

Exhibit 28

<p>1 UNITED STATES DISTRICT COURT 2 NORTHERN DISTRICT OF ILLINOIS 3 EASTERN DIVISION 4 ----- 5 6 In re: Watts Coordinated 7 Pretrial Proceedings Case Number 1:2019cv01717 8 9 ----- 10 11 12 Deposition of Mathew J. Cadman 13 Wednesday 14 September 22nd, 2021 15 16 -at- 17 18 Zoom Remote Deposition 19 20 21 22 23 24 25</p>	<p>Page 1</p> <p>1 For Individual Defendant Officers: 2 Anthony E. Zecchin 3 Hale & Monico 4 53 West Jackson Boulevard 5 Suite 330 6 Chicago, Illinois 60604 7 8 9 For Defendant Ronald Watts: 10 Ahmed A. Kosoko 11 Johnson & Bell, Ltd. 12 33 West Monroe Street 13 Suite 2700 14 Chicago, Illinois 60603 15 16 For Defendants Cadman and Spaargaren: 17 James V. Daffada 18 Megan K. McGrath 19 Leinenweber Baroni & Daffada, LLC 20 120 North LaSalle Street 21 Suite 2000 22 Chicago, Illinois 60602 23 24 25</p> <p>Page 2</p> <p>1 APPEARANCES 2 3 For the Plaintiffs: 4 Scott Rauscher 5 Loevy & Loevy 6 311 North Aberdeen Street 7 3rd Floor 8 Chicago, Illinois 60607 9 10 For the Plaintiffs: 11 Joel Flaxman 12 Law Offices of Kenneth N. Flaxman, P.C. 13 200 South Michigan Avenue 14 Suite 201 15 Chicago, Illinois 60604 16 17 For Defendants City of Chicago and Supervisory 18 Officials: 19 Daniel M. Noland 20 Reiter Burns LLP 21 311 South Wacker Drive 22 Suite 5200 23 Chicago, Illinois 60606 24 25</p>
	<p>Page 4</p> <p>1 For Defendant Kallatt Mohammed: 2 Kathryn Doi 3 Daley Mohan Groble P.C. 4 55 West Monroe Street 5 Suite 1600 6 Chicago, Illinois 60603 7 8 REORDER: Zoom is now recording. Good 9 morning. We are now on the record. Today is 10 Wednesday, September 22nd, 2021. The time is now 10:14 11 a.m. We are meeting remotely today for the deposition 12 of Mathew Cadman in the matter of In re: Watts 13 Coordinated Pre -- Pretrial Proceedings, case number 14 1:2019cv01717. The venue is Northern District of 15 Illinois, Eastern Division. Mr. Cadman, my name is 16 Brenda Portillo. I'm a notary public, and I'm 17 recording this deposition on behalf of Exhibit 5, LLC. 18 This deposition is being recorded remotely via Zoom in 19 accordance with Illinois Public Act 101-0640. Mr. 20 Cadman, would you please confirm your identity by 21 placing a valid picture ID in front of the camera 22 briefly? 23 MR. DAFFADA: That's good. 24 REORDER: Thank you. And Mr. Cadman, are 25 you physically located in the state of Illinois today?</p>

<p style="text-align: right;">Page 5</p> <p>1 MR. CADMAN: Yes, ma'am.</p> <p>2 RECORDER: Thank you. At this time, would</p> <p>3 you please raise your right hand for the oath?</p> <p>4 (Witness sworn)</p> <p>5 RECORDER: Thank you. Would the attorneys</p> <p>6 please state their appearances for the record?</p> <p>7 MR. RAUSCHER: Scott Rauscher for the</p> <p>8 Plaintiffs represented by Loevy and Loevy in the Watts</p> <p>9 Coordinated Proceedings.</p> <p>10 MR. DAFFADA: James --</p> <p>11 MR. FLAXMAN: Joel -- oh, go ahead. Sorry.</p> <p>12 MR. DAFFADA: James Daffada -- oh, I'm sorry,</p> <p>13 I didn't see you there, Joel. Go ahead.</p> <p>14 MR. FLAXMAN: Oh, okay. Joel Flaxman for the</p> <p>15 Flaxman Plaintiffs.</p> <p>16 MR. DAFFADA: James Daffada and Megan McGrath</p> <p>17 for Mat Cadman, Defendant.</p> <p>18 MR. ZECCHIN: Anthony Zecchin for the</p> <p>19 individual Defendant officers except for Cadman and</p> <p>20 Spaargaren from Hale and Monico.</p> <p>21 MR. KOSOKO: Ahmed Kosoko on behalf of Ronald</p> <p>22 Watts, Johnson and Bell.</p> <p>23 MS. DOI: Kathryn Doi on behalf of Defendant</p> <p>24 Mohammed.</p> <p>25 MR. NOLAND: Daniel Noland for the City of</p>	<p>1 let's -- let me --</p> <p>2 MR. DAFFADA: Well, keep --</p> <p>3 MR. RAUSCHER: I'll check it on this -- I'll</p> <p>4 check it on this one.</p> <p>5 Q. Can you -- were you -- in the first case you</p> <p>6 mentioned, were you a defendant or a plaintiff or just</p> <p>7 a witness?</p> <p>8 A. That first case, I was a witness.</p> <p>9 MR. RAUSCHER: Jim, it sounds fine.</p> <p>10 MR. DAFFADA: Okay, good. 0:03:49</p> <p>11 Q. Okay. And then in the second case, you were</p> <p>12 also a witness, it sounds like?</p> <p>13 A. Yes, sir.</p> <p>14 Q. And were they both involving your time on the</p> <p>15 Chicago Police Department?</p> <p>16 A. No, sir.</p> <p>17 Q. Okay. Was the -- were either of them -- did</p> <p>18 either of them -- were either of them connected to your</p> <p>19 work?</p> <p>20 A. One was, the -- the -- the first one I</p> <p>21 mentioned, sir.</p> <p>22 Q. Okay.</p> <p>23 A. I don't recall the year, 2005, 2006.</p> <p>24 Q. And do you know how that case was resolved?</p> <p>25 A. No, sir.</p>
<p style="text-align: right;">Page 6</p> <p>1 Chicago and supervisory Defendants.</p> <p>2 RECORDER: And that completes the required</p> <p>3 information. We can proceed.</p> <p>4 EXAMINATION</p> <p>5 BY MR. RAUSCHER:</p> <p>6 Q. Mr. Cadman, can you please say and spell your</p> <p>7 name?</p> <p>8 A. My first name is Mathew, M-a-t-h-e-w. My</p> <p>9 last name is Cadman, C-a-d-m-a-n.</p> <p>10 Q. Have you ever been deposed before?</p> <p>11 A. Yes. 0:02:38</p> <p>12 Q. How many times have you been deposed?</p> <p>13 A. Twice.</p> <p>14 Q. Can you tell me what the -- when those were</p> <p>15 and what the cases were about?</p> <p>16 A. One was approximately 2005, 2006 and involved</p> <p>17 a battery, that was as a police officer, and one as a</p> <p>18 child that involved a -- was a witness to a battery, I</p> <p>19 don't recall how old I was.</p> <p>20 MR. DAFFADA: Hey, Scott?</p> <p>21 MR. RAUSCHER: Yeah.</p> <p>22 MR. DAFFADA: I don't mean to interrupt. Are</p> <p>23 you getting a drag on Mat? In other words, his lips</p> <p>24 are moving, but the voice is not timed?</p> <p>25 MR. RAUSCHER: I don't know, let me try --</p>	<p style="text-align: right;">Page 8</p> <p>1 Q. Do you remember any of the parties to the</p> <p>2 case, plaintiffs or defendants?</p> <p>3 A. Yes.</p> <p>4 Q. What -- who -- which -- who was a -- who --</p> <p>5 which parties do you remember to that case?</p> <p>6 A. It was both police officers, one police</p> <p>7 officer's name was Lance Rezny, the other police</p> <p>8 officer's last name was Howard, I don't recall his</p> <p>9 first name.</p> <p>10 Q. Okay. Do you remember the plaintiff, the</p> <p>11 person who sued?</p> <p>12 A. To the best of my understanding, sir, both of</p> <p>13 those names that I just mentioned were plaintiffs and</p> <p>14 also defendants.</p> <p>15 Q. They sued and they were also being sued?</p> <p>16 A. To the best of my recollection, sir, yes. 0:05:13</p> <p>17 Q. Okay. So just a few ground rules for today,</p> <p>18 and I think so far we've been doing -- we're off to a</p> <p>19 good start on this one, which is to make sure the court</p> <p>20 reporter can transcribe everything, please let me</p> <p>21 finish my questions before you start answering, even if</p> <p>22 you think you know what I'm going to ask, and I will do</p> <p>23 my best to let you answer the questions before I ask</p> <p>24 another one. Is that fair?</p> <p>25 A. Yes, sir.</p>

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<p>1 Q. And then the other one is, if you don't 2 understand what I'm asking you, just let me know and I 3 will do my best to clarify. If you don't do that, I'm 4 going to assume that you understood the question. Is 5 that fair also?</p> <p>6 A. Yes.</p> <p>7 Q. Can you tell me what you did to prepare for 8 today's deposition?</p> <p>9 A. I met with my lawyer.</p> <p>10 Q. All right. Which lawyer did you meet with?</p> <p>11 A. Mr. Daffada. 0:06:04</p> <p>12 Q. Did you meet with anybody else other than Mr. 13 Daffada?</p> <p>14 A. Megan. I'm -- I'm sorry, I -- I -- her last 15 name has slipped my mind.</p> <p>16 Q. Megan McGrath maybe?</p> <p>17 A. Yes, sir.</p> <p>18 Q. How long did you meet with your lawyers?</p> <p>19 A. I don't recall.</p> <p>20 Q. How many times did you meet with them to 21 prepare for your deposition?</p> <p>22 A. I don't recall.</p> <p>23 Q. Was it more than once?</p> <p>24 A. Yes.</p> <p>25 Q. When was the most recent time you met with</p>	<p>1 A. I -- I don't recall, sir. 0:07:59</p> <p>2 Q. Do you remember any specific police reports 3 you looked at?</p> <p>4 A. No, sir.</p> <p>5 Q. Do you remember any of the specific 6 complaints you looked at?</p> <p>7 A. No, sir.</p> <p>8 Q. Did you look at or listen to a transcript of 9 -- did you look at a transcript of your COPA interview 10 or listen to a recording of an interview with COPA?</p> <p>11 A. Yes, sir.</p> <p>12 Q. Was that part of your deposition prep?</p> <p>13 A. I -- I don't recall, sir.</p> <p>14 Q. But at some point, you've listened to that or 15 read the transcript?</p> <p>16 A. Yes.</p> <p>17 Q. And then when it -- which one was it or was 18 it both? Did you listen to the recording or did you 19 read a transcript?</p> <p>20 A. I read a transcript. 0:08:57</p> <p>21 Q. What was the reason for reading the COPA 22 interview transcript?</p> <p>23 A. My lawyer asked me to read the transcript.</p> <p>24 Q. All right. Is there anything -- we'll -- 25 we'll talk about that COPA interview later, but did</p>
<p style="text-align: right;">Page 10</p> <p>1 them to prepare for today's deposition?</p> <p>2 A. Yesterday.</p> <p>3 Q. And then how -- about how long did you meet 4 yesterday?</p> <p>5 A. At -- at least four hours. 0:07:01</p> <p>6 Q. All right. Do you remember the -- the last 7 time -- or the most recent time before yesterday you 8 met with them, one or both of them?</p> <p>9 A. I -- I don't recall.</p> <p>10 Q. Did you look at any documents either 11 yesterday or any of the other times you met with your 12 lawyers to prepare for today's deposition?</p> <p>13 A. Yes.</p> <p>14 Q. Can you tell me which documents you looked 15 at?</p> <p>16 A. I looked at police reports.</p> <p>17 Q. Anything other than police reports?</p> <p>18 A. Complaints.</p> <p>19 Q. Anything else?</p> <p>20 A. No, sir.</p> <p>21 Q. And when you say, "complaints," do you mean 22 CRs or the civil lawsuit complaints or something else?</p> <p>23 A. Civil lawsuit complaints.</p> <p>24 Q. Did you look at any of your CRs or any other 25 CRs?</p>	<p style="text-align: right;">Page 12</p> <p>1 anything you looked at to prepare for your deposition 2 today refresh your recollection about any of the events 3 at issue in these cases?</p> <p>4 A. No, sir.</p> <p>5 Q. Do you remember signing interrogatory 6 responses in -- in these cases?</p> <p>7 A. Yes, sir. 0:09:45</p> <p>8 Q. Did you look at those interrogatory responses 9 to prepare for today's deposition?</p> <p>10 A. No, sir.</p> <p>11 Q. Are you familiar with a website or blog, 12 Second City Cop?</p> <p>13 A. I've heard of it, yes, sir.</p> <p>14 Q. Have you ever looked at it?</p> <p>15 A. Yes, sir.</p> <p>16 Q. I'm sorry, did you say, "yes"?</p> <p>17 A. Yes.</p> <p>18 Q. And have you ever posted anything on it?</p> <p>19 A. No.</p> <p>20 Q. Have you ever commented on that blog or 21 written anything else on it?</p> <p>22 A. No.</p> <p>23 Q. Have you ever read anything about Ronald 24 Watts or anyone who worked with or for him on Second 25 City Cop?</p>

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<p>1 A. I don't recall. 0:10:30</p> <p>2 Q. Let's mark as Exhibit 1 a set of</p> <p>3 interrogatory responses, I'm going to bring them up on</p> <p>4 the screen so that you can see them. Sorry, I just</p> <p>5 need a second, I clicked on the wrong thing. All</p> <p>6 right. Are you seeing the document titled "Defendant</p> <p>7 Mathew Cadman's Objections and Answer to -- Answers to</p> <p>8 Plaintiff's First Set of Interrogatories"?</p> <p>9 MR. DAFFADA: I handed him a typed copy.</p> <p>10 A. Yeah, sure.</p> <p>11 MR. RAUSCHER: Oh, he has a typed copy?</p> <p>12 Okay.</p> <p>13 MR. DAFFADA: Yeah. 0:11:33</p> <p>14 MR. RAUSCHER: Well, then I will -- I'm going</p> <p>15 to take them down actually from share screen.</p> <p>16 Q. So we're going to call -- this is going to be</p> <p>17 Exhibit 1, and you know, we may -- we may be able to</p> <p>18 shortcut some of the questions that I would be</p> <p>19 otherwise asking you today, but we'll see. So I'm</p> <p>20 going to ask you -- feel free to take your time to look</p> <p>21 through whatever you want in this, but I -- my first</p> <p>22 specific question is going to be about interrogatory</p> <p>23 five, which starts at page 4, and my question on that</p> <p>24 -- well, actually, I'm going to have one more question</p> <p>25 before, so once you have a chance to look at it, let me</p>	<p>1 A. I believe so, sir, if I've got the right --</p> <p>2 it says, "attestation" at the top.</p> <p>3 Q. Yeah -- yes, "attestation." Do you recall</p> <p>4 signing this attestation under penalty of perjury to</p> <p>5 verify that the answers in the interrogatories that you</p> <p>6 were giving were true and correct to the best of your</p> <p>7 knowledge and belief?</p> <p>8 A. Yes, sir. 0:16:12</p> <p>9 Q. And do you still maintain that the answers in</p> <p>10 the interrogatories are true and correct to the best of</p> <p>11 your knowledge and belief, other than that correction</p> <p>12 you just made?</p> <p>13 A. Yes.</p> <p>14 Q. And then are you still assigned to the fifth</p> <p>15 district?</p> <p>16 A. No, sir.</p> <p>17 Q. What's your current -- when did -- so can you</p> <p>18 fill me in on the -- what you've been doing since the</p> <p>19 -- February 2017 for the Chicago Police Department?</p> <p>20 A. I remained in the fifth district --</p> <p>21 Q. Okay.</p> <p>22 A. -- from 2017 until May of 2020.</p> <p>23 Q. Okay. And then what happened in May 2020?</p> <p>24 A. I retired.</p> <p>25 Q. Was that a voluntary retirement?</p>
<p style="text-align: right;">Page 14</p> <p>1 know when you're done.</p> <p>2 A. I've read it, sir. 0:13:55</p> <p>3 Q. Okay. So is that a complete -- is the answer</p> <p>4 you've given to interrogatory five a complete and</p> <p>5 accurate answer about your assignments and supervisors</p> <p>6 to the best of your recollection?</p> <p>7 A. So there seems to be a -- I don't know if</p> <p>8 it's a typo, it says, "Period, March 2016, assignment,</p> <p>9 unit 055, mounted patrol."</p> <p>10 Q. Yes.</p> <p>11 A. That is actually one name, that's one</p> <p>12 sergeant, Sergeant Baudilio Lopez, it's a first and</p> <p>13 last name where the --</p> <p>14 Q. I see.</p> <p>15 A. Yes, sir.</p> <p>16 Q. Sergeant Baudilio Lopez is the full name?</p> <p>17 A. Yes, sir. I -- I -- I don't know how to</p> <p>18 spell Baudilio.</p> <p>19 Q. Okay. And then any other -- anything else to</p> <p>20 add or change from this?</p> <p>21 A. No, sir. 0:15:11</p> <p>22 Q. Can you also just take a look at what I think</p> <p>23 is the third to last page in this document, which is a</p> <p>24 verification page? Have you had a chance to look at</p> <p>25 that?</p>	<p style="text-align: right;">Page 16</p> <p>1 A. Yes.</p> <p>2 Q. And do you collect a pension from the Chicago</p> <p>3 Police Department?</p> <p>4 A. No. 0:17:07</p> <p>5 Q. Do you collect a pension related to your time</p> <p>6 with the Chicago Police Department?</p> <p>7 A. No.</p> <p>8 Q. And how come you don't get a pension?</p> <p>9 A. I'm too young.</p> <p>10 Q. Will you get it when you're older?</p> <p>11 A. Yes.</p> <p>12 Q. So you're entitled to a pension, or you</p> <p>13 vested, you earned it, you just are too young to</p> <p>14 collect it?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. Was your title always police officer</p> <p>17 with the Chicago Police Department?</p> <p>18 A. Yes. I -- no.</p> <p>19 Q. Okay.</p> <p>20 A. No.</p> <p>21 Q. Can you clarify, please?</p> <p>22 A. Yes, sir. Probationary police officer and</p> <p>23 then police officer.</p> <p>24 Q. Okay. And could you give me your star</p> <p>25 number, please, or star numbers?</p>

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<p>1 A. 17276, 11914, 13109. 0:18:18</p> <p>2 Q. How come you had three star numbers?</p> <p>3 A. I lost two stars, sir.</p> <p>4 Q. Do you remember the years when you had those 5 star numbers?</p> <p>6 A. I don't recall, sir.</p> <p>7 Q. Was 13109 the last one, the one you retired 8 with?</p> <p>9 A. No, sir.</p> <p>10 Q. What was the order that you had them?</p> <p>11 A. 13109 was first.</p> <p>12 Q. Okay.</p> <p>13 A. 11914 was the second.</p> <p>14 Q. Okay.</p> <p>15 A. I don't recall when -- I don't recall, it was 16 pretty early on, and then 11914, I retained until I 17 lost that. I don't recall when that was, sir.</p> <p>18 Q. And -- and -- and then 17276 was the -- the 19 last one you had?</p> <p>20 A. Yes. 0:19:28</p> <p>21 Q. Were you on any tactical teams when you were 22 a Chicago Police Officer?</p> <p>23 A. Yes.</p> <p>24 Q. What tactical team or teams did you serve on 25 as a police officer?</p>	<p>1 Housing South?</p> <p>2 A. Yes, sir. 0:21:41</p> <p>3 Q. And then when you were on the third watch, 4 were you just a regular patrol officer?</p> <p>5 A. Yes, sir.</p> <p>6 Q. Were your duties and obligations, 7 responsibilities different as a patrol officer than 8 they were as a tactical team officer?</p> <p>9 A. Yes, they were.</p> <p>10 Q. Can you tell me what the differences were 11 between responsibilities as a tactical team officer and 12 as a patrol officer?</p> <p>13 A. As a patrol officer, I wore a uniform.</p> <p>14 Q. Other than the dress, was there any 15 difference between the jobs?</p> <p>16 A. Not that I recall, sir. 0:22:37</p> <p>17 Q. What did you wear when you were a tactical 18 team officer?</p> <p>19 A. Civilian dress.</p> <p>20 Q. Did you have a -- did you like one role 21 better than the other, patrol officer versus tactical 22 team officer?</p> <p>23 A. Yes.</p> <p>24 Q. Which one did you like better, tactical team 25 or patrol?</p>
<p style="text-align: right;">Page 18</p> <p>1 A. I served on a tactical team in Ida B. Wells 2 Public Housing South and a tactical team in Public 3 Housing West.</p> <p>4 Q. And was -- so the Public Housing South, 5 that's about the January 2000 to fall 2003 time period?</p> <p>6 A. I'm sorry, sir, can you repeat the question?</p> <p>7 Q. Sure. I just want to make sure I get the 8 timing right. Is the -- is the time -- is the time you 9 were on the tactical team at Ida B. Wells January 2000 10 to about the fall of 2003?</p> <p>11 A. Yes, sir, that's the approximate, yes, sir. 0:20:40</p> <p>12 Q. And then was the Public Housing West TAC team 13 after that?</p> <p>14 A. It was later, sir, it wasn't immediately 15 after.</p> <p>16 Q. Where did you go immediately after you left 17 the tactical team in Public Housing South?</p> <p>18 A. Immediately after, I went to the third watch 19 of Public Housing South, Ida B. Wells.</p> <p>20 Q. Okay. How long were you on the third watch 21 at Public Housing South for?</p> <p>22 A. Approximately three months, sir, three to 23 four months.</p> <p>24 Q. So was that about -- was that then during the 25 fall of 2003, you were on the third watch at Public</p>	<p style="text-align: right;">Page 20</p> <p>1 A. Patrol.</p> <p>2 Q. Why did you like being a patrol officer 3 better than tactical team officer?</p> <p>4 A. I don't know, just liked it better. I --</p> <p>5 Q. What was it about the patrol job that you 6 liked better than about -- than the tactical team job?</p> <p>7 MR. DAFFADA: Objection. Form. You can 8 answer.</p> <p>9 A. Wearing the uniform. 0:23:56</p> <p>10 Q. And why did you like wearing the uniform?</p> <p>11 A. I -- I don't know, sir.</p> <p>12 Q. Did you have any law enforcement experience 13 before you came to the Chicago Police Department?</p> <p>14 A. No.</p> <p>15 Q. Did you serve in the military?</p> <p>16 A. Yes, sir.</p> <p>17 Q. When did you serve in the military?</p> <p>18 A. January of 1992 to January of 1996 on active 19 duty and some time in the reserves, I -- I don't recall 20 the years off the top of my head.</p> <p>21 Q. Which branch were you in?</p> <p>22 A. United States Marine Corps. 0:24:54</p> <p>23 Q. Did you have a title in the marine corps?</p> <p>24 A. I -- I don't understand the question, sir.</p> <p>25 Q. What -- what was -- what did -- well what did</p>

