

22 Q Was there one that was easier to work for than
23 others?

24 A I wouldn't say that.

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1 Q What were the differences in their leadership
2 styles?

3 A I don't know. I can't say what the difference
4 was in their leadership style. Every -- I think every
5 leader is different in some kind of way. I just can't
6 find one specific reason or thing to say why they were
7 different.

8 Q Was Watts more hands-on?

9 A Hands-on how?

10 MR. KOSOKO: Objection to form. Foundational.

11 Q Were there any ways in which you observed Watts
12 to be more hands-on as a leader?

13 A What do you mean by hands-on?

14 Q Well, was he -- did he go out to investigate
15 more with the team than other leaders?

16 A I don't think so.

17 Q You think the other sergeants went out the same
18 amount?

19 A Yeah, they all worked. They all would go out.

20 Q Did they all do the same things when they would
21 went out?

22 A What do you mean the same thing?

23 Q Well, did they all do the same things when they
24 went out?

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1 A Same things as what?

2 Q As each other.

3 MR. MICHALIK: Yeah, I --

4 MR. KOSOKO: Object to form. Foundation.

5 A I'm still not understanding.

6 Q So you would go out to do investigations,
7 patrols, walk around the homes, right?

8 A Yes.

9 Q And sometimes Watts or the other sergeants
10 would be with you?

11 A Yes.

12 Q Okay. When you observed those people, the
13 sergeants, were they doing the same things as each other
14 over time?

15 A What do you mean by same things?

16 Q What did the sergeants do when they went out in
17 a field?

18 A They went out with the team and investigated as
19 the team did. Or they went and answered calls as the
20 team did.

21 Q Did they do the same things as other team
22 members?

23 A What do you mean by same things?

24 Q Same actions, same activities, same roles?

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1 A I don't think so.

2 Q Okay. And what was different about the
3 sergeant role than officer role?

4 A I don't think at that time -- trying to
5 remember. I'm trying to remember. Trying -- I can't
6 remember when with Henry, but I'm quite sure he was the
7 same way at some point some days.

8 Let's say we go in and try to get into a
9 building, and we go into a building and we hide.
10 Sometime they would go into the building and hide with
11 us.

12 The only thing I could say, one difference was
13 when -- no, because Ed Thomas did reverse stings with us
14 also. So that's about that I remember. I don't
15 remember Henry Harris doing a reverse sting and I don't
16 remember Mark Moore doing a reverse sting, but they
17 happened.

18 Q But they didn't, Moore and Harris, you don't
19 remember them participating?

20 A I can't remember them participating.

21 Q Did Thomas and Watts participate in reverse
22 stings the same way as each other?

23 A In a supervisory role, yes.

24 Q In any role. I'm just asking. You're --

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1 sorry, you're answering that yes, in a supervisory role?

2 A In a supervisory role, yes, they oversaw them.

3 Q How did Thomas and Watts oversee -- well,
4 actually, before we get into details about the reverse
5 stings, did Thomas and Watts oversee reverse stings in
6 the same way?

7 MR. BAZAREK: Let me just can I object to
8 foundation. Just the line of questions in terms of kind
9 of vague.

10 A In the same way? They'd be on the same -- they
11 would be in the same location in the area where we were.

12 About the same to me.

13 Q Did they interact with citizens in the same
14 way?

15 A In the same way?

16 Q Yeah.

17 MR. BAZAREK: Object to form. Foundation.

18 A I'm trying to remember. I don't think Sergeant
19 Thomas -- well, I don't think either one of them really
20 often played a role as a seller too much. They would
21 oversee the security of those people who were coming in
22 and been arrested in the reverse sting.

23 Q When you say oversee the security, you mean
24 like once people are arrested?

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1 A Yes.

2 Q More generally though, take it outside of the
3 context of reverse stings, did you observe Watts and
4 Thomas interact with citizens?

5 A Yeah, they would talk to citizens.

6 Q Did they talk to them, did they seem to have a
7 similar rapport with citizens?

8 A No.

9 Q Tell me what the differences were in the
10 rapport that you saw between Watts and citizens versus
11 Thomas and citizens?

12 A Watts would talk to everybody. Watts would
13 talk to any and everybody.

14 Q Thomas not so much?

15 A Not so much. I mean, it was sometimes part of
16 the day because when I worked with Thomas, it was
17 usually we worked at night so you didn't have a lot of
18 citizens out in different.

19 Q Thomas was at night, you said?

20 A Yes.

21 Q That's reverse stings at night?

22 A Early evening before it got dark, dark, yes.
23 Doing the reverse sting, yes.

24 Q Was Watts the last sergeant you served under on

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1 the tact team?

2 A Yes.

3 Q Did you think he was a good sergeant?

4 A He had some problems, personal -- -
5 personalized personal problems.

6 Q Tell me about -- well, all right. But before
7 we go into the personal problems, did those personal
8 problems affect his ability to do the job as sergeant?

9 A No.

10 Q Right. So do you think he was a good sergeant?

11 A It depends what you say a sergeant is.

12 Q Well, I want to know if you think he was a good
13 sergeant?

14 A Yeah.

15 Q Okay. Is it fair to say you hesitated before
16 giving that answer?

17 A Because I had to think about what I would --
18 what I would consider a good sergeant to be.

19 Q Okay. And what -- what was the thought process
20 to get to the yes?

21 A To get to the yes? The being able -- the
22 ability to be able to judge situations in your
23 personnel, to be able to be able to work with other --
24 other people, other coworkers.

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1 Q Anything else?

2 A No.

3 Q All right. What did you mean be able to judge
4 situations?

5 A Every supervisor takes situations and look at
6 them differently depending upon the circumstances of
7 what they are. And some may overreact, some may be less
8 reactive. Some may be able to communicate better in the
9 situation than others.

10 Q And where did Watts fall in that continuum?

11 A Depending upon the circumstance.

12 Q Some good, some bad?

13 A Some good, some bad.

14 Q What were some things he was bad at?

15 A Sometimes communicating with other people.

16 Q All right. How was Watts bad at communicating
17 with other people?

18 A Because sometimes it was his train of thought
19 and his way. He had an arrogance about his self at
20 times.

21 But as far as making sure that people were on
22 time and doing what they should be doing, making sure
23 that they were preparing to get things together, he's
24 pretty good at that. If you didn't -- if he didn't have

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1 an answer for you when you needed an answer, he'd find
2 an answer or somebody who knew the answer.

3 Q Is he -- go ahead.

4 A He pretty much was at work most of the time.

5 Q What do you mean pretty much most of time he
6 was at work?

7 A He didn't take off too often other than
8 vacations. He wouldn't take -- he wouldn't even take
9 off a lot.

10 Q So you were not saying sometimes he just didn't
11 show up?

12 A No.

13 Q Was he an intimidating boss?

14 A Not to me.

15 Q Was he intimidating to other people?

16 MR. KOSOKO: Objection. Foundation.

17 A I don't know.

18 Q Did he yell at people?

19 A Sometimes.

20 Q When would he yell at -- and when I say people,
21 I mean on the team.

22 A I don't know every situation, but he'd yell at
23 you sometimes. He yelled at me.

24 Q What were the types of things that would make

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1 him yell?

2 A I don't know. I mean, in my -- in my instance
3 one time, I was trying -- I wasn't trying to. I thought
4 the correct way to prepare something or who to contact
5 to notify on a situation, and he yelled at me about
6 that.

7 Q Do you remember what the general subject matter
8 was?

9 A No, I don't. But it was about -- it was
10 something about a notification being made somewhere to
11 somebody for the case report I was doing.

12 Q Was he right?

13 A I don't remember. I don't -- I really don't
14 remember. I just remember that's a conversation he was
15 yelling at me for.

16 Q And how did you respond when he yelled at you?

17 A Initially, I thought maybe I could be right.
18 Afterwards, I didn't say anything. I -- after I found
19 out the correct way, and I'm not sure who was correct in
20 the situation.

21 Q Did you yell back at him?

22 A No.

23 Q You said he was arrogant?

24 A Oh, yeah, he talked a lot.

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1 Q So tell me -- tell me more about him being
2 arrogant?

3 A He'll tell you about his self. He had no
4 problems with telling you about his self. He had no
5 problem with telling you about how much he liked to be
6 outside with his -- with his team. He liked like he
7 would tell you about like he liked to play cards. He
8 just had that air about himself.

9 Q Why was he telling you that he liked to be
10 outside with his team a sign of arrogance?

11 A This is some sergeants who probably would never
12 leave the office as a tactical officer. And I don't
13 degree with it, but there are some who never would leave
14 the office. They wouldn't see their team until the team
15 came in and they had to approve whatever reports would
16 come in what they were doing.

17 Q What was arrogant about it? Was he saying
18 like I need to be out here, I'm better than everyone, or
19 what was the --

20 A He wasn't saying that. It was, you know, I'm
21 one here and I can still do the job as like he's lead.

22 Q Like he is in charge of -- -

23 A Like he's in charge.

24 Q Was he? Was he in charge of the --

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1 A He was the supervisor.

2 Q But did you -- did he have an accurate
3 perception of himself and his abilities?

4 A He was pretty good at it.

5 Q I guess if you thought he was arrogant, maybe
6 you didn't think he was good as he said he was?

7 A At times.

8 Q Did he fall short in any certain areas?

9 A What type of scenarios are you referring to?

10 Q Well, do you think there were any scenarios
11 where he felt short of his own view of himself?

12 A Maybe when he came to sometimes judgment of
13 people.

14 Q All right. Tell me in more about problems with
15 his judgment of people?

16 A I mean, yes, he's a supervisor, he's the case
17 officer, he's out there talking trying to get to know,
18 as you should, the people and the players out there.
19 But at times, you know, the laughing and the joking
20 sometimes went a little overboard.

21 Q Laughing and joking with who?

22 A People we would consider players and drug
23 dealers in that area.

24 Q Which ones specifically?

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1 A Specifically? Sometimes -- what was the name?
2 Wilbert Moore.

3 Q Big Shorty?

4 A Big Shorty.

5 Q That's the same person, just for the -- right?

6 A Yes.

7 Q Allan Jackson. B Low. Shock. I don't know.
8 He would -- those are all people he would joke around
9 with?

10 A Yeah, he would joke around with.

11 Q In a way that you felt was not appropriate?

12 A Sometimes.

13 Q Anyone else?

14 A Not that I can think of right now.

15 Q Can you tell me more about your observations of
16 him joking around with those four people in that way
17 that you found it inappropriate?

18 A We worked there, we didn't live there. And
19 neither did they, for that matter. And that's -- that's
20 how -- that's how sometimes the communication of they
21 felt like they were too friendly to come and talk to us.
22 And you shouldn't -- you shouldn't -- if you know that
23 you a drug dealer, you shouldn't feel that comfortable
24 all the time coming to talk to us.

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1 Q Did you think they felt comfortable because
2 some of them were paying them?

3 A I don't know.

4 Q Did you ever tried to find out?

5 A No, because I didn't know.

6 Q In this case, have you seen any documents
7 talking about Watts taking bribes?

8 A In this case? I -- I can't remember what
9 documents I've seen about that.

10 Q You can't remember whether you've seen them?

11 A Whether I've seen them.

12 Q Would you like to see them if they exist?

13 A You want to show me a document and refer to --

14 Q No, I just -- I'm asking as a police officer
15 who worked with them. That's not a -- I'm not trying to
16 lay -- well, I'm just going to ask the question.

17 As a police officer who worked with Watts and
18 Mohammed, if there are documents showing that they were
19 taking bribes while you worked with them, would you like
20 to see those documents?

21 A What point would that serve for me?

22 Q I'm asking. If the answer is no, it's no.

23 A It doesn't really matter to me.

24 Q It doesn't matter to you whether you see the

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1 documents or it doesn't matter to you whether they were
2 taking bribes --

3 A It matters to me whether they were taking
4 bribes. It doesn't matter if I look at the document.

5 Q Why does it matter to you if they were taking
6 bribes while you worked with them?

7 A Because at this point right now, it has cast a
8 bad reflection on everyone.

9 Q Would you be interested in knowing how they
10 were doing it so you could be on the lookout if anyone
11 else was doing it who you worked with?

12 MR. MICHALIK: I'd object to the form of the
13 question. It's also argumentative.

14 A The question again?

15 Q Would you be interested in knowing how Watts
16 and Mohammed operated to take the bribes, for example,
17 so you could maybe look out for behavior like that from
18 other officers?

19 A A really don't care because I won't be
20 supervising a tactical team. I supervise community
21 engagement for the little bit that I do, and what I've
22 have been doing since I'm a sergeant. I had no contact
23 and no interest ever to be a tactical sergeant.

24 Q Why don't you want to be a tactical sergeant?

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1 A I'm older now. That's for younger -- younger
2 exuberant guys. I'm a little older now.

3 Q Of the four people who you named who you
4 thought Watts had inappropriate interactions with, was
5 there any one he was seen closer to than others?

6 A Not in my opinion.

7 Q Okay. Yeah, just I'm asking for your --

8 A Not in my opinion.

9 Q Was there anyone who of those four he talked to
10 more than others?

11 A Not in my opinion.

12 Q Did you ever see him get anything of value from
13 any of those people?

14 A Yes.

15 Q All right. Tell me about that.

16 A Shock will sell clothes at times. They'd go
17 buy -- what's the neighborhood guys would buy? There
18 was a clothing store on 47th and J-Bees. Sometime they
19 would -- and it just might not be Shock and them. Might
20 be one of those four guys. But people come dope here
21 with clothing from J-Bees or somewhere, something like
22 that. And they had something that looked nice, and
23 Watts, he'd buy it.

24 Q Watts would buy clothes from Shock and others?

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1 A He would buy it, yes.

2 Q Do you know that he bought it from anyone else
3 other than Shock?

4 A I just remember Shock.

5 Q Okay.

6 A And then, I remember him having a foot race
7 with Big Shorty, \$400.

8 Q When did the foot race happen with Watts and
9 Big Shorty?

10 A I don't know, but it was one of the funniest
11 things I'd seen.

12 Q Who won?

13 A Take a guess.

14 Q I'm going to say Watts.

15 A Big Shorty.

16 Q All right. I was wrong. Usually I don't
17 answer questions during this but --

18 A I understand.

19 Q All right. Did Watts pay him?

20 A Yeah, they both put the money on the ground.

21 Q Do you know when this race happened?

22 A Don't remember when it happened.

23 Q Did you think that was inappropriate?

24 A No, that was just some -- some natural things

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1 that happened in the neighborhood between two people
2 that were having a conversation arguing about who could
3 outrun who, being two fat boys. It's almost like
4 community engagement.

5 Q But was something was different about the
6 clothes?

7 A It wasn't so much different about the clothes.
8 I mean, it just -- just one of those things, you know.
9 I -- there would be people down here and things going on
10 in Ida B. Wells that most people, I don't care how long
11 you sit and tell them, they would never understand it.
12 For instance, people coming down here selling things.
13 I'm not just talking about criminal activity. I'm
14 talking about things that made Ida B. Wells Ida B.
15 Wells. And that area where it was just -- it was just
16 different.

17 Q I'm not questioning whether people were selling
18 things like food or clothes or anything else for right
19 now. I'm just asking was there something different
20 about you seeing Watts buy clothes from Shock and seeing
21 him race Big Shorty?

22 A No, I mean I just -- well --

23 Q Because I thought you said that it was
24 inappropriate for him to be --

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1 A Here is my point. They liked the clothing that
2 they wore down here. I mean, we would try to wear
3 clothing to fit in. I didn't like to wear that type of
4 clothing. That's just my personal opinion.

5 Q But you weren't -- you weren't saying the
6 problem was with the clothing?

7 A It was the problem if -- why you have to buy
8 from them? You can go buy for yourself somewhere else
9 if that's the point, you know what I mean? You don't
10 have to just buy just because they were selling. You
11 don't have to do that.

12 Q Did at one point did, you confront him over
13 getting clothes from Shock?

14 A Once.

15 Q Tell me about confronting Watts over buying,
16 getting clothes from Shock?

17 A I was in the station, we were get -- we had an
18 arrest, we had -- we were getting ready to process, I
19 wanted -- but I knew it was going to be a long process
20 so I wanted to get my clothes out of the dry cleaner
21 before they close.

22 As I get ready to leave out, he asked me to
23 meet Shock to get whatever clothing that he had.

24 When I saw Shock, after I come out the

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1 cleaners, he had a J-Bees bag with his clothing in it.

2 Q And what was the confrontation?

3 A Because I was uncomfortable with meeting
4 someone to get the bag at that point in time. So I
5 guess at that point, one of those things you might maybe
6 want to say well, did you have a suspicion? Might have
7 been but I didn't know. It was nothing factual that I
8 could say this here, other than I picked up clothes, but
9 just didn't feel right.

10 Q What was the suspicion that you had?

11 A I just didn't know why I -- just why I had to
12 go meet him. Just because I'm going out to get my
13 clothes, you gon' -- you can go get your own clothes.
14 You can go get your clothes yourself while we process.

15 Q And so did you take -- did you say anything to
16 Watts?

17 A I said to him later on.

18 Q What did you say to him?

19 A I said if this clothing issue here isn't
20 something other than what it is, it's some bullshit, and
21 don't put me in the middle of it again.

22 Q You said if this clothing situation isn't -- is
23 something other than what it is?

24 A Yes.

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1 Q Meaning that if it wasn't just an exchange of
2 clothing?

3 A Yes.

4 Q What did you mean?

5 A Exactly what I meant, because I wasn't sure as
6 to the contents of the bag.

7 Q What did you think was in the bag?

8 A Clothing. Along with clothing.

9 Q Clothing along with clothing?

10 A Along -- along with his change from whatever,
11 because I had seen him earlier giving him money for
12 these clothing, he's gon' get whatever, whatever. So I
13 thought it was his change. Now you put his change in
14 this bag.

15 Q So there was money in the bag?

16 A There was a few dollars in the bag.

17 Q How much?

18 A I don't remember how much it was. It wasn't --
19 it wasn't a lot of money.

20 Q But you thought it was more than just change?

21 A I thought it was more -- I don't know. It
22 could have been.

23 Q You thought it was?

24 A It could have been.

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1 MR. BAZAREK: Objection. Argumentative.

2 Q Did you think it was more than just change?

3 A I thought it could have been.

4 Q If it was enough -- how many times over the
5 years did you confront Sergeant Watts on something?

6 A That was the one time I did confront him about
7 that.

8 Q If you didn't think it was more than just
9 change, would you have gone out to him and told him that
10 it was bullshit?

11 A If I didn't think it was more than just change?

12 Q Yeah.

13 A Yes, I would have.

14 Q You would have, even if it was just change?

15 A Even if it was just change, I would have
16 confronted him about it.

17 Q And you would have said that if this is
18 something more than just clothing?

19 A This is bullshit, and don't involve me in it.

20 Q Even if you didn't think there was a basis? If
21 you had no basis to think --

22 A If I had no basis to think it.

23 Q You'd still say that?

24 A I would still say that.

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1 Q Why?

2 A Because he could have done picked it up his
3 self.

4 Q But then why would you click the part in about
5 how it's something different than change?

6 A Because as we've been talking and discussing,
7 they were always people talking about things about him.
8 And at that particular moment , that date and time, it
9 sent a little red flag up in my head. And that's all it
10 was. And I felt I had to say what I wanted to him about
11 that.

12 Q You didn't know?

13 What's your best estimate of how much money was
14 in the bag?

15 A I don't know.

16 Q No idea?

17 A No idea.

18 Q How do you know it was the change then?

19 A Because it was in his hand.

20 Q Whose hand?

21 A It was in Shock's hand. He put it in the bag
22 because he tried -- and I don't know. You put his --
23 whatever belonged to him in that bag, and it was his --
24 it wasn't a thick amount of money. I mean, you could

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1 have money this thick. It was just it was -- it looked
2 like change.

3 Q Is it fair to say you don't really know if it
4 was change or not?

5 A I don't know.

6 Q The only thing you know for sure is that he did
7 put money in the bag?

8 A Yeah.

9 Q Do you remember when this happened?

10 A No, I don't.

11 Q Did you say anything to Shock?

12 A Not really, other than put his property in his
13 bag.

14 Q You said put Watts' property in his bag?

15 A Yeah. That's --

16 Q You -- you didn't want to hold it?

17 A No. I didn't want to touch it, no, because I
18 didn't know. Wasn't gon' be a part of it.

19 Q All right. And what did Shock say to you? He
20 just do it?

21 A He just do it and then he gave me the bag and
22 he drove off. And I drove back to the station.

23 Q And you went back and you just told, you
24 confronted Watts?

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1 A I didn't confront him then.

2 Q Okay. When did --

3 A We had the processing and we went on to
4 finishing doing the processing. And as we finished the
5 processing, he was gone. So his bag wasn't there, so I
6 had to take it to his house. I called him and asked him
7 where he was. He had left.

8 Q What did you do with the bag in the meantime?

9 A The bag was in the squad car where my dry
10 cleaning and everything else was until I got ready to go
11 home. And I wanted to get my dry cleaning out the car,
12 get his bag, give him his bag, and he was gone.

13 Q Watts was gone?

14 A Yes.

15 Q Any did you call him or did you go to his
16 house?

17 A I called him.

18 Q What did you say to him?

19 A I said where you at. He told me he had left.

20 Q Did you say why you were calling him?

21 A I told him he had left his bag.

22 Q What did he say?

23 A He didn't say anything. He said I'm at home,
24 bring it to me. And then, when I got to his house, I

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1 thought about that. I got to his house, dropped the bag
2 off, and that's when I confronted him with the words
3 that I said.

4 Q Were you mad that he tried -- that he made you
5 bring it to his house?

6 A Yes, I was.

7 Q Why were you mad he mad it -- made you --

8 A Because I wasn't sure, and it was just my
9 instincts of what I might have thought been going on,
10 yes. So I felt some kind of way about it.

11 Q Can you tell me specifically what you felt
12 might have been going on?

13 A What I felt might have been going on?

14 MR. KOSOKO: Object. Calls for speculative
15 response.

16 A Maybe something inappropriate. I wasn't sure.
17 I had no way of knowing for sure. But I felt
18 inappropriate about it.

