

EXHIBIT 3



KENTUCKIANA
— COURT REPORTERS —

MASTER DOCKET CASE NO. 19-CV-01717

**IN RE: WATTS COORDINATED
PRETRIAL PROCEEDINGS**

**DEPONENT:
KALLATT MOHAMMED**

**DATE:
November 15, 2023**



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1 had drugs in it?

2 A. No, I don't recall that.

3 Q. Okay. All right. We're moving right along.

4 MR. PALLES: Beautiful.

5 BY MR. TEPFER:

6 Q. You ever heard of an individual named Lionel
7 White, or Lionel White Senior?

8 A. Yes.

9 Q. Oh, you do? Okay. You've heard of him. I
10 should say, do you know him?

11 A. I -- I don't know him. I heard of him.

12 Q. Okay. Have you ever been involved in
13 arresting him?

14 A. I don't remember. Don't recall.

15 Q. Okay. Are you aware that Lionel White Junior
16 has filed a lawsuit in this case?

17 MR. PALLES: Excuse me? Do you mean Lionel
18 White Senior?

19 MR. TEPFER: Did I say Junior?

20 MR. PALLES: You did.

21 MR. TEPFER: Sorry.

22 BY MR. TEPFER:

23 Q. Are you aware that Lionel White Junior has
24 named you as a defendant in his lawsuit related to an
25 April 24, 2006 arrest?

1 A. Yes, I'm aware.

2 Q. Okay. Do you recall the arrest of Lionel
3 White Junior -- Lionel White Senior in any way on that
4 date?

5 A. No, I don't.

6 Q. I'm going to show you what's marked as Exhibit
7 17. It's City-LW-66. Actually, make it 66 to 67. We
8 can put them together.

9 (EXHIBIT 17 MARKED FOR IDENTIFICATION)

10 MR. PALLES: Yeah, that's fine.

11 BY MR. TEPFER:

12 Q. Do you -- is this the person you remember as
13 Lionel White Senior, or do you just not recall?

14 A. Yes. This -- this is him.

15 Q. Okay. Seeing this picture, do you recall the
16 arrest of Lionel White?

17 A. No, I don't -- I don't recall the -- the
18 arrest of him

19 Q. Okay. Look at that second page of that photo,
20 City-LW-67. Do you see that scratch on the side of his
21 -- Lionel White Senior's face?

22 A. Yes.

23 Q. Okay. Do you recall Lionel White Senior and
24 Alvin Jones ever getting in a physical altercation?

25 A. No.

1 Q. Do you know Kimberly Collins (phonetic)?

2 A. Name doesn't sound familiar.

3 Q. Rasaan Brakes (phonetic)?

4 A. Nope.

5 Q. All right. I'm going to show you Exhibit 18.

6 This is City-LW-30 to 31. I want you to take as much
7 time as you need to read this. Okay. Does that -- you
8 -- have you finished reviewing --

9 (EXHIBIT 18 MARKED FOR IDENTIFICATION)

10 A. Yes.

11 BY MR. TEPFER:

12 Q. -- Exhibit 18? Does that in any way refresh
13 your recollection of this arrest?

14 A. No, it doesn't.

15 Q. If you have any idea why you're named as a
16 witnessing officer on that report in number 18 -- in Box
17 18?

18 A. Because it's a -- it was a team arrest.

19 Q. Okay. But beyond it being a team arrest, and
20 it being the practice of your team to list everyone on
21 the team on the police reports, do you have any
22 recollection of any act you took in regards to this
23 arrest?

24 A. No, I don't.

25 Q. Okay. Do you recall prior to this April 24,

1 2006, sometime in March, three to four weeks earlier,
2 going to the same -- or going with Watts to Lionel
3 White's home and threatening to break the door down, or
4 tear the door down, if he didn't open the door?