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<p>1 you -- what was your role in the marines?</p> <p>2 A. I was an enlisted marine.</p> <p>3 Q. And were your responsibilities related -- law</p> <p>4 enforcement related with the marines?</p> <p>5 A. No, sir.</p> <p>6 Q. Can you tell me what your general</p> <p>7 responsibilities were as a tactical team officer in</p> <p>8 Public Housing South?</p> <p>9 A. Arrest activity and visibility --</p> <p>10 Q. Okay. Let's try to do the --</p> <p>11 A. -- in and around --</p> <p>12 Q. Oh, I'm sorry, go ahead. 0:26:04</p> <p>13 A. In and around CHA addresses.</p> <p>14 Q. What is arrest responsibility?</p> <p>15 MR. DAFFADA: Objection. Form --</p> <p>16 Q. All right, yeah, let me rephrase that. You</p> <p>17 said arrest and visibility were the two main areas of</p> <p>18 responsibility as a tactical team officer. Is that</p> <p>19 right?</p> <p>20 A. To the best of my recollection, sir.</p> <p>21 Q. All right. What is arrest -- what do you</p> <p>22 mean when you say, "arrest" as a -- as an area of</p> <p>23 responsibility?</p> <p>24 A. The TAC team -- it was my understanding that</p> <p>25 there was an expectation that the TAC team make</p>	<p>1 A. No, sir.</p> <p>2 Q. Was it -- do you think it's more than 100?</p> <p>3 A. I don't know.</p> <p>4 Q. When you were a tactical team member working</p> <p>5 in Ida B. Wells, would you have been involved in</p> <p>6 arresting people every day you were on duty?</p> <p>7 A. No, sir.</p> <p>8 Q. Would you have been involved in arresting</p> <p>9 people on most days that you were on duty as a tactical</p> <p>10 team officer at Ida B. Wells?</p> <p>11 A. I don't recall, sir. 0:29:04</p> <p>12 Q. What types of crimes were you typically</p> <p>13 arresting people for at Ida B. Wells when you were a</p> <p>14 TAC team member?</p> <p>15 A. Criminal trespass and drug-related arrests.</p> <p>16 Q. Was it drug sales, drug use, or both?</p> <p>17 MR. DAFFADA: Objection. Form. You can</p> <p>18 answer.</p> <p>19 A. Both.</p> <p>20 Q. Was there a particular type of drug or</p> <p>21 particular types of drugs being sold at Ida B. Wells</p> <p>22 that you remember during your time as a tactical team</p> <p>23 member?</p> <p>24 A. Cannabis, heroin, and crack cocaine. 0:30:10</p> <p>25 A. May I take a break?</p>
<p>1 arrests.</p> <p>2 Q. And how would you go about, as a TAC team</p> <p>3 member, gathering information that you need to make</p> <p>4 arrests?</p> <p>5 MR. NOLAND: Vague. Incomplete hypothetical. 0:27:17</p> <p>6 MR. DAFFADA: Join. You can answer if you</p> <p>7 know.</p> <p>8 A. I don't recall.</p> <p>9 Q. Well, I guess one example would be you could</p> <p>10 see someone doing something illegal, another could be</p> <p>11 you did some sort of investigation and determined that</p> <p>12 someone was doing something illegal, so there is</p> <p>13 affirmative acts like that, there are observing things,</p> <p>14 can you give me examples of the types of activities</p> <p>15 that you would have done as a tactical team member to</p> <p>16 arrest people?</p> <p>17 MR. DAFFADA: Objection. Form. You may</p> <p>18 answer.</p> <p>19 A. The best of my recollection, there would be</p> <p>20 on-view arrests based on observation.</p> <p>21 Q. Anything else?</p> <p>22 A. I don't recall, sir. 0:28:06</p> <p>23 Q. Do -- do you have an estimate of how many</p> <p>24 people you arrested or assisted in arresting as a</p> <p>25 Chicago Police Officer?</p>	<p>1 RECORDER: Sorry.</p> <p>2 Q. Sorry, what was the last -- what was the last</p> <p>3 one?</p> <p>4 MR. DAFFADA: Go ahead, you can -- he's</p> <p>5 asking you to repeat --</p> <p>6 A. Cannabis, heroin.</p> <p>7 Q. Yep.</p> <p>8 A. Crack cocaine, and I request --</p> <p>9 Q. I thought you --</p> <p>10 A. I requested to take a brief break, sir.</p> <p>11 MR. RAUSCHER: Oh, of course.</p> <p>12 WITNESS: Thank you, sir.</p> <p>13 MR. RAUSCHER: Sure.</p> <p>14 RECORDER: Off the record, 10:44 a.m.</p> <p>15 (Off the record)</p> <p>16 RECORDER: Back on the record, 10:51 a.m.</p> <p>17 MR. DAFFADA: Yeah -- keep time.</p> <p>18 Q. I'm on mute. Was one type of drug that you</p> <p>19 -- one of the types of drugs that you mentioned,</p> <p>20 cannabis, heroin, or crack cocaine, more prevalent than</p> <p>21 the others during the years when you were a tactical</p> <p>22 team officer at Ida B. Wells?</p> <p>23 A. Yes. 0:31:15</p> <p>24 Q. Which -- which of the drug or drugs was more</p> <p>25 prevalent than the others?</p>

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<p>1 A. Cannabis.</p> <p>2 Q. That was the most prevalent?</p> <p>3 A. To the best of my recollection, yes, sir.</p> <p>4 Q. Do you remember any -- anyone from your time at Ida B. Wells as a tactical team officer or a patrol officer who sold drugs?</p> <p>7 A. No, sir.</p> <p>8 Q. At the time you worked at Ida B. Wells, did you know of -- like, did you have an -- well, did you know who was selling drugs when you worked at Ida B. Wells?</p> <p>12 MR. DAFFADA: Objection. Form. You can answer.</p> <p>14 A. I don't recall, sir.</p> <p>15 Q. You don't recall whether you knew at the time who were the drug dealers at Ida B. Wells?</p> <p>17 A. I -- I don't recall, sir. 0:32:19</p> <p>18 Q. Did you work with any informants when you were at -- an officer working at Ida B. Wells?</p> <p>20 A. I don't recall, sir.</p> <p>21 Q. Did you ever work with any informants as a Chicago Police Department officer?</p> <p>23 A. I -- I don't recall, sir.</p> <p>24 Q. What are you -- what have you been doing since you retired?</p>	<p>1 MR. DAFFADA: Is there anybody else having a problem?</p> <p>3 MR. FLAXMAN: I'm not. 0:34:10</p> <p>4 RECORDER: Everything's fine on my end. If you guys are having a lot of troubles, it might help to log off and log back in.</p> <p>7 WITNESS: I just got a notice that mine isn't stable.</p> <p>9 MS. MCGRATH: Hold on one sec.</p> <p>10 WITNESS: Okay.</p> <p>11 MR. RAUSCHER: That's why it's --</p> <p>12 MR. DAFFADA: All right.</p> <p>13 MR. RAUSCHER: Do you want to --</p> <p>14 MR. DAFFADA: Really -- stay on here. Let me -- I'll leave and come back, Megan and I, we -- we'll -- there's a lot of us on this -- what's that?</p> <p>17 MR. RAUSCHER: Maybe turn off your video. If -- if the other two are using the same connection, want to turn off your video, that might help if you're comfortable with that. Not Mr. Cadman though.</p> <p>21 MR. DAFFADA: Great idea. Turn off my video. I'm going to leave the meeting --</p> <p>23 MR. RAUSCHER: Should we wait for -- is someone staying or --</p> <p>25 MR. DAFFADA: I'm --</p>
<p>1 A. Maintaining my home and yard, looking after my mother, and artwork.</p> <p>3 Q. Okay. So no employment since you retired?</p> <p>4 A. No, sir. 0:33:14</p> <p>5 Q. And the second category of responsibilities you listed as a tactical team officer was visibility. Is that right? List -- you listed the second category --</p> <p>9 A. Yes, sir.</p> <p>10 Q. -- the second category of responsibility you listed was --</p> <p>12 A. Yes, sir -- I'm -- I'm --</p> <p>13 Q. All right. So --</p> <p>14 A. I beg -- beg your pardon, sir, I --</p> <p>15 MR. DAFFADA: He can't hear you, Scott.</p> <p>16 MR. RAUSCHER: All right. Is this better?</p> <p>17 MR. DAFFADA: You don't have to do that.</p> <p>18 WITNESS: Okay.</p> <p>19 MR. DAFFADA: Okay.</p> <p>20 WITNESS: Can you hear him? I --</p> <p>21 MR. DAFFADA: Yeah, we're freezing up here.</p> <p>22 WITNESS: It's like it's stuttering.</p> <p>23 MS. MCGRATH: Maybe --</p> <p>24 Q. Oh, that's probably a --</p> <p>25 A. No, no, no, the equipment is -- okay.</p>	<p>1 MR. RAUSCHER: -- should we just wait?</p> <p>2 RECORDER: The --</p> <p>3 MR. DAFFADA: You can go ahead and keep going.</p> <p>5 RECORDER: -- thing that --</p> <p>6 MR. DAFFADA: Is it working now? 0:35:08</p> <p>7 RECORDER: -- are the ones having the issue with connectivity right now.</p> <p>9 MR. RAUSCHER: Oh, yeah. Sorry, there's three people, I think, in his office sharing the connection.</p> <p>12 RECORDER: Oh, okay.</p> <p>13 MS. MCGRATH: I'm not -- I'm not on.</p> <p>14 MR. DAFFADA: I'm not on either.</p> <p>15 MR. RAUSCHER: Oh. So should we keep going? I'm not --</p> <p>17 MR. DAFFADA: So --</p> <p>18 MR. RAUSCHER: -- sure.</p> <p>19 MR. DAFFADA: Keep talking. Go ahead and give it a try.</p> <p>21 Q. Okay. The -- the second area of responsibility you listed as a tactical team officer was visibility. Is that right?</p> <p>24 A. Yes, sir.</p> <p>25 Q. What is -- what did you mean by "visibility"?</p>

<p style="text-align: right;">Page 29</p> <p>1 A. From the best of my recollection, team 2 members would -- would be assigned to stand in specific 3 buildings of CHA family developments.</p> <p>4 Q. Was -- was this uniformed or not uniformed?</p> <p>5 A. Both. 0:36:23</p> <p>6 Q. And what -- what would you do when you were 7 assigned to stand in a specific building?</p> <p>8 A. Oh, the best of my recollection, stay at that 9 location and -- stay at that location for the tour.</p> <p>10 Q. Would -- would you be arresting people or are 11 you just there to have a presence?</p> <p>12 A. Presence, sir, is -- was the -- the -- to the 13 best of my recollection.</p> <p>14 Q. Do you remember doing that at any specific 15 building in Ida B. Wells?</p> <p>16 A. Not at Ida B. Wells, sir. 0:37:26</p> <p>17 Q. Do you remember doing it generally at Ida B. 18 Wells or was this somewhere else?</p> <p>19 A. Somewhere else, sir.</p> <p>20 Q. All right. Where did you -- where did you do 21 this -- the visibility-type work you're talking about?</p> <p>22 A. The Cabrini-Green CHA family developments, 23 the -- the Rockwell -- beg your pardon, the Rockwell 24 Gardens, and Robert Taylor Homes.</p> <p>25 Q. And what unit or units were you assigned to</p>	<p>1 I -- I thought visibility -- oh, yeah -- to effect 2 arrests and to respond to in-progress calls as well, 3 sir.</p> <p>4 Q. Okay. 0:39:42</p> <p>5 A. I -- I'm -- I'm -- that's -- I just --</p> <p>6 Q. And would -- would the TAC team respond to 7 in-progress calls?</p> <p>8 A. Yes, sir.</p> <p>9 Q. So let me just -- I want to -- tell me if I'm 10 getting this right. There were -- overall, as a 11 tactical team member, there were three areas of primary 12 responsibility that you remember, arrests, visibility, 13 and responding to in-progress calls, but you only did 14 two of those three, the arrests and in-progress calls, 15 when you were working at the Ida B. Wells complex?</p> <p>16 A. I -- I -- I don't recall visibility in the 17 same way of those -- the -- the other locations as Ida 18 B. Wells.</p> <p>19 Q. Okay. So is that that you -- you can't rule 20 out that you were doing visibility, but you don't 21 remember doing it at Ida B. Wells?</p> <p>22 A. No, sir. 0:40:51</p> <p>23 Q. So is -- do you know that you didn't do 24 visibility at Ida B. Wells?</p> <p>25 A. I don't recall, sir. I don't recall.</p>
<p style="text-align: right;">Page 30</p> <p>1 when you did the visibility work?</p> <p>2 A. Ida B. Wells.</p> <p>3 Q. So you were assigned to Ida B. Wells, but you 4 were working -- you were doing that particular job at 5 other locations?</p> <p>6 A. To the best of my recollection, yes, sir.</p> <p>7 Q. What -- did you think that the 8 visibility-type assignments were effective?</p> <p>9 A. I don't recall, sir. 0:38:34</p> <p>10 Q. What -- do you know if that work was done at 11 Ida B. Wells or -- like, as opposed to just -- do you 12 -- when you say you didn't do it at Ida B. Wells, do 13 you mean you or do you mean the team while you were 14 there, or both?</p> <p>15 A. I -- I don't recall the -- the team doing 16 that when we were there -- when I was there.</p> <p>17 Q. Do you know why the team didn't do that type 18 of visibility work while you were there at Ida B. 19 Wells?</p> <p>20 A. No, sir.</p> <p>21 Q. So is it fair to say that the -- the only -- 22 the only area of responsibility your team had that you 23 remember from when you were at Ida B. Wells was to 24 effectuate arrests?</p> <p>25 A. I -- I don't believe that was my answer, sir.</p>	<p>1 Q. All right. Were there differences that you 2 remember in the responsibilities of the tactical teams 3 that you worked on from Public Housing South and Public 4 Housing West?</p> <p>5 A. No, sir.</p> <p>6 Q. Were there --</p> <p>7 A. Not that I recall.</p> <p>8 Q. Were there differences in how the teams were 9 run?</p> <p>10 MR. DAFFADA: Objection. Form. You can 11 answer.</p> <p>12 A. I -- I don't recall differences. I -- I 13 don't recall.</p> <p>14 Q. Was Sergeant Taylor, Albert Taylor, the 15 sergeant for the tactical team in Public Housing West 16 when you were there?</p> <p>17 A. Yes. 0:41:51</p> <p>18 Q. Was -- were -- were there difference -- was 19 Sergeant Ronald Watts your sergeant for the tactical 20 team in Public Housing South?</p> <p>21 A. He -- he was one of three tactical sergeants 22 that I had, I had three different ones.</p> <p>23 Q. In South?</p> <p>24 A. Yeah, in South, yes, sir. He was the last of 25 three.</p>

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<p>1 Q. Okay. Can you tell me who each of the 2 sergeants were who -- because I think there were more 3 than three listed in the answer to that interrogatory, 4 so can you tell me which ones were the sergeants for 5 the Public Housing South tactical team when you were on 6 it?</p> <p>7 A. May -- may I look at the interrogatories one 8 -- one more time, sir?</p> <p>9 Q. Of course. I --</p> <p>10 A. Would that be okay?</p> <p>11 Q. I didn't -- I wasn't saying you listed it 12 wrong, I was just saying I -- I don't know which -- who 13 did what, so. But if -- if you want to look at it, 14 sure.</p> <p>15 A. Yes, sir. Yeah, yes, sir. Excuse me.</p> <p>16 Sergeant Henry Harris is listed. He would have been my 17 first tactical sergeant.</p> <p>18 Q. Okay. 0:43:06</p> <p>19 A. The second would have been Sergeant Silas.</p> <p>20 Q. Okay. And then Watts was third?</p> <p>21 A. And I -- the third -- my third and last would 22 have been Sergeant Watts. The other sergeants, sir, 23 were uniformed assignments.</p> <p>24 Q. Understood. And -- and then in Public 25 Housing South -- sorry, Public Housing West, it was</p>	<p>1 A. I don't recall, sir.</p> <p>2 Q. Who was your least favorite in that group of 3 sergeants?</p> <p>4 A. Sergeant Watts.</p> <p>5 Q. And why was Ronald Watts your least favorite 6 of the four sergeants you had on tactical teams?</p> <p>7 A. I didn't like him.</p> <p>8 Q. What didn't you like about him?</p> <p>9 A. I thought that he was mean to me. I didn't 10 think he was fair to me.</p> <p>11 Q. Did you witness him acting that way, being 12 mean and unfair, to people other than you?</p> <p>13 MR. KOSOKO: Object to form. 0:46:09</p> <p>14 A. Not that I recall, sir.</p> <p>15 MR. KOSOKO: And that was Counsel for Watts 16 on the objection, sorry.</p> <p>17 Q. How -- what did he do that was mean and 18 unfair to you?</p> <p>19 A. I remember him yelling at me in front of the 20 public. I don't remember the specific date or time or 21 location.</p> <p>22 Q. You said he yelled at you in public, but you 23 do or don't remember a specific day or time and 24 location?</p> <p>25 A. I do not remember a specific date or time.</p>
<p>1 only Sergeant Albert Taylor for you?</p> <p>2 A. Yes, sir.</p> <p>3 Q. Did you like working for one or more of those 4 sergeants more than the others?</p> <p>5 A. Yes, sir.</p> <p>6 Q. All right. Who'd you like working for more 7 than the others in that group?</p> <p>8 A. Sergeant Henry Harris. 0:44:07</p> <p>9 Q. Okay. He was the -- he was your favorite?</p> <p>10 A. Yes.</p> <p>11 Q. Why was Sergeant Henry Harris your favorite 12 of -- of that group of four sergeants?</p> <p>13 A. I liked him.</p> <p>14 Q. Just as a person?</p> <p>15 A. Yes.</p> <p>16 Q. What did you like about him?</p> <p>17 A. He was approachable, knowledgeable, fair.</p> <p>18 Q. When you say he was fair, was he fair to 19 officers and civilians, non-officers?</p> <p>20 A. Yes. 0:45:10</p> <p>21 Q. And how did you see it come -- how did you 22 witness him being fair or how did that kind of 23 effectuate or show itself, or play out?</p> <p>24 MR. DAFFADA: Objection. Form. You can 25 answer.</p>	<p>1 Q. Got it. But you do remember him yelling at 2 you in front of the public?</p> <p>3 A. Yes. 0:47:07</p> <p>4 Q. Okay. And what was he yelling at you about?</p> <p>5 A. That I don't recall, sir.</p> <p>6 Q. Did it just happen once or did it happen more 7 than once?</p> <p>8 A. More than once.</p> <p>9 Q. Was it about police work, about how you 10 interacted with people, just even general, like, broad 11 strokes, what was -- what did he kind of pick on you 12 about?</p> <p>13 MR. DAFFADA: Objection. Form. You can 14 answer.</p> <p>15 A. I don't recall, sir.</p> <p>16 Q. Did it happen frequently?</p> <p>17 A. I don't recall, sir.</p> <p>18 Q. Do you recall if there was something specific 19 that happened that started Watts acting like this to 20 you?</p> <p>21 MR. DAFFADA: Objection. Form. You can 22 answer.</p> <p>23 A. I don't recall, sir. 0:48:09</p> <p>24 Q. Did you ever talk to Watts about the way he 25 treated you?</p>
	Exhibit 5, LLC