19 Q So I want to try to drill down on that a little
20 bit. I understand you have said a bunch of times today
21 you did not know for sure. What I want to know is you
22 said I thought there was something wrong.

23 A Yes.

24 Q I want to know you had a particular suspicion,

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1 you got something from a drug dealer, including money,
2 and you were supposed to bring it to Watts. I want to
3 know specifically what did you think might be wrong?
4 What did you think was going on?

5 A I thought it was inappropriate for him to be --
6 to be handing me money or put money in a bag for him
7 with whatever items he had in the bag. Although I had
8 seen it happen prior to that.

9 Q You had?

10 A Yeah, he used to -- when he was -- when he
11 would buy something from Shock, it's not like he's
12 hiding it. He was out in the open. It's nowhere like
13 he's hiding somewhere. Hey, Shock showed up, how about
14 this. He want to buy, he buys it. That money exchange
15 hands like a normal sale, put it in the bag, and he
16 gone.

17 Q You saw him exchange -- you saw him give Shock
18 money, Shock would give him clothes and change?

19 A Yeah. Clothes and change sometimes, yes.

20 Q Did you see him getting change before?

21 A Yes.

22 Q Okay. And in any of those occasions, did you
23 say anything to Watts?

24 A No, because it's openly wide. Everybody is out

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1 there for see. I didn't -- it didn't look suspicious to
2 me.

3 Q Was he paying a fair price for the clothes?

4 A I don't know what he was paying for them.

5 Q All right. So this at a, the one where you
6 confronted Watts --

7 A Yes.

8 Q -- did you think that maybe it was payoff money
9 from Shock?

10 A I don't know. I wouldn't call it payoff money.
11 I -- it's just -- it just didn't feel right to me.

12 Q Did you think maybe it was bribe money?

13 A I don't know what was. It just didn't feel
14 right to me.

15 Q I know you don't know what it was, but can you
16 just tell me what you thought it was? What was the
17 concern?

18 A I don't know --

19 MR. BAZAREK: Objection. Asked and answered.

20 A -- it just didn't feel right to me.

21 Q Okay. You can't say anything else about it
22 other than it just didn't feel right?

23 A It just didn't feel right.

24 MR. RAUSCHER: I don't know what time it is.

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1 Do you want to --

2 MR. MICHALIK: We can go -- why don't we go to
3 1:15 and then or you got -- you going into a new area
4 or?

5 MR. RAUSCHER: I don't know yet.

6 MR. MICHALIK: Okay.

7 MR. RAUSCHER: You all tell me. I'll keep
8 going. If you want, whenever you get to it, just tell
9 me and I'll stop.

10 MR. BAZAREK: Take a lunch break. Right?

11 MR. MICHALIK: Yeah.

12 MR. RAUSCHER: Okay.

13 THE VIDEOGRAPHER: Off the record. 108.

14 (Lunch was taken.)

15 THE VIDEOGRAPHER: Back on the record. 2:02.

16 BY MR. RAUSCHER:

17 Q Before we took a lunch break, we were talking
18 about the incident where you took -- I think, as I
19 understand it, you had a bag of clothes and some money
20 from Shock and brought it to Watts?

21 A Yes.

22 Q We had talked about that in a little bit of a
23 disjointed way, I think, and so what I'd like you to do
24 can you just walk me through step-to-step how that

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1 incident occurred.

2 A I was in the station, we were getting ready to
3 process some arrestees. I knew it was going to take a
4 long time. So I asked him to go -- if I could go to the
5 cleaners to pick up my clothes. He said oh, yeah, by
6 the way, can you stop and get my bag from Shock with the
7 five purchasing.

8 Okay. I go to the cleaners. Shock was by the
9 cleaners where I go get my -- go pick up my clothes.
10 Come out the cleaners, put my clothes in the squad car,
11 go to the car, he has a bag. He has whatever
12 denominations of money in his hands. I don't know how
13 much there were. I told him no, you could put it in the
14 bag.

15 I took the bag back to the station. I go back
16 in. I go to start the process, and I don't look for him
17 right away. Leave my clothes, the bag, in the squad car
18 because I move all my stuff, I load in my car when I
19 ready to go home.

20 But when we finished processing, he was gone.
21 So I'm looking around for him like where you at. So he
22 tells me he's at home, to bring him his bag, bring the
23 back to home.

24 Then I go to his house. And that's where I

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1 could say what I had to say, didn't stay long, and I
2 left.

3 Q And I'm sorry if I -- if you already answered
4 this. What did Watts say to you in response when you
5 sort of confronted him?

6 A I don't recall what he said. I don't think I
7 even stuck around to say. I wasn't there that long.

8 Q Were you mad at him when you confronted him?

9 A I had -- I felt a warm kind of way.

10 Q What; warm?

11 A Warm kind of way.

12 Q You were mad?

13 A I felt a warm kind of way.

14 Q What does that mean?

15 A I -- because I felt uneasy about it, I was -- I
16 wasn't, I wouldn't say mad but I felt a warm kind of way
17 that I had to express my opinion to him.

18 Q Were you yelling at him?

19 A No, it wasn't yelling but it was a firm way of
20 expressing myself.

21 Q You said Shock was by the cleaners where you
22 went to get your clothes?

23 A Yes.

24 Q Did he -- did he live by the cleaners?

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1 A I don't know where he lived, and I don't know
2 how -- Watts knew where I was going to the cleaners at,
3 so I don't know how Shock eventually found where I was
4 going to the cleaners at. I don't know.

5 Q Did you tell Shock?

6 A No.

7 Q Do you know if Watts and Shock would talk on
8 the telephone?

9 A I don't know. I don't know.

10 Q Is there any way that you can think of that
11 Shock would have known where you'd be other than --

12 A He would have to talk to him and tell him I was
13 going to.

14 Q Watts would --

15 A I would assume that. So I don't know.

16 Q Right. Other than -- you assume that Watts
17 told Shock?

18 A Yes.

19 Q Because otherwise, there's no really any way
20 you could think of that he would know?

21 A Correct.

22 Q Where was the cleaners?

23 A 42nd and King Drive.

24 Q Do you know what it was called?

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1 A No.

2 Q Do you know if it's still there?

3 A I don't know.

4 Q Did you pick up your clothes?

5 A Yes.

6 Q And then, did you talk to Shock after you
7 picked up your clothes or before?

8 A After.

9 Q Where did Shock meet you?

10 A Right there by the cleaners.

11 Q Right in -- -

12 A Right across the street from the cleaners at
13 42nd and King Drive.

14 Q Across the street?

15 A Yeah. The cleaners was on one side of the
16 street, he was parked across the street.

17 Q He was in his car?

18 A Yes.

19 Q Did you go up to his car?

20 A Yes.

21 Q Did he get out of his car?

22 A No.

23 Q What kind of car did Shock have?

24 A I don't remember.

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1 Q How did you know he was there?

2 A I saw him.

3 Q How did you know that you were supposed to go
4 approach him?

5 A How do I know I was supposed to go approach
6 him?

7 Q Yeah.

8 A Watts had asked me to pick up the bag whatever
9 he had for him.

10 Q Did Watts tell you -- Watts said he wanted you
11 to get the bag?

12 A Yeah, with the clothe in it, yes.

13 Q When he told you that, did he say where Shock
14 would be?

15 A No. I'm going to the cleaners.

16 Q You said I'm going to the cleaners?

17 A Right.

18 Q Watt said Shock has the bag?

19 A Right. So I don't know how. He must have told
20 Shock to meet me at the cleaners, is my assumption.

21 Q Other than you telling Shock to put the money
22 in the bag and not give it to you directly, did you
23 exchange -- did you exchange any words with him?

24 MR. BAZAREK: I just object to the way that the

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1 question was formed. And also I think it
2 mischaracterizes his prior testimony.

3 Q That I want to make sure that I'm getting it
4 right. Did I mischaracterize your testimony?

5 A What -- what are you saying?

6 Q My question was other than you telling Shock to
7 put the money in the bag instead of in your hands --
8 hold on. Just let me finish for the record.

9 A Uh-hum.

10 Q Other than you telling Shock to put the money
11 in your bag -- no, I'm sorry.

12 Other than telling Shock to put the money in
13 the bag instead of handing it to you, did you exchange
14 any other words with Shock?

15 A No.

16 Q So the first question is -- all right. So no.

17 A Right. Put that in the bag. That's not mine.
18 That's his. Put it in the bag.

19 Q That exchange happened?

20 A That exchange happened. He never said nothing
21 to me.

22 Q He just complied when you said put it in the
23 bag?

24 A He -- yeah.

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1 Q Did you think about telling him I'm not taking
2 the money?

3 A I didn't know if it was change or not. I told
4 you it wasn't -- I couldn't tell the denomination. It
5 wasn't a large denomination of money. So I don't know
6 if it had been change or not from whatever the purchase,
7 whatever the situation was.

8 Q That's not my question. The question is did
9 you think about not taking the money?

10 A Not taking the money?

11 Q Yeah. Did you think about telling him no, I'm
12 not taking that money?

13 A No, I didn't think about that at that moment.

14 Q What kind of bag was it?

15 A It was a J-Bees bag, clothing bag.

16 Q A plastic bag or like --

17 A Plastic bag.

18 Q -- a garment bag?

19 A Plastic bag. J-Bees clothing bag.

20 Q What color?

21 A I don't recall.

22 Q Did you see the clothes inside?

23 A No.

24 Q Do you know that there were clothes inside?

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1 A There was something in there, yes.

2 Q I know there was something. Do you know that
3 there were clothes?

4 A They had -- yeah. A folded bag. I didn't look
5 in it to see what was in there.

6 Q But it felt like clothing?

7 A Yes.

8 Q What did it -- was it soft?

9 A It was foldable.

10 Q What --

11 A Foldable. You know, it wasn't like something
12 that wouldn't fold. Like clothes. You can feel clothes
13 through a bag.

14 I didn't decide to see what they were.

15 Q You had said something Watts had told you that
16 he wanted you to go get a bag of. Was it things he had
17 bought? Is that what he told you?

18 A I guess he had -- clothing. Whatever it was he
19 had bought. That he had purchased from Shock. Earlier
20 I had seen them in conversation about what -- whatever,
21 whatever. He asked me to go pick up the ones he had
22 purchased from Shock.

23 Q So earlier in the day, you saw Watts talking to
24 Shock?

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1 A Yes.

2 Q And did you hear what they were talking about?

3 A No.

4 Q So you don't know if that conversation related
5 to the -- this exchange that you previously --

6 A No, I don't.

7 Q And do you remember Watts said to you can you
8 go pick up the bag of stuff I purchased from Shock?

9 A Yeah.

10 Q That's what he said?

11 A Yes.

12 MR. BAZAREK: I'm just going to lodge like a
13 standing objection to all these questions. Mr. Alvin
14 indicated that Shock. We covered it ad nauseam. And
15 he's not one of the plaintiffs in the Watts Coordinated
16 Pretrial Proceedings. So standing objection to all this
17 line of questioning.

18 Q You had said you had seen Watts get clothing
19 from Shock on other occasions?

20 A Yes.

21 Q Do you know how Shock got the clothing?

22 A No, I don't.

23 Q Did you have any belief or understanding that
24 he was stealing the clothing or that others were

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1 stealing it for him?

2 A No.

3 Q You never suspected that?

4 A No.

5 Q All right. You had also, when you were talking
6 about the ways in which Shock displayed arrogance, you
7 said something about he talked about how he liked to
8 play cards?

9 A Yes.

10 Q Tell me more about that.

11 A He was a bid whist player.

12 Q Big what?

13 A Bid whist card player.

14 Q What does that mean?

15 A It's a card game.

16 Q What kind of game is that?

17 A It's a card game.

18 Q Just a -- all right.

19 A It's called.

20 Q Did you ever play with him?

21 A Yes.

22 Q Did he gamble a lot?

23 A What do you mean a lot?

24 Q Did you gamble with Watts?

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1 A On what?

2 Q On anything?

3 A Yeah.

4 Q All right. How frequently would you gamble
5 with Watts?

6 A We might bet on a game.

7 Q Small amounts, big amounts?

8 A Depending upon how big the game was.

9 Q What's the biggest bet you made with Watts?

10 A About \$100.

11 Q And when I was asking -- when I said do you
12 gamble with Watts, were you saying you bet against him
13 on things?

14 A Yes.

15 Q Did you ever go to casinos with him?

16 A Once.

17 Q Tell me about going to a casino with Watts?

18 A We were Albuquerque, New Mexico, at a training
19 class.

20 And in a week, that week before we left, the
21 night before, a few feel from the training class, we all
22 went to the casino.

23 Q What kind of training class?

24 A Bomb tech, I believe it was.

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1 Q Do you remember when this happened?

2 A No.

3 Q Did either you or Watts gamble a lot of money
4 at the casino?

5 A I don't know what he was gambling because he
6 was playing another game and I was playing the slot
7 machine.

8 Q So you did not gamble too much?

9 A Oh, I played the slot.

10 Q No, I'm sorry, it was -- it was a slow
11 question.

12 You were not gambling large amounts of money?

13 A No.

14 Q But would you know what Watts was playing?

15 A No. He was playing card game somewhere.

16 Q All right. What was arrogant about Watts and
17 his playing -- is it bid whist? Is that how you say it?

18 A Yes.

19 Q What was arrogant about that?

20 A Talk loud, you talk intimidating to other
21 people. That the source of how the game is played
22 amongst people.

23 Q So you're saying he just acted arrogant during
24 the games?

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1 A Yeah, he acted very arrogant during the game.
2 That's a trait of playing the game.

3 Q So that's how you are supposed to act in the
4 game?

5 A If you that good at it. If you think you're
6 good at it.

7 Q Was he?

8 A He was pretty good at it.

9 Q So when you -- when you were saying Watts and
10 you in which he was arrogant, when he was, you know,
11 acting like he was in charge of everything when he was
12 outside, I think you were saying that as a negative?

13 A Yes. At times.

14 Q Is the playing cards and acting like he's good
15 at it during the game a negative?

16 A I wouldn't call it negative at that time.

17 Q You had also mentioned, when I first asked you
18 if Watts was a good sergeant, that he had personal
19 problem?

20 A Sometimes people don't know how to communicate
21 with people. And that's in any profession. Whether it
22 be a sergeant or any profession.

23 Q Let's just stick to it. Try to just listen to
24 the questions and answer these questions.

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1 What are the personal problems that you are
2 referring to with Sergeant Watts?

3 A Personal communication-wise to people.

4 Q How did that show itself?

5 A Other officers sometimes didn't like the way he
6 communicated to them.

7 Q How did he communicate with other officers that
8 caused problems?

9 A I would say in a way of speaking as an
10 authority figure to them and they -- they weren't
11 officers on our team.

12 Q What sort of things would he say that would
13 bother people?

14 A I don't know what they are directly, but you
15 know, a lot of people would have an opinion of okay, I
16 got to listen to what the sergeant says at his direction
17 but he's an arrogant asshole, behind his pack.

18 Q They would say that about Watts?

19 A Yes.

20 Q Do you remember anyone specifically that said
21 that?

22 A No.

23 Q Anyone in your team said that?

24 A Not that I remember but you know, we shared an

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1 office with several other teams. Sometimes he might be
2 the only sergeant for that shift.

3 Q Did you ever say that about him?

4 A What?

5 Q That he was an arrogant asshole?

6 A If I felt like that at that moment.

7 Q Was that a yes, you said it?

8 A Yes, I have.

9 Q And did you say that when you were working for
10 him on the tact team?

11 A Yes.

12 Q And when you said it, what types of things were
13 you referring to?

14 A Whatever the situation was that he had done at
15 that time, and I felt the need to say what I had to say
16 about him.

17 Q Do you remember any specific or general things
18 that you were -- that you said that about him while you
19 were on the tact team?

20 A No.

21 Q Were there any other things that we haven't
22 talked about that you observed from Watts that you felt
23 were problematic?

24 A Not that I could think of at this time.

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1 MR. RAUSCHER: Let's mark this as Exhibit 4.
2 City BG056464.

3 (Exhibit 4, Personnel File Request, was marked
4 for identification and is attached to the transcript.)

5 Q Have you seen this document before?

6 A I don't remember.

7 Q Do you remember asking -- well, let me ask you
8 this: Does this reflect you asking to see your
9 personnel file?

10 A Yes.

11 Q Do you remember asking to see your personnel
12 file in November 2005?

13 A No.

14 Q Do you know why you asked to see your personnel
15 file in November 2005?

16 A No.

17 Q Do you remember ever asking to see your
18 personnel time?

19 A No.

20 MR. RAUSCHER: Let's mark this as Exhibit 5,
21 city BG056496.

22 (Exhibit 5, VRA Suspension Notice, was marked
23 for identification and is attached to the transcript.)

24 Q Do you recognize this document?

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1 A Yes, I do.

2 Q Can you explain it to us.

3 A It's a VRI suspension notice.

4 Q What's VRA?

5 A Voluntary -- voluntary -- overtime basically.

6 Q Okay.

7 A Or to work overtime.

8 Q What is a suspension notice?

9 A Suspension notice? Failure to record or
10 incorrectly record activity in a clear database system.

11 Q Do you know what activity it's accusing you of
12 not recording?

13 A Doing -- if I can remember correctly which is
14 what they have me do every day is you are supposed to do
15 activity report. And I don't remember if this is early
16 on first time working there, and I didn't do a activity
17 report for what the team had done and recorded it in the
18 database.

19 Q What is an activity report?

20 A It's an -- it shows what the people working
21 under you did for that time on the watch. If they made
22 a arrest, if they made parking tickets, whatever, moving
23 tickets, whether they wrote curfews, you're supposed to
24 list all that in there and make it. And I wasn't sure

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1 I guess how to do it or that I was supposed to print it
2 out and submit it.

3 Q So I think you did it but didn't print it out
4 and submit it?

5 A I don't remember if I did or not.

6 Q What -- how long -- well, do you know if there
7 were activity reports when you were on the tact team in
8 the 2nd District in Public Housing?

9 A No, I don't.

10 Q You don't know either way?

11 A No, I don't.

12 Q Did you ever review any activity reports before
13 you became a sergeant?

14 A No.

15 Q Did you ever create any activity reports before
16 you became a sergeant?

17 A Not that I remember.

18 Q Do you remember ever seeing an activity report
19 at any time before you became a sergeant?

20 A Not that I remember.

21 Q Did you agree with this notice, like what they
22 say in here, correct?

23 A Yes.

24 Q You didn't challenge it?

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1 A Because I realized I hadn't done it, whatever
2 it was, or what I didn't actually put it in because you
3 have to save it first after you list it -- well, you
4 make it out. It's a box to check first next to
5 beginning of the tour, of labelling it, where your
6 locations are. Then when you go back at the end of the
7 tour, you are to put the information in, uncheck the
8 box, save it, then go to another place and pull it up
9 and print it.

10 And I wasn't aware of all that at the time and
11 I don't -- I don't know which mistake I made, if I
12 didn't print it out or if I just didn't actually get it
13 done. So no, I didn't.

14 Q Do you recall ever giving a performance review?

15 A No.

16 Q Do you ever complete performance reviews for
17 people under your commands?

18 A Yes.

19 Q How long have you -- do you still do
20 performance reviews in your current role?

21 A Yes.

22 Q How long have you been completing performance
23 reviews for?

24 A Since I've been a sergeant.

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1 Q How often do you do that?

2 A As often as they said amount. Quarterly, if
3 whoever is up, I get an email to say looking in their
4 performance of evaluation.

5 Q How frequently are people under your command
6 reviewed?

7 A I don't know. It just pops up, like I say
8 quarterly.

9 Q Okay. Do you think you review each person
10 under you quarterly?

11 A No.

12 Q This is some sort of rotation?

13 A I would assume so because I don't know, I don't
14 pick it. I don't know --

15 Q Okay.

16 A -- how it's done.

17 Q What are the questions if you know -- well,
18 actually, just tell me what a performance review looks
19 like from your end?

20 A From my end? It looks like the five or six --
21 five or six categories. From those categories, you have
22 things in those bracket -- in the default in here
23 whether they doing exceptional, whether they doing okay
24 or whether they need some help with it.

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1 Q And is there room for comments?

2 A Yes.

3 Q Do you put comments in all the time?

4 A Yes -- you have to fill it. It won't go past
5 the next step if you don't put in what -- whether they
6 exceed, meet or needs improvement.

7 Q And how do you decide which category to put
8 people in? What are you looking at?

9 A I look at a performance evaluation chart.

10 Q How do you -- what does the performance
11 evaluation chart tell you?

12 A It has wording in there for whether they
13 exceed, it has wording for whether they meet it, and
14 wording in there whether they need help in it.

15 Q And what do you look at to decide how to slot
16 people into different categories?

17 A It's a -- it's a performance evaluation chart.

18 Q Let me try -- I'll try to clarify that. We'll
19 just -- can we do another hypothetical if your lawyer.

20 If you're reviewing him, you have the chart
21 that says, you know, exceeds, meets, or needs help?

22 A Yes.

23 Q And then, you must know something about him to
24 decide which ones of those he meets, right?

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1 A Correct.

2 Q So what are the things that you look at for the
3 person you're reviewing?

4 A I think about the daily activity that they
5 brought in based upon what their daily activity sheet
6 that they -- the kind of work that they do.

7 Q Do you use any like you have personal
8 observations in addition to that or is it just the hard
9 data on the sheets?

10 A Take personal observation in there also.

11 Q And do you look at CRs or anything like that?

12 A No, I haven't looked at a CR, no, I don't know
13 where.

14 Q Do you look at the number of complaints that
15 are raised against people?

16 A No.

17 MR. RAUSCHER: Let me mark this -- and we're
18 at 6?

19 (Exhibit 6, Performance Review, was marked for
20 identification and is attached to the transcript.)

21 Q Before you actually before you review that, do
22 you know if the people you're reviewing get the reviews
23 that you complete?

24 A Yes.

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1 Q Then, do you sit down and do you talk to them
2 about that?

3 A Yes.

4 Q But that and so just to be clear, you don't
5 remember ever having that kind of meeting when you were
6 -- at any time before you were a sergeant?