5 A. No.

6 Q. No recollection of that?

7 A. No. No recollection.

8 MR. TEPFER: Okay. Can we go off the record
9 for a second?

10 MR. PALLES: Sure.

11 THE VIDEOGRAPHER: We're off the record. The
12 time is 11:35 a.m.

13 (OFF THE RECORD)

14 THE VIDEOGRAPHER: Back on the record. The
15 time is 11:36 a.m.

16 MR. PALLES: All right. I understand that Mr.
17 Tepfer's going to go into a bunch of arrests that
18 are not involved in the target cases but are
19 contemporaneous -- roughly contemporaneous to Mr.
20 White's arrest on April 24, 2006. I object to the
21 relevance of this line of questioning, but I'm going
22 to allow it to proceed.

23 MR. TEPFER: Thank you. Actually, I guess I
24 need a minute to get this ready. Hold on.

25 MR. BAZAREK: Eric, I think he called it the

1 target cases, the test cases.

2 MR. PALLES: I -- you know, I always do. Why
3 did -- I did that in court the other day. Test
4 cases. I'll never get that right.

5 MR. TEPFER: I think someday, Eric, you may get
6 it right. I have confidence in you.

7 MR. PALLES: Yeah. In my closing.

8 MR. TEPFER: I'm missing one. I've got five in
9 this one and three in that one. Okay.

10 MR. PALLES: Are these going to -- just give
11 them to her. Are these --

12 MR. TEPFER: Yeah. I'm just trying to get them
13 all in one and I already screwed up. Sorry guys, I
14 need a minute. There's a lot of them. There's
15 going to be one more that's added. I got to see
16 which one I duplicated here. Sorry, I'm sorry. All
17 right, put that one as the fourth one, maybe.

18 MR. PALLES: Whatever.

19 MR. TEPFER: Or you want to do this, the last
20 one?

21 MR. PALLES: Huh?

22 MR. TEPFER: Nothing. Put that at the end. All
23 right.

24 MR. PALLES: See you.

25 MR. TEPFER: Here we go. We're going to mark

1 as Exhibit 19, City-LW-127 to 128. And I give a
2 whole bunch.

3 (EXHIBIT 19 MARKED FOR IDENTIFICATION)

4 MR. PALLES: It would be the same, so...

5 MR. TEPFER: Okay. So that is -- that -- which
6 one? What's the name on that one? Can I just see
7 real quick? Sorry. All right. That's the George
8 Green arrest vice case report. Then Exhibit 20 is
9 City-LW-121 to 122. This is the Teresa Butler vice
10 case report. And 21, it's going to be LW-113 to
11 114. This is the John Pierce vice case report. 22
12 is going to be LW-125 to 126. This is the Dale
13 Morrow Vice Case Report.

14 (EXHIBIT 20 MARKED FOR IDENTIFICATION)

15 (EXHIBIT 21 MARKED FOR IDENTIFICATION)

16 (EXHIBIT 22 MARKED FOR IDENTIFICATION)

17 THE WITNESS: Excuse me.

18 MR. TEPFER: Okay. Then 20 -- where are we at?

19 23?

20 THE REPORTER: 23.

21 BY MR. TEPFER:

22 Q. 23 is LW-111 to 112. This is the Cleothus
23 Morris vice case report. I might want -- all right. 24
24 is LW-119 to 120. It's the Lynn Howard vice case
25 report. 25 is LW-123 to 124. It's the Charles Riley

1 vice case report. And 26 is LW-117 to 118. And that's
2 the Lorener Williams vice case report. All right. You
3 can go ahead and take as much time as you need. I want
4 you to look at all of those exhibits. They all relate
5 to arrest on April 24, 2006 during various times of that
6 day. Do you want to take a look at them, or you already
7 have them? Just take whatever time you need.

8 (EXHIBIT 23 MARKED FOR IDENTIFICATION)

9 (EXHIBIT 24 MARKED FOR IDENTIFICATION)

10 (EXHIBIT 25 MARKED FOR IDENTIFICATION)

11 (EXHIBIT 26 MARKED FOR IDENTIFICATION)

12 MR. PALLES: What are the --

13 THE WITNESS: I don't know.

14 MR. PALLES: -- you've read what? A couple of
15 them?

16 THE WITNESS: Yeah. Yeah.

17 MR. PALLES: Okay. If you have any specifics
18 about signature lines or whatever, he'll look at
19 those separately.

20 BY MR. TEPFER:

21 Q. Okay. Your name is the reporting officer 2 on
22 the Box 45 and or Box -- I'm sorry, Box 46 on each of
23 those exhibits, correct?