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<p>1 A. Not that I recall, sir.</p> <p>2 Q. How come you never talked to Watts about the 3 way he treated you?</p> <p>4 MR. DAFFADA: Objection. Form. You can 5 answer.</p> <p>6 A. I don't know.</p> <p>7 Q. Did you want to talk to him about it?</p> <p>8 A. I don't know, sir.</p> <p>9 Q. Have you had other CPD officers, including 10 supervisors, treat you the way Watts treated you?</p> <p>11 A. Not that I recall, sir. 0:48:59</p> <p>12 Q. Was there -- what else -- was there anything 13 else about Watts that you didn't like beside the fact 14 that he was mean and not fair to you?</p> <p>15 A. I didn't care for Watts' off-duty behavior.</p> <p>16 Q. Tell me about what -- what didn't you like 17 about Watts' off-duty behavior?</p> <p>18 A. I recall sometime in 2003, he told a story, I 19 think I just heard it, I don't think he told me, that 20 he interfered on a crime scene --</p> <p>21 Q. Okay. Tell me --</p> <p>22 A. -- off duty.</p> <p>23 Q. Tell me more about that.</p> <p>24 A. To the best of my recollection --</p> <p>25 MR. DAFFADA: Go on.</p>	<p>1 directly or if you heard it from someone else?</p> <p>2 A. He said it somewhere in my presence --</p> <p>3 Q. Okay.</p> <p>4 A. -- at the station.</p> <p>5 MR. DAFFADA: You -- tone down, you're --</p> <p>6 WITNESS: I -- I'm sorry.</p> <p>7 MR. DAFFADA: Yeah, you're -- the microphone 8 will pick you up.</p> <p>9 WITNESS: I'm shouting. I do that on phones 10 too.</p> <p>11 Q. What was his tone like when he was saying it, 12 what was his demeanor like?</p> <p>13 A. Angry.</p> <p>14 Q. What -- when -- when you -- what was he -- 15 did he -- how did he express his anger when he was 16 telling the story?</p> <p>17 A. To the best of my recollection, his voice was 18 raised and he was name-calling the officers that -- 19 that stopped him.</p> <p>20 Q. What kind of names was he calling them?</p> <p>21 A. That I do not recall, sir. 0:52:44</p> <p>22 Q. Do you remember which officers had stopped 23 him?</p> <p>24 A. I -- I -- I never knew which officers that 25 were or exactly what location that was at, sir, it was</p>
<p style="text-align: right;">Page 38</p> <p>1 A. Sir? 0:50:12</p> <p>2 Q. Sorry, I was --</p> <p>3 A. To the best of my recollection --</p> <p>4 MR. DAFFADA: What did you say, Scott?</p> <p>5 MR. RAUSCHER: Sorry, he was freezing up on 6 my screen, but now I can hear it.</p> <p>7 MR. DAFFADA: Just do that --</p> <p>8 Q. Go ahead.</p> <p>9 MR. DAFFADA: -- tell him the -- answer the 10 question.</p> <p>11 Q. Yeah, please go ahead and tell me what -- 12 tell me more about Watts talking about interfering in a 13 crime scene while he was off duty.</p> <p>14 A. To the best of my recollection, Watts related 15 that his car was parked on a crime scene off duty and 16 that he walked under the crime scene tape and that he 17 was stopped and briefly detained by officers on that 18 crime -- on-duty officers by that crime scene. He also 19 related at that time, to the best of my recollection, 20 that he was disarmed by those police officers.</p> <p>21 Q. Do you know what kind of crime scene it was?</p> <p>22 A. No. 0:51:25</p> <p>23 Q. Do you know why he was there?</p> <p>24 A. No.</p> <p>25 Q. And do -- do you remember if he told you this</p>	<p style="text-align: right;">Page 40</p> <p>1 off duty.</p> <p>2 Q. Do you -- do you remember who else was around 3 when Watts was telling this story?</p> <p>4 A. No, sir.</p> <p>5 Q. Do you know if there was any physical 6 altercation between Watts and any of the officers who 7 had detained him or anyone else who was at the scene?</p> <p>8 A. No, sir.</p> <p>9 Q. Is there anything else you remember about 10 that story that Watts was -- that Watts told about him 11 being at that crime scene off duty?</p> <p>12 A. To the best of my recollection, he was 13 handcuffed and placed in the back of a squad car, 14 that's what I recall him saying.</p> <p>15 Q. Is there any -- any other off-duty behavior 16 that you remember from -- about Watts that you didn't 17 like?</p> <p>18 A. Not that I recall, sir. 0:54:05</p> <p>19 Q. Do you remember talking about Watts saying 20 something about 9/11 when you met with COPA?</p> <p>21 A. Yes, I do.</p> <p>22 Q. Tell me -- tell me about the -- that 23 incident.</p> <p>24 A. I can't remember verbatim, sir. The posture 25 of the conversation was that he seemed more sympathetic</p>

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<p>1 to the attackers than the victims, that's how I took 2 his comments. I don't recall verbatim what he said, I 3 -- I just remember being angry. 4 Q. Do -- did you -- did you say anything -- do 5 you remember saying anything to him? 6 A. No, sir. 0:55:00 7 Q. And I think you also said something to COPA 8 about Watts having gang ties and maybe he -- that 9 wasn't a life he left behind before he came to the 10 police force? 11 MR. DAFFADA: Objection. There's no question 12 pending. 13 Q. Okay. Did you tell COPA something about 14 Watts having ties to gangs and maybe not leaving that 15 life behind when he joined the police force? 16 A. Yes, I did. 17 Q. Can you please tell me more about Watts 18 having gang ties and maybe not leaving that life behind 19 when he joined the Chicago Police Department? 20 MR. KOSOKO: Object to form. 21 MR. DAFFADA: You can answer. 22 A. Based on his own statements. 0:55:53 23 Q. Based on his own statements what? 24 A. Based -- based on his own statements. I -- I 25 don't -- don't recall verbatim. I recall that he</p>	<p>1 is pending. 2 MR. RAUSCHER: That's a question. 3 MR. DAFFADA: He -- 4 MR. RAUSCHER: It's a leading question, but 5 it's a question. 6 MR. DAFFADA: I thought it was a statement, 7 but can you just say it again, please? 8 Q. When you heard Watts talking about gang ties 9 in 2003, you heard something more than just he had 10 sympathy to gang ties -- to gangs? 11 MR. KOSOKO: Objection to form. 0:58:19 12 A. I can't remember what was said, sir, I just 13 recall being worried that -- that he was too 14 comfortable with members of street gangs. 15 Q. And that you -- you also -- you took it to 16 mean that he was too comfortable with street gangs even 17 while he was a sergeant, not just before he joined the 18 police force? 19 MR. DAFFADA: Objection. Form. 20 MR. KOSOKO: Join. 21 MR. DAFFADA: You can answer. 22 A. I was worried of that possibility, sir. 23 Q. Why were you worried of that possibility? 24 A. That -- it was not in keeping with my own 25 personal sensibilities as a police officer.</p>
<p>1 related, in my presence at some point in 2003, that he 2 had, in the past, gang ties. 3 Q. Ties to which gang or gangs? 4 A. I don't know, sir. 5 Q. And when you say Watts had gang ties, what 6 did -- what did you understand that to mean when he 7 said it? 8 A. I took it to mean as sympathy towards Chicago 9 street gangs, or some Chicago street gangs. 10 Q. Why did you take it to mean that he had 11 sympathy to street gangs, or at least a street gang? 12 A. I don't know, sir. 0:57:11 13 Q. Did you think that Watts had been in a gang, 14 had been a gang member? 15 A. I don't recall that specifically, sir. 16 Q. Did you think he had association -- 17 associates who were gang members? 18 A. Yes, sir. 19 Q. And tell me -- can you tell me more about why 20 you thought Watts had associates who were gang members? 21 A. I don't recall what he said, sir, but it was 22 something that he said. 23 Q. So it was -- it was more than just sympathy 24 to street gangs? 25 MR. DAFFADA: Objection. Form. No question</p>	<p>1 Q. So you're -- you didn't have any sympathy to 2 street gangs. Is that fair? 3 MR. DAFFADA: Objection. Form. You can 4 answer. 0:59:19 5 A. I would say I -- I described what I had as 6 empathy, sir. 7 Q. So can you tell me the difference between how 8 you viewed street gangs when you were a police officer 9 and how you understood Watts viewed street gangs? 10 MR. DAFFADA: Objection. Form. You can 11 answer. 12 A. I believe there was unfortunate circumstances 13 for persons growing up in areas exposed to gangs, but I 14 did not agree with their actions. I think of sympathy 15 as that, in some cases, a person may agree with that 16 group's actions or that individual's actions, that's 17 the way I understood -- understand those two words, 18 sir. 19 Q. Okay. Thank you. And then can you tell me 20 what actions you thought Watts agreed with -- what 21 street gang actions you thought Watts agreed with? 22 A. I don't recall, sir. 1:00:23 23 Q. Can you give me just broadly what you thought 24 it was even if there is no specifics? 25 A. No, sir.</p>

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<p>1 Q. And what were the -- when you were a Chicago 2 police officer and specifically in the 2003 time 3 period, what actions did street gangs undertake to your 4 knowledge?</p> <p>5 MR. DAFFADA: Objection. Form.</p> <p>6 A. To -- to my knowledge, they engaged in -- 7 possibly in gun violence, engaged in dog fighting, 8 engaged in robbery.</p> <p>9 Q. Anything else? 1:01:22</p> <p>10 A. No, sir.</p> <p>11 Q. What -- what about drugs?</p> <p>12 A. I would add drugs.</p> <p>13 Q. Selling drugs?</p> <p>14 A. Perhaps.</p> <p>15 Q. So is it fair to say then you felt Watts was 16 sympathetic to at least one of the four things you just 17 talked about from gangs, drug sales, robbery, dog 18 fighting, and gun violence?</p> <p>19 MR. KOSOKO: Object to form.</p> <p>20 MR. DAFFADA: Form. Can you repeat the 21 question again, please? I'm sorry.</p> <p>22 Q. Is it --</p> <p>23 A. Sir, will you please --</p> <p>24 Q. And go ahead. Do you need me to repeat the 25 question?</p>	<p>1 answer.</p> <p>2 A. I don't recall witnessing a dog fight, sir.</p> <p>3 Q. Did you ever talk about dog fighting while 4 you were on the tactical team at Ida B. Wells?</p> <p>5 A. I don't recall a conversation, sir, about dog 6 fighting.</p> <p>7 Q. Did you ever hear Ronald Watts talk about dog 8 fighting?</p> <p>9 A. I don't recall, sir. 1:03:48</p> <p>10 Q. Did you ever arrest anybody for gun violence?</p> <p>11 A. At Ida B. Wells, sir?</p> <p>12 Q. At Ida B. Wells?</p> <p>13 A. That was the question?</p> <p>14 Q. Sure, let's do that. Did you ever arrest 15 anyone for gun violence at Ida B. Wells?</p> <p>16 A. I don't recall.</p> <p>17 Q. Do you know whether dog fighting was -- let 18 me rephrase that. Do you know whether dog fighting 19 happened at Ida B. Wells while you were on the tactical 20 team?</p> <p>21 A. I believe it did, sir.</p> <p>22 Q. And what is your belief that dog fighting 23 occurred at Ida B. Wells based on?</p> <p>24 A. I can remember seeing dead dogs, sir.</p> <p>25 Q. And they -- those -- did those dogs look like</p>
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<p>1 A. Yes, sir.</p> <p>2 Q. Is it fair to say that you believed that 3 Watts was sympathetic to at least one of the four 4 categories of activities you just listed for gangs that 5 gangs engaged in, gun violence, dog fighting, robbery, 6 or drug sales?</p> <p>7 MR. KOSOKO: Object to form.</p> <p>8 MR. DAFFADA: Same. Go ahead and answer.</p> <p>9 A. Yes. 1:02:31</p> <p>10 Q. And can you be any more specific about 11 whether there was any category in that group that you 12 believed Watts was sympathetic to gang members engaging 13 in?</p> <p>14 A. No. May I take a break?</p> <p>15 MR. RAUSCHER: Sure.</p> <p>16 RECORDER: Off the record --</p> <p>17 MR. DAFFADA: Five --</p> <p>18 WITNESS: Okay.</p> <p>19 RECORDER: -- 11:24 a.m.</p> <p>20 (Off the record)</p> <p>21 RECORDER: Back on the record, 11:32 a.m.</p> <p>22 Q. Did you ever arrest anybody for dog fighting?</p> <p>23 A. I don't recall, sir.</p> <p>24 Q. Did you ever witness dog fighting?</p> <p>25 MR. DAFFADA: Objection. Form. You can</p>	<p>1 they had been in fights?</p> <p>2 A. That's what I remember, sir.</p> <p>3 Q. And did Watts ever make any comments about 4 the dogs?</p> <p>5 MR. DAFFADA: Objection. Form. 1:04:58</p> <p>6 A. I don't recall, sir.</p> <p>7 Q. And was gun violence with gangs an issue at 8 Ida B. Wells when you were there?</p> <p>9 A. I would say not at Ida B. Wells, sir.</p> <p>10 Q. And what about robberies by gang members, was 11 that an issue at Ida B. Wells when you were there?</p> <p>12 A. I don't recall, sir.</p> <p>13 Q. And what about drug sales, was that an issue 14 with gangs at Ida B. Wells when you were there?</p> <p>15 A. Yes.</p> <p>16 Q. And did you ever hear Ronald Watts talk about 17 drugs in Ida B. Wells?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. What do you remember about Watts 20 saying about drugs at Ida B. Wells?</p> <p>21 A. I don't recall, sir. 1:05:51</p> <p>22 Q. So of the four categories of activities 23 you've attributed to gangs, is it fair to say the only 24 one you remember hearing Watts talk about was drugs?</p> <p>25 A. Can you answer that -- ask that question one</p>

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<p>1 more time please, sir?</p> <p>2 Q. Sure. Of the four categories of activities</p> <p>3 that you have said gangs engaged in, is it fair to say</p> <p>4 that the only one of those categories that you remember</p> <p>5 Ronald Watts talking about was drugs?</p> <p>6 A. That's the only one I remember.</p> <p>7 Q. And can you tell me when you learned that</p> <p>8 Ronald Watts had been arrested?</p> <p>9 MR. DAFFADA: Objection. Form. You can</p> <p>10 answer.</p> <p>11 A. Sometime in 2012, sir. 1:06:58</p> <p>12 Q. How did you learn he had been arrested?</p> <p>13 A. I don't recall, sir.</p> <p>14 Q. Did you hear about -- do you remember ever</p> <p>15 hearing any news reports or reading any news reports</p> <p>16 about Watts' arrest?</p> <p>17 A. Yes, sir. I don't remember specific articles</p> <p>18 or -- but I -- it was in the news.</p> <p>19 Q. Okay. And what was your reaction when you</p> <p>20 found out that he had been arrested?</p> <p>21 MR. DAFFADA: Objection. Form. You can</p> <p>22 answer.</p> <p>23 A. I was sad.</p> <p>24 Q. Who were you sad for?</p> <p>25 A. Sad for him. 1:07:48</p>	<p>1 MR. DAFFADA: Objection. Form. You can</p> <p>2 answer.</p> <p>3 A. No.</p> <p>4 Q. So what was it about Watts that made it so</p> <p>5 you weren't surprised when he got arrested, other than</p> <p>6 the fact that you didn't like him?</p> <p>7 A. Just kind of think back to that off-duty</p> <p>8 incident that -- that I described earlier, sir, 2003.</p> <p>9 Q. Yep. 1:10:03</p> <p>10 A. I believe that he could have been arrested</p> <p>11 and charged at that time, I --</p> <p>12 Q. Any other reasons?</p> <p>13 A. No, sir.</p> <p>14 Q. Did you think he was dirty?</p> <p>15 A. I don't know, sir.</p> <p>16 Q. What do you mean you don't know?</p> <p>17 MR. DAFFADA: Objection. Form. You can</p> <p>18 answer.</p> <p>19 A. At -- at that time, sir, I don't know.</p> <p>20 Q. Are you saying when you worked with Watts,</p> <p>21 you didn't know if he was dirty, or right now, you</p> <p>22 don't know if you thought Watts was dirty when you</p> <p>23 worked with him, or something different?</p> <p>24 MR. DAFFADA: Objection. Form. You can</p> <p>25 answer. 1:10:59</p>
<p style="text-align: right;">Page 50</p> <p>1 Q. Why were you sad for him when he got</p> <p>2 arrested?</p> <p>3 A. I -- I don't know. I never wanted to -- I</p> <p>4 didn't like him, I can't say I was surprised, but I</p> <p>5 don't want to see -- I didn't want to see him go</p> <p>6 through something like that.</p> <p>7 Q. Were you -- were you sad when you arrested</p> <p>8 people -- when you arrested civilians at Ida B. Wells,</p> <p>9 were you sad for them also?</p> <p>10 A. I can't say specifically Ida B. Wells. I've</p> <p>11 been sad for people that I've arrested throughout my</p> <p>12 career.</p> <p>13 Q. But none -- none that you remember from Ida</p> <p>14 B. Wells?</p> <p>15 A. None specifically, sir.</p> <p>16 Q. And you said you weren't surprised that Watts</p> <p>17 was arrested, can you tell me more about that?</p> <p>18 A. I didn't like him, sir. 1:08:54</p> <p>19 Q. Well, that wouldn't necessarily be a reason</p> <p>20 to think someone's getting arrested, right?</p> <p>21 A. I don't --</p> <p>22 MR. KOSOKO: Object to form.</p> <p>23 A. I don't know.</p> <p>24 Q. Well, do you think everybody you don't like</p> <p>25 is going to get arrested at some point?</p>	<p>1 A. Could you repeat that question one more time,</p> <p>2 sir?</p> <p>3 Q. Let me try a different question. Did you</p> <p>4 have an opinion one way or the other about Watts was</p> <p>5 dirty when you worked with him?</p> <p>6 A. No, sir.</p> <p>7 Q. As you sit here today, do you have an opinion</p> <p>8 about whether Watts was dirty?</p> <p>9 A. I don't know, sir.</p> <p>10 Q. And what information are you missing to make</p> <p>11 you be able to answer it yes or no?</p> <p>12 MR. DAFFADA: Objection. Form.</p> <p>13 Hypothetical.</p> <p>14 A. I -- I -- I feel like I don't have facts</p> <p>15 about everything, sir. I don't know.</p> <p>16 Q. Did you suspect he might have been dirty when</p> <p>17 you were working with him?</p> <p>18 MR. KOSOKO: Form. 1:11:55</p> <p>19 A. I don't recall, sir.</p> <p>20 Q. You don't recall if you suspected he was</p> <p>21 dirty while you worked with him?</p> <p>22 A. I know I've been influenced by news media</p> <p>23 since that time, sir. It's -- it's very difficult for</p> <p>24 me to -- it's very difficult for me to -- to -- to not</p> <p>25 let some of the articles that -- that I've read over</p>

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<p>1 the years influence my -- my present day opinion.</p> <p>2 Q. Did you ever hear about Watts taking money</p> <p>3 from people when you worked with him?</p> <p>4 A. No.</p> <p>5 Q. Did you ever see him take money from people?</p> <p>6 A. No.</p> <p>7 Q. Was he an active sergeant, like was he out</p> <p>8 there on the -- at Ida B. Wells doing patrols, going</p> <p>9 out with you guys?</p> <p>10 MR. DAFFADA: Objection. Form. You can</p> <p>11 answer.</p> <p>12 MR. KOSOKO: Object to form. 1:13:03</p> <p>13 A. Sometimes.</p> <p>14 Q. Would he be out there most days with you?</p> <p>15 A. I -- I don't recall, sir.</p> <p>16 MR. DAFFADA: Would you --</p> <p>17 Q. Did you ever -- do you ever remember Watts</p> <p>18 pulling people aside who had been detained and talking</p> <p>19 to them privately?</p> <p>20 MR. KOSOKO: Object to form.</p> <p>21 A. I don't recall, sir.</p> <p>22 MR. DAFFADA: Filled it --</p> <p>23 WITNESS: Thank you.</p> <p>24 MR. DAFFADA: -- I can do that.</p> <p>25 Q. Did you ask to leave the Public House</p>	<p>1 A. I didn't know much about it, but it sounded</p> <p>2 like interesting work.</p> <p>3 Q. Did you enjoy being a police officer?</p> <p>4 A. Sometimes. 1:15:52</p> <p>5 Q. What was it that you liked and didn't like</p> <p>6 about being a police officer?</p> <p>7 A. Didn't like the -- didn't like the sadness</p> <p>8 that I saw. I liked helping people, I remember a</p> <p>9 number of positive interactions with citizens.</p> <p>10 Q. Okay. And when you say the sadness you saw,</p> <p>11 what do you mean?</p> <p>12 A. Homicides, child deaths, homelessness, mental</p> <p>13 illness, addiction, poverty.</p> <p>14 Q. And what -- can you just give me some</p> <p>15 examples of positive interactions you had with people</p> <p>16 over the years?</p> <p>17 A. My later years -- you okay? 1:17:31</p> <p>18 Q. Sorry, say that again?</p> <p>19 A. My -- my later years, I was in the fifth</p> <p>20 district, I liked the citizens that I interacted with.</p> <p>21 I was there for some period of time, got to know some</p> <p>22 of them, I had friendly interactions with them.</p> <p>23 Q. Did you ever have any friendly or positive</p> <p>24 interactions that you remember from Ida B. Wells?</p> <p>25 A. I get the impression that I -- that I had</p>
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<p>1 Southing (sic) tactical team -- Public House South</p> <p>2 tactical team?</p> <p>3 A. Yes. 1:14:07</p> <p>4 Q. Why did you ask to leave the public house --</p> <p>5 why did you ask to leave the Watts team?</p> <p>6 A. For several reasons, sir.</p> <p>7 Q. What were those reasons that you asked to</p> <p>8 leave the Watts team?</p> <p>9 A. I wasn't getting along with my partner, I</p> <p>10 lost confidence in Watts, I didn't like my treatment</p> <p>11 towards Watts -- the way I was treated by Watts.</p> <p>12 Q. Anything else?</p> <p>13 A. I wanted to work someplace else.</p> <p>14 Q. Did you want to work someplace else because</p> <p>15 of the first two reasons or was there another reason</p> <p>16 for wanting to work somewhere else?</p> <p>17 A. I don't recall. 1:15:04</p> <p>18 Q. Did you have somewhere in particular you</p> <p>19 wanted to work?</p> <p>20 A. Yes.</p> <p>21 Q. Where -- where did you want to go work?</p> <p>22 A. I had an application into the vice control</p> <p>23 section.</p> <p>24 Q. And why did you want to go work in that</p> <p>25 section?</p>	<p>1 friendly interactions.</p> <p>2 Q. And why do you get that impression or why did</p> <p>3 you get that impression?</p> <p>4 A. I seem to recall throwing footballs around</p> <p>5 with some of the younger kids and basketball, and there</p> <p>6 was nice people that I recall -- I mean nice people</p> <p>7 that I -- I -- I -- I don't recall their names, but I</p> <p>8 just remember the kids being great.</p> <p>9 Q. Can you tell me about not getting along with</p> <p>10 your partner? Getting back to the reasons you wanted</p> <p>11 to leave the Watts team.</p> <p>12 A. Yes. 1:18:56</p> <p>13 Q. So who was your partner and what -- what was</p> <p>14 causing the disagreement?</p> <p>15 MR. DAFFADA: Objection. Form. You can</p> <p>16 answer.</p> <p>17 A. We were friends.</p> <p>18 MR. DAFFADA: No, who was your partner?</p> <p>19 WITNESS: Oh, I'm sorry.</p> <p>20 MR. DAFFADA: He asked two questions, two --</p> <p>21 WITNESS: Two questions.</p> <p>22 Q. The question that I asked, it was a compound</p> <p>23 question. So who was your partner who you were not</p> <p>24 getting along with?</p> <p>25 A. Brian Bolton.</p>