7 A A -- for the review of my --

8 Q Like you being on the other side of it, getting
9 your review?

10 A I don't remember, no.

11 Q Okay. Take a look at this document. Let me
12 know when you've had a chance to look it over.

13 A Yes.

14 Q Have you seen this document before today?

15 A I don't recall seeing it.

16 Q Do you recognize it looking at it?

17 A No.

18 Q Do you know what -- do you see that it says
19 performance ratings on the far right-hand columns?

20 A Yes.

21 Q And then, it looks like it's as got a year or
22 four different years, and then some numbers and certain
23 months. You see that?

24 A Yes.

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1 Q Do you have any idea what any of those mean?

2 A Those are the performance rating numbers.

3 Q Are you saying that just because it's under the
4 performance rating heading or do you have some basis to
5 think that beyond looking at the document?

6 A I believe that's what they are from that point
7 in time.

8 Q What is that basis? What is your belief based
9 on?

10 A Because it says here Performance rating, and
11 someone would have rated, as you look at the year, '97,
12 somebody from -- January, June they gave me a 91, and
13 from July to December, they would have given me a 94.

14 Q And do you remember getting ratings of any
15 sort?

16 A I don't remember.

17 Q Do you know if there was a rating system in
18 place at the time?

19 A I don't remember what the system was.

20 Q Do you know if there wasn't any system at all?

21 A Yeah, there was some type of system.

22 Q Some type of review system?

23 A Yes.

24 Q How do you know there was a review system?

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1 A Because we were told there was a review system.
2 I just didn't know what it was.

3 Q Got it. Okay. You don't know what these
4 numbers measure?

5 A No.

6 Q And you don't know who filled this form out?

7 A No.

8 Q Do you know if there has always been a review
9 system? Since you've been on the force?

10 A I'm not sure.

11 Q Were there any reviews or any papers that
12 looked anything like this in your meritorious package?

13 A I don't know.

14 Q Did you see any?

15 A I don't remember.

16 Q All right. Tell me who you remember being on
17 the Watts Team while you were on the team.

18 And when I say Watts Team, I'm talking about
19 the time period when Watts was the sergeant on the
20 tactical team you served on.

21 A Myself, Kenny Young, Brian Bolton, Robert
22 Gonzalez, Ed Caddman, Michael Spaargaren, Kallatt
23 Mohammed, Darrell Edwards, Jerome Sommers, Calvin Rojea,
24 Katherine Hughes, Doug Nipples, Manny Leono, Elsworth

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1 Smith, Cynthia Torres, Miguel Cabrera, Darius Smith,
2 Caroline Smith.

3 I don't know. I can't remember anybody else.

4 Q Lamonica Lewis.

5 A Lamonica Lewis.

6 Q Was she known as Coco?

7 A Yes.

8 Q And obviously Ronald Watts?

9 A Yes.

10 Q Did he have a nickname?

11 A People called him Big Smooth.

12 Q Did people other than him call him Big Smooth?

13 A Did people other than him?

14 Q I've heard --well, did you hear him refer to
15 himself as Big Smooth?

16 A Yes.

17 Q Did anyone else call him Big Smooth?

18 A There was people in the office that called him
19 Big Smooth.

20 Q All right. Which officers called him Big
21 Smooth.

22 A I don't know the particulars. Some he had
23 probably worked in the past.

24 Q Did any of the residents -- did you ever hear

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1 any of the residents call him Big Smooth?

2 A Sometimes.

3 Q Any resident, any particular residents or
4 people who were around you you remember calling him Big
5 Smooth?

6 A No.

7 Q Any other members of the team who you remember
8 having nicknames?

9 A Given nicknames or their own nicknames?

10 Q You mean -- oh, so either -- either one.

11 Nicknames that people -- you mean nicknames that people
12 gave them?

13 A Nicknames that people gave them in the streets.

14 Q So let -- let's do this. Tell me what you
15 remember and just tell me which category it falls in and
16 sort of who called them that, whether it was the team or
17 people in the streets or both.

18 A I think people in the streets called me AJ
19 because they heard other people call me AJ by my
20 initials.

21 Q Did you ever hear anybody in the streets refer
22 to you as the Watts Team enforcer?

23 A No.

24 Q Have you ever heard anyone say that people said

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1 that about you?

2 A No.

3 Q All right. What other nicknames?

4 A They call Manny Charter Man. I'm trying to
5 remember the nicknames they were calling. I -- they
6 just don't jump off at me.

7 Q Edwards or Mohammed or Sommers or Kenny Young
8 have any nicknames that you can remember?

9 A Kenny was called KY.

10 Q Initials?

11 A Yes.

12 Q Team members or people in the street or both?

13 A Both.

14 Q Did people on the team call you AJ?

15 A Yes.

16 Q And then, what about Lamonica Lewis, people on
17 the street and team members call her Coco?

18 A Coco.

19 Q She called herself Coco?

20 A Yes.

21 Q Which, if any of the people who you've listed
22 as part of the Watts Team were you friends with outside
23 of work?

24 A Outside of work? I spent time with most of

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1 them at some point or another.

2 Q Which ones would you consider to be friends, if
3 any?

4 A I considered them all to be friends.

5 Q Still consider them all to be friends?

6 A Well, I haven't seen a lot of them in a long
7 time, so no.

8 Q At the time, though, when you were on the team,
9 you considered them all your friends?

10 A Some.

11 Q Which ones did you not consider friends?

12 A I mean, I didn't have a really outside of the
13 work job with Miguel Cabrera.

14 Q Anybody else you were really friends with?

15 A Darrell Edwards. We were -- we knew each other
16 but we didn't really hang out, hang out, like that. We
17 might have a drink somewhere. I think I may have went
18 to his house once. I think he may have come to my
19 house once.

20 Q Who did you -- was there anyone else who falls
21 in that category of people you don't really consider
22 friends?

23 A I -- no.

24 Q And let's go to the other end of the spectrum.

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1 Were there people who you would say you were closer
2 with?

3 A Yeah, I was closer with few of them.

4 Q Who were you closest with on the team?

5 A I was close with Watts. We played cards. With
6 other police officers. We'd have drinks in bars with
7 other police officers. With some of the team, team.
8 Same for Jerome Sommers.

9 Q Okay. Same type of things; play cards?

10 A Yes.

11 Q Anyone else?

12 A I don't think the rest of the guys were card
13 players.

14 Q Yeah, let's not limit it to cards. Just --

15 A I mean it started because that's what it was.
16 He liked -- they liked to frequent the bar. I couldn't
17 play, unless we were playing with other police officers
18 at somebody's house or at a function somewhere, it was
19 bid whisk. He played straight whisk a lot at a bar. I
20 didn't play straight whisk so I didn't go there too
21 often when they played cards.

22 Q All right. Who else did you socialize with a
23 lot on the Watts Team, if anyone?

24 A A lot? Jerome Sommers.

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1 Q So we got Sommers and Watts.

2 A I went by Coko's house a few times for drinks.
3 Went by Mohammed's house a couple of times for drinks,
4 few times for drinks. Kenny didn't drink.

5 Q Were you in his wedding or was he in your
6 wedding?

7 A I was in his wedding.

8 Q Would you consider yourself close with Kenny
9 Young when you were on the team together?

10 A Yes.

11 Q All right. Did he leave the team before you
12 did?

13 A Yes.

14 Q Do you know why he left the team?

15 A No, I did not.

16 Q Did you ever talk to him about it?

17 A No, I did not.

18 Q Did you ever hear any rumors about why he left
19 the team?

20 A No.

21 Q Was the wedding before or after he left the
22 team?

23 A I think it was before.

24 Q Was it while he was on the tact team?

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1 A Yes.

2 Q Did you stay close with him when he left the
3 team?

4 A Yeah, I talked to him.

5 Q You still in touch with him?

6 A I haven't talked to him in a while.

7 Q Did you miss having him on the team?

8 A Excuse me?

9 Q Did you miss having him on the team?

10 A Yeah; Kenny was a nice person.

11 Q Did you ever want know why he left?

12 A No.

13 Q All right. Anybody else you socialized with?

14 A Calvin Rojeo. We'd go to his house a couple of
15 times a year. He would have a summer barbecue once a
16 year.

17 Brian had a party he would have once a year in
18 the summertime, and I went up there a couple times.

19 I went to Doug's house too at a social for
20 something once.

21 I was invited to Manny's house but I never made
22 it.

23 That's it outside of there I socialized with.

24 Q Elsworth Smith at all?

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1 A Elsworth. Me and Elsworth would hang out and
2 smoke cigars.

3 Q How frequently did you hang out with Elsworth
4 Smith outside of work?

5 A Not often. I mean maybe once a month. So we'd
6 go to the same cigar place.

7 Q Well, once a month you would go smoke a cigar
8 with him?

9 A Yes, outside of work.

10 Q At a cigar shop?

11 A At a cigar shop, or if something was going on
12 where another event where some people were that we all
13 knew. Other police officers.

14 Q And that's included in the once a month
15 estimate?

16 A Yes.

17 Q Anyone else who you remember socializing with
18 on the team.

19 Catherine Hughes?

20 A Vaguely. I went to her house a couple of
21 times. She came by my house a couple of times.

22 Q Are you still in touch with any members of the
23 Watts Team?

24 A Not really. I see Catherine Hughes because we

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1 work in the same building.

2 Q Is she on administrative duty also?

3 A I don't know.

4 Q Have you ever talked to any of the other Watts
5 Team members about being on administrative duty?

6 A No.

7 Q Have you ever talked to any of them about the
8 accusations being made against you at all?

9 A No.

10 Q Were there any people you remember from that
11 team who didn't get along, like it was obvious they
12 didn't get along with each other?

13 A Not that I know of.

14 Q Nothing you observed --

15 A Nothing I observed where --

16 Q Go ahead, sorry.

17 A No, nothing I observed that would say they
18 really didn't like each other, no.

19 Q Any rumors about people not getting along on
20 the team?

21 A Nope, not that I remember.

22 Q Were there particular types of crimes at the
23 2nd that the Watts Team was responsible for
24 investigating?

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1 A No.

2 Q Were there particular types of crimes that you
3 came upon more often than others when you were on the
4 Watts Team?

5 A More narcotics sales down there in that area.

6 Q And when you say that, you mean Ida B. Wells?

7 A Ida B. Wells area, yes.

8 Q Ida B. Wells was the primary area where you all
9 worked, correct?

10 A Primary area, yes.

11 Q Did you ever hear of any of the building in Ida
12 B. Wells referred to as a Watts building or the Watts
13 buildings?

14 A No.

15 Q Do you know if he was involved in the drug
16 trade?

17 A No, I do not.

18 Q You don't know either way?

19 A I don't know either way.

20 Q Was that one of the rumors about him back in
21 the day?

22 A I don't remember hearing that rumor.

23 Q When -- so you've named, I think, some people
24 you believed were bigger plays in the drug trade?

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1 A Yes.

2 Q Shock, Big Shorty?

3 A Yes.

4 Q Allan Jackson?

5 A Yes.

6 Q B-Low?

7 A Yes.

8 Q Are there any others who you remember who you
9 thought were big players?

10 A Ben Baker. Leonard Gibson. That's what comes
11 to mind right now.

12 Q And how did you know that those six people were
13 big players in the drug trade?

14 A Because they carried themselves down there like
15 they were better than everybody else, and to that end,
16 people would say that. And the other officers who were
17 down there trying to make arrests and also had
18 experience with being down there in the Ida B. Wells
19 area.

20 Q Did you have any confidential informants that
21 you worked with when you were a member of the Watts
22 Team?

23 A No.

24 Q Did you know of any confidential informants

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1 that the team was working with?

2 A No.

3 Q Do you know whether the team had confidential
4 informants or whether anyone on the team had
5 confidential informants?

6 A I don't know.

7 Q You don't know either way?

8 A No.

9 Q All right. Did you use the term, concerned
10 citizen?

11 A Yes.

12 Q What does concerned citizen mean to you?

13 A That means someone who was giving information
14 because they were concerned with what was going on in
15 that area.

16 Q Who like generally who were the concerned
17 citizens?

18 A Some would be people who lived down there.
19 There would be people who would just be around down in
20 the area.

21 Q And is a concerned citizen different than a CI,
22 confidential informant?

23 A Yes.

24 Q What's the difference between a confidential

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1 informant and a concerned citizen?

2 A The confidential informant is someone who has
3 to be signed up on the payroll book to be getting paid.
4 And the concerned citizen is someone who just gives you
5 information about what they know to be a problem to
6 them.

7 Q Have you ever worked with confidential
8 informants in your time on the Chicago Police
9 Department?

10 A No.

11 Q What is your understanding of what a -- where
12 does your understanding of what a confidential informant
13 come from?

14 A Pardon me?

15 Q You -- I had asked you to tell me the
16 difference between a confidential informant and a
17 concerned citizen, and you did. And I'm just wondering
18 what is the basis for your belief as to what a
19 confidential informant is?

20 A The confidential informant goes down into the
21 buildings or wherever to find out what illegal activity
22 is going on, and they report it back to the police.

23 Q They are kind of working undercover?

24 A I would say so.

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1 Q So what's your basis for that, for having that
2 belief as to like that's what a confidential informant
3 is?

4 A I have read reports about that.

5 Q Okay. Did you personally frequently get tips
6 from concerned citizens when you were working at Ida B.
7 Wells?

8 A Yeah, you would get concerned tips all time.

9 Q You, you personally?

10 A I would get some, yes.

11 Q Do you remember any specific concerned citizens
12 you got tips from?

13 A No.

14 Q So other than getting tips from concerned
15 citizens, how would you go about finding out where
16 illegal activity was taking place in Ida B. Wells?

17 A We would go down there on a regular basis.
18 Sometimes just to be there as your presence. Other
19 times going down there trying to get up in the
20 buildings. And you would know because people would run
21 scattered when the police would come.

22 Q All right. So one way to know about illegal
23 activity is a concerned citizen; is that fair?

24 A Yes.

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1 Q And then, did you say another one is if you
2 showed up and people ran away?

3 A Ran away, and if you got up in the building to
4 see illegal activity going on.

5 Q What is it about people running and scattering
6 that tells you they've done something illegal?

7 A Because they are yelling a term called clean up
8 which was meant to alert the police that the -- I mean,
9 alert the drug dealers that the police were coming.

10 Q So that the people yelling clean up, you
11 believe they were involved in the drug trade?

12 A Yeah, they are a part of it.

13 Q And then all the people running you also
14 believed to be?

15 A Not all -- not all the time because some of the
16 people running might be people coming to buy narcotics,
17 might be the people outside on security.

18 Q Or could just be people there who didn't want
19 to talk to the police?

20 A I wouldn't say didn't want to talk to the
21 police. Why would anyone want to go to an area -- well,
22 I don't believe anyone would want to go to that area
23 just to hang out. It was not that kind of appealing
24 area. It wasn't a resort area.

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1 Q Right. I'm not suggesting it was a resort
2 area. What I'm saying is there could be people who were
3 not doing anything illegal but still didn't want to be
4 stopped by the police, so they ran away. Are you saying
5 that it's impossible at Ida B. Wells?

6 A It's possible.

7 Q But you think it's unlikely?

8 A I'm not saying it's unlikely. It's possible.

9 Q Was your assumption when somebody ran that they
10 did something --

11 A Well, they were part of something, yes.

12 Q Well, let me finish just so --

13 A I'm sorry.

14 Q -- it's a clean record.

15 A I apologize.

16 Q I know we're both trying.

17 A Okay.

18 Q Was it your assumption when you were working in
19 Ida B. Wells that when somebody ran, it was because they
20 were doing something illegal connected to the drug
21 trade?

22 A Yes.

23 Q Do you think it would have been appropriate to
24 arrest somebody who you saw running but who you didn't

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1 actually observe do anything illegal?

2 MR. KOSOKO: Objection. Calls for legal
3 conclusion.

4 MR. BAZAREK: I'll join.

5 A Not just for running. There's no crime in
6 running.

7 Q So if you didn't see -- if you suspected
8 someone was there to buy drugs, but you didn't see them
9 buy drugs, and they ran, and you didn't find drugs on
10 them, it would not be appropriate to arrest that person
11 for drugs, right?

12 A Not for narcotics, no.

13 Q Maybe for trespassing if they were trespassing?

14 A Maybe.

15 Q Maybe not?

16 A Maybe not.

17 Q And you said earlier on sometimes Watts would
18 say we're taking people for trespassing today, we're
19 taking people for possession; is that right?

20 A We're taking them for trespassing or we're
21 taking them for unlawful solicitation of business.

22 Q And can you tell me more about what you mean.

23 A So every -- every time we'd go down there, it's
24 not like -- it's like going fishing. You weren't

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1 catching a fish. You wasn't catching someone selling
2 narcotics. But over time, you keep going down there,
3 and the same people who don't live down there who you
4 have given warning and signs posted down there for
5 trespassing, been down there illegally who had been
6 warned previous, you take them to jail.

7 Q You say it's like going fishing, meaning
8 sometimes you catch a fish, others you don't?

9 A Sometimes you don't.

10 Q What does that have to do with the description
11 of how Watts decided on who should go to jail?

12 MR. KOSOKO: Objection. Misstates -- misstates
13 prior testimony.

14 A If we go down there, a bunch of people down
15 there, we stop as many people as we can. Some people
16 rush in the building trying to get to where the illegal
17 narcotics were and what people were selling narcotics,
18 and you didn't get there. There were people that were
19 detained outside who we had seen down there previous or
20 we had watched on our camera, possibly on a Pod camera.

21 You run their information to make sure, check
22 their ID, they wasn't residents of that area. So they
23 would get arrested for tres -- criminal trespassing,
24 stay supported lane.

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1 Q And then, who would -- but what is Watts --
2 what was Watts' role in that? That's what I'm trying --

3 A He's out there with us. He said okay, we're
4 taking everybody for trespassing today that's
5 trespassing.

6 Q So if everybody he would -- what does -- I'm
7 going to try to hopefully clarify maybe.

8 A Okay.

9 Q Say you stopped 30 people --

10 A Yes.

11 Q -- and none of them lived there --

12 A Yes.

13 Q -- are you saying Watts would decide one day
14 we're taking all of these people for trespassing?

15 A Yes.

16 Q What if -- if some of them lived there, would
17 he say we're taking these people for trespassing but
18 we're going to not charge these other people with
19 anything?

20 A If they lived there?

21 Q Yeah. Like if what if they lived -- well,
22 actually --

23 A You can't --

24 Q -- strike that.

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1 Not say wasn't. That's not even what I meant,
2 so let's strike that question.

3 A Okay.

4 Q Would there ever be a time when there were say
5 there were 30 people stopped, none of them lived there,
6 but Watts say we're taking these 20 people for
7 trespassing, these 10 get out of there?

8 A Sometimes.

9 Q What would be the basis for that decision?

10 A We didn't have enough room to transport them
11 in. Sometimes you could take all of them.

12 Q Did you ever charge anyone for trespassing who
13 wasn't trespassing?

14 A Not that I know of.

15 Q Now, let's use a -- not just for trespassing
16 but for, let's say, drug possession.

17 Were there ever -- were there ever more people
18 who were stopped for drug possession than were actually
19 arrested and transported?

20 A No.

21 Q Always took everyone if it was drugs?

22 A If you had narcotics on you, you -- you went to
23 jail.

24 Q You had talked -- I think you had touched on

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1 reverse stings earlier.

2 A Yes.

3 Q I think we both did a little bit.

4 Where would reverse stings fall into the ways
5 in which you could detect drug activity at Ida B. Wells?
6 Is it its own category?

7 A I don't -- I'm not understanding the question.

8 Q I think you said you regularly would go into
9 the buildings and you would see transactions or you
10 would see people run or you'd get tips from concerned
11 citizens. Those were the ways you listed in which you
12 all could detect drug activity in Ida B. Wells?

13 A That's some ways, yes.

14 Q Are there other ways?

15 A Yeah, you get -- you actually were able to
16 sneak up in the building and observe for yourself.

17 Q Yeah, I think that is one of the ones you
18 mentioned. Is that are there other ones?

19 A I'm not -- I'm not clear on what you mean.

20 Q I'm asking if there are other ways in which you
21 can investigate drug sales. Like you mentioned Pod
22 cameras or Pod videos earlier.

23 A Yeah, you can look at a Pod video and you can
24 tell it's a bunch of people down there, you know that

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1 they're up and working selling narcotics really good
2 down there.

3 Q Where could you watch the Pod video?

4 A People watch the Pod from any police station.

5 Q Could you watch -- you'd watch live feed?

6 A I don't know if it was -- oh, it probably was
7 live, yeah. I'm not sure. Yeah.

8 Q And then, if you arrested somebody because you
9 saw them on a Pod video, you'd put that in the report,
10 right?

11 A If that's what the case was, yes.

12 Q Yeah, of course. If you arrested them because
13 you saw them do something on the Pod video --

14 A It's called a Pod mission.

15 Q Yeah, you would write Pod mission. That means
16 you saw something and you went and you arrested them?

17 A Yes.

18 Q And then, where -- are reverse stings their own
19 category of like a different way you could ferret out
20 drug activity?

21 A Do what with drug activity?

22 Q Find it.

23 A Find it? Reverse stings isn't like looking
24 for narcotics sellers. Reverse stings is looking for

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1 people to come buy narcotics to try to deter them from
2 being down into buying narcotics in a certain area.

3 Q All right. Tell me -- tell me how reverse
4 stings worked in your experience?

5 A We would take a group of police officers, as
6 many as we could, we'd go down to an area. When we got
7 to that area, some people would get stopped outside that
8 area. And if they were -- if they were out there
9 seeing, yelling information or calling out names of dope
10 lines, then we'd hold onto them.

11 At that point, we might actually use them,
12 stick them right back out there, stand out there with
13 them while other -- after we set up, posing as drug
14 dealers to come into the building and do a reverse
15 sting.

16 Q What was the incentive for someone to help you
17 out with a reverse sting?

18 A To not be arrested for criminal trespass or
19 unlawful solicitation of business, which we had seen
20 them do in previous to that.

21 Q Were there times when you wanted to do a
22 reverse sting but you were detected on the way in and
23 people were yelling clean up and you weren't able to do
24 it?

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1 A I'm not sure if that happened. I mean
2 sometimes people would scatter out and we had nobody --
3 and then we had nobody sometimes or just a few. We'd
4 stand the building, because now there's no drug dealers
5 there's just no narcotics being sold, and you still have
6 people who were for back -- lack of a better term, drug
7 users who were just focused on coming down here to get
8 narcotics.