24 A. Yes.

25 Q. Okay. Do you recall the arrests of any of

these individuals?

A. No, I don't. I don't recall.

Q. Okay. And nothing in any of these vice case reports, in anything that you've read, refreshes your recollections?

A. No.

Q. And I just --

A. No.

Q. I know you and your lawyer had a brief conversation, saying you've read a couple of them. I really -- I want to give you a chance to read as much or little as you want to make sure. Because I just want to make sure there's nothing in any of these reports that refresh your recollection. So just whenever you're ready to comfortably answer that question.

A. It --

MR. PALLES: He's -- what you can't ask me anything. He is asking you if you've read enough that you feel comfortable --

THE WITNESS: Oh, yeah. Yeah.

MR. PALLES: Well, is there any -- it -- from what you've seen, will it refresh your recollection if you continue to look at this right now?

THE WITNESS: No. The only thing that we -- is the attempt possession narcotics. To -- to me,

1 that's the only recollection is this is -- was a
2 suppress -- narcotics suppression mission.

3 BY MR. TEPFER:

4 **Q. Where are you looking at?**

5 MR. PALLES: The very top.

6 THE WITNESS: The very top, secondary
7 classification.

8 BY MR. TEPFER:

9 **Q. The very top of which exhibit?**

10 A. It's Box number 2.

11 MR. PALLES: All of them.

12 A. All of them.

13 BY MR. TEPFER:

14 **Q. Box number 2. Okay. Secondary attempt**
15 **possession of narcotics?**

16 A. Yes.

17 **Q. Okay. What did you -- explain. Can you**
18 **repeat what you said?**

19 A. I said that it is a -- a suppression mission
20 of narcotics.

21 **Q. Okay.**

22 A. And that's people who came down and attempted
23 to buy narcotics.

24 **Q. Okay. But do you recall any of these**
25 **individuals, or witnessing, or being involved in the**

1 arrest in any way of any, of these individuals --

2 A. No.

3 Q. -- attempting to buy narcotics that day?

4 A. No, I don't recall.

5 Q. Oh, okay. So you're just saying that point --
6 correct me if I'm wrong, but noting that it was a
7 secondary classification as attempt possession of
8 narcotics, why is that significant to you, I guess, is
9 my question?

10 A. Because all these -- they read the same, just
11 about. And it -- they come in at every 15 minutes --
12 every five minutes, I think.

13 Q. Okay. So is that different than some of the
14 other vice case reports we looked, where it was actual
15 non-attempts, but they were, like, actual possession of
16 narcotics?

17 A. Right.

18 Q. Is that of some significance to you?

19 A. Yes.

20 Q. But that doesn't in any way refresh your
21 recollection of this actual attempt, as opposed --

22 A. No.

23 Q. Okay. I got it. I think that's all on that
24 one. You don't recall one way or the other -- actually,
25 it's not one, whether you were at 575 East Browning on

April 24, 2006?

A. No.

Q. Okay.

A. No.

Q. Okay. We're going to get lunch today.

MR. PALLES: Great.

BY MR. TEPFER:

Q. Okay. Okay. Do you know who Bobby Coleman is?

A. Yes.

Q. You do?

A. Yes, sir.

Q. What do you recall about Bobby Coleman?

A. That he was always in Ida B. Wells.

Q. Okay. Could you recognize him if you saw him?

A. Yes.

Q. Have you ever arrested Bobby Coleman?

A. I can't remember.

Q. Is there anything else you remember about him, besides that he was always in Ida B. Wells?

A. None other than that. And he was -- yeah. Narcotics.

Q. He wasn't -- he was narcotics?

A. Yeah.

Q. You mean he was involved? What do you mean by