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<p>1 Q. And what were you and Brian Bolton not 2 getting along about or how did that manifest itself? 3 A. We were personal friends, we had a falling 4 out over some family issues that I recall, we just 5 seemed to drift apart.</p> <p>6 Q. Without getting too personal or into too much 7 detail, can you give me, like, a high-level overview of 8 what the issues were that caused the falling out?</p> <p>9 A. I -- we drifted apart. We used to see each 10 other off duty and it just seemed like it stopped 11 suddenly.</p> <p>12 Q. And do -- do you know what caused that 13 drifting?</p> <p>14 A. No. 1:20:32</p> <p>15 Q. Were you able to maintain a professional 16 relationship?</p> <p>17 A. For a short period of time.</p> <p>18 Q. And then did that professional relationship 19 deteriorate as well?</p> <p>20 A. It -- it ended when I left the team.</p> <p>21 Q. Okay. Are you -- do you still -- do you talk 22 to Brian Bolton today?</p> <p>23 A. No.</p> <p>24 Q. When's the last time you talked to Bolton?</p> <p>25 A. I don't recall. 1:21:21</p>	<p>1 against me for -- for -- for -- I don't recall what 2 it's called -- for not making an arrest, sir, I don't 3 recall what it's called.</p> <p>4 Q. Who initiated that CR? 1:23:48</p> <p>5 A. That -- that citizen's -- I remember the 6 person that -- the name of the person, I -- I remember 7 that -- the name of the person that didn't meet with 8 Watts, I don't remember that person's name, that -- the 9 other half of the -- that -- was Loyola Moore 10 (phonetic), a woman named Loyola Moore.</p> <p>11 Q. Loyola Moore was the person who didn't make 12 the complaint?</p> <p>13 A. Who did not speak to Sergeant Watts.</p> <p>14 Q. Was this a -- was -- do you remember, was 15 their dispute employment related?</p> <p>16 A. I believe it was, sir.</p> <p>17 Q. Do you remember the result of that CR?</p> <p>18 A. I was exonerated.</p> <p>19 Q. Do you remember who wrote the police report 20 for that incident?</p> <p>21 A. I don't recall. 1:24:49</p> <p>22 Q. And what -- we said -- you said, "CR," I 23 think, and I repeated it, does that stand for complaint 24 register?</p> <p>25 A. To the best of my knowledge, yes, sir.</p>
<p style="text-align: center;">Page 58</p> <p>1 Q. And then the other reason you gave us, that 2 you had lost confidence in Watts and didn't like how he 3 was treating you, I think. Is that right?</p> <p>4 A. Yes.</p> <p>5 Q. Why had you lost confidence in Watts?</p> <p>6 A. Again, going back to that -- that off-duty 7 incident, whenever I -- it seemed like he was trying to 8 -- that he had a vendetta against whatever department 9 members those were that detained him.</p> <p>10 Q. Any other reasons you had lost confidence in 11 him? 1:22:09</p> <p>12 A. Had an interaction with a citizen near my 13 station -- with two citizens, there was a shouting 14 match. I intervened, didn't find that it was 15 appropriate that time to make an arrest, I had no -- no 16 reason to make an arrest. One half of that party met 17 with Sergeant Watts several hours later, I believe it 18 was the same day, and related to Sergeant Watts a 19 completely different story than what I observed -- not 20 completely, but a different story, and I tried to talk 21 to Sergeant Watts about it. My concern was that she 22 was making allegations against the other half of that 23 disturbance that were not true. I related that to 24 Sergeant Watts, and there was still a -- a police 25 report written, and I ended up getting a CR number</p>	<p style="text-align: center;">Page 60</p> <p>1 Q. And that's a -- that's a complaint against a 2 police officer?</p> <p>3 A. Yes, sir.</p> <p>4 Q. Do you remember which entity or division or 5 unit investigated the CR?</p> <p>6 A. I don't recall, sir.</p> <p>7 Q. Do you know if Watts was interviewed for the 8 -- in connection with that CR?</p> <p>9 A. No.</p> <p>10 Q. No, you don't know, or no, he wasn't?</p> <p>11 A. Oh, excuse me. Beg your pardon, sir. I -- I 12 -- I -- I don't know if he was or not.</p> <p>13 Q. Okay. 1:25:41</p> <p>14 A. I -- I don't know.</p> <p>15 Q. Any other reasons that you lost confidence in 16 Watts that you haven't talked about today already? So 17 we've talked about Bolton a little bit and Watts, can 18 you tell me who else was on the Watts team when you 19 were on the team?</p> <p>20 A. Yes. Excuse me.</p> <p>21 Q. Who also -- yeah. Who also was on the Watts 22 team while you were on the team?</p> <p>23 A. Alvin Jones, Kenny Young, Gerome Summers, 24 Calvin Ridgell, Kallatt Mohammed, Darryl Edwards, 25 Robert Gonzalez, and Michael Spaargaren.</p>

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<p>1 Q. Are you in touch with any of those people 2 today? And I don't mean literally today, but I mean 3 these days?</p> <p>4 MR. DAFFADA: Objection. Form. You can 5 answer.</p> <p>6 A. No, sir. 1:26:59</p> <p>7 Q. When's the last time that you remember 8 talking to any of those, what is it, eight people you 9 just listed?</p> <p>10 A. I don't recall, sir.</p> <p>11 Q. Was it within the last handful of years?</p> <p>12 MR. DAFFADA: Objection. Form.</p> <p>13 A. I don't recall, sir.</p> <p>14 Q. Were -- were you friends with any of those 15 people outside of work other than Brian Bolton?</p> <p>16 A. Yes.</p> <p>17 MR. DAFFADA: Objection. Form.</p> <p>18 Q. Who were you -- who were you friends with 19 outside of work on that Watts team other than Brian 20 Bolton?</p> <p>21 MR. DAFFADA: Objection. Form, but you can 22 answer.</p> <p>23 A. Michael Spaargaren.</p> <p>24 Q. Okay. Anyone else?</p> <p>25 A. Robert Gonzalez.</p>	<p>1 didn't mean to cut you off if you were saying something 2 else.</p> <p>3 A. No, sir. 1:28:56</p> <p>4 Q. Do you know Shannon Spalding?</p> <p>5 A. Yes.</p> <p>6 Q. And how do you know Shannon Spalding?</p> <p>7 A. She was an officer in Ida B. Wells.</p> <p>8 Q. Did she work in Ida B. Wells when you were on 9 the Watts team?</p> <p>10 A. Yes.</p> <p>11 Q. Was she ever on the Watts team?</p> <p>12 A. No.</p> <p>13 Q. Did you ever work with her when she was at 14 Ida B. Wells?</p> <p>15 A. Yes.</p> <p>16 Q. Do you have any opinion about her?</p> <p>17 A. No. 1:29:50</p> <p>18 Q. Did she seem like a good officer?</p> <p>19 A. To the best of my recollection, yes.</p> <p>20 Q. Have you ever talked to her about the Watts 21 team?</p> <p>22 A. Not that I recall.</p> <p>23 Q. Do you know anything about her trying to be a 24 whistleblower relating to Watts?</p> <p>25 MR. DAFFADA: Objection. Form. You can</p>
<p>1 Q. Anyone else? 1:27:55</p> <p>2 A. Gerome Summers.</p> <p>3 Q. Okay. Anyone else?</p> <p>4 A. Friendly with other members, sir, but nothing 5 --</p> <p>6 Q. But -- so when you said you were friends with 7 Summers, Gonzalez, Spaargaren, and then Bolton earlier, 8 did you mean -- does that mean you socialized with them 9 outside of work?</p> <p>10 A. I said, "Spaargaren."</p> <p>11 Q. Yeah.</p> <p>12 A. What -- one of those names, sir, I don't know 13 if that --</p> <p>14 Q. Oh, I heard Spaargaren, Gonzalez, Summers, 15 and then earlier Bolton.</p> <p>16 A. I'm sorry, that -- that -- I apologize, sir, 17 I -- I -- I misheard you.</p> <p>18 Q. Okay.</p> <p>19 A. Yes.</p> <p>20 Q. Did you socialize with all four of those 21 people outside of work?</p> <p>22 A. Yes.</p> <p>23 Q. Okay.</p> <p>24 A. And -- yes.</p> <p>25 Q. Oh, go ahead. If you were going to -- I</p>	<p>1 answer.</p> <p>2 A. Only what I read from the newspapers, sir. I 3 don't remember specific details of what I read or when 4 I read it.</p> <p>5 Q. Did you ever confront Brian Bolton about the 6 integrity of the Watts team or about Ronald Watts?</p> <p>7 MR. DAFFADA: Objection. Form. 1:30:53</p> <p>8 A. I don't recall.</p> <p>9 Q. Did you ever talk to him about the -- the 10 integrity of the Watts team?</p> <p>11 MR. DAFFADA: Objection. Form. You can go 12 ahead, answer.</p> <p>13 A. I don't recall.</p> <p>14 Q. Did you ever talk to Brian Bolton about 15 Watts' integrity?</p> <p>16 A. I don't recall.</p> <p>17 Q. Did you ever talk to Bolton about any of your 18 concerns you had about Watts?</p> <p>19 A. I don't recall.</p> <p>20 Q. Did you ever talk to Shannon Spalding about 21 Watts or about the Watts team?</p> <p>22 A. I don't recall. 1:31:52</p> <p>23 Q. Do you remember about the last time you 24 talked to Shannon Spalding?</p> <p>25 A. I don't recall.</p>

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<p>1 Q. When you were working on the Watts team, did 2 you frequently have to chase people -- chase people 3 down to arrest them?</p> <p>4 MR. DAFFADA: Sorry, did you say, 5 "frequently"? I didn't hear.</p> <p>6 MR. RAUSCHER: I did say, "frequently," yeah.</p> <p>7 MR. DAFFADA: Okay. You can answer that.</p> <p>8 A. Sometimes. I don't know what "frequently" --</p> <p>9 Q. All right. From time to time at least, you 10 had to chase people down to arrest them at Ida B. 11 Wells?</p> <p>12 A. Yes.</p> <p>13 Q. Did you chase people down more than other 14 people on the Watts team, to your knowledge?</p> <p>15 A. No. 1:32:53</p> <p>16 Q. Were you faster than other people on the 17 Watts team, to your knowledge?</p> <p>18 A. I don't know.</p> <p>19 Q. Were you ever disciplined in any way relating 20 to your time as a team member -- as a Watts team 21 member?</p> <p>22 MR. DAFFADA: Objection. Form. You can 23 answer.</p> <p>24 A. No.</p> <p>25 Q. Were you ever placed on desk duty or</p>	<p>1 Q. And is it your understanding that you were 2 assigned to the desk because of allegations that had 3 been made against you relating to your time on the 4 Watts team?</p> <p>5 A. That was my understanding, sir.</p> <p>6 Q. And who told you that? 1:35:06</p> <p>7 A. My watch commander, district station 8 supervisor, watch commander.</p> <p>9 Q. And who was your watch commander at the time?</p> <p>10 A. Lieutenant Elizabeth Mishler.</p> <p>11 Q. Can -- can you spell that last name?</p> <p>12 A. I could try.</p> <p>13 Q. Let's -- yeah, just give it a try.</p> <p>14 A. M-i-s-c-h-l-e-r (sic).</p> <p>15 Q. And what did Lieutenant Mishler tell you when 16 she informed you you were going to be on 17 administration?</p> <p>18 A. I don't recall. 1:35:54</p> <p>19 Q. Do you recall generally what she said?</p> <p>20 A. I don't recall what she said.</p> <p>21 Q. How would you describe your role in that 12 22 -- December 2017 time period?</p> <p>23 MR. DAFFADA: Objection. Form.</p> <p>24 Q. If someone came up to you and said, "What do 25 you do at the Chicago Police Department?" what would</p>
<p>1 administrative leave or had police powers taken away?</p> <p>2 A. I was placed on administrative -- excuse me, 3 administration -- I was placed on administration.</p> <p>4 Q. And what does it mean to be placed on 5 administration?</p> <p>6 A. To work inside of a police facility rather 7 than the street.</p> <p>8 Q. Okay. Would that be commonly referred to as 9 desk duty?</p> <p>10 A. I -- I don't know. 1:34:06</p> <p>11 Q. Okay. When -- when were you on 12 administration, what time period?</p> <p>13 A. I was placed on it in -- sometime in December 14 of 2017.</p> <p>15 Q. Were you still in -- assigned to the fifth 16 district though when you were placed on administration?</p> <p>17 A. Yes.</p> <p>18 Q. And then were you detailed somewhere else?</p> <p>19 MR. DAFFADA: Objection. Form. You can 20 answer.</p> <p>21 A. No.</p> <p>22 Q. Okay. What was your assignment when you were 23 on administration starting in December 2017?</p> <p>24 A. Beginning in December, I was assigned to the 25 fifth district desk, second watch.</p>	<p>1 you have told them?</p> <p>2 MR. DAFFADA: Told -- I'm sorry, can -- can 3 you repeat the question? I'm either not hearing it 4 right or I'm missing pieces.</p> <p>5 MR. RAUSCHER: Yeah.</p> <p>6 Q. So in December 2017, you were assigned to, as 7 you call it, administration, right?</p> <p>8 A. Administrative duties.</p> <p>9 Q. Administrative duties. All right. Is that 10 how you would -- you would have described your role 11 from that time period?</p> <p>12 MR. DAFFADA: Objection. Form. You can 13 answer.</p> <p>14 A. I -- I -- I don't recall. 1:36:57</p> <p>15 Q. Did -- did you consider being placed on 16 administrative duty as a form of discipline?</p> <p>17 A. No.</p> <p>18 Q. Did you want to be placed on administrative 19 duties?</p> <p>20 A. I -- I didn't know what it was, sir, prior to 21 being placed on it.</p> <p>22 Q. Okay. And then did you stay on 23 administrative duties until you retired?</p> <p>24 A. Yes.</p> <p>25 WITNESS: Can we take a break? Can we take a</p>

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<p>1 break?</p> <p>2 MR. RAUSCHER: Sure. 1:37:53</p> <p>3 WITNESS: Thank you.</p> <p>4 RECORDER: Off the record, 12:07 p.m.</p> <p>5 (Off the record)</p> <p>6 RECORDER: Back on the record, 12:16 p.m.</p> <p>7 Q. Can you describe any differences in how Watts 8 behaved as a supervisor on a TAC team compared to the 9 other supervisors you worked with, other than treating 10 you unfairly and yelling at you?</p> <p>11 MR. DAFFADA: Objection. Form. You can 12 answer.</p> <p>13 A. I -- I don't recall.</p> <p>14 Q. Okay.</p> <p>15 A. I mean --</p> <p>16 Q. Did you ever suspect that Kallatt Mohammed 17 was a dirty police officer?</p> <p>18 A. No. 1:39:04</p> <p>19 Q. Were you surprised when you found out he had 20 been arrested?</p> <p>21 A. Yes.</p> <p>22 Q. Did you ever talk to any -- any other police 23 officers about Watts' or Mohammed's arrest?</p> <p>24 A. I don't recall.</p> <p>25 Q. Do you recall ever talking to anybody about</p>	<p>1 Watts team or your experience on the Watts team?</p> <p>2 A. Once.</p> <p>3 Q. And when you reviewed the transcript or 4 listened to the recording, did you find anything that 5 wasn't accurate in there?</p> <p>6 MR. DAFFADA: Objection. Form.</p> <p>7 A. Not that I recall.</p> <p>8 Q. And I -- I don't mean, like, were there any 9 typos -- well, I guess -- I guess either that or did 10 you read anything, "Oh, I said that a little bit wrong" 11 or "I would say that again differently," some -- 12 anything like that?</p> <p>13 MR. DAFFADA: Objection. Form. You can 14 answer.</p> <p>15 A. Not that I recall.</p> <p>16 Q. Have you also talked to the FBI about the 17 Watts team?</p> <p>18 A. Yes.</p> <p>19 Q. How many times have you talked to the FBI? 20 A. Twice. 1:41:56</p> <p>21 Q. Can you tell me when you talked to the FBI? 22 A. April of 2018.</p> <p>23 Q. Okay. When's the second time? 24 A. June or -- or July -- sometime between June 25 of this year, sir.</p>
<p style="text-align: center;">Page 70</p> <p>1 their arrests?</p> <p>2 A. I don't recall.</p> <p>3 Q. And did you have any particular reason to 4 retire -- for retiring from the Chicago Police 5 Department?</p> <p>6 A. I had a number of reasons, sir. 1:39:49</p> <p>7 Q. And what were the reasons that you -- what -- 8 what were your reasons for retiring?</p> <p>9 A. The -- the COVID was a big issue for me, my 10 -- my mother is 81 years old, I wanted her living with 11 me, and that eventually happened from the time that I 12 retired present, that was a big -- that was a big issue 13 for me. There's other -- I have an art background, 14 that's my education, that's what I aspire to be, I 15 aspire to be making art full time.</p> <p>16 Q. All right. Do you -- do you have a college 17 degree?</p> <p>18 A. I do not, sir.</p> <p>19 Q. Do you have a -- what's your -- what art 20 education do you have?</p> <p>21 A. I attended four different art colleges, sir.</p> <p>22 Q. Okay. And did you get a -- did you get a 23 degree of any -- like, any type of degree?</p> <p>24 A. No, sir. 1:40:57</p> <p>25 Q. How many times did you talk to COPA about the</p>	<p style="text-align: center;">Page 72</p> <p>1 Q. Okay.</p> <p>2 A. And June and -- I don't recall the month, 3 sir.</p> <p>4 Q. Summer -- summer of this year basically, June 5 or July?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. Of 2021?</p> <p>8 A. In 2021.</p> <p>9 Q. All right. Let's -- let's take it one 10 meeting at a time, so let's go ahead and let's start 11 with the April 2018 meeting, where did that occur?</p> <p>12 A. On Roosevelt Road. 1:42:58</p> <p>13 Q. At the FBI office in Chicago?</p> <p>14 A. Yes.</p> <p>15 Q. Who was at that meeting?</p> <p>16 A. Two FBI agents, a department of -- two 17 Department of Justice lawyers, myself, and my attorney.</p> <p>18 Q. Which attorney was with you?</p> <p>19 A. I'm sorry, sir?</p> <p>20 Q. What -- which attorney was with you at the 21 meeting?</p> <p>22 A. Mr. Tim Grace.</p> <p>23 Q. Was he appointed by the FOP, the union, to 24 represent you at the FBI meeting?</p> <p>25 A. Yes.</p>

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<p>1 Q. Do you remember the names of the FBI agents 2 at the April of 2018 meeting? 3 A. No. 1:43:54 4 Q. And do you remember the names of the DOJ 5 lawyers at the April of 2018 meeting? 6 A. I don't remember both names. 7 Q. Do you remember either name? 8 A. Yes. 9 Q. Which name do you remember? 10 A. Mr. Blumberg. 11 Q. Do you remember his first name? 12 A. Mark. 13 Q. Was he the lead lawyer, to your knowledge? 14 A. I don't know. 15 Q. Okay. Was the meeting recorded? 16 A. I don't know. 17 Q. Was there -- do you know what a 302 report 18 is? 19 A. No. 20 Q. Have you ever seen a memo documenting or 21 memorializing your meeting with the FBI in April 2018? 22 A. I don't know. 23 Q. Okay. Do you know if anybody at the meeting 24 was taking notes? 25 A. Yes. 1:45:03</p>	<p>1 A. I don't know, sir. 2 Q. Have -- are you still drinking? 3 A. Yes, sir. 4 Q. Did you drink today? 5 A. No, sir. 6 Q. When's the last time you had a drink? 7 A. Last night. 8 Q. How much did you drink yesterday? 9 A. I don't know, sir. 10 Q. Were you drunk yesterday? 11 MR. DAFFADA: Objection. Form. You can 12 answer. 13 A. No, sir. 1:48:22 14 Q. Did you have more than one drink yesterday? 15 A. Yes. 16 Q. What -- what do you drink? 17 MR. DAFFADA: Objection. Form. You can 18 answer. 19 A. Beer. 20 Q. How much beer do you drink on a typical day? 21 A. I don't know, sir. 22 Q. Do you drink every day? 23 A. Yes. 24 Q. Are you in any sort of treatment for your 25 alcoholism?</p>
<p>1 Q. Who was taking notes at the April of 2018 2 meeting with the FBI? 3 A. Mr. Grace and one of the agents at least. 4 Q. What was the -- do you know the reason for 5 the meeting? 6 MR. DAFFADA: Objection. Form. 7 A. I believe it was to discuss my time with the 8 -- with the tactical team under Sergeant Watts. 9 Q. Did -- did you ever see the notes that the 10 agent took? 11 A. No. 12 Q. Can you please tell me everything you 13 remember discussing at that April of 2018 meeting with 14 the FBI? 15 MR. DAFFADA: Objection. Form. 1:46:12 16 A. Yes, I recall -- I believe we discussed my 17 background, my childhood -- some portions of my 18 childhood, my -- my education, a bit of my military 19 service. I had been drinking that day and we discussed 20 my -- my alcoholism and treatment, we discussed my -- 21 my assignments in the police department, we discussed 22 equipment personnel. 23 Q. Anything else? 1:47:24 24 A. Not that I recall, sir. 25 Q. How long have you been an alcoholic?</p>	<p>1 A. No. 1:49:16 2 Q. Have you gotten treatment in the past for 3 alcoholism? 4 A. Yes. 5 Q. What sort of treatment have you had in the 6 past? 7 A. Inpatient treatment. 8 Q. Where did you get inpatient treatment? 9 A. Hazelden. 10 Q. Where is Hazelden? 11 A. It's in Minnesota. 12 Q. And when did you get treatment at Hazelden? 13 A. That was between 2010 and 2011. 14 Q. Did you have to take a leave of absence from 15 the police department to go get that training? 16 A. No. 1:50:16 17 Q. Did you take vacation time? 18 A. No. 19 Q. How was it that you were able to get 20 treatment while still being a Chicago police officer? 21 A. I was placed on the medical roll. 22 Q. Got it. Was that something you did 23 voluntarily or was it mandated? 24 A. Voluntarily, sir. 25 Q. And were you able to stay sober for a period</p>