9 Q So they may not notice that you are police
10 officers?

11 A No, some may not.

12 Q Were reverse stings some of them more effective
13 techniques you or one of the more effective techniques
14 you had?

15 A It was hit or miss.

16 Q Were there times you'd try a reverse sting and
17 didn't catch anybody?

18 A We might catch a few, not a lot.

19 Q What is the range of people you would catch in
20 reverse sting?

21 A It depends upon the weather outside.

22 Q Well, what was --

23 A Well, I mean a lot of people are coming in,
24 they weren't coming to get narcotics out there in the

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1 snow or the cold out there. But in the summertime, you
2 have a lot of people. There's some people who hadn't --
3 who would just walk in a building, and oblivious we were
4 the police because we didn't wear our vest outside. And
5 some, even the residents who lived down there, they
6 laugh at them. They laugh at them well, look at them
7 walking in there and they gon' get caught up. Laugh at
8 them.

9 Q So it was less people came by in the winter?

10 A Yeah, it was much less.

11 Q So let's take a nice day. What's a range of
12 people you would typically ketch in a reverse sting on a
13 nice day?

14 A On a nice day, um. You'd ketch five in five
15 minutes.

16 Q How long would a reverse sting typically last?

17 A Until we decided how many we were going to take
18 or we were gon' process.

19 Q How would you make that decision?

20 A I don't recall how we would make that decision
21 but yeah.

22 Q Like would it go on for hours?

23 A Sometimes it would.

24 Q Even when -- what's the most people you think

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1 that were arrested at any given -- sorry. Let me
2 restart that.

3 What's the most people who were ever arrested
4 in any one reverse sting you participated in?

5 A That I participated in?

6 Q Yeah.

7 A In what location?

8 Q In Ida B. Wells.

9 A I would estimate somewhere between 20 to 25.

10 Q And would there be --

11 A Or more. I'm sorry, what?

12 Q Would there be an arrest report for each of
13 those people?

14 A Yes.

15 Q But the same officer typically would be the one
16 -- like one officer would be the arresting officer in
17 that situation like how you described earlier, they
18 would be the one doing all the reports?

19 A Not always.

20 Q Okay. How would you decide in a reverse sting
21 situation who would be the one to write the reports?

22 A The officer who would be performing as the
23 supposed drug dealer probably more than likely would be
24 the reporting and arresting officer.

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1 Q Why is that?

2 A Because they would be the ones who would be
3 able to give the information of what happened. The
4 person approached them and asked for this or that. And
5 normally when we had a large number of people going in a
6 reverse sting operation, it would just -- it would be
7 more than just our team. It would be other teams from
8 the district.

9 Q Would you all set up in different locations or
10 would it just be one reverse sting?

11 A It'd be one reverse sting.

12 Q One building?

13 A One building. We'd pick out a building.

14 Q And so how many drug dealers would there be --
15 or not -- how many pretend drug dealers would there be?

16 A I don't know. Sometimes there might be two,
17 sometimes there might be four. Sometimes there might be
18 one.

19 Q And then, would the person who was pretending
20 to sell drugs who wrote the report, they would be in box
21 1?

22 A They would be in box 1.

23 Q Any then, their partner would be in box 2?

24 A More than likely, yes.

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1 Q Did -- were there ever times like when you were
2 in the middle of a reverse sting, the team would be
3 exposed?

4 A Sometimes.

5 Q How frequently did that happen?

6 A You ketch one or two who rise up before they
7 got into the building.

8 Q But how often would it happen that you would
9 get exposed -- that a team, the team would get exposed
10 during your reverse sting?

11 A It could happen every time. I mean, some
12 people -- like I say, they would, like, being drawn to
13 the dealer for dope, and sometimes they look up and they
14 back away and they gone. It could happen. And then,
15 they might go as they going away see somebody else
16 coming. Hey, that's the police over there, don't go
17 over there.

18 Q Did that happen frequently?

19 A It happened. I would say half the time.

20 Q When you did reverse stings, did you typically
21 also carry out other missions or investigations on the
22 same day?

23 A It's possible.

24 Q Was it more likely than not, or it just

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1 depended?

2 A It would just depend.

3 Q Who were the people on the team or from other
4 teams who were most commonly the fake drug dealers in
5 reverse stings?

6 A The black officers.

7 Q All of the black officers?

8 A Yes.

9 Q Did you play that role?

10 A Yes.

11 Q Who decided on any given reverse sting who had
12 what role?

13 A Whoever wanted to play their role that day.

14 Q It was just like a group decision?

15 A The group, somebody said okay, I'm going to be
16 here today, or somebody else stood outside, I'm going to
17 be outside with the security on security today. It
18 wasn't no, okay, you doing this side was.

19 Q Did you have a particular role that you
20 preferred over others?

21 A No.

22 Q What other roles were there for the police
23 officers on reverse stings?

24 A Security for the people who were arrested in

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1 the reverse sting. The people who would stand outside
2 and act as the lookouts or the security for the reverse
3 sting.

4 Q And they're lookouts as if they're pretending
5 to be lookouts for the drug dealers?

6 A Yes.

7 Q And that -- would that be police officers and
8 civilians?

9 A Yes.

10 Q Any other roles?

11 A No.

12 Q What about the -- who did the -- who would
13 actually effectuate the arrests?

14 A Who would actually effect the arrests?
15 Probably the officer playing the drug dealer?

16 Q And how -- would that person just tell them or
17 did you just -- say you are the drug dealer, would you
18 just tell that person you're under arrest or would you
19 have some other officer come out or what would you do?

20 A They come in there, they would come in and ask
21 the officer what -- hey, officer, which one, what you
22 need. I need -- they tell you what drug line they
23 looking for. As soon as they produce money that you can
24 see, then they would be placed in custody for if attempt

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1 for possession of controlled substance.

2 Q How did you place them in custody?

3 A They would be taken to the side and handcuffed
4 over to the side somewhere in security out of the view
5 of the doorway of where other people were coming
6 through that we were waving people through there.

7 Q Did you do reverse stings on different floors
8 of the building?

9 A No.

10 Q Where did you do them?

11 A We usually did reverse stings in the lobby
12 area. On the first floor.

13 Q In your experience, how did -- separate from
14 reverse stings, how did actual drug transactions happen
15 at Ida B. Wells?

16 A How did they happen?

17 Q What was the flow of the transaction?

18 A A drug transaction could take less than ten
19 seconds.

20 Q And what were the steps?

21 A Whoever the drug dealer was would be there
22 selling, and there is a line. People come in in line.
23 They have to line to get their -- have your money, they
24 get -- have your money out. They have their money out,

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1 how you want? Two, three, they get the money. Boom,
2 they count the money. It would be boom, hand them three
3 and they're gone. They out back out the door, they
4 gone.

5 Q So it typically was the person -- the person
6 who wants the drugs comes out with money, they hand it
7 to the drug dealer, the dealer hands them drugs, and
8 they leave?

9 A Turn right around and they gone.

10 Q Any other -- were there any other ways of how
11 it went down?

12 A It was -- it was versatile ways they would go
13 down. I mean, depends upon the layout of where they
14 were or what floor they were on.

15 Q Tell me some of the other ways.

16 A They might send them down the other stair but
17 they not let them. They get them up here, they get them
18 on this floor here, they send them down the other stair,
19 but they don't let them come up the stairwell where the
20 line is going up to get. They get their stuff, they
21 send them down the other stairwell.

22 Q So they come up, but that still the transaction
23 works. They give them the money --

24 A Same thing. They give them the money.

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1 Q Drug dealer gives the drugs?

2 A Give them the drug, boom.

3 Q They just may say you got to exit a different
4 way?

5 A Yeah.

6 Q Is there always a line?

7 A Not always but it was a flow. Sometimes there
8 would be a line.

9 Q Is it a pretty constant flow during the day?

10 A Pretty constant.

11 Q Was the flow more or less when you were doing
12 reverse stings that it was when there were just normal
13 drug sales?

14 A When we doing --

15 Q Or the same.

16 A Doing a reverse sting, we would never let a
17 line line up like that. I mean, it was just enough of
18 us to take care of it to get the person, people coming
19 in, but we didn't -- we would never let a line form.
20 But the actual people who was selling narcotics down
21 there, they'd have a line. And they sometimes they'd
22 have a line because they ran out and they needed to go
23 get more.

24 Q How did you make sure there wasn't a line?

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1 A How did we make sure there wasn't a line?

2 Q Yeah.

3 A We would stop people.

4 Q How?

5 A Made a little hold up. You tell them hold up,
6 hold up. Wait a minute. Okay. Now you can go.

7 Yeah, we would stop them, outside.

8 Q So then, would there be a line outside?

9 A No. I mean, people we knew okay, we got it,
10 let's go, keep -- let's keep it moving. But we never
11 form -- let people form in a line like that. You know
12 what I mean. They -- it just didn't happen.

13 Q Were there -- did you have any special way of
14 stopping one other than telling people to hold up?

15 A No, same way that the people who are actually
16 selling narcotics, as time went on, they would stop
17 people, hold up, if they -- if they felt they line got
18 too long.

19 Q But doesn't stopping people turn zone line?

20 A Nope. I mean, people are still mulling around,
21 they don't get in line. They don't -- you don't be keep
22 -- hey, move around, we'll let you know when you come
23 out. Okay, now come on in.

24 Q So when you were doing reverse stings, you'd

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1 hold people outside the building?

2 A Sometimes.

3 Q And then, they'd come in one at a time?

4 A Yep. One or two or three at a time, yes.

5 Q And that -- was that sometimes real drug
6 dealers did that also, you're saying?

7 A Yes.

8 Q How frequently did your team do reverse stings
9 while you were on the team?

10 A I don't know. It wasn't like routine of we
11 gon' do reverse stings once a week or once a month. It
12 was okay, we gon' do reverse sting today depending upon
13 how many people we had.

14 Q How many people, how many officers you had?

15 A Officers, yes.

16 Q Who would decide whether you should be doing a
17 reverse sting at any given day?

18 A A supervisor.

19 Q Would that be Watts?

20 A He -- it could have been Watts.

21 Q What other supervisors would make that call?

22 A If another team was going with us and they
23 wanted to do reverse down there, then we all go down
24 there and do reverse. Or if the lieutenant said okay,

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1 go down there and do a reverse sting down at this
2 location today.

3 Q Who were the lieutenants with command over the
4 Watts Team when you were there?

5 A Joe Patterson. Kenny Mann.

6 Q Kenny Mann?

7 A Kenny Mann. Mark Moore. I can't think of the
8 last guy. But there was a fourth.

9 Q You had said there were 20 to -- 20 to 25 you
10 think is the most people probably arrested in a reverse
11 sting when you were at Ida B. Wells?

12 A I would estimate that.

13 Q Were there -- did you ever -- were you ever
14 involved tin reverse stings outside of Ida B. Wells that
15 resulted in more arrests?

16 A Yes.

17 Q Tell me about that.

18 A When we first learned how to do reverse stings,
19 we did them on the West Side of the 11th District. And
20 they had police officers come from all over, and we
21 stood on the corner out there on the West Side because
22 there weren't buildings. And people would come up, and
23 then and you stood on the corner just like you looking
24 out, whatever, and you point them to that direction of

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1 where the building was, where we was staging the reverse
2 sting. And they would send them back down again a
3 gangway where other officers would be waiting after they
4 asked for whatever, whatever and lined up.

5 And I think the biggest reverse sting netted
6 I'm going to say eight people or more, several cars were
7 taking them for what purpose, yeah.

8 Q And in Ida B. Wells, how were people typically
9 transported to a police station after a reverse sting?

10 A Depending upon how many people, in a wagon or
11 in a caged vehicle.

12 Q Which is bigger?

13 A A paddy wagon.

14 MR. BAZAREK: We take a break?

15 MR. RAUSCHER: Yeah, of course.

16 THE VIDEOGRAPHER: Off the record, 3:14.

17 (A recess was taken.)

18 THE VIDEOGRAPHER: Back on the record. 3:25.

19 BY MR. RAUSCHER:

20 Q I'm not going to revisit the testimony that you
21 gave earlier about the Shock incident with the cleaner,
22 the bag near the cleaners. But I did have a question
23 that I don't think I asked, which is were there any
24 other incidents other than that one you testified to

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1 where Watts asked you or directed you to get anything
2 from Shock?

3 A No.

4 Q Back to reverse stings. Can you tell me when
5 the paperwork would be -- so during your time at Ida B.
6 Wells when you were on the Watts Team, when would the
7 paperwork be completed about arrests made during reverse
8 stings?

9 A After the reverse sting was over.

10 Q And where would that report be completed?

11 A In the 2nd District.

12 Q At the station?

13 A Yes.

14 Q Where was the police station?

15 A 51st and Wentworth.

16 Q About how long did it take to get from 51st and
17 Wentworth to Ida B. Wells?

18 A Actually -- actually driving or after getting
19 somebody, getting on all the prisoners loaded onto?

20 Q Yeah, that's it.

21 A Your drive time?

22 Q Good question. So let's say drive time.

23 A Drive time, seven to ten minutes.

24 Q And then, how long would typically elapse in

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1 total between when you finished a reverse sting and when
2 you'd get back to the station?

3 A Depends upon how -- how long it took the wagon
4 or enough transport cars to get to the location to get
5 all of the people that were being arrested loaded up for
6 transportation.

7 Q Say there were ten people, what's the -- do you
8 have an estimate of how long it would take from when you
9 said we are done with this reverse sting to when you got
10 back to the station?

11 A It would vary depending upon how long it took
12 the transportation car to get there.

13 Q Is there a -- can you give any -- do you have a
14 high, low estimate for how long it would take?

15 A No, because you never know where the
16 transportation vehicle was coming from.

17 Q What steps were there on the scene to finish up
18 when you -- so like when you -- when the team decided
19 we're done with the reverse sting, what else would need
20 to happen before you went back to the station?

21 A Before we went back to the station? You do a
22 subtle pat down of the people who were being arrested
23 and you would make sure they was secured to be
24 transported.

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1 Q How would you make sure they were secured?

2 A We would either have FlexiCuffs or we'd have --
3 have to have enough handcuffs to put them in -- in
4 handcuff together. Sometimes we'd handcuff them
5 together, and then at the end we would separate them and
6 put them in flex cuffs so they wouldn't be sitting there
7 however long we'd be sitting there with those flex cuffs
8 on.

9 Q Would you -- did you have to change the way
10 they were cuffed before they had gotten into the
11 transport vehicle?

12 A Yes.

13 Q Tell me -- can you explain that.

14 A If we had three or four people handcuffed to
15 each other like a chain link, we'd have to separate
16 them, put them in the flex cuffs with their hands behind
17 their backs so they could be transported.

18 Q Who's -- who would make the decision on the
19 scene to end a reverse sting?

20 A It could be the supervisor, it could be another
21 officer.

22 Q How would an officer make that decision?

23 A Is that okay, we've had enough for the day, we
24 done. We --

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1 Q What is -- sorry, go ahead.

2 A We have enough people and enough that we have
3 to process.

4 Q What does it mean we have enough people for the
5 day?

6 A We have enough people in this reverse sting.
7 And it's going to take us sometime we know to process
8 them. So we have enough, let's cut this off right here.

9 Q Were you trying to make sure that you get it
10 done before your shift ended?

11 A You would try to.

12 Q So would you cut it off based on when the shift
13 would end?

14 A That could be a reason, yes.

15 Q Were there other reasons?

16 A Probably didn't have enough, let's say,
17 transportation.

18 Q How would you know how much transportation was
19 available?

20 A We -- you could listen to the radios. If the
21 wagon was tied down somewhere, if you're going to have
22 to call extra beat cars or whatever. You -- if you hit
23 the wagon, you know you got seven, eight people already
24 on the wall. But the wagon has to take a transport.

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Conducted on February 26, 2020

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1 You hit the wagon taking the transport all the way down
2 to 26th and California, now you got to wait for the
3 wagon to come back. So you try to cut it off and see if
4 the wagon could get to you before they made their
5 transport. If they call the wagon in to make a
6 transport, we gon' need it, so maybe we need to cut them
7 off here, let the wagon come first, pick these guys up,
8 take them to the station, then they could take wherever
9 they going.

10 Q Would you get that information from the radio?

11 A Yeah, you can get that information from the
12 radio.

13 Q Was there any other way to get that
14 information?

15 A Not that I know of. Sometimes if we had enough
16 people like that and we knew we had another wagon set
17 aside, we'd have some officer with a wagon somewhere
18 sitting off. And then okay, we know we got this one
19 wagon, we put so many people in this wagon, so many
20 people in this car. Okay. That's enough people for the
21 transport, cut it off, we close, call the wagon in at
22 (inaudible) and load them in the vehicle so we can go
23 ahead and trip, I mean process.

24 Q Did the wagon ever make multiple trips?

Transcript of Alvin Jones
Conducted on February 26, 2020

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1 A I don't think so.

2 Q Could you have asked the wagon to do that if
3 you had more people than you could --

4 A Could have.

5 Q Any reason not to do that you had more people
6 to arrest?

7 A Because you have -- you didn't -- you didn't
8 want to leave people down in that area by themselves to
9 guard people. And you got to have people to go back to
10 the station to sit on the first group of people that you
11 had sitting there.

12 Q You never --

13 A So more likely than not, it would be a wagon
14 and extra, couple extra cars if you need it too.

15 Q So whenever the reverse storages was done, the
16 whole team would go back to the 15th District?

17 A Everybody would go back.

18 Q Well, was that always how it happened?

19 A Yes, you'd take everybody to process them.

20 Q Was there any particular time when the reverse
21 stings would start?

22 A No.

23 Q How did you clear out the drug, the real drug
24 dealers from the buildings?

Transcript of Alvin Jones
Conducted on February 26, 2020

222

1 A We would come down there in a -- a bunch of
2 cars just come down there, and we didn't really care.
3 Sometimes they got away. We just wanted to clear them
4 out so that we could go and set up and do what we wanted
5 to do.

6 Q So sometime, some period of time elapsed from
7 when you would get there until when you would have the
8 reverse sting up and running?

9 A It might take a while, yes.

10 Q Did it always take a while?

11 A Depending upon circumstances, we might have to,
12 you know, because we still had to clear all those cars
13 out that we came down in, we clear the people out or
14 getting the people that we holding onto at that time
15 that we're probably going to be a part of the reverse
16 sting operation.

17 Q Was there ever a time when you just got there
18 right away and you set up the reverse sting and you were
19 up and running?

20 A No.

21 Q How did you remember all of -- say you arrest
22 10, 15, 20, 25 people. How do you remember all of the
23 details to put in the police report at the end of the
24 reverse sting?

Transcript of Alvin Jones
Conducted on February 26, 2020

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1 A How did you remember?

2 Q Yeah.

3 A Someone was taking notes of that.

4 Q How did they take notes?

5 A They would write it down.

6 Q Where would they write it?

7 A We would have a -- usually we knew we were
8 going to do a reverse sting, we would take a kit. And
9 somebody would be as they came in, you'd have an
10 inventory bag, you'd have a piece of paper that you put
11 their name on, how much money they in, and what time
12 they came in.

13 Q And you said a kit?

14 A Yes, a kit. We call it reverse sting kit. It
15 had, let's say, a inventory bag for their money, a sheet
16 of paper for you to write on what number they were in
17 order, and the time, and their name in.

18 Q The time, what was the time? The time they got
19 -- they showed up?

20 A The time that they -- the time that they showed
21 up.

22 Q And how did the person -- who filled out the
23 kits?

24 A I don't know. Whoever was back there on

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1 security, if you were number 1, your name would go
2 there, number 1, how much money you had, what time you
3 were there.

4 The next person come in, number 2's name would
5 go on the list, the money in the bag, what time is
6 there.

7 Q So it was one kit for a reverse sting and it
8 would have a bunch of different lines?

9 A Yes.

10 Q Okay. And one of the security people would
11 fill that out?

12 A Yes, usually, they usually keep up with that.

13 Q And when I say the security, we're talking
14 about the people who would watch over the arrestees?

15 A Yes.

16 Q And how would that person know what to put on
17 there?

18 A What do you mean what to put on there?

19 Q How would they know what time that sting
20 happened, how much money there was?

21 A The person would actually, they would have it
22 in their hands. So when they ask for the identity, you
23 place them in custody and get the money out of their
24 hands. Okay, this is your money, what's your name? Put

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1 your name. Here's the bag, put your name on the bag.
2 Put it with the thing. So that when you got back there
3 to do the inventory, you knew whose money went with who.

4 Q And so then, they would know the time because
5 they would be brought over right away; is that right?

6 A The time would be written down on the sheet as
7 to what time they came in.

8 Q What time the person who got arrested came in?

9 A Yes.

10 Q In that the officer would know that because
11 fake drug dealer would immediately after doing that
12 pretend exchange call for that officer; is that right?

13 A No, he'd hand them off to that officer.

14 Q Would that officer be -- would that officer see
15 it?

16 A He would be nearby.

17 Q Would that officer be in a position to witness
18 the exchange?

19 A At some times.

20 Q If they didn't witness it, how would they know
21 what time that it happened?

22 A Because when they grab them right there, it
23 mean if they not there, you walk them around the walk
24 because they -- we didn't have people sitting out in the

Transcript of Alvin Jones
Conducted on February 26, 2020

226

1 open where they could see the people actually doing the
2 narcotics -- the narcotics sales. You knew it had to
3 have just happened because they just brought them
4 around?

5 Q Do you -- was it standard to have this reverse
6 sting kit when --

7 A When it was applicable. When we actually, when
8 we actually knew that's what we were going to go do,
9 yes.

10 Q Were there times you did reverse stings when
11 you didn't know before you got there you were going to
12 do them?

13 A Yes.

14 Q How often did that happen?

15 A I don't know. It varied.

16 Q Was it more common that you know in advance or
17 more common you just would show up and then all of a
18 sudden people would decide to do a reverse sting?

19 A More common that we know we were going to go do
20 a reverse sting.

21 Q When it -- when you didn't know and you got
22 there and you did a reverse sting, how did it come, like
23 how did you decided to do it?

