

Exhibit 2

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

LIONEL WHITE,)	
)	No. 17 C 2877
Plaintiffs)	
v.)	Hon. Sharon Johnson Coleman
)	
)	Hon. Sheila M. Finnegan, M.J.
CITY OF CHICAGO et al.,)	
)	
Defendants)	

**DEFENDANT KALLATT MOHAMMED'S ANSWERS TO PLAINTIFF
LIONEL WHITE'S FIRST SET OF INTERROGATORIES**

Defendant, Kallatt Mohammed, (herein "Defendant Mohammed" or "Defendant"), in response to Plaintiff Lionel White's First Set of Interrogatories, states as follows:

1. State your full name, month and year of birth, and place of birth.

ANSWER: Kallatt Mohammed, November 1964, Chicago, Illinois.

2. List each high school, college, university, graduate school, trade or technical school which you have attended and your dates of attendance in each and what degree or certificate, if any, you received from such institution.

ANSWER: I attended Hyde Park Career Academy, 1978-82 and graduated in 1982.

3. Did you ever serve in the military? If so, state:

- a. rank;
- b. serial number;
- c. branch of service;
- d. approximate dates of entry and discharge;
- e. the type of discharge, whether honorable or otherwise, and if for medical reasons, state and describe the medical disability with reasonable specificity; and
- f. whether you were ever the subject of any disciplinary proceedings in the military service, and if so, describe the nature and state the outcome of such proceedings.

ANSWER: Objection; this interrogatory is overly broad, unduly burdensome, irrelevant to any party's claim or defenses and not proportionate to the needs of this case. Without waiver, I served in the Army National Guard from 1982-86, ending with the rank of private, first class. I was honorably discharged and was never disciplined.

4. Identify each of your employers, in chronological order, starting with your graduation from high school and including all current and part- time employment. In your answer include the following:

- a. the name and address of each employer;
- b. the date you began such employment;
- c. a general description of your job duties;
- d. the date of termination of said employment;
- e. a general description of your job duties at the time or said termination; and
- f. the reason for your termination.

ANSWER: Objection; this interrogatory is overly broad, unduly burdensome, irrelevant to any party's claim or defenses and not proportionate to the needs of this case. Without waiver, to the best of my recollection, I worked for National Car Rental from approximately 1986 to 1994, maintaining cars. I left to take a job as a bus driver with the CTA from approximately 1994 to 1996, when I became a Chicago Police officer. I resigned in 2012. At that time, I was a patrol officer assigned to the Second District tactical team.

5. Have you ever been the subject of any disciplinary proceedings, including but not limited to citizen complaints to the Police Department of the City of Chicago, which resulted in the imposition of any disciplinary action, including but not limited to a written or verbal warning, suspension, or reassignment?

ANSWER: Objection; this interrogatory is overly broad, unduly burdensome, irrelevant to any party's claim or defenses and not proportionate to the needs of this case. Without waiver, you are directed to the City of Chicago's Production in Baker v City of Chicago, 16 C 8940, including pages City BG 00065,00080, 00196-00261.

6. Describe any awards, recognitions, or commendations, you have received in the course of your employment as a Chicago police officer.

ANSWER: Objection; this interrogatory is overly broad, unduly burdensome, irrelevant to any party's claim or defenses and not proportionate to the needs of this case. Without waiver, my complimentary history is provided as KM – LW 00072.

7. During the time you have worked as a Chicago police officer, did you ever apply for a promotion to a higher paying position over your present rank? Unless you answer is an unqualified "no," state, for each position applied to, the name of the position, the date you applied for the promotion, and the result of your application.

ANSWER: No.

8. Have you ever been a party, whether plaintiff or defendant, in any lawsuit? If so, state:

- a. the court in which filed;
- b. the year filed;
- c. the title and docket number of said case; and
- d. the outcome of said case.

ANSWER: Objection; this interrogatory is overly broad, unduly burdensome, irrelevant to any party's claim or defenses and not proportionate to the needs of this case. Without waiver, *United States v. Mohammed*, 12 CR 87-2 (N.D. IL) (Resulted in guilty plea); *Camp v City of Chicago, et al.*, 08 C 858 (N.D. IL) (settled); *Baker v City of Chicago*, 16 C 8940 (N.D. IL) (pending); *White v City of Chicago*, 17 C 2877 (N.D. IL) (pending); *Carter v. City of Chicago*, 17 C 7241 (N.D. IL) (pending).