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<p>1 of time after that treatment?</p> <p>2 A. Yes, sir.</p> <p>3 Q. How long did you stay sober for?</p> <p>4 A. I don't recall, sir.</p> <p>5 MR. DAFFADA: Hey, Scott? Can --</p> <p>6 MR. RAUSCHER: Yeah.</p> <p>7 MR. DAFFADA: -- we designate this part of</p> <p>8 the examination as confidential?</p> <p>9 MR. RAUSCHER: Yeah. 1:51:15</p> <p>10 MR. DAFFADA: Yeah. Anything to do with his</p> <p>11 treatment, his medical treatment, his alcoholism,</p> <p>12 agreed?</p> <p>13 MR. RAUSCHER: Yeah, I think once we get the</p> <p>14 transcript, maybe you can do the specific pages, and if</p> <p>15 there is some reason that it needs to change, we can</p> <p>16 discuss, but of course, for now at least, we'll do it</p> <p>17 that way.</p> <p>18 MR. DAFFADA: Okay.</p> <p>19 Q. Do you have any plans to enter treatment</p> <p>20 again?</p> <p>21 A. Sir, I think I should tell you that Hazelden</p> <p>22 was the first time I entered treatment.</p> <p>23 Q. Okay.</p> <p>24 A. And the second time I entered treatment was</p> <p>25 at a facility called Origins.</p>	<p>1 doctor ever told you that the drinking affects your</p> <p>2 memory?</p> <p>3 MR. DAFFADA: Objection. Form.</p> <p>4 A. I don't recall.</p> <p>5 Q. Do you take any medications that might affect</p> <p>6 your memory?</p> <p>7 A. No.</p> <p>8 Q. Have you ever had any substance issues other</p> <p>9 than alcohol?</p> <p>10 A. Nicotine.</p> <p>11 Q. Cigarettes?</p> <p>12 A. Yes, sir. 1:53:53</p> <p>13 Q. Do -- do you know how -- how did it come up</p> <p>14 that you had been drinking the day of your April of</p> <p>15 2018 interview with the FBI?</p> <p>16 A. I believe one of the persons there could</p> <p>17 smell it on my breath.</p> <p>18 Q. What time of day was that meeting in April</p> <p>19 2018?</p> <p>20 A. I don't recall.</p> <p>21 Q. And I'm sorry if I asked you this, if I do, I</p> <p>22 don't mean to repeat it, but were you drunk during the</p> <p>23 meeting?</p> <p>24 A. I was feeling the effects of alcohol.</p> <p>25 Q. Is that different than being drunk in your</p>
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<p>1 Q. Origins?</p> <p>2 A. Yes.</p> <p>3 Q. And where is Origins?</p> <p>4 A. That's in Florida, sir. 1:52:06</p> <p>5 Q. When were you at Origins?</p> <p>6 A. April 2016.</p> <p>7 Q. Were you on medical -- placed on the medical</p> <p>8 roll then also?</p> <p>9 A. Yes.</p> <p>10 Q. Did you -- was that mandatory or something</p> <p>11 you asked for, to go to treatment at Origins?</p> <p>12 A. I asked for it.</p> <p>13 Q. Did you used to drink on the job as a Chicago</p> <p>14 police officer?</p> <p>15 A. No.</p> <p>16 Q. Never?</p> <p>17 A. No, never.</p> <p>18 Q. Were you ever drunk on the job as a police</p> <p>19 officer?</p> <p>20 A. No. 1:52:55</p> <p>21 Q. Does the -- does your -- does all the</p> <p>22 drinking you've done over the years affect your memory</p> <p>23 at all?</p> <p>24 A. I don't know.</p> <p>25 Q. Has any -- have you ever gone to -- has any</p>	<p>1 mind?</p> <p>2 A. I don't know, sir. 1:54:53</p> <p>3 Q. Well, do you -- would you describe yourself</p> <p>4 as being drunk during that meeting?</p> <p>5 A. I don't know.</p> <p>6 Q. Okay. When you say you were feeling the</p> <p>7 effects of alcohol during the meeting with the FBI, can</p> <p>8 you tell me what you mean by that?</p> <p>9 A. I knew I had been drinking.</p> <p>10 Q. And what -- what were -- what effects were</p> <p>11 you feeling?</p> <p>12 A. I don't recall.</p> <p>13 Q. Do you recall any of them?</p> <p>14 A. No.</p> <p>15 Q. Were you able to understand the questions</p> <p>16 being asked of you during the meeting?</p> <p>17 A. I don't know.</p> <p>18 Q. Were you able to give truthful answers to the</p> <p>19 questions you were asked during the meeting with the</p> <p>20 FBI?</p> <p>21 A. Yes. 1:55:57</p> <p>22 Q. Well, how -- how are you sure that you could</p> <p>23 give truthful answers if you don't know if you could</p> <p>24 understand the questions?</p> <p>25 MR. DAFFADA: Objection. Form.</p>

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<p>1 A. Could you repeat the question, sir?</p> <p>2 Q. Well, yeah, I think you told me two questions</p> <p>3 ago that you weren't sure if you could understand the</p> <p>4 FBI -- or the questions during the meeting in April</p> <p>5 2018 with the FBI. Is that correct?</p> <p>6 A. Yes.</p> <p>7 Q. And then you also told me you gave truthful</p> <p>8 answers to the questions you were asked during that</p> <p>9 meeting, and I'm trying to see how you can reconcile</p> <p>10 those two points.</p> <p>11 A. I don't know.</p> <p>12 Q. Are you -- how can you be certain you were</p> <p>13 giving truthful answers if you don't know if you could</p> <p>14 understand the questions you were being asked?</p> <p>15 A. I don't know.</p> <p>16 WITNESS: Can we take a break?</p> <p>17 MR. RAUSCHER: Sure. 1:57:00</p> <p>18 RECORDER: Off the record, 12:35 p.m.</p> <p>19 (Off the record)</p> <p>20 RECORDER: Back on the record, 12:40 p.m.</p> <p>21 Q. Tell me everything you remember talking about</p> <p>22 with the FBI at that April 2018 meeting relating to</p> <p>23 Watts or the Watts team?</p> <p>24 A. I recall telling the FBI about an incident</p> <p>25 when I was on the team, late in the team, one of my</p>	<p>1 Q. Did he say what he wanted it for?</p> <p>2 A. No.</p> <p>3 Q. Did you give it to him?</p> <p>4 A. No.</p> <p>5 Q. Why did you not give him part of the</p> <p>6 cannabis?</p> <p>7 A. I didn't think it was appropriate.</p> <p>8 Q. Why not, what was inappropriate about it?</p> <p>9 A. I don't know. 2:00:03</p> <p>10 Q. You have no -- no explanation at all about</p> <p>11 what you thought was inappropriate about Watts asking</p> <p>12 you to give you -- asking you to give him some</p> <p>13 cannabis?</p> <p>14 A. No one had ever asked me to give them a</p> <p>15 portion of cannabis before that I recall and I -- I</p> <p>16 haven't been asked that since.</p> <p>17 Q. Had it been inventoried when he asked you?</p> <p>18 A. No.</p> <p>19 Q. So if you would have given it to him, then</p> <p>20 there would have been no record of that cannabis ever</p> <p>21 being recovered, correct?</p> <p>22 MR. DAFFADA: Objection. Form. Calls for</p> <p>23 speculation.</p> <p>24 A. I don't know. I don't know what he was going</p> <p>25 to do with it.</p>
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<p>1 last days on the team, where I recovered a -- a</p> <p>2 quantity of cannabis from a building and that Watts</p> <p>3 wanted a portion of that cannabis.</p> <p>4 Q. All right. Tell me more about that incident. 1:57:55</p> <p>5 A. I was in a building assigned to one of those</p> <p>6 -- I described it earlier, sir, the -- the high</p> <p>7 visibility. Securing the -- the lobby, I found a</p> <p>8 broken mailbox, it was partly open, and there was a --</p> <p>9 a zip -- large ziplock back with a quantity of -- of</p> <p>10 cannabis in it.</p> <p>11 Q. All right. This -- this was at -- was this</p> <p>12 at Ida B. Wells?</p> <p>13 A. No, sir.</p> <p>14 Q. Where was this?</p> <p>15 A. I don't recall exactly, sir.</p> <p>16 Q. Okay. One of the housing projects in Chicago</p> <p>17 -- one of the housing developments in Chicago, CHA?</p> <p>18 A. Yes, sir. 1:59:02</p> <p>19 Q. All right. And so you found a large ziplock</p> <p>20 bag with some cannabis in it, and then what next?</p> <p>21 A. I don't remember verbatim, but Sergeant Watts</p> <p>22 was there and wanted a quantity of -- some portion of</p> <p>23 -- of that cannabis to be given to him.</p> <p>24 Q. Did he say why he wanted it?</p> <p>25 A. No.</p>	<p>1 Q. Well, you -- you didn't think he was going to</p> <p>2 go inventory it or else you would have given it to him,</p> <p>3 right?</p> <p>4 A. I don't know. 2:00:59</p> <p>5 MR. KOSOKO: Object to form.</p> <p>6 Q. If you would have thought he was going to</p> <p>7 take the cannabis and go inventory it, would there have</p> <p>8 been any reason to say no to his request?</p> <p>9 MR. KOSOKO: Object to form.</p> <p>10 MR. DAFFADA: Form.</p> <p>11 A. I don't know.</p> <p>12 Q. What would you need to know to answer that</p> <p>13 question?</p> <p>14 MR. NOLAND: Objection. Argumentative. This</p> <p>15 is Dan Noland.</p> <p>16 A. His intentions, I guess.</p> <p>17 Q. But you assumed he had bad intentions or you</p> <p>18 would have said yes, correct?</p> <p>19 A. I don't know.</p> <p>20 Q. How many times over the years did you refuse</p> <p>21 a command from a superior officer?</p> <p>22 MR. KOSOKO: Object to form.</p> <p>23 MR. DAFFADA: Same.</p> <p>24 A. I don't recall.</p> <p>25 Q. Do you recall ever doing it other than that</p>

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<p>1 one time you just described right now?</p> <p>2 A. I don't recall. 2:01:57</p> <p>3 Q. Is saying no to a superior officer something</p> <p>4 you can do lightly at Chicago Police Department?</p> <p>5 MR. KOSOKO: Object to form.</p> <p>6 MR. DAFFADA: Object -- join.</p> <p>7 A. I don't know.</p> <p>8 Q. Are you expected to follow orders at the</p> <p>9 Chicago Police Department?</p> <p>10 A. Yes.</p> <p>11 Q. So not following an order such as the one you</p> <p>12 just got is a deviation from a standard procedure,</p> <p>13 correct?</p> <p>14 MR. DAFFADA: Objection. Form.</p> <p>15 MR. KOSOKO: Object to form.</p> <p>16 A. I don't know.</p> <p>17 Q. Was it unusual for you to say no to a</p> <p>18 superior officer?</p> <p>19 A. Yes. 2:02:57</p> <p>20 Q. How did Watts react when you said no at --</p> <p>21 after he told you he wanted some of the cannabis?</p> <p>22 A. At that time, I don't recall.</p> <p>23 Q. What about at any other time?</p> <p>24 A. Later, I remember that he was angry.</p> <p>25 Q. All right. Tell me more about that.</p>	<p>1 A. I don't know.</p> <p>2 Q. In hindsight, do you think you should have</p> <p>3 reported it?</p> <p>4 A. I don't know.</p> <p>5 Q. Why don't you know if you should have</p> <p>6 reported that behavior to somebody?</p> <p>7 MR. DAFFADA: Objection. Form.</p> <p>8 A. Because I -- I recovered the -- the -- the</p> <p>9 contraband and I feel I followed the orders that I'm</p> <p>10 supposed to follow --</p> <p>11 Q. Okay.</p> <p>12 A. -- by inventorying it.</p> <p>13 Q. So I'm not asking if you think you should</p> <p>14 have reported your own behavior, I'm asking if you</p> <p>15 think you should have reported what Watts did.</p> <p>16 A. I don't know. 2:05:50</p> <p>17 Q. All right. Why don't you know if you should</p> <p>18 have reported what Watts did?</p> <p>19 A. He made an ideation, I -- I -- I don't know</p> <p>20 if I should have reported an ideation.</p> <p>21 Q. What's an ideation, what does that mean?</p> <p>22 A. Sounds to me like he -- he wanted the weed,</p> <p>23 he didn't get it.</p> <p>24 Q. And why would you not report that?</p> <p>25 A. I don't know.</p>
<p style="text-align: right;">Page 86</p> <p>1 MR. DAFFADA: Objection. Form. You can</p> <p>2 answer.</p> <p>3 A. I inventoried the entire contents of the</p> <p>4 contraband that I found, and I recall that he was angry</p> <p>5 at me.</p> <p>6 Q. And how did he express his anger to you?</p> <p>7 A. By yelling at me, sir. 2:03:53</p> <p>8 Q. How -- what did he say?</p> <p>9 A. I don't recall exactly. I believe that he</p> <p>10 called me some names.</p> <p>11 Q. What kind of names do you think he called</p> <p>12 you?</p> <p>13 A. I believe -- I believe he called me "bitch."</p> <p>14 Q. And you think he said that because you</p> <p>15 inventoried all of the cannabis?</p> <p>16 MR. NOLAND: Objection. Form.</p> <p>17 A. I believe so.</p> <p>18 Q. How did you react when Watts said that to</p> <p>19 you?</p> <p>20 A. I don't recall.</p> <p>21 Q. Did you report it to anybody?</p> <p>22 A. No. 2:04:55</p> <p>23 Q. Why didn't you report Watts' behavior to</p> <p>24 somebody?</p> <p>25 MR. DAFFADA: Objection. Form.</p>	<p style="text-align: right;">Page 88</p> <p>1 Q. So I -- let's make sure then -- I -- I want</p> <p>2 to walk through the facts of this, and you tell me if I</p> <p>3 get anything wrong. You recovered a large quantity of</p> <p>4 cannabis, Watts demanded that you give him some of the</p> <p>5 cannabis, you said no, you inventoried the cannabis,</p> <p>6 then he called you a "bitch" for inventorying the</p> <p>7 cannabis instead of giving him some, right?</p> <p>8 MR. DAFFADA: Objection. Form. 2:06:45</p> <p>9 A. I don't know that he demanded, I thought it</p> <p>10 was a request, I thought I said, "requested." I -- I</p> <p>11 --</p> <p>12 Q. Okay. You recovered a large quantity of</p> <p>13 cannabis, your supervisor officer, Ronald Watts,</p> <p>14 requested that you give him some of that cannabis.</p> <p>15 When you said no and inventoried it, he called you a</p> <p>16 "bitch" for doing that. Is that all correct?</p> <p>17 A. Yes.</p> <p>18 Q. Did you -- you didn't see anything wrong with</p> <p>19 that?</p> <p>20 A. Yes, I did.</p> <p>21 Q. All right. So then why didn't you report it?</p> <p>22 A. I don't know.</p> <p>23 Q. You should have reported it?</p> <p>24 A. I don't know.</p> <p>25 Q. What type of behavior would you think rises</p>

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<p>1 to the level of something that -- what kind of 2 misconduct from a police officer rises to the level 3 that it should be reported at CPD?</p> <p>4 MR. DAFFADA: Objection. Form. You can 5 answer. 2:07:46</p> <p>6 WITNESS: I'm -- answer?</p> <p>7 A. Had -- had it escalated beyond name-calling, 8 that would have been reported.</p> <p>9 Q. And -- and what do you mean, "escalated 10 beyond name-calling"?</p> <p>11 A. If he got physical, if he force -- forcibly, 12 if he was able to -- to get the weed, the cannabis, 13 somehow shape or form from me.</p> <p>14 Q. Do you ever report another officer for 15 committing misconduct on the job?</p> <p>16 A. Sir, can you repeat that -- repeat that 17 question, please?</p> <p>18 Q. Did you ever report another officer for 19 committing misconduct on the job?</p> <p>20 A. No.</p> <p>21 Q. Are you familiar with the phrase "code of 22 silence"?</p> <p>23 A. Yes.</p> <p>24 Q. What does "code of silence" mean to you?</p> <p>25 A. To me, it means an unwritten rule where</p>	<p>1 arrested that civilian?</p> <p>2 MR. DAFFADA: Objection. Speculation.</p> <p>3 A. I don't know.</p> <p>4 Q. All right. What do -- what would you need to 5 know to answer that question?</p> <p>6 A. Additional information, sir.</p> <p>7 Q. What information?</p> <p>8 MR. DAFFADA: Objection. Speculation. You 9 can answer.</p> <p>10 A. I'd need to know if the person had cannabis.</p> <p>11 Q. The -- the person who might be selling 12 cannabis?</p> <p>13 A. Yes.</p> <p>14 Q. All right. So assume that they did have 15 cannabis.</p> <p>16 MR. DAFFADA: Objection. Form.</p> <p>17 A. I don't know.</p> <p>18 Q. Or what else do you need to know?</p> <p>19 A. I don't know.</p> <p>20 Q. Was anyone else around when Watts requested 21 the cannabis from you toward the end of your time on 22 his team?</p> <p>23 A. Yes. 2:11:06</p> <p>24 Q. Who else was around?</p> <p>25 A. My partner, Brian Bolton.</p>
<p>1 officers don't identify problem behaviors among other 2 officers.</p> <p>3 Q. In -- in your experience when you worked at 4 the Chicago Police Department, was there a code of 5 silence?</p> <p>6 A. I don't know. 2:09:01</p> <p>7 Q. So there might have been, there might not 8 have been?</p> <p>9 A. I don't know.</p> <p>10 Q. Were you scared that if you reported Watts 11 for his misconduct, he would have retaliated against 12 you?</p> <p>13 A. I don't recall.</p> <p>14 Q. If a civilian would have -- if you would have 15 heard a civilian walk up to another person at Ida B. 16 Wells and ask them to buy drugs, would you have 17 arrested that civilian?</p> <p>18 MR. DAFFADA: Objection. Speculation.</p> <p>19 A. Can you rephrase the question?</p> <p>20 Q. Sure, I can try. You've told us earlier that 21 cannabis was sold a lot at Ida B. Wells, right?</p> <p>22 A. Yes. 2:10:02</p> <p>23 Q. All right. If a civilian walked up to a 24 person who might have been selling drugs and said, "I 25 want to buy \$30 worth of drugs," would you have</p>	<p>1 Q. All right. Did he hear Watts make the 2 request?</p> <p>3 A. I don't know.</p> <p>4 Q. Did he see Watts interacting with you?</p> <p>5 A. I don't know.</p> <p>6 Q. How do you know he was around?</p> <p>7 A. Because I was working with him that day.</p> <p>8 Q. Do you remember working with him that day?</p> <p>9 A. I was working with him that day.</p> <p>10 Q. Were you still friends with him at the time?</p> <p>11 A. I don't know.</p> <p>12 Q. Did you talk to him about what happened with 13 Watts?</p> <p>14 A. I don't recall.</p> <p>15 Q. Anyone else around other than Bolton when 16 Watts requested the cannabis?</p> <p>17 A. I don't recall. 2:12:02</p> <p>18 Q. What about when Watts yelled at you about 19 inventorying the cannabis, was anyone around then?</p> <p>20 A. Yes.</p> <p>21 Q. Who else was around then?</p> <p>22 A. Kallatt Mohammed.</p> <p>23 Q. All right. Well, how did Mohammed react?</p> <p>24 A. I don't recall.</p> <p>25 Q. Did he say anything?</p>

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<p>1 A. I don't recall.</p> <p>2 Q. Was this incident the last straw for you to</p> <p>3 leave the team?</p> <p>4 A. It's one of the last things that happened on</p> <p>5 that team --</p> <p>6 Q. Are there any --</p> <p>7 A. -- for me.</p> <p>8 Q. Are there any other incidents like that that</p> <p>9 you haven't talked about yet today?</p> <p>10 MR. DAFFADA: Objection. Form.</p> <p>11 A. No. 2:12:54</p> <p>12 Q. All right. Is there anything else about that</p> <p>13 incident that you haven't covered with me yet today?</p> <p>14 A. Not that I recall.</p> <p>15 Q. What else did you talk about relating to the</p> <p>16 Watts team with the FBI in April of 2018?</p> <p>17 A. I don't recall.</p> <p>18 Q. No other incidents? Do you know if there</p> <p>19 were other -- let me rephrase, I'll strike that. Do</p> <p>20 you know if you talked to them about any -- any other</p> <p>21 Watts-related incidents?</p> <p>22 MR. DAFFADA: Objection. Form. You can</p> <p>23 answer.</p> <p>24 A. I don't recall. 2:13:54</p> <p>25 Q. Did you talk to the FBI about anything else</p>	<p>1 arrested?</p> <p>2 A. I -- to the best of my recollection, I</p> <p>3 returned the -- made arrangements for the -- for the</p> <p>4 owner of that vehicle to -- to retrieve the vehicle.</p> <p>5 Q. Rather than having it impounded or towed?</p> <p>6 A. Yes, sir.</p> <p>7 Q. Why did you do that?</p> <p>8 A. I had some bad feelings about a kid and --</p> <p>9 already being arrested and the car belonged to someone</p> <p>10 else, it was grandma's car, and it didn't seem like --</p> <p>11 at the time, it didn't seem like it would be so harmful</p> <p>12 to not report that vehicle and follow through on that</p> <p>13 processing.</p> <p>14 Q. Do you -- do you feel differently about that</p> <p>15 now?</p> <p>16 A. Yes. 2:17:03</p> <p>17 Q. Why do you feel differently about it now?</p> <p>18 A. I didn't do my job in those instances, sir.</p> <p>19 Q. Were you doing that as kind of a favor to the</p> <p>20 person who was arrested, like to be nice to them?</p> <p>21 A. Yes, sir.</p> <p>22 Q. Did you get anything in return for doing</p> <p>23 that?</p> <p>24 A. No.</p> <p>25 Q. All right. Tell me about pushing a teenager</p>
<p style="text-align: right;">Page 94</p> <p>1 Watts related during the April 2018 meeting?</p> <p>2 A. My -- my own misconduct, sir.</p> <p>3 Q. All right. What -- what misconduct did you</p> <p>4 talk about -- what of -- what of your own misconduct</p> <p>5 did you talk about with the FBI?</p> <p>6 A. I related that, when I was a member of that</p> <p>7 tactical team, that I pushed a teenager on a crime</p> <p>8 scene several times.</p> <p>9 Q. Anything else? 2:15:06</p> <p>10 A. Yes, sir.</p> <p>11 Q. What else?</p> <p>12 A. Related -- I believe I related that on at</p> <p>13 least four different occasions, I omitted vehicle</p> <p>14 information on an arrestee's arrest report to return</p> <p>15 the vehicle to an owner.</p> <p>16 Q. What does that mean?</p> <p>17 A. The -- the vehicle would normally get</p> <p>18 impounded or towed, or there'd be some disposition that</p> <p>19 take the -- the car away from the arrestee or an</p> <p>20 arrestee's family member, whoever owned the car, and I</p> <p>21 omitted the vehicle information, did not impound the</p> <p>22 car.</p> <p>23 Q. So you left it --</p> <p>24 A. Did not tow the car. 2:15:59</p> <p>25 Q. You left it for the person who had been</p>	<p>1 at a crime scene several times.</p> <p>2 A. To my -- to the best of my recollection,</p> <p>3 there was a hectic crime scene somewhere in Ida B.</p> <p>4 Wells, and they -- a teenager walked onto the crime</p> <p>5 scene. In retrospect, I believe the teenager was</p> <p>6 confused, I believe the teenager was scared, and I</p> <p>7 pushed that teenager several times off the crime scene,</p> <p>8 I lost my temper.</p> <p>9 Q. Do you know who the teenager was?</p> <p>10 A. No, sir. 2:18:03</p> <p>11 Q. Do you know when this happened?</p> <p>12 A. Sometime during my -- my time on Sergeant</p> <p>13 Watts' team.</p> <p>14 Q. Was there a CR related to this incident?</p> <p>15 A. No, sir.</p> <p>16 Q. Should there have been a CR relating to this</p> <p>17 incident?</p> <p>18 A. Yes, sir.</p> <p>19 Q. Should you have reported yourself for this</p> <p>20 force?</p> <p>21 A. Yes, sir.</p> <p>22 Q. Who else -- did anyone witness you use</p> <p>23 excessive force in this way?</p> <p>24 A. I don't know.</p> <p>25 Q. Okay. Why didn't you start a CR against</p>