24 A Same thing. We take a piece of paper.

Transcript of Alvin Jones
Conducted on February 26, 2020

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1 Q Wait, I'm sorry, I -- I shouldn't have. That's
2 not what -- I was trying to ask a different question.

3 So you're out patrolling at Ida B. Wells?

4 A Uh-hum.

5 Q You have no plans to do a reverse sting, right,
6 and then at some point, you started a reverse sting?

7 A Yes.

8 Q How -- how did you decide to start one and who
9 made that decision?

10 A Usually the supervisor.

11 Q That would be Watts?

12 A Yes.

13 Q And -- all right. So then tell me how you keep
14 records during in those situations.

15 A Get a piece of paper, write all the information
16 down. Name, money, times. Same thing.

17 Q And what was Watts' role typically in reverse
18 stings?

19 A I don't know. It varied.

20 Q Sometimes he was the dealer?

21 A Sometimes the dealer, sometimes he was out on
22 security.

23 Q Out on security in front of the buildings or --

24 A Yes.

Transcript of Alvin Jones
Conducted on February 26, 2020

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1 Q Was he ever security for the people arrested?

2 A Yes.

3 Q And in those situations, was he ever the
4 arresting officer?

5 A The arresting officer of what?

6 Q For people?

7 A He was never the arresting officer because he
8 wasn't posing as the dealer dealer. They wouldn't
9 approach him for anything. He would be overseeing
10 pretty much the security area that people can come in
11 that okay, this is where he came, this is what he asked
12 for, this is the money, this is where he go, this is
13 where he is, write this down.

14 Q I thought you said he was a dealer sometimes?

15 A He'd stand there but he wouldn't actually be
16 the dealer. He'd be there. He could be out front in
17 the hallway with the other guys as the dealer.

18 Q So he was not the dealer?

19 A No.

20 Q All right.

21 A But he standing out there with them acting like
22 he was.

23 Q What does that mean? There was no real dealer
24 involved?

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Conducted on February 26, 2020

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1 A There was no real dealer act --

2 Q So what does it mean? What did you say about

3 --

4 A I'm saying he's standing out there like he's it
5 one of those characters that the other officers claim.
6 He could still be out there in the same area with those
7 officers playing the fake drug dealers.

8 Q And then, what would he be doing?

9 A Observing and overseeing okay, this guy came,
10 he did ask for narcotics. Okay, we going to arrest him,
11 send him back there. He'd walk him back to the
12 security. Okay, this is what this guy asked for, this
13 is his money, take his name down. He do that direction.

14 Q So what -- how would you describe that role if
15 it's not a dealer?

16 A That's the supervisor of police doing a --
17 supervising the reverse sting.

18 Q So does that have a role in the reverse sting?
19 Is that one of the actors in the reverse sting?

20 A I wouldn't say it was a role in the reverse
21 sting. I said this what he did, he's a supervisor, saw
22 it happen. That's how I saw most supervisors do.

23 Q When you said sometimes Watts was the dealer in
24 the reverse sting, was that --

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1 A Yeah, he would stand out there like he was the
2 dealer, but he -- no one asked him what he asking what
3 you need. That's not what he was doing. He was out
4 there in the role with his two or three out standing
5 there.

6 Q Well, then, how was he the dealer?

7 A He was standing there out there with whomever
8 the other gentlemen were playing the dealer just like
9 he's a dealer there.

10 Q Was he saying anything that would suggest he
11 was a dealer?

12 A No.

13 Q He was just standing there?

14 A He'd just be there.

15 Q Okay. You mentioned the -- well, actually,
16 before I move. So regardless of whether the team knew
17 in advance they were doing a reverse sting, or rather
18 that Watts decided while you're out there to do a
19 reverse sting, you kept accurate records of who was
20 arrested, when they were arrested, and how much money
21 that had?

22 A Yeah, you'd have to write it in down line by
23 line, number by number who and what order they were.

24 Q And you did that at the time of the

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1 occurrences?

2 A At the time of the occurrences.

3 Q You would -- you were never in a position where
4 you just had to guess at the time when you got back to
5 the police station?

6 A I wouldn't say you had to guess, no. I don't
7 know. I don't believe so. Because somebody would have
8 to accurately know who was number 1, who was number 2,
9 who was number 3.

10 Q And what time they were each arrested?

11 A What time they were arrested pretty much.

12 Q So then, the person who's writing those notes,
13 that's one of the security --

14 A Yes.

15 Q -- over the arrestees?

16 A Yes.

17 Q And the person who does the paperwork is the
18 dealer usually?

19 A Usually.

20 Q And so does the -- does that -- do they do the
21 paperwork together or does that person who has the notes
22 hand it off to the pretend dealer?

23 A You make a copy and hand it almost to everyone.
24 And they, depending upon what you were doing, that you

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1 worked off that list.

2 Q Okay. And then where do you put the copies
3 when or the original when you're done with that?

4 A They probably would go in the garbage.

5 Q All of every copy?

6 A The copies? Yeah, pretty much.

7 Q And all the notes too, all the originals?

8 A Yes.

9 Q Why would you throw them in the garbage?

10 A Because you have an arrest report that states
11 what happened on there and what time it was.

12 Q What if the arrest reports are inaccurate?

13 A Then they would be inaccurate, but never kept
14 the notes like that.

15 Q Did someone tell you to throw the notes out?

16 A No, we were never directed to throw the notes
17 out.

18 Q You said that one of the ways you kept the
19 notes was on an inventory bag with money in them?

20 A We had inventory bag, yes.

21 Q You must not have thrown that one out, right?

22 A Oh, no.

23 Q So where did that one go?

24 A Inventory bag, it's sealed and sent to ERPS.

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Conducted on February 26, 2020

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1 Q So there should still be inventory bags that
2 reflect --

3 A A reverse sting.

4 Q -- with including a time of all the arrests?

5 A I don't know if the time went on them. If the
6 -- I don't even remember if the time went on there. It
7 might have. It might have.

8 Q You think -- yeah.

9 A On a -- on a blue bag. Yeah, it might have.

10 Q That's what you said earlier, right?

11 A Yes.

12 Q Do you have any reason to think your earlier
13 testimony wasn't correct?

14 A I haven't seen a inventory bag in a long time.

15 Q But that's how you remember it?

16 A Yes.

17 Q Do you remember anywhere else where the time of
18 arrest was written down while you were on the scene of a
19 reverse sting other than inventory bags or on the
20 unplanned ones you had that other sheet?

21 A No. I don't remember nowhere.

22 Q Was all -- you say there were ten people
23 arrested in the reverse sting. Were all ten people's
24 money put into the same inventory bag?

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1 A No.

2 Q They each had an inventory bag?

3 A They had their own separate inventory bag.

4 Q Did each inventory bag have the time of arrest
5 written on it?

6 A It should have.

7 Q Were copies made of the inventory bags?

8 A Copies of the bags?

9 Q Copies of the cover of the bag?

10 A Copies of the what?

11 Q The cover of the bag?

12 A No, there would be an inventory sheet that
13 would go with it.

14 Q All right. Tell me what the -- what does the
15 inventory sheet look like?

16 A It's a white piece of paper that comes out of
17 the system where you go in to do an inventory and states
18 what's being inventoried.

19 Q When was that sheet created?

20 A At the station when we would be doing process.

21 Q Who would be the person who would create the
22 inventory sheet after reverse stings?

23 A I don't know. It depends.

24 Q Would it be the same person that did the arrest

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1 paperwork?

2 A No.

3 Q What does it depend on?

4 A Who would -- who was handling security back
5 there and what they show they were working on the
6 inventories. The other ones would work on probably the
7 complaints.

8 Q What do you mean the complaints?

9 A It has to have a complaint that go with it
10 also. And a processing. So someone would work on the
11 complaint, someone would work on the inventory, someone
12 would be doing a searching, someone would be doing a
13 name checks. The arresting officer probably would be
14 doing and throwing in the case report and the arrest
15 report.

16 Q But they couldn't be doing the arrest report
17 and the case report at the same time that person was
18 doing the inventory sheets, right?

19 A Yes, they could.

20 Q How would they have the information about the
21 time?

22 A Because they would give it to them. That's why
23 they would make a copy of the written sheet and pass it
24 around. So okay, this is this person's name and the

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1 time and this is what they had.

2 Q I thought written sheets were only used on days
3 whether you showed up without a plan to do a reverse
4 sting?

5 A If sometimes you had a piece of paper -- it
6 didn't take nothing but a piece of paper to write just
7 like writing on the back of this piece of paper here.

8 Q I don't -- what do you mean?

9 A If we decided to do a reverse sting and we
10 didn't have a kit with us, and we didn't have a kit that
11 we had prepared knowing that we were going down there to
12 do a reverse sting.

13 Q Right.

14 A You just get a piece of paper and they would
15 write down the information.

16 Q Right. I think I get that part of it. But in
17 a situation where you had a plan, let's say you had a
18 kit --

19 A Yes.

20 Q -- is the kit -- are there ten kits? If ten
21 people are arrested, are there ten kits created?

22 A Are there ten separate inventories you're
23 asking?

24 Q Well, what is the kit? Is that different from

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1 the inventory?

2 A It was a box where you had -- if you had ten
3 people, you had ten bags, with that a sheet of paper, a
4 sheet of paper that had the numbers and the lines on it
5 that reflected the names of the people. And then the
6 amount of money that went in the bag with it.

7 Q So let me -- tell me if I'm correctly
8 understanding this testimony. We are talking about days
9 where you went out with a reverse sting kit?

10 A Yes.

11 Q That's a box. It has a bunch of stuff in the
12 box?

13 A Yes.

14 Q And one of the things in the box is the sheet
15 that you use to track whoever you arrested?

16 A Yes.

17 Q Any that separate from that, there are
18 inventory bags that will list how much money was taken
19 from the person, and when they were arrested, and what
20 number they were?

21 A Yes.

22 Q So there are two places where it's written down
23 what time someone was arrested and what number they
24 were?

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1 A It should be, yes.

2 Q Okay. Those on the days when you had reverse

3 --

4 A Yes.

5 Q -- sting kits?

6 A Yes.

7 Q And the sheet that you're talking about, you
8 make a copy and hand that off while people are doing
9 reports?

10 A Yes.

11 Q And then, you all destroy every copy of that?

12 A Yeah, you throw it away.

13 Q And but not the inventory sheets, obviously?

14 A Not the inventory sheets. The inventory goes
15 with the inventory bag with the money. The person being
16 arrested gets a copy of their inventory, and then one
17 goes with the court copy to the paperwork.

18 Q But the inventory sheet you create, you make
19 that inventory sheet using the inventory bag?

20 A You make what inventory sheet?

21 Q I thought you were saying you typed something
22 in a computer to the create an inventory sheet?

23 A Yes, you do.

24 Q You don't have to memorize that information

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1 though, right? You have an inventory in the bag and the
2 inventory bag has notes on it, and you take notes --

3 A Yes, you take --

4 Q -- of that event?

5 A -- you put the person's information in, you put
6 what you recovered from them, you put the charges, those
7 things that populate itself, and then you print it all
8 out when you're done after they have approved.

9 Q When you are filling in that inventory sheet,
10 what is the source of your information? Would you say
11 your memory or is it something you had written down from
12 earlier?

13 A That's the sheet of paper, whoever was taking
14 that first sheet that they made copies and handed out to
15 everyone else to do whatever they doing.

16 Q So you don't use the inventory bag to create
17 the inventory sheet?

18 A I'm not -- I'm not following what you saying.

19 Q There is -- isn't there a bag where you're
20 saying there's bag where I put the money in?

21 A Uh-hum.

22 Q And I write down when this person was
23 arrested --

24 A Right.

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1 Q -- and who they were.

2 Are you saying you do not use those bags, you
3 don't look at those when you're creating the inventory
4 sheets?

5 A I'm quite sure to day that I would look at both
6 of them.

7 Q Okay. That's what I was trying to ask you.

8 A Okay.

9 Q But they should, those things should have the
10 same information?

11 A They should.

12 Q Do you think there is a code of silence in
13 Chicago Police Department?

14 A Yes.

15 Q Tell me about that. Tell me why you think
16 there's a code of silence in Chicago Police Department?

17 A I think that sometimes people because of the
18 nature of the job and through historic reasons have had
19 that code of silence amongst each other.

20 Q When you say code of silence, when you hear
21 code of silence, can you explain, tell us what it means
22 to you?

23 A That means that some -- some group of people
24 have knowledge of certain things and don't share it with

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1 the outside, people outside of the department.

2 Q Or inside the department?

3 A Or inside the department at times, yes.

4 Q When you say people have knowledge of certain
5 things that they don't share, you're talking about
6 negative behavior by police, correct?

7 A It could be negative behavior.

8 Q Was there a code of silence to stop people from
9 talking about positive behavior?

10 A They could be.

11 Q Are you aware of one?

12 A No.

13 Q Okay. Do you think that code of silence
14 prevented the wronging of Watts and Mohammed from coming
15 to light earlier?

16 A I don't know. I don't know anybody that knew
17 what was going on with Watts and Mohammed.

18 Q Do you think if there wasn't a code of silence
19 you would have felt more comfortable sharing your
20 concerns?

21 MR. BAZAREK: Objection. Calls for
22 speculation.

23 A The concern I --

24 MR. BAZAREK: Incomplete hypothetical.

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1 MR. MICHALIK: And argumentative.

2 A The concern I saw raised a issue with me for
3 how I felt. I wasn't thinking it was criminal and the
4 nature of that like to that degree.

5 Q What does that mean?

6 A To the degree where they were arrested for what
7 they were arrested for.

8 Q But is the only type of wrongful police
9 behavior that you think should be reported criminal in
10 nature?

11 A No. It does not have to be criminal in nature.
12 I mean, if you witness someone doing something they
13 shouldn't be, you should speak up to a supervisor.

14 Q Have you ever done that?

15 A Spoken up to a supervisor?

16 Q About something you thought was done that
17 shouldn't have been done?

18 A Yes.

19 Q All right. Can you tell me about or tell us
20 about any instances like that.

21 A There was a time when a tenant from Ida B.
22 Wells, Charlene Campbell, was calling me --

23 Q You know, I'm going to just pause you for a
24 second.

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1 MR. BAZAREK: Yeah. That's a topic we're going
2 -- will be for another day.

3 THE WITNESS: Okay.

4 Q We had talked, you wouldn't have been privy to
5 that conversation, that's ought to be fair --

6 A Okay.

7 Q -- to counsel and everyone, hold off on that.

8 MR. BAZAREK: But so it's clear, you'll be able
9 to talk about the event with Charlene Campbell, but it
10 will just be at another day.

11 THE WITNESS: Okay.

12 MR. BAZAREK: And that was through an agreement
13 of the parties when we were discussing this, myself and
14 plaintiff's counsel.

15 Q Are there any other instances, other than that
16 specific one, where you spoke up to a supervisor about
17 wrongdoing by police officers?

18 A No, because I never witnessed any wrongdoing.

19 Q And do you think you have to witness it
20 firsthand to report it?

21 A How would you know if -- if you didn't witness
22 it?

23 Q Someone could tell you.

24 A Someone could tell. In that instance, if

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1 someone tells you, that hey, you should go to depend --
2 well, I won't say depending. If someone tells you that
3 specifically, then you maybe you should go to a
4 supervisor and let a CR number get initiated.

5 Q Only if that someone is another police officer?

6 A No, not necessarily from a police officer.

7 Q Who else should you listen to if they raised
8 complaints about officer wrongdoing?

9 You know what, let me rephrase that.

10 Who else falls into the category of people
11 where if they raised officer wrongdoing, you should go
12 report it to a supervisor?

13 A A citizen, only if you believe that that
14 citizen is giving you information that is legitimate.

15 Q Do you think you have any responsibility as a
16 police officer to try to determine whether a citizen is
17 giving you legitimate information?

18 A As -- as a police officer, sometimes, yeah,
19 because people bullshit you. And you know they're
20 bullshitting you. So yes. You know that this bullshit
21 could have happened the way they say it happened. So
22 no. Most of it, it wouldn't warrant you going to
23 another -- going to a supervisor to report it.

24 Q If you know for a fact it didn't happen, you

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1 would say you don't have a responsibility. What if you
2 don't know?

3 A What you mean if you don't know?

4 Q What if you don't know either way? They come
5 up, they give you incidents of alleged wrongdoing and
6 you don't know whether it's true or not, do you think
7 you have any responsibility to try to figure out at all
8 if it's true?

9 A I think you -- that's a personal decision that
10 you have to make as a police officer and how you police.

11 Q What's your view on that?

12 A What's my view on it?

13 Q Yeah.

14 A Then a supervisor, and having aspiration to be
15 a supervisor beforehand, if that was the case, then you
16 should.

17 Q Obviously as a police officer, many, many, many
18 times you heard things from citizens, and you did go to
19 investigate them, just not about police officers, true?

20 A Not all the time.

21 Q But that was a common thing where citizens
22 would raise issues with a team, and then the team would
23 go investigate that, right?

24 A Not all the time.

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1 Q I'm not saying all the time. I'm asking if it
2 was common.

3 A Well, at times, yes.

4 Q I'm sorry, we're talking way too fast.

5 A I'm sorry.

6 Q Was it common that citizen would report
7 information to the Watts team and then the team would go
8 and investigate that information to determine whether it
9 was true?

10 A Most times.

11 Q What would be the situations where a citizen
12 would report some alleged wrongful behavior and the team
13 just wouldn't investigate it?

14 A Maybe we didn't have time because we might be
15 at the end of reverse sting and we getting ready to
16 leave. And they working over here in the hallway, over
17 there in the back of the building over there. We didn't
18 have time to go investigate that.

19 Q Any other reasons?

20 A No.

21 Q All right. Have you ever had any personal
22 experience where you felt you've run up into the code of
23 silence? Or seen the code of silence in action?

24 A No.

Transcript of Alvin Jones
Conducted on February 26, 2020

247

1 Q So why do you think -- what's your basis for
2 thinking that there is a code of silence in the Chicago
3 Police Department?

4 A Because historically you've heard that. You've
5 heard it and seen it on TV, you've heard the mayor talk
6 about it, so yes.

7 Q When you say you've heard, you've heard it on
8 TV, you mean you've heard reports of officer misconduct
9 coming to light or you've heard people saying there's a
10 code of silence?

11 A Heard people on TV saying there is a code of
12 silence.

13 Q And do you believe that?

14 A It could be possible, yes.

15 Q Do you believe that there is a code of silence?

16 A I'm not sure. I've never witnessed a situation
17 where there was a code of silence, had to be a code of
18 silence, so I can't say, but I believe there could be.

19 Q Do you have any reason to disagree with the
20 mayor or mayors who have said that, or the police chief?

21 A No, they have -- they have right to their own
22 opinion.

23 Q Do you disagree with their opinions?

24 MR. MICHALIK: Objection.

Transcript of Alvin Jones
Conducted on February 26, 2020

248

1 Q On the code of silence?

2 MR. MICHALIK: Still objection to the foundation
3 of that question.

4 A Not really.

5 Q Were you working when Big Shorty was killed?

6 A We worked on that day.

7 Q Do you remember that day?

8 A Vaguely.

9 Q Tell me what you remember about the day Big
10 Shorty was killed.

11 A We had just gotten to work, and then I don't
12 know if it was over the radio. Somebody heard over the
13 radio or through a phone call that he had been shot down
14 on 42nd and somewhere down there off of 43rd Street.

15 Q Was that in the area that your team covered?

16 A It was close to.

17 Q But it was not an area that you would patrol?

18 A We drive through that area. There's a
19 residential area. It wasn't a project area.

20 Q What do you mean you drive through it?

21 A Different blocks, streets, going through there.
22 We didn't always stay in the projects when we were
23 working.

24 Q Would you drive through it for work, that's

Transcript of Alvin Jones
Conducted on February 26, 2020

249

1 what I'm asking, to investigate things to --

2 A Not normally, no.

3 Q Who were you with when that call or radio came
4 in?

5 A Who was -- Lee Watson was in the office. Just
6 got to the office. I don't know what other team members
7 were there, and they got the -- the call because I don't
8 know if it was over like say over the radio, whatever,
9 but cars were licensed sirens to that location.

10 Q And were you with Watts at the time?

11 A I think I might have been.

12 Q Did you go to the scene?

13 A Yeah, I went there.

14 Q Why did you go to the scene?

15 A Because it was a call of a person shot, and we
16 had just started work. I mean we had just come into
17 work.

18 Q Was it common that you when -- were you on the
19 Watts Tactical Team at the time?

20 A Yes.

21 Q Was it common when you were a member of the
22 Watts Tactical Team that you'd respond to the scenes of
23 people shot outside of that area that you patrolled?

24 A Yes.

Transcript of Alvin Jones
Conducted on February 26, 2020

250

1 Q How frequently did you respond to those kind of
2 calls?

3 A Any time you heard the call, shots fired or
4 persons shot, and you wasn't doing anything else, you
5 would go to that location.

6 Q And anywhere in the city?

7 A Anywhere in the district that you were in the
8 radio zone of.

9 Q Did you go over there with Watts?

10 A I believe yeah, I was in the car with him when
11 we went over there, yes.

12 Q Did you ever talk about anything?

13 A No.

14 Q How strong is your memory that you were with
15 Watts when you learned that Big Shorty had been killed?

16 A Big -- I was down there, and I don't know who
17 else might have jumped in the car with us. But I do
18 know, yes, we were there.

19 Q You had a clear -- I'm sorry, you have a clear
20 memory of going to the scene with Watts?

21 A Yes.

22 Q Do you know who was driving?

23 A Don't remember.

24 Q Were you in a -- what kind of car were you in?

Transcript of Alvin Jones
Conducted on February 26, 2020

251

1 A A tactical unmarked vehicle.

2 Q Were you and Watts some of the first people on
3 the scene?

4 A No, I think there was another car there.
5 Another couple of cars there.

6 Q Do you remember anyone else who was on the
7 scene when you got there?

8 A No.

9 Q Did Watts seem upset?

10 A I don't remember how he felt about what he
11 looked like.

12 Q What -- what were your feelings toward Big
13 Shorty, if any?

14 A What were they?

15 Q Yeah.

16 A I didn't have no personal feelings about it one
17 way or the other.

18 Q Did Watts seem like he had a pretty friendly
19 relationship with him?

20 A Yeah, it seemed like they could talk, they
21 would talk.

22 Q Is that -- that was one of the ones that you
23 felt was inappropriate, one of the relationships?

24 A Sometimes.

Transcript of Alvin Jones
Conducted on February 26, 2020

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1 Q And were there any specific times you remember
2 other than you talked about that race, but I think you
3 said that wasn't inappropriate?