9. Have you ever been arrested, irrespective of whether or not the arrest has been expunged or sealed and irrespective of whether or not the arrest was made while you were a juvenile? If so, please state for each such arrest:

- a. The date and place of arrest;
- b. The arresting authority and names of arresting officers;
- c. Whether any criminal charges were filed in connection with the arrest, and, if so, the jurisdiction and disposition of the arrest;
- d. Whether the records of the arrest have been expunged or sealed.

ANSWER: Defendant Mohammed was arrested by the Federal Bureau of Investigation on February 12, 2012 and charged in the Northern District of Illinois under

Title 18, United States Code, Sections 641 and 2. See #8, above. The records of the arrest have not been expunged or sealed.

10. Have you ever been interviewed (either in person, by telephone, or through any other means) by any law enforcement officer in connection with the investigation of any alleged wrongdoing, whether on your part or on the part of another? If so, state for each such interview:

- a. The date and place of the interview;
- b. The interviewing authority and name of the interviewing person or persons;
- c. The subject matter of the interview; and
- d. Whether you were advised of any constitutional or statutory rights prior to or during the interview, and if so, the nature of the advice.

ANSWER: Defendant states he spoke with FBI agents Hart and Henderson in February 2012, and, on information and belief, with these agents and with AUSAs Ben Langer and Maggie Schneider in May 2012. To the best of his recollection, neither discussion involved Lionel White; they mostly involved discussions involving evidence against Mohammed in the criminal case, 12 CR 87-2. Some of the May 2012 communications were related to claims of misconduct against Watts. The February interview took place outside my home, the May interview at the office of the United States Attorney.

11. At any time, did Plaintiff make any statements (written, oral, or otherwise) to you or to anyone in your presence? If so, state:

- a. the nature, substance, and description of any such statement, setting forth verbatim any oral statement and providing any written or other recording, or setting forth the contents thereof verbatim, or if you cannot recall the statement verbatim, setting forth its contents as completely and accurately as possible;
- b. the identity of each person present when each such statement was made; and
- c. the nature, substance, and description of any statement you made to Plaintiff, setting forth verbatim such oral statement(s) and providing any written or other recording, or setting forth the contents thereof verbatim, or if you cannot recall the statement(s) verbatim, setting forth its substantive contents as completely and as accurately as possible.

ANSWER: Upon the advice of counsel, Defendant Mohammed respectfully invokes the rights guaranteed to him by the Fifth Amendment of the United States Constitution regarding the subject matter of this interrogatory.

12. Which, if any, of the police reports identified below contain false or inaccurate statements? For each such false or inaccurate statement, identify the statement, state the manner in which the statement is false or inaccurate, and state what the true or accurate statement should be.

- a. Arrest Report, LIONEL WHITE 00368-00370
- b. Vice Case Report, LIONEL WHITE 00371-00372
- c. Inventory Sheet, LIONEL WHITE 00078-00081
- d. Tactical Response Report, LIONEL WHITE 00067

ANSWER: Upon the advice of counsel, Defendant Mohammed respectfully invokes the rights guaranteed to him by the Fifth Amendment of the United States Constitution regarding the subject matter of this interrogatory.

13. Does the transcript of your statement regarding Plaintiff's complaint, LIONEL WHITE 000135, contain false or inaccurate statements? If yes, identify each such statement, state the manner in which the statement is false or inaccurate, and state what the true or accurate statement should be.

ANSWER: Upon the advice of counsel, Defendant Mohammed respectfully invokes the rights guaranteed to him by the Fifth Amendment of the United States Constitution regarding the subject matter of this interrogatory.

14. Describe with reasonable specificity your conduct during, immediately preceding, and immediately following the arrest of plaintiff on April 24, 2006.

ANSWER: Upon the advice of counsel, Defendant Mohammed respectfully invokes the rights guaranteed to him by the Fifth Amendment of the United States Constitution regarding the subject matter of this interrogatory.

15. Have you ever planted drugs or guns on a person, seen another police officer plant drugs or guns on a person, and/or directed another police officer to plant drugs or guns on a person? If so, for each incident, state:

- a. the full names and star numbers of all officers involved;
- b. the full name of the person on whom drugs or guns were planted;

- c. the date, time, and location of the incident; and
- d. the complete nature of the actions that you and any other police officer took in the incident.

ANSWER: Upon the advice of counsel, Defendant Mohammed respectfully invokes the rights guaranteed to him by the Fifth Amendment of the United States Constitution regarding the subject matter of this interrogatory.

16. Are you aware that you will be personally responsible for the payment of any award of punitive damages that may be made against you in this lawsuit?