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<p>1 yourself for that incident?</p> <p>2 A. I don't know.</p> <p>3 Q. Did you ever see any of your team members use</p> <p>4 excessive force on the Watts team?</p> <p>5 A. No.</p> <p>6 Q. Did you ever see Al Jones rough anyone up?</p> <p>7 A. No. 2:18:58</p> <p>8 Q. Do you think that this time you're describing</p> <p>9 when you -- well, would you say you used excessive</p> <p>10 force against that teenager?</p> <p>11 A. I don't know.</p> <p>12 Q. Well, should you have used any force against</p> <p>13 him?</p> <p>14 A. I don't know.</p> <p>15 Q. Then why do you think you did something wrong</p> <p>16 that should have been reported?</p> <p>17 A. Because I have a bad feeling about it.</p> <p>18 Q. Why do you have a bad feeling about it?</p> <p>19 A. I have a bad feeling about it because I -- I</p> <p>20 think I didn't have enough experience on the job at</p> <p>21 that time to recognize that the potential wasn't that</p> <p>22 he was trying to break a law, wasn't trying to</p> <p>23 interfere with -- with a crime scene, that there -- I</p> <p>24 could have handled that a lot better, I could have been</p> <p>25 calm, I could have been patient, I think I misread what</p>	<p>1 A. I don't recall. 2:21:22</p> <p>2 Q. All right. Anything else that you discussed</p> <p>3 during the April 2018 meeting with the FBI?</p> <p>4 A. I don't recall.</p> <p>5 Q. Were you given any sort of promises of</p> <p>6 immunity or any other promises by the FBI or the DOJ?</p> <p>7 A. I don't know.</p> <p>8 Q. Did anyone ever tell you why they asked you</p> <p>9 to come talk to them?</p> <p>10 MR. DAFFADA: Objection. Form. You can</p> <p>11 answer.</p> <p>12 Q. Did anyone connected to that April 2018</p> <p>13 meeting with the FBI tell you why they had asked you to</p> <p>14 come talk to them?</p> <p>15 A. I don't recall. 2:22:11</p> <p>16 Q. Do you know what the FBI or DOJ was</p> <p>17 investigating that caused them to have the meeting with</p> <p>18 you in April 2018?</p> <p>19 A. Specifically, I don't know, sir.</p> <p>20 Q. What about generally?</p> <p>21 A. In general, yes, sir.</p> <p>22 Q. What about -- what is generally the reason</p> <p>23 that they asked you to come to a meeting?</p> <p>24 A. Police misconduct pertaining to Public</p> <p>25 Housing South.</p>
<p style="text-align: center;">Page 98</p> <p>1 I was seeing, and that is not the type of police</p> <p>2 officer I want to be. It stuck with me all these</p> <p>3 years.</p> <p>4 Q. Did you ever do --</p> <p>5 A. That's not who I want to be.</p> <p>6 Q. Did you ever do anything like that again?</p> <p>7 A. No, sir. 2:20:06</p> <p>8 Q. Did you ever witness anyone on your team, on</p> <p>9 the Watts team, do anything like what you did that day?</p> <p>10 A. No.</p> <p>11 Q. All right. What else did you talk about with</p> <p>12 the FBI relating to the Watts team?</p> <p>13 A. I don't recall, sir.</p> <p>14 Q. Do you recall anything else you discussed</p> <p>15 during that meeting with the FBI in April 2018 that you</p> <p>16 haven't talked about already?</p> <p>17 A. Chain of command.</p> <p>18 Q. All right. Tell me what you talked about</p> <p>19 about chain of command during the FBI meeting.</p> <p>20 A. Who my lieutenant was, I believe who other</p> <p>21 sergeants were.</p> <p>22 Q. Did you give them any substantive information</p> <p>23 about other sergeants or lieutenants beyond Watts?</p> <p>24 MR. DAFFADA: Objection. Form. You can</p> <p>25 answer.</p>	<p style="text-align: center;">Page 100</p> <p>1 Q. Are you aware of any police misconduct</p> <p>2 pertaining to Public Housing South that we haven't</p> <p>3 discussed yet today?</p> <p>4 A. No.</p> <p>5 Q. Did you ever hear rumors over the years that</p> <p>6 Watts, or Mohammed, or anyone else on the team was</p> <p>7 dirty?</p> <p>8 MR. DAFFADA: Over what -- I'm sorry.</p> <p>9 Objection. Form.</p> <p>10 A. I don't recall. 2:22:56</p> <p>11 Q. All right. When the -- how did the second</p> <p>12 meeting with the FBI come about, that June or July 2021</p> <p>13 meeting?</p> <p>14 A. I was informed by my lawyers that they spoke</p> <p>15 to the Department of Justice.</p> <p>16 Q. All right. Then who was at the -- the second</p> <p>17 meeting in -- oh, actually, you know what? Sorry, let</p> <p>18 me back up one sec. How -- about how long did the</p> <p>19 April 2018 meeting last?</p> <p>20 A. Four and a half hours, approximately.</p> <p>21 Q. Did you ask any questions during the meeting?</p> <p>22 A. Not that I recall.</p> <p>23 Q. All right. Then who was at the June, July</p> <p>24 2021 meeting?</p> <p>25 A. Myself, Mr. Tim Grace, Mr. Jim Daffada, Mr.</p>

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<p>1 Tom Leinenweber -- Leinenweber --</p> <p>2 Q. Okay. 2:24:03</p> <p>3 A. -- Mr. Mark Blumberg, and two FBI agents.</p> <p>4 Q. How long did -- where -- where did that</p> <p>5 meeting -- the summer 2021 meeting take place?</p> <p>6 A. On Roosevelt Road, sir.</p> <p>7 Q. Same FBI office?</p> <p>8 A. Yes.</p> <p>9 Q. Do you know which FBI agents were there?</p> <p>10 A. I -- I don't know their names.</p> <p>11 Q. Was -- did anyone take notes during that</p> <p>12 meeting?</p> <p>13 A. I don't know.</p> <p>14 Q. Did you take notes during the meeting?</p> <p>15 A. No.</p> <p>16 Q. Did you take notes during the April 2018</p> <p>17 meeting?</p> <p>18 A. I don't recall.</p> <p>19 Q. Do you know if the summer 2021 meeting was</p> <p>20 recorded?</p> <p>21 A. No.</p> <p>22 Q. No, it wasn't, or you -- no, you don't know?</p> <p>23 A. No, I don't know. 2:25:09</p> <p>24 Q. Okay. How long did the summer 2021 meeting</p> <p>25 last?</p>	<p>1 RECORDER: Okay.</p> <p>2 Q. So did he -- he told you --</p> <p>3 A. Is it working?</p> <p>4 Q. -- read your COPA statement?</p> <p>5 A. Sir, I didn't understand the question.</p> <p>6 Q. Okay. Did Mr. Blumberg say he had read your</p> <p>7 COPA statement?</p> <p>8 A. I don't know.</p> <p>9 Q. What -- what specific things did he ask or</p> <p>10 try to clear up with you during the meeting?</p> <p>11 MR. DAFFADA: Objection. Form. You can</p> <p>12 answer.</p> <p>13 WITNESS: Okay. 2:27:30</p> <p>14 A. We discussed a number of those things that I</p> <p>15 just discussed with you, sir.</p> <p>16 Q. Okay.</p> <p>17 A. Pushing that teenager, those -- the omissions</p> <p>18 on those -- of that vehicle information on those arrest</p> <p>19 reports, on those police reports. We talked about my</p> <p>20 -- my drinking a bit more.</p> <p>21 Q. What did you talk about with respect to your</p> <p>22 drinking during that summer 2021 meeting?</p> <p>23 A. I believe I told Mr. Blumberg that I was</p> <p>24 still active in -- in my alcohol addiction.</p> <p>25 Q. Okay. Had you -- were you drinking the day</p>
<p style="text-align: center;">Page 102</p> <p>1 A. Approximately three to four hours.</p> <p>2 Q. Did the -- did the agents or Mr. Blumberg</p> <p>3 tell you why they wanted to meet with you again?</p> <p>4 A. Yes.</p> <p>5 Q. What -- who told you -- what did they tell</p> <p>6 you and who -- who said it about why they wanted to</p> <p>7 meet with you again?</p> <p>8 A. Mr. Blumberg.</p> <p>9 Q. And what did Mr. Blumberg say?</p> <p>10 A. Mr. Blumberg wanted to clarify information,</p> <p>11 things that I had said, answers I had given from our</p> <p>12 first meeting, and wanted to clear up -- answers that I</p> <p>13 gave during my COPA statement.</p> <p>14 RECORDER: I'm sorry, it cut out on my end.</p> <p>15 I heard "clear up," and then it cut out.</p> <p>16 MR. RAUSCHER: Yeah, it's doing it again. 2:26:23</p> <p>17 MR. DAFFADA: "Clear up," then you said, "my</p> <p>18 COPA statement."</p> <p>19 A. Clear up --</p> <p>20 MR. RAUSCHER: He's frozen on my screen.</p> <p>21 Okay, it's back, I think.</p> <p>22 RECORDER: Can you repeat the last answer?</p> <p>23 MR. DAFFADA: Do you need the last --</p> <p>24 A. Yes, to clear up information during -- given</p> <p>25 during that COPA statement.</p>	<p style="text-align: center;">Page 104</p> <p>1 of the meeting, that summer 2021 meeting?</p> <p>2 A. No.</p> <p>3 Q. Did Mr. Blumberg -- Blumberg ask you why you</p> <p>4 hadn't mentioned the incidents that you told the FBI</p> <p>5 about to COPA?</p> <p>6 A. Yes. 2:28:42</p> <p>7 Q. And what did you say -- what did you tell</p> <p>8 him?</p> <p>9 MR. DAFFADA: Objection. Form.</p> <p>10 A. I don't recall.</p> <p>11 Q. You don't recall what you -- all right.</p> <p>12 Well, what's the answer, why didn't you tell COPA about</p> <p>13 those things you told the FBI in April 2018?</p> <p>14 A. My interview with the FBI lasted over four</p> <p>15 hours, sir, my interview with COPA was very brief, it</p> <p>16 could possibly be between 20 and 30 minutes. I don't</p> <p>17 recall the specific questions that I was answered --</p> <p>18 that I -- that I was asked. I -- I don't believe I was</p> <p>19 specifically asked those questions.</p> <p>20 Q. Okay. Is that what you told Mr. Blumberg?</p> <p>21 A. I don't recall. 2:29:45</p> <p>22 Q. All right. What -- what else did you -- did</p> <p>23 you give the FBI any more substantive information</p> <p>24 during the June, July 2021 meeting that you hadn't</p> <p>25 given them in April 2018?</p>

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1 A. I don't recall.	1 A. To the best of my recollection, I -- I have
2 Q. How did you fill the three or four hours of	2 been to a grand jury at least one time.
3 the meeting, what -- what was it -- well, I'll just	3 Q. Okay. But you don't remember what it was
4 stop there. How did you fill the three to four hours	4 about?
5 of the FBI meeting in the summer of 2021?	5 A. I don't recall. 2:33:27
6 MR. DAFFADA: Objection. Form. You can	6 Q. Is it -- but it -- it is safe to say it was
7 answer. 2:30:26	7 not about Ronald Watts or Kallatt Mohammed?
8 A. I explained about myself, the -- there was a	8 A. It -- I think that's safe to say.
9 -- Mr. Blumberg had a number of things at both meetings	9 Q. Did you ever talk to prosecutors in
10 that he wanted to tell me. We had breaks -- we took	10 connection with Watts' and Mohammed's criminal case?
11 breaks.	11 A. No.
12 Q. What are the things that Mr. Blumberg wanted	12 Q. Did you ever talk to Watts' or Mohammed's
13 to tell you during that meeting in the summer of 2021?	13 criminal defense attorneys?
14 A. I don't recall.	14 A. No.
15 Q. Do you recall any of the things he wanted to	15 Q. Is there anything else you discussed during
16 tell you?	16 that FBI meeting in the summer of 2021 that we haven't
17 MR. DAFFADA: Objection to form. You can	17 talked about today?
18 answer.	18 A. I -- I -- I don't recall at this time, sir.
19 A. I don't recall. 2:31:21	19 Q. Do you know someone named Charlie (phonetic)
20 Q. Have you ever testified before a grand jury?	20 --
21 A. Yes.	21 WITNESS: May I take a break?
22 Q. How many times have you testified before a	22 MR. RAUSCHER: Sure. 2:34:27
23 grand jury?	23 RECORDER: Off the record, 1:18 p.m.
24 A. I don't recall.	24 (Off the record)
25 Q. Have you ever testified before a grand jury	25 RECORDER: Back on the record, 1:27 p.m.
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1 about Ronald Watts or Kallatt Mohammed?	1 Q. Did you ever get disciplined for failing to
2 A. No.	2 include the car vehicle information you had mentioned
3 Q. Have you ever testified before a federal	3 earlier during the deposition?
4 grand jury?	4 A. No.
5 A. No.	5 Q. Did anyone know you had done that other than
6 Q. Did -- were the -- have you testified before	6 you until you told the FBI?
7 a grand jury in connection with your job as a Chicago	7 A. I don't know.
8 police officer?	8 Q. Did -- did you ever talk about it with anyone
9 A. I'm sorry, sir, what was the question one	9 else on the police force?
10 more time?	10 A. Yes.
11 Q. What were the -- what -- what was the context	11 Q. Who did you talk about that with on the
12 for when you talked to grand -- when you testified in	12 police force?
13 front of grand juries?	13 A. Mick Spaargaren. 2:35:12
14 A. I don't recall. 2:32:17	14 Q. All right. When did you talk to Spaargaren
15 Q. Well, would it have been related to arrests	15 about that, about leaving vehicle information off the
16 you made or were involved in -- let me back up -- let	16 arrest reports?
17 me try to rephrase that. Would you have testified in	17 A. Sometime while I was working with him.
18 front of grand juries relating to arrests you made or	18 Q. And so would that have been during the time
19 were involved in at the Chicago Police Department?	19 you were on the Watts team?
20 A. I don't recall.	20 A. I -- it could have been under another
21 Q. Well, what types of things did you testify to	21 sergeant, it was very early on working with Mick.
22 grand juries about over the years?	22 Q. I got it. It was some -- it was in Public
23 A. I -- I don't recall.	23 Housing South, but you're not sure which sergeant?
24 Q. Are you certain that you have testified in	24 A. I'm not certain if it was in Public Housing
25 front of a grand jury?	25 South. I'm not certain if it was in Public Housing

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<p>1 South.</p> <p>2 Q. Okay. And what did Spaargaren say when you</p> <p>3 told him what you had been doing with those reports?</p> <p>4 A. To stop.</p> <p>5 Q. And did you stop?</p> <p>6 A. Yes. 2:36:02</p> <p>7 Q. And did he report you internally?</p> <p>8 A. I don't know.</p> <p>9 Q. Well, did anybody from OPS or IPRA or Bureau</p> <p>10 of Internal Affairs ever come question you about your</p> <p>11 report writing?</p> <p>12 A. No.</p> <p>13 Q. So would that suggest that you were not</p> <p>14 reported for not doing it correctly?</p> <p>15 A. I don't know.</p> <p>16 Q. Did he ever tell you he was filing a report</p> <p>17 against you?</p> <p>18 A. I don't recall.</p> <p>19 Q. Did you ever report yourself for improperly</p> <p>20 filing -- filling out those reports?</p> <p>21 MR. DAFFADA: Objection. Form. You can</p> <p>22 answer.</p> <p>23 A. No. 2:36:55</p> <p>24 Q. All right. Anything else that you talked</p> <p>25 about with the FBI in either of meeting -- those two</p>	<p>1 A. I don't recall exactly what he said, it was</p> <p>2 -- it was something in -- affirmative.</p> <p>3 Q. Did you express a concern to Charlie Williams</p> <p>4 that if you didn't leave Watts' team, you'd end up in</p> <p>5 jail?</p> <p>6 A. No. 2:38:54</p> <p>7 Q. Did you express a concern to Charlie Williams</p> <p>8 that any member of the Watts team might end up in jail,</p> <p>9 including Watts?</p> <p>10 A. No.</p> <p>11 Q. Do you remember a CR where Al Jones was</p> <p>12 accused of stealing money from a drug dealer in, I</p> <p>13 think it was 2002?</p> <p>14 A. No.</p> <p>15 Q. Do you remember ever being approached by any</p> <p>16 internal affairs or OPS or IPRA about a CR involving</p> <p>17 Jones allegedly taking money from a drug dealer?</p> <p>18 A. No. 2:39:51</p> <p>19 Q. All right. I'm going to ask you some</p> <p>20 questions about individual Plaintiffs in the Watts</p> <p>21 cases. You -- you know that you are a Defendant in</p> <p>22 certain of the cases that are part of the Watts</p> <p>23 Coordinated Proceedings, correct?</p> <p>24 A. Yes.</p> <p>25 Q. And is it also correct that you have no</p>
<p style="text-align: center;">Page 110</p> <p>1 meetings that we have not yet talked about today?</p> <p>2 A. I -- I can't remember, sir.</p> <p>3 Q. Do you know someone named Charlie Williams?</p> <p>4 A. Yes.</p> <p>5 Q. All right. Who is Charlie Williams?</p> <p>6 A. He was the commander of public housing when I</p> <p>7 was in Public Housing South.</p> <p>8 Q. And did you ever -- did you talk to him when</p> <p>9 you left Public Housing South?</p> <p>10 A. No. 2:38:03</p> <p>11 Q. Did you talk to him about leaving Public</p> <p>12 Housing South?</p> <p>13 A. No.</p> <p>14 Q. Did you talk to him about leaving -- either</p> <p>15 joining or leaving any tactical team?</p> <p>16 A. Yes.</p> <p>17 Q. All right. What did you -- which tactical</p> <p>18 team did you talk to him about either joining or</p> <p>19 leaving?</p> <p>20 A. Leaving Watts' team.</p> <p>21 Q. And what did you -- what did you tell him</p> <p>22 about leaving Watts' team?</p> <p>23 A. That I wanted to leave the team and go to the</p> <p>24 third watch.</p> <p>25 Q. And what did he tell you?</p>	<p style="text-align: center;">Page 112</p> <p>1 recollection of being involved in any of the arrests of</p> <p>2 the Plaintiffs who are part of the Watts cases?</p> <p>3 MR. DAFFADA: The ones you're named in. The</p> <p>4 ones he's named in, correct?</p> <p>5 MR. RAUSCHER: Well, any of them.</p> <p>6 MR. DAFFADA: Okay.</p> <p>7 A. Could you -- could you ask that question</p> <p>8 again, please, sir?</p> <p>9 Q. Do you have any recollection of being</p> <p>10 involved in the arrests of any of the Plaintiffs in the</p> <p>11 Watts cases?</p> <p>12 MR. DAFFADA: Objection. Form. Scott, to be</p> <p>13 fair, I'm not trying to do a speaking objection, but</p> <p>14 can you narrow it down? I mean, if he's seen the other</p> <p>15 cases.</p> <p>16 MR. RAUSCHER: I mean he might say, "I don't</p> <p>17 know," I just want to start with that one because if</p> <p>18 the answer is "definitely not," then that's an answer.</p> <p>19 MR. DAFFADA: That's -- all right. 2:41:04</p> <p>20 MR. RAUSCHER: I'm not trying to be unfair</p> <p>21 either, I know there's a lot.</p> <p>22 MR. DAFFADA: You can answer the question.</p> <p>23 A. So I -- I -- I'm sorry, what -- what exactly</p> <p>24 was the question then?</p> <p>25 Q. All right. Well let me ask you this, do you</p>