4 A The race wasn't something I would have called
5 inappropriate. The race was, I've said, was like
6 community engagement. You standing out there with
7 everybody talking back and forth.

8 How do I want to say this?

9 It's like playing, when he playing a cat and
10 mouse game because you sitting out there talking having
11 conversations, you trying to feel them out, they trying
12 to feel you out. That's part of policing. But at the
13 time, it wasn't something of that nature because nothing
14 was going on, or Big Shorty wasn't doing anything
15 illegal at that time in the view of what we was looking
16 at. So they talking trash back and forth to each other.
17 And that's how the race came about.

18 Q And what are the things that you thought were
19 inappropriate about how Watts interacted with Big
20 Shorty?

21 A I mean, sometimes you see them go off and walk
22 and talk. They never go anywhere out of eye distance,
23 whatever, but you seen them walk off and talk.

24 Q And why was that inappropriate and not just

Transcript of Alvin Jones
Conducted on February 26, 2020

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1 regular policing?

2 A Sometimes it was. I just didn't -- I just
3 didn't feel that then you should be that close to
4 someone all the time. But maybe that was my way of
5 policing and my way of thinking.

6 Q What was it about them walking off that made
7 you feel like they were doing something inappropriate?

8 A It wasn't the same as inappropriate that way
9 but it looks inappropriate. So if you need to have a
10 conversation with someone or you need to get information
11 from someone, I mean, maybe you need to walk off that
12 far and get information. And at times, it would happen
13 where all of the people, not just Big Shorty, who may
14 not have been as important as Big Shorty while they're
15 in the quote, unquote "thug game." And that's what I'm
16 saying. Because I wouldn't -- I mean, if somebody want
17 to tell me something, just tell me. Come over here and
18 tell me. I'm standing over here by myself over there
19 (inaudible) come on, or you walk over here. But I just
20 didn't -- I -- I wasn't comfortable with being that kind
21 of way with him. Or with him or other alleged drug
22 dealers like that.

23 Q Were people drinking champagne, smoking cigars
24 after Big Shorty's death?

Transcript of Alvin Jones
Conducted on February 26, 2020

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1 A No. We smoked a cigar. We did have a cigar
2 because we were smoking already.

3 Q You -- you had a cigar with you that day?

4 A Yes, sir.

5 Q You were smoking a cigar at the scene?

6 A Yeah. I think I was -- I was there for a long
7 time.

8 Q Because you were already smoking the cigar
9 before you went over there?

10 A No. I had a cigar, we got over there to the
11 scene, I know we got close enough to see where the body
12 was. And we were standing around as the other officer
13 were coming around and other trying to gather
14 information. And yes, sir, I do remember lighting a
15 cigar. Myself and might have been Elsworth with me,
16 with the three of us.

17 But no, we weren't drinking champagne. We were
18 on duty.

19 Q So you, Elsworth Smith and Ronald Watts were at
20 the scene of Big Shorty's murder not doing any
21 investigating, you were by the body but smoking a cigar?

22 MR. BAZAREK: Just going to object to the form
23 of the question the way that's phrased.

24 A Sergeant Watts was walking around talking to

Transcript of Alvin Jones
Conducted on February 26, 2020

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1 people presumably trying to gather information. But you
2 had a lot of police officers on the scene, you had the
3 detectives come to the scene, the crime scene, and was
4 standing off across the street somewhere on -- excuse
5 me. And yes, I had a cigar.

6 Q How many times did you stand at a murder scene
7 as a police officer smoking a cigar?

8 A I don't know how many times I stood in a murder
9 scene or a person dropped dead. But that wasn't the
10 only time.

11 Q No, no, I'm not saying how many times did you
12 go to a murder scene as a police officer. How many
13 times did you go to the scene of a murder as a police
14 officer and smoke a cigar while you were there?

15 A How many times did I do it?

16 Q Yeah.

17 A I don't know.

18 Q You mean you did it more than once?

19 MR. BAZAREK: Just standing objection to this
20 whole inquiry.

21 A I may have, yes.

22 Q All right. Do you remember any other instances
23 of doing that?

24 A Of doing what?

Transcript of Alvin Jones
Conducted on February 26, 2020

256

1 Q Smoking a cigar at the scene of a murder while
2 you were on duty as a police officer?

3 A I don't know.

4 Q Was Elsworth Smith smoking the cigar?

5 A I believe he was, yes.

6 Q Was Ronald Watts smoking the cigar?

7 A I believe he was.

8 Q How frequently did you and Elsworth Smith and
9 Ronald Watts smoke cigars while you were on duty?

10 A Sometimes. Elsworth at the time was a bigger
11 smoker than myself or Watts. Elsworth always smoked a
12 cigar. I might have smoked a cigar every other day
13 every few days.

14 Q On duty?

15 A On duty.

16 Q Okay.

17 A Yes.

18 Q What about Watts?

19 A He may have also.

20 Q Was it a celebratory cigar?

21 A No, it was not.

22 Q Were you happy to have Big Shorty out of the
23 way?

24 A Pardon me?

Transcript of Alvin Jones
Conducted on February 26, 2020

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1 MR. BAZAREK: Object to the form of the
2 question. Foundation, argumentative, vague and
3 ambiguous.

4 Q I'll rephrase out of way.

5 Were you -- if that was part of the problem.

6 Were you happy to have Big Shorty not be around
7 at Ida B. Wells anymore?

8 A I'm never happy that anybody dies. I was never
9 happy anybody, see anybody be killed.

10 Q Were you -- was it a positive that Big Shorty
11 wouldn't be at Ida B. Wells anymore in your view?

12 MR. BAZAREK: Object to the form.

13 A I don't think so.

14 Q Why was it not positive that he wouldn't be at
15 Ida B. Wells anymore?

16 A Why was it not positive?

17 Q I'm not trying -- I'm not asking you now if you
18 were happy that he was killed. I heard you answer that
19 I'm saying why wasn't it a positive thing that he wasn't
20 going to be at Ida B. Wells anymore?

21 MR. BAZAREK: Object to the form of the
22 question.

23 A A life had been taken off this earth, whether
24 he was a gang banger or drug dealer, whatever. So that

Transcript of Alvin Jones
Conducted on February 26, 2020

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1 couldn't be positive in no fashion.

2 Q Okay. Was Ida B. Wells a safer place without
3 him there?

4 A I don't think so. I don't think either way.

5 Q You said Watts was walking around you think
6 trying to gather information?

7 A Yeah, he was walking around talking to people
8 who had gathered like he was canvassing the crowd.

9 Q He was -- was he talking to civilians or other
10 officers?

11 A Civilians.

12 Q And was he taking notes?

13 A I don't know if he was taking notes or not.

14 Q Would you typically take notes when you are
15 canvassing a crowd, during an investigation?

16 A I don't know if you just physically take notes.
17 You might remember certain things and write them down
18 and pass them along to someone else or whoever the
19 detectives were.

20 Q Do you know did someone ask Watts to go around
21 canvassing the scene?

22 A Not that I know of.

23 Q When you're saying canvassing, you mean he was
24 going around sort of interviewing people?

Transcript of Alvin Jones
Conducted on February 26, 2020

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1 A Yes.

2 Q Did you hear him have any of those
3 conversations?

4 A No.

5 Q Do you know why he wanted -- why he decided
6 that he should go canvas the scene?

7 A No.

8 Q Did you ever ask him?

9 A No.

10 Q Did you think it was unusual?

11 A No.

12 Q Why?

13 A As a supervisor police, I thought he was going
14 to do what he was supposed to be doing as an officer of
15 the Chicago Police Department. It wasn't my crime
16 scene, there were other things, other people going on.
17 Although as a tactical officer, I didn't get into it.

18 Q Was it his crime scene?

19 A No, it wasn't his crime scene.

20 Q Do you know if he ran any reports?

21 A No, I don't.

22 Q Do you know if he relayed any of the
23 information that he got to anybody else?

24 A No, I do not.

Transcript of Alvin Jones
Conducted on February 26, 2020

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1 Q How long were you at the scene?

2 A We were there a good while. At least 45
3 minutes to an hour.

4 Q How quickly did you light -- did you and Watts
5 and Smith light your cigars?

6 A We had -- me and Smith had been there for a
7 while with him. We were just standing over off away
8 from the crowd. We weren't doing anything. We stood
9 back waiting, whatever, and we lit a cigar.

10 Q Were you with Watts when you lit the cigars?

11 A No.

12 Q Did he smoke -- when did he light his cigar?

13 A I don't know when he lit his cigar.

14 Q Was he with you when he lit his cigar?

15 A I don't recall.

16 Q And over the years, you had not heard any
17 rumors about Big Shorty paying Watts or Watts getting
18 money from Big Shorty, drugs or anything like that?

19 A No.

20 Q Did you ever know Watts to give drugs to
21 people?

22 A No.

23 Q Did you ever hear rumors that he gave drugs to
24 people?

Transcript of Alvin Jones
Conducted on February 26, 2020

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1 A No.

2 Q Over the years, have you ever told any
3 civilians how to file a complaint with OPS or IAD or
4 COPA or HIPAA or anything like that?

5 A In my career as a police officer? Yes.

6 Q How frequently have you done that?

7 A I wouldn't say it was frequent at all.

8 Q Do you remember any specific instances of
9 telling someone how to go file a complaint?

10 A No.

11 Q But you know you've done it?

12 A Yes.

13 Q Did you ever tell any of the people who told
14 you that Watts was dirty to go file, how they could file
15 a complaint about that?

16 A No.

17 Q Did you ever tell any of the people who told
18 that you Mohammed was dirty how to go file a complaint?

19 A The people that told me Mohammed was dirty?

20 Q Did I mishear that? I thought you said you
21 heard humors they were both dirty.

22 MR. BAZAREK: Object.

23 A I don't recall saying that. I recall people
24 saying that Mohammed acted too friendly with him.

Transcript of Alvin Jones
Conducted on February 26, 2020

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1 Q Got it. Okay. Did you ever -- so getting back
2 to Watts. But you said no, you never told anybody
3 who --

4 A No.

5 Q Why didn't you tell anything who came up and
6 told you that they felt Watts was dirty how to go file a
7 complaint?

8 A Because I thought in what I was thinking that
9 it was trash-talking him, so I didn't take it seriously.

10 Q Have you ever given false testimony under oath?

11 A No.

12 Q Did you have any voice in deciding from --
13 well, let me rephrase that.

14 When you were on the Watts Team, did you have
15 any role in deciding who would go to court to testify in
16 cases involving arrests that your team made?

17 A No.

18 Q Do you know how -- were you ever involved in
19 discussions with the prosecutor or prosecutors about who
20 should testify in a particular case?

21 A Involved with a prosecutor in who should
22 testify?

23 Q Yeah, deciding who should testify.

24 A No. I went to court, when I went to court and

Transcript of Alvin Jones
Conducted on February 26, 2020

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1 they looked and me and reviewed the case, what do you
2 know, what do you know, what do you know, and they
3 decided who they were going to put on the stand.

4 Q The prosecutors did that?

5 A The prosecutors. Each.

6 Q You would have to go through multiple people
7 for each arrest?

8 A If that was the case, yes.

9 Q Were there any times when you went in, it was
10 just you, and they said what do you know and you said
11 well, I was only number two, I don't know anything so I
12 can't testify?

13 A I can't remember that.

14 Q Did you ever testify as to what somebody else
15 told you without disclosing that's what you were doing?

16 MR. BAZAREK: Object to the form of the
17 question. Foundation.

18 A I don't recall that.

19 Q Did you understand my question?

20 A You asked if I ever went to court and I was not
21 the person in box 1, and I would have to testify to
22 something that somebody had relayed to me.

23 Q Not necessarily whether you were in box 1 but
24 just yes, that you hadn't seen it.

Transcript of Alvin Jones
Conducted on February 26, 2020

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1 A That I hadn't seen it?

2 Q So did you -- right, you hadn't seen what
3 happened. You went to court, you testified as if you
4 had seen it, even though you were just really relaying
5 what someone else told you?

6 MR. BAZAREK: Object to the form of the
7 question.

8 A I don't recall.

9 Q You don't recall ever doing that?

10 A I don't recall ever doing that.

11 Q Did anybody on your team or Watts himself ever
12 ask you to testify as to something they saw?

13 A No.

14 Q Was it common for people on the team to sign
15 the names of other people on the team on reports?

16 MR. KOSOKO: Object to form.

17 A Yes.

18 Q Before that happened, would the person whose
19 name was -- the person whose name was being added
20 without their own signature, would they have reviewed
21 the report?

22 A Sometimes. Sometimes they wouldn't.

23 Q So tell me about the second part of that when
24 they wouldn't?

Transcript of Alvin Jones
Conducted on February 26, 2020

265

1 A Sometimes when they wouldn't?

2 Q Yeah.

3 A It was already understood or what the
4 circumstance were, they knew whoever was writing the
5 report was going to fill out all the report and sign
6 their name to it. You were in box 2, okay, you in box
7 2, I'm in box 1, I'm writing this, and this is what
8 happened, and then you sign your name when you completed
9 the report.

10 Q They would tell you what was going in the
11 report?

12 A Yes.

13 Q So you know what they were going to say?

14 A Pretty much.

15 Q What do you mean pretty much?

16 A Pretty much you knew what the person in box 1
17 who would prepare the report, you had pretty much knew
18 what they were going to put in the report.

19 Q Are you aware of any situations where someone's
20 name was added to a report, signed without their
21 knowledge?

22 A I can't recall that.

23 Q Did you ever do that?

24 A Sign someone's name to a report without their

Transcript of Alvin Jones
Conducted on February 26, 2020

266

1 knowledge? No.

2 Q Have you had any interactions with any of the
3 plaintiffs in these cases since you left the Watts Team?
4 If you know?

5 A Plaintiffs?

6 Q Yes, so the people filing suit.

7 A Filing suit? I think one.

8 Q Who's that?

9 A Lee Rainey, Jr.

10 Q And when did you see Lee Rainey?

11 A Before I was put on desk assignment, probably
12 that summer, 2017 or spring. I saw him in a convenience
13 store playing the lottery.

14 Q Did you talk to him?

15 A We spoke.

16 Q What did you speak about?

17 A Hello. Good luck.

18 Q You said hello, good luck to him?

19 A He said -- he said hey, what's happening, good
20 luck. He bought his raffle -- his lottery tickets, I
21 bought mine. He walked out, said good luck, I said good
22 luck.

23 Q Good luck about the lottery tickets?

24 A The lottery tickets.

Transcript of Alvin Jones
Conducted on February 26, 2020

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1 Q Was there anything else to that conversation?

2 A No.

3 Q Did you remember who he was?

4 A Yes.

5 Q It sounds like he remembered you?

6 A Yes.

7 Q How long was that interaction about?

8 A The interaction?

9 Q Yeah.

10 A Seconds.

11 MR. RAUSCHER: Take a quick break.

12 MR. BAZAREK: (Inaudible) the Rainey case, have
13 you covered it?

14 MR. RAUSCHER: I don't think so.

15 THE VIDEOGRAPHER: Off the record. 4:16.

16 (A brief recess was taken.)

17 MR. VIDEOGRAPHER: Back on the record. 4:22.

18 MR. RAUSCHER: We're going to mark Exhibit 7,
19 which is defendant, Jones', Answer to plaintiff's,
20 Lionel White's, case March 23, 2018, Interrogatory.

21 (Exhibit 7, Answer to Interrogatories, was
22 marked for identification and is attached to the
23 transcript.)

24 BY MR. RAUSCHER:

Transcript of Alvin Jones
Conducted on February 26, 2020

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1 Q Do you recognize this document?

2 A Yes.

3 Q And is it correct that you were -- that you
4 assisted the Narcotics In Gaining Intelligence Section
5 from approximately February 2005 through August 2005?

6 A Yes.

7 Q Can you tell me how you assisted the Narcotics
8 in Gaining Intelligence Section during that time?

9 A Myself and Officer Young would identify drug
10 dealers, a drug transaction that occurred off a video by
11 narcotics.

12 Q And at the time, were you still on the Watts
13 Tactical Team?

14 A Yes.

15 Q And you were just -- you weren't assigned a
16 detail to the other unit?

17 A That's correct.

18 Q Okay. Do you remember any specific people you
19 identified for that -- that unit during this time?

20 A There were a lot of people who were we
21 identified off videotape.

22 Q But as you sit here today, do you remember any
23 specific people?

24 A Not really. I mean, there was so many of them,

Transcript of Alvin Jones
Conducted on February 26, 2020

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1 it was like -- normal, everyday people that you would
2 see down there.

3 Q Were you asked to identify people who had been
4 caught on video engaging in drug transactions or was it
5 just people?

6 A No, that had been engaged in drug transactions.

7 Q And were the transactions captured on video?

8 A Yes.

9 Q And it was people you saw routinely?

10 A Yes.

11 Q But you just as of today, you don't remember
12 who?

13 A No.

14 Q Is there anywhere you could look to get that
15 information?

16 A To know what -- who I identified?

17 Q Yeah.

18 A There was a book made of who we identified and
19 those things but I know the videotapes, I don't know.
20 We identified most of the people that were in the book,
21 that they placed in the book. But what part of the
22 narcotics activity they were actually played or were
23 doing at the time, we didn't -- we pretty much
24 identified from the video.

Transcript of Alvin Jones
Conducted on February 26, 2020

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1 Q Okay. I think at the beginning of your
2 deposition today or toward the beginning, you mentioned
3 that Lee Rainey was one of the people who you either
4 remembered or you thought whom your recollection was
5 refreshed when you looked at documents?

6 A Yes.

7 Q Is that right?

8 A Yes.

9 Q Is he someone whose arrest you remembered
10 before you began preparing for your deposition, or was
11 it something that came to you when you looked at some
12 paperwork?

13 A It's when I looked at the paperwork. I
14 remember looking at his mugshot.

15 Q Before that, did you remember who he was?

16 A Vaguely.

17 Q When you saw him in 2017, was he the same
18 person you were talking about?

19 A Yes.

20 Q Okay. When you saw him in 2017, did you
21 remember him clearly?

22 A I didn't hear your last part.

23 Q When you saw him in 2017, did you remember him
24 clearly?

Transcript of Alvin Jones
Conducted on February 26, 2020

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1 A Yes.

2 Q And did you know who it was or did you just
3 know he was somebody you knew?

4 A I knew who he was.

5 Q Did something change between 2017 and 2020 by
6 your memory of him?

7 A Not really. I looked at -- we looked at a case
8 report and an arrest report.

9 Q And do you remember what it was in what you saw
10 that refreshed your recollection?

11 A In the report?

12 Q Yeah.

13 A Yes.

14 Q All right. Tell me what refreshed your
15 recollection.

16 A In the report as we were in line, I remember
17 him coming down and saying we're up.

18 Q Did you know Lee Rainey before you were
19 involved in his arrest?

20 A I had seen him, yes, up where we was.

21 Q Do you know how many times you were involved in
22 arresting him?

23 A No, I do not.

24 Q All right. So you tell me you saw -- you knew

Transcript of Alvin Jones
Conducted on February 26, 2020

272

1 Lee Rainey before you arrested him?

2 A Yes.

3 Q Do you know if he knew you?

4 A I'm -- I would say he did.

5 Q Who did he say we're up to?

6 A Excuse me?

7 Q He said we're up? That's the --

8 A To the other defendant in the arrest
9 identification board, who by his mugshot I don't recall
10 who he is.

11 Q Thomas Jefferson?

12 A I believe that's his name.

13 Q I'm saying. You're saying you just -- you
14 looked at it and you don't remember?

15 A I don't recall his face.

16 Q Where were you when you heard Lee Rainey say
17 we're up?

18 A I was in the stairwell leading up towards the
19 second floor.

20 Q And there was -- where was a line of other
21 people?

22 A Yes.

23 Q Did you see him engage in drug transactions
24 with those other people?

Transcript of Alvin Jones
Conducted on February 26, 2020

273

1 A Yes.

2 Q How many people did you see them -- how many
3 people did you see engage in drug transactions?

4 A I don't know how many it was, but there were
5 people in front of me in line before I got up too close
6 to the front to him where he was.

7 Q How many people were in front of you in line?

8 A I don't remember.

9 Q Where was the line?

10 A The line was in the hallway in the back of the
11 building, I believe it was.

12 Q It was in -- was it in the lobby?

13 A No, the line, I believe it was in the hallway
14 leading upstairs in the back stairwell.

15 Q The people were lining up on the stairs?

16 A Yes.

17 Q Do you have any estimate of how many people it
18 was?

19 A No.

20 Q Did you arrest other people in front of you who
21 bought drugs?

22 A No.

23 Q Why not?

24 A Because I was -- at that point in time, I was

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1 focusing on getting to the top where the sellers were.

2 Q Why couldn't you have done both?

3 A Because my intentions were to get to the seller
4 at that time. They were -- it was like we got in the
5 building up on the person, people that were actually
6 selling. So that was my goal and intentions, not to
7 arrest the people who had bought narcotics from them.

8 Q Why -- why didn't you just arrest both of them?

9 A Because I didn't have time to arrest all of the
10 other people.

11 Q Could you not have just announced your office
12 when you saw the first transaction and arrested
13 Jefferson, Rainey and the first drug purchaser?

14 A Probably not.

15 Q Okay. Why not?

16 A Because I probably would have never got up to
17 the top of the stairs where they were. They probably
18 would have gotten away and I would have been stuck in
19 the cluster with those people on the stairwell.

20 Q But you knew Rainey?

21 A I knew who he was.

22 Q So what would -- if he got away again, can you
23 just find him again and written up the report?

24 A As what?

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Conducted on February 26, 2020

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1 Q I'm just asking you could you not have done
2 that?