ANSWER: Objection. The interrogatory is vague, argumentative, calls for a legal conclusion, and seeks information that is irrelevant, disproportionate to the needs of the case and premature. Moreover, my understanding of my potential liability for punitive damages derives from my discussions with my attorneys, which are privileged.

17. Do you own or do you have any interest in real property? Unless your answer is an unqualified “no,” state the location of any such property, the name or names in which the title is held, and the nature of your interest.

ANSWER: Objection. The interrogatory seeks information that is irrelevant, disproportionate to the needs of the case and premature. Only Defendant’s current assets and liabilities at the time of trial are relevant to the punitive damages claims against him. *King v. Evans*, No. 13-cv-01937, 2015 U.S. Dist. LEXIS 26665 (N.D. Ill. March 5, 2015).

18. Do you own any cash or checking or savings accounts? Unless your answer is an unqualified “no,” state the total value of the items owned and state, for each checking or savings account:

- a. The name of the financial institution the account is in;
- b. The type of account; and
- c. The present balance and the highest balance in the preceding 12 month period;

ANSWER: Objection. The interrogatory seeks information that is irrelevant, disproportionate to the needs of the case and premature. Only Defendant’s current assets and liabilities at the time of trial are relevant to the punitive damages claims against him. *King v. Evans*.

Evans, No. 13-cv-01937, 2015 U.S. Dist. LEXIS 26665 (N.D. Ill. March 5, 2015).

19. Do you own any marketable securities such as stocks, bonds, or United States Government Bonds? Unless you answer is an unqualified “no,” for each security:

- a. The type of security;
- b. The number of shares held (if applicable); and
- c. The present market value of the security.

ANSWER: Objection. The interrogatory seeks information that is irrelevant, disproportionate to the needs of the case and premature. Only Defendant’s current assets and liabilities at the time of trial are relevant to the punitive damages claims against him. *King v. Evans*, No. 13-cv-01937, 2015 U.S. Dist. LEXIS 26665 (N.D. Ill. March 5, 2015).

20. List the persons, if any, who are dependent on you for their support and state your relationship to any such person or persons.

ANSWER: Kallatt Brown Mohammed, son.

21. State your 10-year salary history.

ANSWER: Objection. The interrogatory seeks information that is irrelevant, disproportionate to the needs of the case and premature. Only Defendant’s current assets and liabilities at the time of trial are relevant to the punitive damages claims against him. *King v. Evans*, No. 13-cv-01937, 2015 U.S. Dist. LEXIS 26665 (N.D. Ill. March 5, 2015).

22. Have you signed any financial statement or statements in the past ten years? Unless your answer is an unqualified “no,” state for each financial statement:

- a. Date Prepared;
- b. Entity to which the financial statement was submitted;
- c. Reason for submission of the statement;
- d. Whether you have access to a copy of such statement;
- e.

ANSWER: Objection. The interrogatory seeks information that is irrelevant, disproportionate to the needs of the case and premature. Only Defendant’s current assets and

liabilities at the time of trial are relevant to the punitive damages claims against him. *King v. Evans*, No. 13-cv-01937, 2015 U.S. Dist. LEXIS 26665 (N.D. Ill. March 5, 2015).

23. Identify any financial assets not described already and state their value.

ANSWER: Objection. The interrogatory seeks information that is irrelevant, disproportionate to the needs of the case and premature. Only Defendant's current assets and liabilities at the time of trial are relevant to the punitive damages claims against him. *King v. Evans*, No. 13-cv-01937, 2015 U.S. Dist. LEXIS 26665 (N.D. Ill. March 5, 2015).

24. If you refused to answer any portion of any interrogatory based on your assertion of your rights under the Fifth Amendment, state the basis for each invocation of those rights.

ANSWER: U.S. Constitution, amend. V.

Dated: March 20, 2018

/s/ Eric S. Palles
Eric S. Palles

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VERIFICATION

Under penalty of perjury as provided by law, the undersigned verifies that the answers to the foregoing interrogatories are true and correct to the best of his knowledge, information and belief.

DATE: 2/20/2018

Kallatt Mohammed


Kallatt Mohammed

CERTIFICATE OF SERVICE

I hereby certify that I caused a copy of the foregoing **DEFENDANT KALLATT MOHAMMED'S ANSWERS TO PLAINTIFF LIONEL WHITE'S FIRST SET OF INTERROGATORIES** to be served upon the following counsel of record via email on March 20, 2018:

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Respectfully submitted,

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