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<p>1 know the names of all the Plaintiffs in the Watts 2 cases?</p> <p>3 A. Not off the top of my head, sir.</p> <p>4 Q. Do you know the names of the Plaintiffs who 5 have sued you?</p> <p>6 A. Not off the top of my head, sir.</p> <p>7 Q. All right. Let me show you -- well, let me 8 -- before I do that though, do you have any 9 recollection of being involved in the arrests of any of 10 the Plaintiffs who have sued you in the Watts cases?</p> <p>11 A. I don't recall.</p> <p>12 Q. All right. You don't recall being involved 13 in any of their arrests?</p> <p>14 A. I -- I don't recall being involved in 15 specific arrests, sir. I don't recall specific 16 arrests.</p> <p>17 Q. Okay. And looking at the police reports to 18 prepare for your deposition didn't refresh your 19 recollection about any of those arrests?</p> <p>20 A. No. 2:42:11</p> <p>21 Q. No, it -- no, it didn't. Is that what you 22 mean?</p> <p>23 A. No, it did not refresh.</p> <p>24 MR. RAUSCHER: All right. So I'm going to -- 25 Jim, did you print out everything or you want me to</p>	<p>1 something and it didn't come through.</p> <p>2 MR. DAFFADA: It's Ahmed.</p> <p>3 MR. KOSOKO: Could I have the Bates -- again, 4 please?</p> <p>5 MR. RAUSCHER: Yeah, sure. It's super -- 6 there's a really long lag on yours, but I think you 7 asked for the Bates number. It's City BG 051643 to 8 1644.</p> <p>9 MR. KOSOKO: Thank you. 2:44:06</p> <p>10 MR. RAUSCHER: And it's the -- it's -- I 11 think it was called "January 2003 Vice Case Report" in 12 the electronic version I sent.</p> <p>13 Q. All right. Have you had a chance to look at 14 that, Mr. Cadman?</p> <p>15 A. Yes.</p> <p>16 Q. Do you see your name on this report?</p> <p>17 A. Yes.</p> <p>18 Q. And that's in box 18 in -- below. Is that 19 correct?</p> <p>20 A. Yes.</p> <p>21 Q. And was your star number, January 4, 2003, 22 11914?</p> <p>23 A. I believe so.</p> <p>24 Q. Were you a part of the Watts tactical team in 25 January 2003?</p>
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<p>1 share screen?</p> <p>2 MR. DAFFADA: Yeah, I didn't print out the 3 big one --</p> <p>4 MR. RAUSCHER: I got the -- I was going to 5 show the vice case report from January 2003.</p> <p>6 MR. DAFFADA: Actually, that one, I printed.</p> <p>7 MR. RAUSCHER: So let's mark Exhibit 2 -- I'm 8 going to find my list so I write it down, but Exhibit 9 2, let's -- it's the vice case report, which is City BG 10 051643 to 1644.</p> <p>11 MR. DAFFADA: 1643?</p> <p>12 MR. RAUSCHER: One --</p> <p>13 MR. DAFFADA: I got it.</p> <p>14 MR. RAUSCHER: 051643 to 44.</p> <p>15 MR. DAFFADA: Yeah, I got it. He's got it.</p> <p>16 MR. RAUSCHER: Okay. 2:43:03</p> <p>17 MR. DAFFADA: Do you want -- he's got it in 18 his hand.</p> <p>19 Q. Okay. Can you take a look at that report and 20 just let me know when you've had a chance to read 21 through it?</p> <p>22 A. It -- for me --</p> <p>23 MR. KOSOKO: If I could have the -- the Bates 24 stamp again -- I apologize.</p> <p>25 MR. RAUSCHER: Someone just tried to say</p>	<p>1 A. January of 2003? Yes.</p> <p>2 Q. And you see there are a number of people 3 listed as offenders on this report?</p> <p>4 A. Yes. 2:45:12</p> <p>5 Q. So the -- the first one listed is Bobby 6 Coleman. Do you see that in box 19?</p> <p>7 A. Yes.</p> <p>8 Q. Do you know who Bobby Coleman is?</p> <p>9 A. No.</p> <p>10 Q. Do you see the name Leonard Gipson, that's 11 the next name?</p> <p>12 A. Yes.</p> <p>13 Q. Do you see -- do you know about -- who 14 Leonard Gipson is?</p> <p>15 A. No.</p> <p>16 Q. Did you know anyone by the nickname of "Fuzz" 17 when you worked in Ida B. Wells?</p> <p>18 A. Yes.</p> <p>19 Q. What did you know -- how did you know Fuzz?</p> <p>20 A. I just remember hearing the nickname.</p> <p>21 Q. And --</p> <p>22 A. It struck me as an unusual nickname.</p> <p>23 Q. What -- did you know anything about Fuzz?</p> <p>24 A. No.</p> <p>25 Q. Do you know if Fuzz was a drug dealer?</p>

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<p>1 A. No.</p> <p>2 Q. Do you know who Clifford Roberts is? That's</p> <p>3 the third name on here?</p> <p>4 A. I -- I see "Clifford Roberts."</p> <p>5 Q. Do you know who Clifford Roberts is?</p> <p>6 A. No. 2:46:17</p> <p>7 Q. Offender number four, if you go down to 40 --</p> <p>8 box 40, which is the narrative, it says, "Marc Giles."</p> <p>9 Do you see that?</p> <p>10 MR. DAFFADA: Box 40.</p> <p>11 Q. Box 40, left side?</p> <p>12 A. Yes.</p> <p>13 Q. Do -- do you know who that person is?</p> <p>14 A. No.</p> <p>15 Q. Did -- did you know someone nicknamed</p> <p>16 "Eastwood" when you were at Ida B. Wells?</p> <p>17 A. No.</p> <p>18 Q. What about George Ollie -- or George Ollie?</p> <p>19 Sorry, I pronounce -- O-l-l-i-e?</p> <p>20 A. I don't recall, no.</p> <p>21 Q. Nickname "G-Dog"?</p> <p>22 A. No, I don't recall. 2:47:12</p> <p>23 Q. And what about Larry Lomax?</p> <p>24 A. No, I don't recall.</p> <p>25 Q. All right. So you don't -- is it fair to say</p>	<p>1 Q. Do you know whether the narrative section</p> <p>2 accurately describes what happened?</p> <p>3 A. I -- I don't recall the arrest, sir.</p> <p>4 Q. Well, so is the answer then you don't know</p> <p>5 whether the narrative section is accurate?</p> <p>6 A. I -- I don't recall the arrest.</p> <p>7 Q. So that has to mean you don't know if the</p> <p>8 narrative is accurate or not accurate, correct?</p> <p>9 A. I don't know.</p> <p>10 Q. Right. You don't know either way whether</p> <p>11 what's written in this report actually happened?</p> <p>12 MR. DAFFADA: Objection. Form. 2:49:17</p> <p>13 A. I don't recall the arrest, sir.</p> <p>14 Q. So maybe can you try to answer this one yes</p> <p>15 or no, and if you can't, just tell me you -- you can't</p> <p>16 and we'll -- and why you can't, but is the narrative</p> <p>17 summary in this vice case report accurate, "yes," "no,"</p> <p>18 or "I don't know"?</p> <p>19 MR. DAFFADA: Object to form. You can</p> <p>20 answer.</p> <p>21 A. I -- I don't know.</p> <p>22 Q. Okay. Anything else that could refresh your</p> <p>23 recollection about this -- about the January 4th, 2003</p> <p>24 arrest?</p> <p>25 A. I don't know. 2:50:06</p>
<p style="text-align: center;">Page 118</p> <p>1 you don't recall any of the people listed as offenders</p> <p>2 on this vice case report other than remembering that</p> <p>3 there was someone named Fuzz at -- when you were at Ida</p> <p>4 B. Wells?</p> <p>5 A. I'm sorry, sir, could you say the question</p> <p>6 again?</p> <p>7 Q. Yeah, I just wanted to make sure that I -- I</p> <p>8 get it right. So is it fair to say that you don't</p> <p>9 remember anyone who is listed as an offender on this</p> <p>10 vice case report at all beyond knowing that there was</p> <p>11 someone named Fuzz when you were at Ida B. Wells?</p> <p>12 A. I -- I don't recall these names or persons.</p> <p>13 Q. And you had a chance to read through the</p> <p>14 narrative on the second -- oh, I'm sorry, there's also</p> <p>15 George Scroggins, I -- I didn't want to leave that off,</p> <p>16 offender seven on the second page, do you know who that</p> <p>17 is?</p> <p>18 A. No. 2:48:23</p> <p>19 Q. And you've -- you've looked at the narrative,</p> <p>20 right? You've -- you've had a chance to read through</p> <p>21 the narrative that starts, "in summary" and then</p> <p>22 describes what allegedly happened?</p> <p>23 A. Yes.</p> <p>24 Q. Do you know who -- who wrote this report?</p> <p>25 A. No.</p>	<p style="text-align: center;">Page 120</p> <p>1 MR. RAUSCHER: There's a -- Jim, did you</p> <p>2 print out any of the pictures?</p> <p>3 MR. DAFFADA: That, I did not do. I --</p> <p>4 MR. RAUSCHER: Okay. So I'm going to --</p> <p>5 that's okay.</p> <p>6 Q. I'm going to share my screen with you, I'm</p> <p>7 going to share a picture, this is going to be Exhibit</p> <p>8 3, and this is CITY BG 031496. Can you see that</p> <p>9 picture?</p> <p>10 A. Yes.</p> <p>11 Q. Do you recognize the person in that picture?</p> <p>12 A. No.</p> <p>13 Q. All right. All right. This is -- let me --</p> <p>14 my screen is freezing up. I'm going to show you</p> <p>15 another picture. Okay. This is CITY BG 052081.</p> <p>16 MR. DAFFADA: What -- what was the first one?</p> <p>17 I'm sorry, can you go back because I don't think it was</p> <p>18 in the record.</p> <p>19 MR. RAUSCHER: Oh, I -- I tried to read it</p> <p>20 in, but maybe I was too fast. It's CITY BG 031496.</p> <p>21 MR. DAFFADA: Okay, thanks. 2:51:19</p> <p>22 MR. RAUSCHER: Sure.</p> <p>23 Q. All right. This one is CITY BG 052081, do</p> <p>24 you recognize the person in this picture?</p> <p>25 A. No.</p>

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<p>1 Q. All right. Another picture, CITY -- this is 2 Exhibit 5, CITY BG 052230, do you recognize the person 3 in this picture?</p> <p>4 A. No. 2:52:00</p> <p>5 Q. The next exhibit I'm showing you would be 6 Exhibit 6, and this is CITY BG 052228. Have you seen 7 this document before?</p> <p>8 A. I don't recall.</p> <p>9 Q. Do you have it in front of you or are you 10 able to -- or are you able to see it on the screen?</p> <p>11 A. I -- I have it in front of me, sir.</p> <p>12 Q. Okay. And so this is an arrest report of 13 George Ollie -- George Ollie, right?</p> <p>14 A. Yes.</p> <p>15 Q. And does looking at this report refresh your 16 recollection at all about the arrests on January 4, 17 2003, the ones we were just talking about?</p> <p>18 A. No. 2:53:16</p> <p>19 Q. There you go, I'm going to show you one more 20 picture as Exhibit 7. So this is CITY BG 051681, have 21 you -- do you recognize the person in this picture?</p> <p>22 A. No. 2:54:07</p> <p>23 Q. Okay. All right. I'm going to ask you to 24 take a look if you have it at a document that is Bates 25 stamped COPA Watts 030607.</p>	<p>1 WITNESS: Okay.</p> <p>2 Q. Tell me if you need me to make it bigger for 3 you.</p> <p>4 A. Yes, sir, please. 2:55:51</p> <p>5 Q. Just let me know when you need me to scroll. 6 If that's too small, let me know.</p> <p>7 A. That's fine.</p> <p>8 WITNESS: I -- see a --</p> <p>9 MR. DAFFADA: No, you don't have it.</p> <p>10 WITNESS: I -- I don't have a vice that 11 corresponds, I thought maybe I did.</p> <p>12 MS. MCGRATH: No.</p> <p>13 Q. There is a vice case report, I'm happy to 14 show you that next.</p> <p>15 A. I -- I don't want to -- I'm having a little 16 hard time -- can we make it just a little bit larger, 17 please, sir?</p> <p>18 Q. Sure. You know what? I think -- I'm going 19 to give you the control so you can -- you should be 20 able to then adjust it --</p> <p>21 A. Oh, I -- I don't think that's a good idea, 22 sir, I'm terrible with computers.</p> <p>23 Q. All right. Then I'm going to adjust it for 24 you, and you tell me when -- when to stop.</p> <p>25 A. A little -- little more. 2:56:56</p>
<p style="text-align: center;">Page 122</p> <p>1 MR. RAUSCHER: That's -- Jim, that's the 2 Leonard Gipson arrest report from May 2003. I can 3 share it if that's easier.</p> <p>4 MR. DAFFADA: Go ahead and put it up.</p> <p>5 MR. RAUSCHER: Okay. 2:55:06</p> <p>6 MR. DAFFADA: Probably -- it's faster.</p> <p>7 MR. RAUSCHER: Sure.</p> <p>8 MR. DAFFADA: And I'll look up and --</p> <p>9 MR. RAUSCHER: Okay. So I'm -- as Exhibit 8, 10 I'm sharing that document I just announced, COPA Watts 11 030607.</p> <p>12 MR. DAFFADA: Don't you have that?</p> <p>13 WITNESS: Excuse me.</p> <p>14 MS. MCGRATH: No, he doesn't.</p> <p>15 WITNESS: No, I guess I don't.</p> <p>16 MR. DAFFADA: Here -- here it is.</p> <p>17 Q. You got it in front of you?</p> <p>18 MR. DAFFADA: That Lomax?</p> <p>19 WITNESS: No, no, that was -- I don't think 20 this is the right one, the dates --</p> <p>21 MR. RAUSCHER: No, I'm on a different -- this 22 is the next -- I should be clear, this is the next 23 Gipson arrest.</p> <p>24 MR. DAFFADA: You can go ahead and use the 25 screen now.</p>	<p style="text-align: center;">Page 124</p> <p>1 Q. Is that good?</p> <p>2 A. Yes, yes --</p> <p>3 Q. All right.</p> <p>4 A. Right here. No. Well --</p> <p>5 Q. Okay.</p> <p>6 A. -- how do I scroll down?</p> <p>7 Q. I'll -- I have to scroll for you because --</p> <p>8 MR. DAFFADA: Here is the -- this is on the 9 iPad. I'm giving him --</p> <p>10 WITNESS: This is the same one?</p> <p>11 MR. DAFFADA: Same thing.</p> <p>12 WITNESS: Good.</p> <p>13 MR. DAFFADA: I'm giving him an iPad of it.</p> <p>14 WITNESS: A little better, yeah.</p> <p>15 MR. RAUSCHER: Okay, that's fine. So I'll 16 take it off here then.</p> <p>17 WITNESS: Thank you.</p> <p>18 MR. DAFFADA: You might need it again.</p> <p>19 Q. All right. So now have you had a chance to 20 read that report?</p> <p>21 A. Yes.</p> <p>22 Q. And do you see it is another arrest of 23 Leonard Gipson from later in -- from May 8th, 2003?</p> <p>24 A. Yes.</p> <p>25 Q. And you see your name is listed as one of the</p>

<p style="text-align: right;">Page 125</p> <p>1 assisting arresting officers?</p> <p>2 A. Yes. 2:58:10</p> <p>3 Q. What does it mean to you, based on your</p> <p>4 experience as a Chicago police officer, to be listed as</p> <p>5 an assisting arresting officer?</p> <p>6 A. It's an officer that assisted with some</p> <p>7 portion of the -- the physical arrest and processing.</p> <p>8 Q. And so can you expand on that a little bit?</p> <p>9 What do you mean by "physical portion of the arrest and</p> <p>10 processing"?</p> <p>11 A. There could be the -- the actual -- the</p> <p>12 handcuffing of an arrestee, there can be portions -- an</p> <p>13 officer called to a -- the scene to assist the officer</p> <p>14 with a transport, securing property that's on scene at</p> <p>15 the station and while the -- the arrestee is being</p> <p>16 processed, it can be guarding an arrestee, it can be</p> <p>17 taking an arrestee to the bathroom, searching an</p> <p>18 arrestee, helping some portion of a paper --</p> <p>19 Q. Is there a -- oh, I'm sorry, go ahead. 2:59:25</p> <p>20 A. Those -- some examples, sir.</p> <p>21 Q. Is there a way to look at a piece of paper</p> <p>22 about an arrest and know who did what? So could -- you</p> <p>23 know, how would -- looking at a -- trying to figure out</p> <p>24 from this letter -- Gipson arrest, who maybe brought</p> <p>25 him to the bathroom and who put the handcuffs on him</p>	<p style="text-align: right;">Page 127</p> <p>1 -- I have never seen that specifically written out.</p> <p>2 Q. Is there -- is there anywhere to look, as a</p> <p>3 general matter, to get more detail about who did what</p> <p>4 if you're -- you know, six people are listed as</p> <p>5 assisting arresting officers, how can you tell who did</p> <p>6 what?</p> <p>7 MR. DAFFADA: Objection. Form. You can</p> <p>8 answer.</p> <p>9 A. Years later, I -- I -- I -- I don't know.</p> <p>10 Several years later, I don't know.</p> <p>11 Q. There's nothing written down generally that</p> <p>12 would explain it. Is that what you're saying?</p> <p>13 MR. DAFFADA: Objection. Form. Are we</p> <p>14 talking about this arrest report or generally?</p> <p>15 MR. RAUSCHER: No, just generally. 3:01:26</p> <p>16 MR. DAFFADA: Objection to the scope.</p> <p>17 WITNESS: Should -- should I answer that</p> <p>18 question?</p> <p>19 MR. DAFFADA: Oh, yes.</p> <p>20 WITNESS: Oh, okay.</p> <p>21 A. The -- the case reports have changed.</p> <p>22 Q. Okay.</p> <p>23 A. So I -- it's fresher in my mind looking at a</p> <p>24 modern case report, or a more modern case report at</p> <p>25 least --</p>
<p style="text-align: right;">Page 126</p> <p>1 and who processed him at the station, how do you do</p> <p>2 that?</p> <p>3 A. Sir, I --</p> <p>4 MR. DAFFADA: Objection. Form. You can</p> <p>5 answer.</p> <p>6 A. Sir, I was giving examples.</p> <p>7 Q. I -- I'm sorry, so was I, I didn't mean to</p> <p>8 suggest I know someone took him to the bathroom.</p> <p>9 A. I -- I -- I -- I don't recall the arrest, I</p> <p>10 don't know if he went to the bathroom, I don't know if</p> <p>11 property had to be secured. I -- I --</p> <p>12 Q. That's fair --</p> <p>13 A. -- don't recall the arrest.</p> <p>14 Q. Let's do it as -- I'm going to try it as a</p> <p>15 hypothetical then because I don't want to sound like --</p> <p>16 I don't want it to be confusing in the record. Looking</p> <p>17 at an arrest report generally, how do you know who did</p> <p>18 what with the arrest? So if there was a -- if there</p> <p>19 was an arrest where there was property recovered and</p> <p>20 someone took the person who was arrested to the</p> <p>21 bathroom, should all of that be written down somewhere?</p> <p>22 MR. DAFFADA: Objection. Form. You can</p> <p>23 answer if you can. 3:00:29</p> <p>24 A. I don't think so, I've never -- for instance,</p> <p>25 taking an arrestee to the bathroom, I have never -- I</p>	<p style="text-align: right;">Page 128</p> <p>1 Q. Okay.</p> <p>2 A. -- there is a -- there is -- it's written on</p> <p>3 a computer, and there is a drop-down as far as crime</p> <p>4 scene or searching or -- to the best of my recollection</p> <p>5 --</p> <p>6 Q. Okay. 3:02:15</p> <p>7 A. -- although -- there. Back then, I -- I -- I</p> <p>8 -- and I don't know all -- I -- I don't know.</p> <p>9 Q. Did you receive training ever on how to</p> <p>10 complete police reports?</p> <p>11 A. Yes.</p> <p>12 Q. And when did you receive training about</p> <p>13 completing -- or about drafting police reports?</p> <p>14 A. When I joined the academy.</p> <p>15 Q. Do you remember anything about that training?</p> <p>16 A. No.</p> <p>17 Q. Having looked at this report of the --</p> <p>18 Leonard Gipson's May 8th, 2003 arrest, do you remember</p> <p>19 anything about being involved in this arrest?</p> <p>20 A. No. 3:03:08</p> <p>21 Q. Do you know one way or the other whether the</p> <p>22 incident happened as it was described in the narrative</p> <p>23 section of this report?</p> <p>24 A. I don't know.</p> <p>25 Q. Is there anything that would refresh your</p>

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1 recollection about this arrest?	
2 A. I don't know.	1 WITNESS: Okay. 3:07:04
3 Q. Well, can you think of anything that might	2 MR. DAFFADA: And just scroll down.
4 refresh your recollection about this arrest?	3 WITNESS: Okay.
5 A. No.	4 MR. DAFFADA: Okay?
6 Q. Do you know who Lee Rainey is?	5 WITNESS: Okay.
7 A. No.	6 MR. RAUSCHER: Okay. It sounds like he has
8 MR. RAUSCHER: Jim, do you have Lee Rainey's	7 it separate, so I won't bring it all up on the screen.
9 vice case report from 2003?	8 MR. DAFFADA: Yes, I gave him an iPad.
10 MR. DAFFADA: Yeah, I should have that.	9 Q. Okay. If you could look, I can -- you know,
11 Yeah, it's right here. That's 76 -- starts with 76?	10 it's -- it's very long, I don't think you want to read
12 MR. RAUSCHER: It's DO JOINT -- yeah, yeah,	11 200 plus pages, but if you look at about the third to
13 ends with 76.	12 -- third, fourth, fifth pages, it'll describe what this
14 MR. DAFFADA: Yeah. 3:04:05	13 is about, and I want you to look at those and tell me
15 Q. That's DO JOINT -- so let's make that Exhibit	14 if you know anything about it.
16 9, DO JOINT 005976 to 5977, and take a look at that,	15 MR. NOLAND: This -- this is Dan Noland, I
17 please, and let me know when you've had a chance to do	16 just -- this CR is marked confidential, so we've marked
18 so, and I can tell you your name shows up at the top of	17 this portion of the -- or at least attaching it, if
19 the second page.	18 it's being attached to the deposition, as confidential,
20 A. I've looked it over, sir. 3:05:04	19 I guess. May --
21 Q. All right. Do you have any recollection of	20 MR. RAUSCHER: Okay. 3:07:53
22 being involved in the arrest of Lee Rainey on May 31st,	21 MR. NOLAND: -- or may not be -- may or may
23 2003?	22 not be confidential information in the questions and
24 A. No.	23 answers depending on -- you know, depending on his
25 Q. Do you know one way or the other where the	24 level of recollections. Thank you.
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1 narrative section describing the incident happened the	25 Q. Have you had a chance to look at those few
2 way it's described in this report?	
3 A. I don't know.	
4 Q. Is there anything you can think of that would	
5 refresh your recollection about this arrest or about	
6 your involvement in this arrest?	
7 A. Nothing I can think of, no.	
8 Q. What was the difference between vice case	
9 reports and arrest reports back in the 2000 to 2003	
10 time period, if you know?	
11 A. I don't recall, sir.	
12 Q. Do you know why they -- both types of reports	
13 existed?	
14 A. No. 3:06:05	
15 Q. All right. Now I'm going to -- I'm going to	
16 ask you some questions about some CRs.	
17 MR. RAUSCHER: Jim, I'm thinking you didn't	
18 print this one out because it's 219 pages.	
19 MR. DAFFADA: I did not. Which number --	
20 MR. RAUSCHER: All right.	
21 MR. DAFFADA: -- is that, BG what?	
22 MR. RAUSCHER: It is CITY BG -- let's make	
23 this Exhibit 10, CITY BG 007777 to 07996.	
24 MR. DAFFADA: Okay. So here, I'm just going	
25 to hand it to you.	
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1 pages?	
2 A. Yes, sir.	
3 Q. And then you know what? I should also tell	
4 you if you want to look at page 8, which is CITY BG	
5 7785, that may -- I think that -- that would be worth	
6 reading before I ask you a question.	
7 A. I've read it, sir. 3:09:15	
8 Q. Are you familiar with this incident or these	
9 allegations against Al Jones stealing \$30 from a female	
10 heroin dealer?	
11 A. No, sir.	
12 Q. And were you ever interviewed in connection	
13 with this CR?	
14 A. No, sir.	
15 Q. Okay. Do you remember ever being disciplined	
16 as a Chicago police officer?	
17 A. Yes.	
18 Q. Tell me what you remember about being	
19 disciplined as a Chicago police officer.	
20 A. I was suspended for outstanding parking	
21 tickets.	
22 Q. How long were you suspended for?	
23 A. One day, sir. 3:10:05	
24 Q. And other than that, were you ever	
25 disciplined as a Chicago police officer?	