3 A No.

4 Q Why not?

5 A Because I might not have caught him with the
6 narcotics on him at the time.

7 Q So if you see someone engage in a narcotics
8 transaction, you watch that person sell drugs, and then
9 they get away from you, you can't write up a report
10 about that and then have them arrested a different time?

11 MR. KOSOKO: Objection. Calls for conclusion.

12 A You couldn't lock him up for control --
13 possession of a controlled substance or selling
14 narcotics, but you have no narcotics that they sold.

15 Q So you made a determination basically you had
16 to let him sell a certain amount before you got close
17 enough to catch him?

18 A No, I made a determination that I was going to
19 work my way to the top of the line up there and ketch
20 him with what they had up there at the top of the line.

21 Q Is that because you needed to be physically
22 close enough to get everybody and get away?

23 A Yes, I -- if it's close enough to him.

24 Q How close did you think you needed to be to him

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1 before you could announce your office and avoid letting
2 him get away?

3 A Far enough to reach out to grab him.

4 Q Was this case unusual in that you let other
5 people buy drugs right in front of you and get away?

6 A No.

7 Q That happened frequently?

8 A Sometimes.

9 Q Did it happen a lot?

10 A If you were to sneak into a building and
11 undetected and get in a line like that, yes.

12 Q And then, would you typically just get in the
13 line till you got close enough to the seller?

14 A Yes.

15 Q How frequently did something like that happen
16 where you did sneak in a building undetected, got in a
17 drug line, got close enough to the seller without being
18 exposed?

19 A It didn't happen often. It was hard.
20 Sometimes you never get -- make it into the building.

21 Q How often did that happen?

22 A I don't know how often. Like I said, it
23 happened. It was rare that you made it all the way into
24 the building into a line.

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1 Q More than once?

2 A More than once when?

3 Q Did it happen more than once when you were on
4 the Watts Team?

5 A Yes.

6 Q Did it happen more than five times when your
7 were on the Watts -- five times when you were on the
8 Watts Team?

9 A It could have been. I just don't remember it.

10 Q Do you think it happened more than five times?

11 MR. BAZAREK: Objection. Asked and answered.

12 A It could have.

13 Q Do you think it could have happened more than
14 ten times where you got in undetected, got far enough in
15 the line to catch the drug dealer in the act?

16 A Not just myself, but I mean, people on the team
17 would also do, do the same thing.

18 Q You think it might have happened ten times
19 while you were on the team but not while you were the
20 person who got in?

21 MR. BAZAREK: Object to the form of that
22 question.

23 Q Is that right?

24 A I didn't understand the question.

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1 Q You're saying that maybe it happened ten times
2 over the course of your time on the Watts Team but not
3 every time would have been you as the person who got in?

4 A Correct.

5 Q And when you were giving estimate about --
6 well, not an estimate. When you were saying it maybe
7 happened more than five times, was that you saying maybe
8 you individually got it done five times or maybe a total
9 of five times?

10 A No, I'm saying the team, someone on the team
11 made it in there successfully.

12 Q Do you remember ever successfully making it in
13 in the way it happened in the Rainey case, you
14 personally other than this one?

15 A Maybe one other time.

16 Q What's the one other time?

17 A I don't know. But it may have happened one
18 other time.

19 Q Maybe it did or maybe it didn't?

20 A Maybe it did or maybe it didn't.

21 Q What did we're up signify to you?

22 A That they were -- they had narcotics and they
23 were ready to sell them.

24 Q And what was Rainey's role, and what was

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1 Jefferson's role?

2 A I believe Rainey came down with Jefferson,
3 handed Jefferson the narcotics and said we're up.

4 Q So what did you see Rainey do?

5 A Rainey handed the bag of suspect narcotics to
6 Jefferson and they started selling.

7 Q And then, what was Rainey doing while Jefferson
8 was -- well, all right. So then, did Jefferson give the
9 drugs to the people in the line?

10 A I'm not sure if Jefferson or Rainey. I know
11 one of them was collecting money and one of them was
12 selling, giving narcotics.

13 Q So how were those transactions working? The
14 people in the line would go up. When they get to the
15 front, then what would they do?

16 A They handed them the money, they got -- they
17 counted off the narcotics.

18 Q They handed the money to one person and got the
19 narcotics from a different person?

20 A I believe so.

21 Q Is that different than the way you were
22 describing how those transactions worked earlier in your
23 testimony?

24 A No.

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1 Q I thought you said there was the same person
2 who got the money and had the drugs?

3 A Sometimes it would be the same person. Be one
4 seller and give the money and the narcotics. Sometimes
5 it would be two.

6 Q All right. Was there --

7 A Sometimes --

8 Q Yeah, go ahead.

9 A At this particular thing, it was two people in
10 the hallway.

11 Q And was it sometimes it was three people?

12 A Pardon me? Yeah, sometimes it would be more
13 than.

14 Q What's the most people who would be in the
15 hallway selling drugs together that you remember?

16 A I don't know. The entire while, they would be
17 giving all. They would be together selling different --
18 different lines of narcotics.

19 Q And you have mentioned lines a few times. What
20 are lines of narcotics?

21 A Lines would mean the street names of the
22 narcotics. It's not -- not as heroin but nicknames that
23 they would give the narcotics.

24 Q What are some of the nicknames the lines that

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1 you remember?

2 A You said Ricky Lake earlier.

3 Q No, I don't think I said Ricky Lake.

4 A I thought I heard the word, Ricky Lake,
5 earlier. But I remember that I also remember Obama. I
6 remember -- it wasn't from down there. It was from
7 another location, because it was always funny to him.
8 They would call Mad Dog, and whoever would be out there
9 yelling, maybe it was some kind of round that went with
10 it that made me remember that one.

11 Q But Mad Dog wasn't in Ida B. Wells?

12 A No, I don't believe that was Ida B. Wells.

13 Q And like was Blow the name of a line or is that
14 different?

15 A Oh, Blow is the street name for heroin.

16 Q Would people walk up and say they wanted blows
17 or no?

18 A More time they asked for the brand name of what
19 they wanted.

20 Q Do you know if Ricky Lake and Obama were lines
21 of heroin?

22 A I don't know. I don't remember.

23 Q Are there any other names, any other lines that
24 you remember as you sit here today?

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1 A Not at this time.

2 Q When you were doing reverse stings, would you
3 call out the names of lines?

4 A Sometimes, yes.

5 Q And what would you call out?

6 A Whatever the name of the line we had heard them
7 using before we got there.

8 Q Would you call out anything else?

9 A Sometimes.

10 Q What else would you call out?

11 A I would make a name up.

12 Q You just different names though?

13 A Just make a different name up.

14 Q You would always make a line or pretend line or
15 something like that?

16 A Yes.

17 Q Do you know how it is that you knew Lee Rainey
18 when you arrested him with Thomas Jefferson?

19 A I can't remember how I knew him. I had seen
20 him in the area, had had contact with him. I don't know
21 if I had arrested him or not or participated in
22 arresting him or not.

23 MR. RAUSCHER: All right. I'm going to mark
24 Exhibit 8. This is a vice case report, DO Joint

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1 00597879.

2 (Exhibit 9, Vice case report, was marked for
3 identification and is attached to the transcript.)

4 Q Have you had a chance to review this report?

5 A Yes.

6 Q Is this one of the reports that you looked at
7 before your deposition?

8 A Yes.

9 Q And did this help refresh your recollection
10 about the arrest of Thomas Jefferson and Lee Rainey?

11 A Yes.

12 Q So does this report memorialize the arrest that
13 you were just telling me about?

14 A Pretty much.

15 Q And you see in the narrative description?

16 A Yes.

17 Q It says that -- it looks to me, and you tell me
18 if I'm wrong, that you and Sergeant Watts entered the
19 rear, other officers went in through the front of the
20 building?

21 A Yes.

22 Q Were those others officers seen when they went
23 in the front of the building?

24 A I don't know.

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1 Q You didn't hear anything?

2 A No.

3 Q Could you hear -- if people were yelling to
4 clean up or anything like that in the front, would you
5 be able to hear in the back?

6 A I don't remember that.

7 Q But typically would you be able to?

8 A I don't know.

9 Q Okay. Who were your partners this day?

10 A It says Cathy Moses Hughes and Kenny Young.

11 Q There's a line that says date, looks to me box
12 47, date investigation completed, time. Is that right?
13 Right next to Kenny Young and Catherine Hughes'
14 name?

15 A Yes.

16 Q Did you put the information that's in that box,
17 did you put it in here?

18 A Yes, that looks like my handwriting.

19 Q The 13 time looks like your handwriting?

20 A That looks like my handwriting.

21 Q Did you type up this report?

22 A Yes, I did.

23 Q You used a typewriter for it?

24 A Yes, I did.

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1 Q What does it mean? What's that time, 13:10,
2 indicate?

3 A The time we finished with the processing of the
4 arrest.

5 Q And what's entailed in with that processing of
6 this arrest?

7 A Finish going back to the station, doing the
8 case report, doing inventories, doing complaint, running
9 maims, searching individual.

10 Q Why did you list Hughes and young as the
11 reporting officers with you?

12 A Because I believe it was the three of us
13 together working together that day.

14 Q Why didn't you just pick one and put the other
15 somewhere else?

16 A I don't recall why.

17 Q Is it -- are they described in the report where
18 it says ROs generally, is that talking about Hughes and
19 Young at all?

20 A Excuse me?

21 Q The recording you see in the narrative, on a
22 bunch of places it says ROs did something?

23 A Yes.

24 Q Are Hughes and Young part of the ROs described

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1 there?

2 A Yes.

3 Q What -- can you tell me what they did?

4 A I don't remember what they did.

5 Q Does it say in the report what they did?

6 A No, it doesn't.

7 Q Should the report have said what they did?

8 A The report is just a summary of the actions
9 that happened. And no, I don't.

10 Q How are these reports used?

11 A They are used in criminal processing.

12 Q The box 5 and 6 says date of occurrence and
13 date RO arrived, and times. You see that?

14 A Yes.

15 Q What do those boxes mean?

16 A That means the time we get on scene and the
17 time that the occurrence of this incident.

18 Q Did those two things happen at the same time?

19 A Pretty much simultaneously, yes.

20 Q So you got into the building, got in a line and
21 arrested him and exited the scene quickly?

22 A Pretty much everything was pretty quickly.

23 Q Is that -- was that common?

24 A No.

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1 Q So usually the time should be different?

2 A Yes.

3 Q How did you know what time to put? What were
4 you basing it on?

5 A I don't remember?

6 Q Did you have a standard practice?

7 A I don't remember how I came up with it that
8 time.

9 Q When you say came up with it --

10 A How did I determine that was the time, I don't
11 recall how.

12 Q And did you have a standard practice for
13 determining what time those two things happened during
14 arrests?

15 A It could have been an estimation. I could have
16 looked at a watch, I could have looked on my phone. I
17 don't know how I did that time.

18 Q Did you do all of those things?

19 A I don't recall if I did any of those things or
20 how, or if somebody -- or if somebody else, be it Moses
21 Hughes or Young gave me the time, I don't know.

22 Q I understand you don't remember for this one.
23 What I'm trying to ask is was there one or more of those
24 methods that you just described that you used more

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1 frequently than others?

2 A No, but it like in the back of your mind you
3 know when it happened, you can search things like that
4 happened, you need to check the time because you need --
5 you got to put it on the report.

6 Q Did you care to get the times accurate?

7 A Pardon me?

8 Q Did you care about getting the times accurate
9 on the reports?

10 A Yes, you should.

11 Q Why should you care about making sure the times
12 are accurate?

13 A Because this is what you're supposed to do.
14 That's what you supposed to do. So yeah, that's one of
15 the things, okay, we done made the arrest, what time the
16 arrest was made, okay, how long before, when we came in
17 here did the arrest. You guesstimate, estimated,
18 however you looked at it, yes.

19 Q Why did you have to estimate it?

20 A Because sometimes it wouldn't happen just when
21 you got there. You might arrive at this time but the
22 arrest might happen later.

23 Q Did you have anything on you typically where
24 you could check to see what time it was?

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1 A You probably would look at like I say your
2 phone or your watch or ask somebody well, how long we
3 been here, what time is it, how long you think we been
4 here.

5 Q You didn't take any -- you didn't like mark it
6 off either mentally or in writing when you got to the
7 scene?

8 A Not always.

9 Q Sometimes?

10 A Sometimes.

11 Q You how would you describe whether to do that
12 or not?

13 A It varied from day-to-day, situation is
14 situation.

15 Q Any reasons like that would make you do it or
16 not do it?

17 A Human beings, you just you're not a robot, you
18 just don't do it all the way the same time.

19 Q Did you carry a cellphone with you in October
20 2004?

21 A I'm quite sure I did.

22 Q Do you remember the number of that cellphone?

23 A Yes.

24 Q Can you --

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1 MR. RAUSCHER: We can mark this attorneys' eyes
2 only but I'm going to ask him for the number.

3 MR. BAZAREK: Yeah, I'm going to --

4 MR. RAUSCHER: If you want to do it off the
5 record, that's fine, but --

6 MR. BAZAREK: Yeah, let's -- I'm going to put
7 an objection. We can have further discussion on that
8 cell phone.

9 MR. RAUSCHER: I mean, there are relevant cell
10 phone records that have been produced in the case, so
11 I'm thinking we should at least be able to know the
12 number.

13 MR. BAZAREK: Okay.

14 MR. RAUSCHER: We can treat it as attorneys'
15 eyes only.

16 MR. BAZAREK: Okay. So we can just talk about
17 that and you know --

18 MR. RAUSCHER: Fine.

19 MR. BAZAREK: -- we can move on.

20 Q Yeah, I guess I should ask do you remember what
21 your number was at the time?

22 A Yes.

23 Q Is it the same one you have now?

24 A Pretty much, I believe so.

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1 Q It's --

2 A I believe so.

3 Q Okay. Got it.

4 All right. Do you remember who went in the
5 front of the building?

6 A I would assume that would be Ed -- judging by
7 this -- Young and Hughes.

8 Q Because it doesn't list anyone else in the
9 report? Other than Watts?

10 MR. BAZAREK: Read back that question.

11 MR. RAUSCHER: I'll ask a different one. I can
12 rephrase it.

13 MR. BAZAREK: Yeah, I just wanted to hear --
14 just wanted to hear.

15 MR. RAUSCHER: No, no, you can hear it.

16 MR. BAZAREK: Yeah, just so I can hear it.

17 Q All right. Do you remember who went in the
18 front of the building?

19 MR. BAZAREK: You asked about the --

20 MR. RAUSCHER: There was actually a different
21 question. That came after --

22 MR. KOSOKO: Yeah, I just don't know if he was
23 --

24 MR. RAUSCHER: I don't know if he understood

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1 it was supposed to be a question.

2 MR. KOSOKO: Yeah.

3 MR. BAZAREK: Yeah.

4 MR. RAUSCHER: So I'm going to reask.

5 Q Just you don't have to answer it or whatever
6 might have been hanging out there, I'm going to ask a
7 different question, which is the reason is you assume it
8 was Ms. Moses Hughes and Young who went in the back
9 because there are no other officers other than Watts
10 listed on the report?

11 A Yes, that's what I want to assume.

12 Q It says in here, In summary, ROs received
13 information that narcotics were being sold in the
14 hallway at the CHA Building located at 559 East
15 Browning.

16 You see that?

17 A Yes.

18 Q Who received that information?

19 A I don't recall who received it.

20 Q Where did it come from?

21 A I don't recall where it came from.

22 Q Is there any anywhere you could look to
23 determine who received the information or where it came
24 from?

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1 A No.

2 Q Does it -- does it necessarily have to be you,
3 Hughes or Young who got the information?

4 A Not necessarily.

5 Q Who else could it be?

6 A It could have been Watts.

7 Q Was Watts one of the ROs described in this?

8 A Yes. I would assume, yes.

9 Q I thought Watts was not a reporting officer
10 because he was a sergeant. Did I misunderstand that?

11 A No, he's RO in here with that because he was in
12 there but he's not a reporting officer. And if he had
13 gotten the information, he could have relayed the
14 information to one of us. And that's on the plan with
15 the vice or all three of us to get in there. I don't
16 know who received the information.

17 Q So you are saying that ROs as used in this
18 report includes Sergeant Watts?

19 A It includes Sergeant Watts.

20 Q So why did you write one RO and Sergeant Watts
21 entered the rear instead of just ROs?

22 A It was just the practice of how I did. I was a
23 singular RO going in the back door with Watts.

24 Q I thought he was an RO also?

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1 A I was a singular officer going in the door, and
2 that's the way I wrote it. That's how we would write
3 paperwork.

4 Q I'm sorry, I didn't catch the last part.

5 A That's how I wrote the paperwork. I wrote
6 myself as the RO. I didn't refer to him as reporting
7 sergeant or officer.

8 Q So he was not the person who got the
9 information that narcotics were being sold in the
10 hallway because that's an RO?

11 MR. BAZAREK: Objection to the form of the
12 question. I think it mischaracterizes what he has
13 testified to.

14 A I don't know who received the information
15 first.

16 Q But I thought -- correct me if I am misstating
17 this. I thought you just said you did not list Watts as
18 an RO?

19 A No, I did not.

20 Q So this says ROs got the information, so that
21 means it wasn't watt?

22 A It says ROs so I don't know. ROs might have
23 gotten information from Watts. I don't remember. He
24 might have been the one who first received the

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1 information.

2 Q And then, you would write that up as even if
3 Watts is the one who gave the information, you'd say ROs
4 received the information as opposed to Watts got the
5 information?

6 A Yes.

7 Q Why?

8 A Because that's what it was. ROs received
9 information. If they had been the case.

10 Q But wouldn't Watts be a relevant witness if he
11 got the information?

12 MR. BAZAREK: Objection.

13 Q At least potentially?

14 MR. BAZAREK: Objection. Argumentative.

15 A Possibly.

16 Q All right. So why -- if Watts is the one who
17 got the information, should you have said that?

18 A Not necessarily.

19 MR. BAZAREK: Object to the form of the
20 question.

21 A Not necessarily.

22 Q Maybe?

23 A Not necessarily.

24 Q Can you think of any reasons why it would have

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1 been helpful to actually write down who got the
2 information?

3 A Not necessarily.

4 Q Does it matter who got the information?

5 A I don't know. I don't know.

6 Q Does it matter that you even received
7 information as opposed --

8 A Yes, it matters --

9 Q -- to you just showed up there?

10 A It matters that you received information.

11 Q Why does it matter that you received
12 information?

13 A Because something was going on there that
14 somebody had a problem with. So I don't know, I don't
15 recall how the information was received. I don't know
16 if it -- one of the three of us as POs got -- received
17 it. I don't know if we received the information from
18 Watts or he learned the information. I have -- I don't
19 really remember.

20 Q Would it be problematic if you wrote a report
21 that said ROs received information about narcotics and
22 it wasn't true?

23 Not that the information wasn't true, but that
24 it wasn't true that you had actually received the

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1 information?

2 A I don't understand what you're trying to say.

3 Q Would it be problematic if you wrote in a
4 report ROs received information that narcotics were
5 being sold in the hallway at the CHA Building even if
6 you had not actually received that information?

7 A ROs had received that information. That's what
8 you write. That's what happened.

9 Q But I'm asking is treated as a hypothetical,
10 would it be problematic if you as an officer wrote in a
11 report ROs received information about narcotic sales
12 even if it wasn't true that you had actually received
13 any such information.

14 MR. BAZAREK: Object to the form of the
15 question.

16 A I don't understand why you would write that
17 information if it wasn't true.

18 Q Would it be a problem if you did write that
19 information and it wasn't true?

20 A I've never seen information put in a report
21 that wasn't true.

22 Q Never seen any information in a report that
23 wasn't true?

24 A No, not that I know of.

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1 Q Okay. Have people ever questioned you as to
2 whether information in a report is true?

3 A Have people questioned? Yes.

4 Q Has it come up in criminal cases where people
5 have questioned, the defendants have questioned it?

6 A Defendants?

7 Q Yeah, criminal defendants or lawyers, have they
8 ever questioned whether information that as used the way
9 you say an arrest had been happened?

10 A Yes, it has come up.

11 Q All right. And in those situations, is it good
12 to be able to come back say no, here's the information
13 we had, here's how we got it?

14 MR. BAZAREK: Object to the form of the question
15 and the hypothetical.

16 A No, you'd go based off this case report which
17 is a summary of what happened to help you relate what
18 you were given.

19 Sometimes it's like say it's a summary to help
20 you jog your memory as to what you do remember. What
21 role you played.

22 Q But looking at this report doesn't jog your
23 memory about where this information on narcotic sales
24 came from?

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1 MR. BAZAREK: Objection. Asked and answered.

2 A No, it does not.

3 Q Did you commonly hear people say we open?

4 A No.

5 Q Did you know what it meant?

6 A Yes.

7 Q And did you know Thomas Jefferson?

8 A I can't say that I remember him.

9 Q Did you read Lee Rainey's affidavit?

10 A Yes, I did.

11 Q And do you see where he says he encountered you
12 in the hallway of 559 East Browning?

13 A In the hallway where?

14 Q All right. He says, On October 16, 2004, I
15 encountered Watts again. This time, I was standing in
16 the hallway at 559 East Browning with three other people
17 including Thomas Jefferson. I saw Watts and Officer L
18 Jones and one other female officer approached the front
19 of the building on foot.

20 A That's not true.

21 Q That's false?

22 A Yes.

23 Q What is false about that?

24 A That's not how it happened.

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1 Q Where did -- did you -- when you went to Ida B.
2 Wells that morning, who did you drive with?

3 A THE WITNESS: I don't remember.

4 Q When did you and Watts split up from Moses,
5 Hughes and Young?

6 A I don't remember.

7 Q So how do you know that he's not telling the
8 truth that he saw you at some point walking up toward
9 the front of the building?

10 A Because I didn't come in the front of the
11 building.

12 Q Did you walk toward the front of the building
13 ever?

14 A Excuse me?

15 Q Did you walk toward the front of the building
16 ever?

17 A I don't recall going to the front of the
18 building at all.

19 Q All right. Then, he says that he didn't run,
20 even though other people ran?

21 Actually, you know what, let me --

22 MR. RAUSCHER: I'm just going to show him --
23 show him the affidavit.

24 All right. We're going to mark the affidavit

Transcript of Alvin Jones
Conducted on February 26, 2020

301

1 as Exhibit 9.

2 (Exhibit 9, Affidavit, was marked for
3 identification and is attached to the transcript.)

4 Q The part about 2004 starts on paragraph 9.

5 A Paragraph where?

6 Q 9. If -- you're welcome to read the whole
7 thing if you would like to but I'm just pointing you to
8 the parts I may have questions about for now.

9 Are you ready?

10 A Yes.

11 Q Okay. Is anything that he says in here true?

12 A No.

13 Q Did Watts go to the second floor in the 559
14 East Browning that day?

15 A Not that I know of, no.

16 Q All right. But is it possible he went up and
17 you didn't see him?

18 A No.

19 Q So he did not go up?

20 A No. What he's -- what he's saying here is all
21 a lie.

22 Q Do you know who Marcus Jefferson is?

23 A Marcus Jefferson?

24 Q Yeah. MJ?

Transcript of Alvin Jones
Conducted on February 26, 2020

302

1 A Vaguely.

2 Q What do you know about MJ?

3 A The little that I remember, but I just remember
4 the name.

5 Q Was he involved in the drug trade?

6 A I don't know.

7 Q Was it common that when you were all out doing
8 investigations or out at Ida B. Wells, Watts would
9 separate from the team?

10 A Sometimes other officers would separate from
11 the team.

12 Q I just want -- I'm just asking about Watts.

13 A Sometimes, yes.

14 Q All right. Would he go upstairs in the
15 building without other officers?

16 A Usually not.

17 Q Sometimes?

18 A Maybe.

19 Q Well, did it happen or did it not happen?

20 A It didn't happen on this date at this time.

21 Q Did it sometimes happen?

22 A Sometimes, yes.

23 Q Okay. Well, do you know where he went when he
24 would go up stairs without other officers?

Transcript of Alvin Jones
Conducted on February 26, 2020

303

1 A No.

2 Q Do you know what he did?

3 A No.

4 Q Do you know why he'd go upstairs without other
5 officers?

6 A No.

7 Q Would you all have to wait around while he did
8 that?

9 A Wait around? What do you mean by wait around?

10 Q Well, if you were in the lobby, and Watts went
11 upstairs, would you have to wait for him before you
12 could leave?

13 A I don't think we would leave him in the
14 building by his self if he went upstairs, or any other
15 officer that went upstairs.

16 Q So yes?

17 A Yes, if a officer went upstairs, whether it
18 would be Watts or someone else, we would wait until they
19 came back before we all left.

20 Q Did other officers go up in those buildings by
21 themselves separate from the other team members?

22 A Sometimes, yes.

23 Q All right. Tell me who else you remember going
24 up alone in the Watt -- in the building?

Transcript of Alvin Jones
Conducted on February 26, 2020

304

1 MR. BAZAREK: I'm just going to do a standing
2 objection to all of the questions as to foundation.

3 A As to who? I've gone up in there by myself
4 sometimes.

5 Q Okay. What have you gone up there for?

6 A We go and we look and we see if there is
7 anybody else up on a higher floor somewhere maybe
8 hiding. That would probably be selling narcotics also.

9 Q And so are you doing that, like is that like a
10 chase type of thing or are you just --

11 A No, sometimes you walk up and you what we call
12 like a building walk down where you check each floor to
13 see if anybody was hiding in a hallway or higher up
14 because they didn't believe or think you would come up
15 that high. Or there was a -- what is it called? Where
16 the garbage room was. Sometimes those doors would be
17 open and they could get into the laundry room, they
18 close it behind them and hide.

19 Q And so you would go looking for those
20 situations?

21 A Sometimes, yes.

22 Q And is that Watts was doing when he'd go
23 upstairs?

24 A I don't know what he was doing when he'd go

Transcript of Alvin Jones
Conducted on February 26, 2020

305

1 upstairs.

2 Q How frequently did you separate from the team
3 and go walk around the building by yourself?

4 A It depended upon the circumstances.

5 Q Well, how -- I just want to know how
6 frequently? Did it happen a lot?

7 A I don't know. It's a long time ago. I mean, a
8 lot of things happened on those days. They different
9 circumstances. Circumstances dictate whether you going
10 up or not.

11 Q Was it unusual to have an officer be all by him
12 or herself in one of the buildings?

13 A All by themselves?

14 Q Yeah.

15 A No one else in the building but them?

16 Q No, fair enough. I mean, maybe other people
17 are in the lobby but the officer alone is walking around
18 upstairs?

19 A Yeah, that would happen.

20 Q Would that be unusual or not?

21 A No, it's not unusual.

22 Q Did Watts know a lot of the residents in the
23 559 Building in 2004?

24 A I don't know.

Transcript of Alvin Jones
Conducted on February 26, 2020

306

1 Q Did you know all the residents in that building
2 in 2004?

3 A I don't know.

4 Q Was it a high -- were any buildings at the
5 time, did any of them have more drug activity than
6 others?

7 A I don't know if they had more or not.
8 Sometimes I mean, you might have all several buildings
9 working at the same time. I don't know.

10 Q Did it -- did it rotate buildings like
11 day-to-day which building were up and selling drugs?

12 A No. No, we didn't rotate.

13 Q So were multiple buildings -- did multiple
14 buildings have drug sales going on in 2004?

15 A Yes.

16 Q Which other buildings do you remember to having
17 drug sales in 2004?

18 A There was the 574 East 36th Street. The 575
19 East Browning. The 527 East Browning.

20 Q Those are the high-rise or mid-rise?

21 A They were seven-story high-rise buildings.

22 Q 559?

23 A Yes.

24 Q Did you ever see Watts transport anyone from

Transcript of Alvin Jones
Conducted on February 26, 2020

307

1 Ida B. Wells to a station?

2 A Transporting them? I don't recall.

3 Q Do you know whether Rainey is telling the truth
4 when he says I was put in a squad car with Watts and
5 another officer?

6 A I don't recall.

7 Q Do you remember if you were the other officer?

8 A I don't recall.

9 Q Do you remember Rainey asking whether Watts --
10 asking Watts what he is being arrested for?

11 A No, I do not.

12 Q Did you go to McDonald's with Watts to get
13 Rainey food?

14 A No, I did not go to McDonald's.

15 Q Did you ever get any -- well, do you know if
16 Watts ever let people get McDonald's after he arrested
17 them?

18 A I can't remember that happening.

19 Q Did you ever let anyone get McDonald's after
20 arresting them?

21 A No.

22 Q You would not do that?

23 A No, I would not do that.

24 Q Did you tell Rainey and Thomas -- well, did

Transcript of Alvin Jones
Conducted on February 26, 2020

308

1 you tell Rainey at the station that he was being -- him
2 and Thomas Jefferson were being charged with possession?

3 A I don't remember having a conversation with
4 them at the station.

5 Q Have you read this --

6 A Yes.

7 Q -- paragraph.

8 So is it fair to say because you don't
9 remember, you can't really say whether he was telling
10 the truth or not in that paragraph?

11 MR. BAZAREK: What paragraph?

12 MR. RAUSCHER: 15.

13 A He's lying here. I didn't frame him, I didn't
14 put him any drugs on him.

15 Q Did he tell you he was being framed?

16 A I don't recall him saying that.

17 Q So at least you don't know if it's true that he
18 told you he was being framed but you know he wasn't
19 being framed?

20 A I know he wasn't being framed.

21 Q Did you tell him that you had -- that the team
22 or someone on the team had found some drugs on the
23 second floor?

24 A I don't recall telling him that at all.

Transcript of Alvin Jones
Conducted on February 26, 2020

309

1 Q Was he on the second floor when you saw him?

2 A He was coming down from the second floor area
3 in the hallway of the stairwell where the narcotic sales
4 had begin where the line was.

5 Q Do you remember charging other people with
6 trespass that day?

7 A No, I do not.

8 Q Do you know what happened to Rainey's case?

9 A I don't recall what happened to his case.

10 Q What about Thomas Jefferson, do you know what
11 happened to him?

12 A I don't recall what happened to his case.

13 Q Do you remember how you all decided who was
14 going to go where that day?

15 A No, I do not.

16 Q Was it common to slit up the team and some
17 people go in the back, some people go in the front?

18 A Yes.

19 Q What's the purpose of doing that?

20 A In case somebody ran out, they would come out
21 in front and run into the other officers.

22 Q Did you know that Rainey was going to be on the
23 second floor coming down when you came in the building?

24 A No, I did not.

Transcript of Alvin Jones
Conducted on February 26, 2020

310

1 Q Did you have any information as to where the
2 drugs were being sold in the building?

3 A I don't remember having any information where
4 they were being sold.

5 Q Did you have any information about who was
6 selling the drugs?

7 A I don't remember that, no.

8 Q How was it that you went, you got in there so
9 quickly and you saw him selling drugs?

10 A There were people standing outside. We were
11 able to get past security and in line right behind the
12 people that were in line.

13 Q And how -- how were you and Watts able to get
14 past the security?

15 A I can't remember what I was dressed like that
16 day. I don't recall what I had on.

17 Q Do you remember what he had on?

18 A No, I do not.

19 Q Were you talking to each other when you went
20 in?

21 A Not really. You just tried to get in there if
22 you can get in there undetected and you saw the line.
23 And you got -- we got in the line, and immediately they
24 went, Here they come, we're up.

Transcript of Alvin Jones
Conducted on February 26, 2020

311

1 And as I worked my way to the top of the line,
2 there they were. Together.

3 MR. RAUSCHER: All right. Let's -- it's a
4 little bit after 5:00. You want me to finish this one
5 or --

6 MR. BAZAREK: Yeah, do you -- do you --

7 MR. RAUSCHER: I'm good with doing that. I
8 just --

9 MR. BAZAREK: Yeah.

10 MR. RAUSCHER: -- didn't know whether you all
11 wanted to.

12 MR. BAZAREK: Uh-hum.

13 MR. RAUSCHER: So let's finish the 2004 arrest,
14 and then if you want to, I'll pick up on the 2003 in the
15 morning.

16 MR. BAZAREK: Sure.

17 MR. RAUSCHER: Or I can do that one. I --
18 let's just keep going for this one.

19 All right. We're going to mark the next. It
20 says DOJOINT 005972 to 73.

21 (Exhibit 10, Arrest report, was marked for
22 identification and is attached to the transcript.)

23 Q Do you recognize this document?

24 A Yes.

Transcript of Alvin Jones
Conducted on February 26, 2020

312

1 Q Did you prepare this report?

2 A Yes.

3 Q And is that your name in the swear under
4 penalty of perjury that the report is true?

5 A Yes.

6 Q Did you sign any of the other names on this
7 report?

8 A Sign?

9 Q Yes. Did you sign your own name on that?

10 A I signed my name.

11 Q Did you sign anybody else's name?

12 A I don't see a place for signature for their
13 name.

14 Q Well, for like Watts' signature on here,
15 there's a couple other ones. Did you sign those?

16 A No.

17 Q All right. Did you ever sign for Watts?

18 A No.

19 Q Did he ever let anybody else sign for him?

20 A No, he's the supervisor. He would sign.

21 Q And just for very briefly turning back to the
22 vice case report which was Exhibit 9. Did you sign any
23 of the other names on that report?

24 A I signed Hughes' name and Young's name.

Transcript of Alvin Jones
Conducted on February 26, 2020

313

1 Q And do you remember if you had permission from
2 them to sign?

3 A I don't remember.

4 Q Do you remember if they looked at the report?

5 A I don't recall.

6 Q I'm sorry if I re-ask this. Did they witness
7 any of the thing -- any of the events?

8 A I don't remember what they witnessed.

9 Q This one, the arrest report, Exhibit 10, has
10 got a alias or nickname, a J-Dawg in box 7. You see
11 that?

12 A Yes.

13 Q Where did you get that from?

14 A It says the tattoo.

15 Q Okay. So you saw his tattoo?

16 A If I put it there, that's what it said.

17 Q Well, do you know why you wrote that refused
18 under nickname on the vice case report?

19 A I don't. I don't recall that.

20 Q It says in the narrative description here,
21 Subject now known Thomas Jefferson -- then we skip over
22 just a few of the descriptive words.

23 The subject, Jefferson, then proceeded to
24 conduct hand-to-hand transaction with unknown

Transcript of Alvin Jones
Conducted on February 26, 2020

314

1 individuals? You see that?

2 A Yes.

3 Q What is the hand -- what is a hand-to-hand
4 transaction as described in this paragraph?

5 A Where he would give from hand to the other, he
6 would hand out narcotics.

7 Q He would hand out narcotics?

8 A Yes.

9 Q And he would get the money?

10 A Um.

11 Q Or did Rainey get the money?

12 A According to this report, from what I remember
13 it would probably, it was -- Rainey.

14 Q You said according to the report from what I
15 remember?

16 A Yes.

17 Q Do you actually remember that or are you just
18 reading the report?

19 A Well, not. Pretty much reading the report.

20 MR. RAUSCHER: All right. We're going to mark
21 Exhibit 11, City BG 011816.

22 (Exhibit 11, Police report, was marked for
23 identification and is attached to the transcript.)

24 Q Did you prepare this report?

Transcript of Alvin Jones
Conducted on February 26, 2020

315

1 A Yes.

2 Q And did you sign your own name on it?

3 A Yes.

4 Q Is this report accurate?

5 A As far as I can see.

6 Q Do you know where the alias or nickname, TE,
7 comes from?

8 A No.

9 Q In box -- box 17, which is asking for things
10 like marks, scars, disabilities, it says NV?

11 A Yes.

12 Q What does that stand for?

13 A I believe nonvisible.

14 Q Meaning you didn't see any? Nothing that fits
15 that description?

16 A I believe so.

17 Q Okay. By the time you got up to the line so
18 you were close enough to arrest them, was anybody else
19 still around? Was there anybody behind you in line?

20 A I don't know if people were behind me in line.
21 I don't know.

22 Q Okay. Do you know if there was anybody left
23 who had been in front of you in line?

24 A I'm not sure.

Transcript of Alvin Jones
Conducted on February 26, 2020

316

1 Q Because it all happened --

2 A It just happened real -- real fast.

3 Q So probably there were other people around,
4 right?

5 A No, but I got to the front of the line.

6 Q But you got to the building and arrested him
7 the same minute basically, right?

8 A It happened so fast. It doesn't take, even
9 like a narcotic transaction five or seven seconds.

10 Q And then get all of them and get out of the
11 building?

12 A And get out of the building. It moves that
13 fast.

14 Q You just don't remember one way or the other
15 whether there was anybody still around?

16 A No.

17 Q Do you remember if anybody else was in the
18 lobby?

19 A I don't recall.

20 Q Where did you go after they were arrested?
21 Where did you take them? What was the next steps?

22 A Where did we take them?

23 Q Yeah.

24 A We took them to our substation at 38th and

Transcript of Alvin Jones
Conducted on February 26, 2020

317

1 Cottage Grove, and that's where we processed them there.

2 Q Who took them there?

3 A It says 4512Boy. That would have been our
4 team.

5 Q That's your -- that's you that day, right?
6 Your car, right?

7 A Yes, that what it says.

8 Q Does it mean you drove them there?

9 A According to the report, yes.

10 Q And it says it's possible that Watts was in the
11 car with you?

12 A Possible.

13 Q Do you have any way to either prove or disprove
14 whether he was in the car with you?

15 A No.

16 Q Do you know if you have ever talked to Marcus
17 Jefferson?

18 A I don't remember.

19 Q Did you read Thomas Jefferson's affidavit?

20 A I don't recall reading his affidavit.

21 Q Do you know whether you met up with Young and
22 Moses Hughes after the arrest?

23 A We all went back to the same place for
24 processing.

Transcript of Alvin Jones
Conducted on February 26, 2020

318

1 Q I mean, do you remember if you met up with them
2 at the scene?

3 MR. BAZAREK: Object to the form of the question
4 and the phrasing. Vague and ambiguous.

5 A They were on the scene at some point. We all
6 converged in that area where the narcotics were being
7 sold.

8 Q So they came up to where you were?

9 A Yeah. I don't know if they came from the top,
10 went around and came up the other stairwell to the top,
11 but they came up from behind. I just don't recall.

12 Q Do you -- but you definitely recall they came
13 up there --

14 A They did.

15 Q You didn't meet them in the lobby or something
16 else?

17 A No.

18 Q And you have an independent recollection of
19 them coming up?

20 A Yes, I do.

21 Q Okay. Do you remember where you saw them?

22 A We were all in the same hallway.

23 Q But you just don't remember which direction
24 they came from?

Transcript of Alvin Jones
Conducted on February 26, 2020

319

1 A Right.

2 Q First floor though?

3 A Between the first and second floor area.

4 Q They came up on the stairs?

5 A I don't know. I don't know which way they came
6 from.

7 Q No, but I mean did they -- did they walk up the
8 stairs so they weren't on the first floor lobby anymore?

9 A I don't recall how they got to up there but
10 they were up there. I don't know if they came up the
11 stairway behind me or if they came around a front
12 stairwell round to the other stairwell.

13 Q I think you've answered. What I was trying to
14 get at was do you remember that you saw them somewhere
15 else other than the first floor?

16 MR. BAZAREK: Object to foundation. At what
17 point?

18 A Did I see who?

19 Q Young and Moses Hughes?

20 MR. BAZAREK: Objection. Foundation.

21 A Somewhere other than the first floor? Yes.

22 Q And where was -- that was somewhere between the
23 first and second floors?

24 A In the stairwell, yes.

Transcript of Alvin Jones
Conducted on February 26, 2020

320

1 Q Did you announce your office to Rainey and
2 Jefferson?

3 A I don't remember.

4 Q Would it be unusual if you just cuffed somebody
5 without announcing your office?

6 A No.

7 Q All right. Did you handcuff them?

8 A I'm not sure if I did or not.

9 Q Would it have been either you or Watts?

10 A Or it could have been Hughes or Young when they
11 got around there.

12 Q How would you have detained them before those
13 other people arrived without announcing your office?

14 A You there too could be, you grab them right
15 there, you got on top of them. Watts was behind me. I
16 don't know. If they showed up, they immediately right
17 there too. But it all happened so fast.

18 Q So you might have grabbed them and gotten on
19 top of them without saying you were a police officer?

20 A Well, you always say you police. You look up,
21 they look, police. And you reach out and grab them.

22 Q In announcing your office different than saying
23 something like police?

24 A What do you mean different?

Transcript of Alvin Jones
Conducted on February 26, 2020

321

1 Q Well, I mean, I think you said you might not
2 have announced your office at all?

3 A Might not have all. You look up, yeah, I got
4 you, police. I don't know what terminology we used that
5 day, or if we used the terminology at all.

6 Q So you might have just grabbed them and not
7 said who you were?

8 A Might have.

9 Q Why would you do that?

10 A Because I'm the police and I witnessed
11 narcotics sale by those individuals.

12 Q And you don't have any responsibility to tell
13 them that you are the police?

14 MR. KOSOKO: Object to the form of the
15 question.

16 A You have to tell them that you're the police
17 after you witnessed?

18 At some point in time, yeah, you let them know
19 that you are the police, but I don't know if we did that
20 first before you put your hands on them.

21 Q Does it present any sort of safety risk for you
22 to just be grabbing people without telling them who you
23 are?

24 MR. KOSOKO: Object to the form of the

Transcript of Alvin Jones
Conducted on February 26, 2020

322

1 question.

2 A Not necessarily.

3 Q Possibly?

4 A Possibly. Possibly could.

5 Q And people probably don't take too kindly to
6 just having people jump on them usually, right?

7 MR. BAZAREK: Object to the form of the
8 question.

9 A Probably not. But as the police, sometimes you
10 don't have time to announce your office, you have to
11 take an action.

12 Q Is there anything in this report that suggests
13 you didn't have time to announce your office?

14 A I don't recall anything in that report. From
15 my experience in working in those projects trying to get
16 up on individuals selling narcotics, you get up there,
17 you say police, whatever you did. If you don't say
18 nothing at all, you grab them and let them know. I'll
19 be grabbing to let you police.

20 Q Right.

21 A You have to immediately do whatever it is you
22 going to do to take charge of them.

23 Q What do you mean immediately?

24 A Immediately. Otherwise, they are going to try

Transcript of Alvin Jones
Conducted on February 26, 2020

323

1 to get away or escape. Now you in a either in a foot
2 chase or they perhaps get away.

3 MR. RAUSCHER: Okay. I don't think I have any
4 other questions about this one. Did you want to pick up
5 on the 2003 one in the morning?

6 MR. BAZAREK: Yeah.

7 MR. RAUSCHER: Okay. All right. Well, then,
8 that's going to be all for today. We're going to
9 continue tomorrow. I'm happy to keep it at 10:00. If
10 you want to do it earlier, we can start earlier.

11 Well, if it's okay with everyone.

12 THE VIDEOGRAPHER: This concludes day 1 of
13 Alvin Jones. The time is 5:18.

14 (Off the record at 5:18 p.m.)
15
16
17
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22
23
24

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Conducted on February 26, 2020

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CERTIFICATE OF COURT REPORTER - NOTARY PUBLIC

I, RYAN GRZELAK, the officer before whom the foregoing proceedings were taken, do hereby certify that said proceedings were electronically recorded by me; and that I am neither counsel for, related to, nor employed by any of the parties to this case and have no interest, financial or otherwise, in its outcome.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my notarial seal this 26th day of February, 2020.



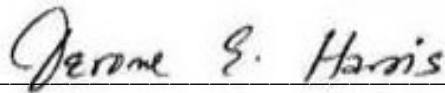
RYAN GRZELAK, Notary Public
for the State of Illinois

Transcript of Alvin Jones
Conducted on February 26, 2020

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CERTIFICATE OF TRANSCRIBER

I, Jerome E. Harris, do hereby certify that
the foregoing transcript is a true and correct record
of the recorded proceedings; that said proceedings were
transcribed to the best of my ability from the audio
recording and supporting information; and that I am
neither counsel for, related to, nor employed by any
of the parties to this case and have no interest,
financial or otherwise, in its outcome.

A handwritten signature in cursive script that reads "Jerome E. Harris". The signature is written in dark ink and is positioned above a horizontal line.

Jerome E. Harris, CDLT-204

March 15, 2020