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<p>1 A. Couldn't -- something else. I think I -- I 2 think I was suspended for a court deviation for missing 3 court, I think.</p> <p>4 Q. Okay. Anything else?</p> <p>5 A. I -- I don't recall anything else at this 6 time, sir.</p> <p>7 Q. Okay. All right. I'm going to ask you to 8 take a look at --</p> <p>9 MR. RAUSCHER: Or Jim, tell me if you want me 10 to share it. 3:11:05</p> <p>11 Q. -- CITY BG 005734 to 5786.</p> <p>12 MR. DAFFADA: 00 -- can you give me the 13 number again? I'm sorry.</p> <p>14 MR. RAUSCHER: It's okay. CITY --</p> <p>15 MR. DAFFADA: What --</p> <p>16 MR. RAUSCHER: -- BG 005734.</p> <p>17 MR. DAFFADA: What is it though?</p> <p>18 MR. RAUSCHER: It's a CR.</p> <p>19 MR. DAFFADA: Oh.</p> <p>20 MR. RAUSCHER: These -- all the ones I'm 21 doing right now are CRs.</p> <p>22 MR. DAFFADA: Seven -- give me a second and 23 I'll look for --</p> <p>24 MR. RAUSCHER: Or I can just put it up.</p> <p>25 MR. DAFFADA: Go ahead.</p>	<p>1 MS. MCGRATH: The first couple pages weren't 2 --</p> <p>3 MR. DAFFADA: -- 5 --</p> <p>4 MR. RAUSCHER: It starts at 5734. 3:13:08</p> <p>5 MS. MCGRATH: No.</p> <p>6 MR. DAFFADA: 5734? Here, this is it. There 7 you go.</p> <p>8 MR. NOLAND: So again, Dan -- Dan Noland, 9 I've marked this -- I've identified this portion as 10 confidential since we're talking about this --</p> <p>11 WITNESS: I thought we said, "5734." 5734?</p> <p>12 I'm sorry, I beg your pardon.</p> <p>13 MR. RAUSCHER: And yeah, Dan, I think 14 probably like the last one, depending on what he 15 remembers, it may or may not be, but the document is 16 marked confidential.</p> <p>17 A. I -- I've seen -- I see the document. 3:13:48</p> <p>18 Q. Do you see that you are accused here of using 19 excessive force?</p> <p>20 A. I see it, sir, I've read it.</p> <p>21 Q. Do you know whether that's a -- that 22 accusation is accurate?</p> <p>23 A. I don't recall this at all, sir.</p> <p>24 Q. Could this have been the incident you 25 mentioned earlier when you pushed a teenager?</p>
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<p>1 MR. RAUSCHER: Do you want me to put it up?</p> <p>2 MR. DAFFADA: Yes, put it up for now.</p> <p>3 MR. RAUSCHER: Okay.</p> <p>4 MR. DAFFADA: Do you want -- here --</p> <p>5 Q. This is Exhibit 11, I believe.</p> <p>6 MR. DAFFADA: Why don't you -- okay, we got 7 it. 3:12:09</p> <p>8 MR. RAUSCHER: Okay.</p> <p>9 MR. DAFFADA: Here --</p> <p>10 Q. If you want to flip through the beginning of 11 this, the -- I can tell you the, like, findings are on 12 page 6, and then page 7 is a brief description of the 13 allegation.</p> <p>14 MR. DAFFADA: Scott, I don't think I heard 15 that, you kind of broke up there. What did you just 16 say?</p> <p>17 MR. RAUSCHER: Oh, I was just saying if he 18 wants to flip through whatever he wants, that's fine, 19 and the findings, I think, are on the sixth page, and 20 then the little summary of allegations are on the 21 seventh. I'm just trying to direct him.</p> <p>22 WITNESS: I don't know what this -- I don't 23 think I -- I have the right thing, you guys -- do I? 24 Doesn't look like a CR number.</p> <p>25 MR. DAFFADA: 65 --</p>	<p>1 A. I -- to the best of my recollection, sir, I 2 was on Sergeant Watts' team when I did that.</p> <p>3 Q. Okay.</p> <p>4 A. To the --</p> <p>5 Q. And --</p> <p>6 A. -- very best of my recollection.</p> <p>7 Q. Do you think you were not on Sergeant Watts' 8 team because this is too early for him, is that --</p> <p>9 A. I -- I never worked with Ross Valenti, I see 10 he -- he here as well --</p> <p>11 Q. Okay. 3:15:11</p> <p>12 A. -- on Sergeant Watts' team, that's why I -- I 13 -- I am -- I'm making an assumption.</p> <p>14 Q. Okay. You don't remember anything about this 15 incident or these allegations?</p> <p>16 A. No, sir, no.</p> <p>17 MR. RAUSCHER: All right. The next one, I'm 18 going to make Exhibit 12, Bates range is CITY BG --</p> <p>19 Jim, another CR, CITY BG 047889.</p> <p>20 MR. DAFFADA: 889? Okay, hold on.</p> <p>21 MR. RAUSCHER: Yep, it goes to 47953.</p> <p>22 MR. DAFFADA: 889. Here you go.</p> <p>23 WITNESS: Thank you so much. 3:16:09</p> <p>24 MR. DAFFADA: Is this all --</p> <p>25 MR. NOLAND: And same designation under the</p>

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<p>1 protective order from Counsel for the City.</p> <p>2 Q. And again, you can feel free to review as</p> <p>3 much as you want, you'll see the summary of things in</p> <p>4 the first few pages here.</p> <p>5 A. I've read it, sir.</p> <p>6 Q. All right. Do you remember this incident or</p> <p>7 these allegations?</p> <p>8 A. No, sir.</p> <p>9 Q. Do you see that you are accused of striking</p> <p>10 someone in the face, specifically someone named Kevin</p> <p>11 Crosby accuses you of striking him in the face?</p> <p>12 A. I -- I don't see it, where? 3:17:14</p> <p>13 Q. If you look at page -- the -- the first page,</p> <p>14 it says, starting on the right side of the page in the</p> <p>15 "allegations" section, fourth line from the top, "Kevin</p> <p>16 Crosby alleged that during the same incident, Officer</p> <p>17 Nicholas Cortesi, two, choked him," semicolon, "Officer</p> <p>18 Mathew Cadman, two, struck him on the side of the</p> <p>19 face." Do you see that?</p> <p>20 A. Yes, I do. Yes, I do.</p> <p>21 Q. Okay. Does that refresh -- seeing that</p> <p>22 refresh your recollection about the allegations made</p> <p>23 against you from this, it was August 30th, 2003 event?</p> <p>24 A. No, sir, I don't recall this.</p> <p>25 Q. Did you strike someone in the face on August</p>	<p>1 Q. You and other officers? 3:19:57</p> <p>2 A. It -- I'm reading here it says that -- I'm</p> <p>3 sorry, I -- I have to go back.</p> <p>4 Q. Okay. If you look at the first page, I think</p> <p>5 it's got the -- the allegations.</p> <p>6 A. I -- I've read it, sir.</p> <p>7 Q. All right. You see that you were -- you --</p> <p>8 several uniformed officers, and it looks like you're</p> <p>9 the first accused listed on here, are accused of</p> <p>10 entering an apartment without permission or warrant,</p> <p>11 throwing a chair which struck the victim's foot causing</p> <p>12 slight bleeding, and then left the apartment in</p> <p>13 disarray which was caused by throwing chairs around and</p> <p>14 beds onto the floor. Do you see that?</p> <p>15 A. Yes.</p> <p>16 Q. Did you do any of those things?</p> <p>17 A. Sir, I don't recall any such -- any portion</p> <p>18 of this incident. Throwing a chair? No.</p> <p>19 Q. Okay. And -- and I'm sorry to go back to</p> <p>20 this again, but -- I won't belabor it, but were you</p> <p>21 drinking heavily in the summer and fall of 2003?</p> <p>22 A. No. 3:21:10</p> <p>23 Q. Okay. Do you know -- do you remember when as</p> <p>24 a police officer you started drinking heavily?</p> <p>25 MR. DAFFADA: Objection. Form. You can</p>
<p style="text-align: center;">Page 138</p> <p>1 30th, 2003?</p> <p>2 A. I don't -- I don't recall. 3:18:10</p> <p>3 Q. Do you recall ever hitting someone in the</p> <p>4 face when you were a police officer?</p> <p>5 A. Not specifically.</p> <p>6 Q. What -- what do you mean, "not specifically"?</p> <p>7 A. I -- I don't remember punching anyone in the</p> <p>8 face, hitting anyone in the face.</p> <p>9 Q. All right. So I'm going to bring up -- or</p> <p>10 I'd like you to look at one more, which is CITY BG</p> <p>11 07954 to 047976.</p> <p>12 MR. DAFFADA: The last two numbers on the</p> <p>13 first page, "54," you said?</p> <p>14 MR. RAUSCHER: Yeah, 047954. 3:19:08</p> <p>15 MR. DAFFADA: Okay, so --</p> <p>16 MR. NOLAND: Same designation by Counsel for</p> <p>17 the City.</p> <p>18 MR. RAUSCHER: Okay.</p> <p>19 A. I've read it, sir.</p> <p>20 Q. All right. And do you see that you are</p> <p>21 accused of wrongdoing in this CR also?</p> <p>22 A. Yes.</p> <p>23 Q. And do you see what specifically you're</p> <p>24 accused of doing?</p> <p>25 A. I'm --</p>	<p style="text-align: center;">Page 140</p> <p>1 answer.</p> <p>2 A. I don't -- I don't recall -- I -- I don't --</p> <p>3 I don't know, sir.</p> <p>4 Q. Okay. But you're -- you're -- you're sure</p> <p>5 that in that fall, summer 2003 time frame, you weren't</p> <p>6 drinking heavily?</p> <p>7 A. No.</p> <p>8 Q. Sorry, was that no, you weren't drinking then</p> <p>9 or you're not sure?</p> <p>10 A. I could -- I could explain. I --</p> <p>11 Q. Yeah.</p> <p>12 A. -- believe -- I believe that I first started</p> <p>13 drinking to where it was problematic, if I had a --</p> <p>14 that I -- that I had a problem, 2008.</p> <p>15 Q. Okay. 3:22:08</p> <p>16 A. May -- maybe more like -- excuse me, I --</p> <p>17 2009. I -- I -- I -- to the best of my recollection,</p> <p>18 if I had to name a year, it'd be 2009, 2010.</p> <p>19 Q. Okay. And is there some -- some particular</p> <p>20 reason you're able to kind of pinpoint it to that time</p> <p>21 frame?</p> <p>22 MR. DAFFADA: We're going to mark -- can we</p> <p>23 keep this as part of the confidential record, so you --</p> <p>24 MR. RAUSCHER: Yeah.</p> <p>25 MR. DAFFADA: Thank you.</p>

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<p>1 MR. RAUSCHER: Of course. 2 MR. DAFFADA: Go ahead. 3 A. That would be after some personal setbacks, 4 some illnesses in the -- in the family. 5 Q. Okay. 6 A. Yeah, yeah, yeah. 3:23:00 7 MR. RAUSCHER: Is it all right if we take 8 about five, maybe a couple minutes longer than that, 9 take a little break now? 10 MR. DAFFADA: Really? Are you sure? 11 MR. RAUSCHER: Do you not want -- do you not 12 want to? 13 MR. DAFFADA: I'm joking. 14 MR. RAUSCHER: Oh. 15 MR. DAFFADA: We've been taking breaks left 16 and right and first time you've asked. 17 MR. RAUSCHER: I know, this is true. I'm -- 18 WITNESS: I'm floating -- 19 MR. RAUSCHER: All right. Thank you. 20 MR. DAFFADA: All right. 21 WITNESS: -- my -- 22 MR. DAFFADA: Let's go. Take a break. How 23 long, Scott? 24 MR. RAUSCHER: Maybe let's say ten. I'm 25 going to just see -- I may be getting close, I just</p>	<p>1 Q. Are you familiar with reverse sting? 2 A. I'm familiar with the term. 3 Q. And what do you know about reverse stings? 4 A. That officers pose as -- as drug dealers. 5 Q. Did you ever participate in reverse stings? 6 A. I believe so. 3:25:03 7 Q. Did you ever participate in reverse stings at 8 the Ida B. Wells homes? 9 A. I believe I did. 10 Q. All right. Tell me what you remember about 11 the reverse stings you participated in at the Ida B. 12 Wells homes? 13 A. I -- I -- I -- I really can't recall. 14 Q. Do -- do you remember the time frame when you 15 were participating in reverse stings at Ida B. Wells? 16 MR. DAFFADA: Objection. Form. You can 17 answer. 18 A. I don't recall. 19 Q. Do you know what role you played during the 20 reverse sting or reverse stings? 21 A. Specifically, I don't remember. I remember 22 what I didn't do. 23 Q. What did you not do? 3:26:09 24 A. I never posed as a drug dealer. 25 Q. Do you know why you -- you didn't ever pose</p>
<p>1 want to double-check some things. 2 RECORDER: Off the record -- 3 WITNESS: Who wants it? 4 RECORDER: -- 2:16 p.m. 5 (Off the record) 6 RECORDER: Back on the record, 2:31 p.m. 7 Q. Did you have any partners on the Watts team 8 other than Brian Bolton? 9 A. I would consider Mick Spaargaren my partner 10 and Bob -- and Robert Gonzalez my partner. 11 Q. Okay. And then what about was Al Jones ever 12 your partner? 13 A. He was not my partner. 3:24:02 14 Q. Did you ever work -- were you ever assigned 15 to be his partner, like, if there were people out or 16 anything like that? 17 A. I don't recall. 18 Q. Do you know why you were his partner that day 19 he was accused of stealing the \$30 from the heroin 20 dealer? 21 A. I -- I don't recall the incident, sir. 22 Q. Did you -- is there -- is there anything else 23 you ever saw from anyone on the Watts team that gave 24 you pause that we haven't talked about today? 25 A. As I sit here now, sir, I can't remember.</p>	<p>1 as the drug dealer? 2 A. I -- I -- I don't fit in, sir, in -- in the 3 areas that I ever conducted a reverse sting. 4 Q. Is that because of -- because your skin 5 color? 6 A. Yes, sir. 7 Q. Were reverse stings effective? 8 A. I don't know. 9 Q. When were -- when -- when the Watts team 10 conducted reverse stings, did they actually -- were 11 they actually handing drugs to people? 12 MR. DAFFADA: Objection. Form. 13 A. I don't know. 3:27:07 14 Q. Do you know if there was a real exchange of 15 money and drugs during a reverse sting? 16 A. I don't know. 17 Q. Is there anything else you do know about 18 reverse stings? 19 MR. DAFFADA: At -- at the Ida B. Wells? I'm 20 sorry. 21 MR. RAUSCHER: Sure. 22 Q. At the Ida B. Wells, is there anything else 23 that you haven't testified to that you know about 24 reverse stings? 25 A. Not that I can remember.</p>

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<p>1 Q. Did you participate in reverse stings at -- 2 at locations other than Ida B. Wells?</p> <p>3 A. I believe at the -- the next TAC team that I 4 was assigned to, I -- I did. I don't remember the -- 5 the exact locations.</p> <p>6 Q. And do you -- was there anything different 7 about the reverse stings in those locations than the 8 ones that you participated in at Ida B. Wells?</p> <p>9 A. The location. 3:28:06</p> <p>10 Q. Okay. Anything about how they were run that 11 was different?</p> <p>12 A. I -- I -- I don't know. I -- I don't recall.</p> <p>13 Q. Did you ever share any of your concerns about 14 Watts or about being on the Watts team with any of your 15 partners on that team?</p> <p>16 MR. DAFFADA: Objection. Form.</p> <p>17 A. I -- I don't recall, sir.</p> <p>18 Q. Did you ever -- while you were on the Watts 19 team, did you ever share any concerns that you had 20 about Watts or about being on the team with anybody?</p> <p>21 MR. DAFFADA: Sorry, can you repeat the 22 question? Because you broke up a minute.</p> <p>23 MR. RAUSCHER: Yeah.</p> <p>24 Q. While you were -- during the time period you 25 were serving on Watts' team, did you ever share</p>	<p>1 Q. Do you have any emails about Watts or the 2 Watts team or your time on the Watts team that you've 3 either sent or received?</p> <p>4 A. I -- I don't know.</p> <p>5 Q. Do you think you might?</p> <p>6 A. I don't know. 3:31:05</p> <p>7 Q. What about any text message about Watts or 8 the Watts team?</p> <p>9 MR. DAFFADA: Objection to the extent it 10 calls for privileged information. You can answer -- 11 not a privilege --</p> <p>12 Q. Yeah, I'm not asking for the content of any 13 text messages with lawyers, I just want to know if you 14 have any text messages about Watts or the Watts team.</p> <p>15 A. No.</p> <p>16 Q. Do you have any social media accounts?</p> <p>17 A. Yes.</p> <p>18 Q. What social media do you use?</p> <p>19 A. Instagram.</p> <p>20 Q. What's your -- is your profile public or 21 private?</p> <p>22 A. It's private. 3:32:03</p> <p>23 Q. Do you have anything on that account relating 24 to Watts or the Watts team?</p> <p>25 A. No.</p>
<p>1 concerts about Watts or about being on the Watts team 2 with anyone?</p> <p>3 A. While I was on the Watts team?</p> <p>4 Q. Yeah. 3:29:12</p> <p>5 A. No.</p> <p>6 Q. And what about after the Watts team but 7 before you retired from the Chicago Police Department, 8 did you ever share concerns about Watts or the Watts 9 team with anyone during that time period?</p> <p>10 A. I -- I -- I don't recall specifically, but I 11 -- I believe I did, sir.</p> <p>12 Q. Okay. Who do you think you shared concerns 13 with and what did you tell those -- what did you tell 14 that person or those people?</p> <p>15 A. I -- I don't recall. I don't recall, sir. 3:30:03</p> <p>16 Q. Do you recall anything about sharing concerns 17 about Watts or the Watts team after you left the team 18 before you retired?</p> <p>19 A. I don't recall, sir.</p> <p>20 Q. Do you have any documents or notes that 21 you've taken over the years about Watts or the Watts 22 team?</p> <p>23 A. No.</p> <p>24 Q. Do you -- do you use email?</p> <p>25 A. Yes.</p>	<p>1 Q. What sort of things do you use Instagram for?</p> <p>2 A. Looking at the artwork of other artists, 3 following the -- the marine corps, keeping up with my 4 friends that don't live in Chicago.</p> <p>5 Q. Any of those friends former police officers?</p> <p>6 A. No.</p> <p>7 MR. RAUSCHER: I don't have any more 8 questions.</p> <p>9 MR. FLAXMAN: This is Joel Flaxman, I don't 10 have any questions. Thank you for your time, sir.</p> <p>11 WITNESS: Thank you, sir. 3:32:59</p> <p>12 MS. DOI: This is Kathryn Doi, I don't have 13 any questions.</p> <p>14 MR. NOLAND: No questions for the City.</p> <p>15 MR. RAUSCHER: Ahmed, do you have anything?</p> <p>16 WITNESS: No, sir.</p> <p>17 MR. RAUSCHER: Oh, no, I was asking another 18 -- there's -- sorry, that's okay, that --</p> <p>19 WITNESS: Beg your pardon.</p> <p>20 MR. RAUSCHER: There's -- there's two more 21 lawyers who I just wanted to make sure.</p> <p>22 MR. KOSOKO: Yeah, I just have a couple 23 questions. 3:33:43</p> <p>24 EXAMINATION</p> <p>25 BY MR. KOSOKO:</p>

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<p>1 Q. Mr. Cadman, what -- what are the inventory 2 procedures that were in place at the time you were on 3 the 4512 tactical team?</p> <p>4 A. I -- I can't -- I -- I think it was inventory 5 books at that time.</p> <p>6 Q. Okay. So if you recovered contraband, what 7 -- from a scene, what would you do after that?</p> <p>8 MR. DAFFADA: Objection. Form. You can 9 answer.</p> <p>10 A. It would be bagged and inventoried. 3:34:32</p> <p>11 Q. And who -- who was responsible for that part 12 or the procedure?</p> <p>13 A. The -- the -- the officer -- the officers 14 doing the inventory.</p> <p>15 Q. And when did the field sergeant become 16 involved in the inventory procedures?</p> <p>17 A. If the field sergeant became involved, that 18 field sergeant would become involved once the inventory 19 was done and it would be for approval.</p> <p>20 Q. Okay. And to your knowledge, what -- what 21 was -- what would -- what did that entail?</p> <p>22 A. To the best of my knowledge, approval and 23 depositing of drugs.</p> <p>24 Q. All right. This incident you spoke of with 25 -- regarding Sergeant Watts and the large amount of</p>	<p>1 anyone that you didn't have probable cause to arrest?</p> <p>2 A. No.</p> <p>3 Q. During your time on the 4512 tactical team, 4 did Sergeant Watts ask you not to arrest someone that 5 you had probable cause to arrest for a felony?</p> <p>6 A. No. 3:36:49</p> <p>7 MR. KOSOKO: No further questions.</p> <p>8 MR. ZECCHIN: I do have a few questions 9 actually.</p> <p>10 EXAMINATION</p> <p>11 BY MR. ZECCHIN:</p> <p>12 Q. This is Anthony Zecchin on behalf of the 13 individual Defendant officers. Just a few questions 14 for you, Officer Cadman. While you were on unit 715, 15 Public Housing South, and on teams supervised by 16 Sergeant Watts, to the best of your knowledge, did you 17 see -- ever see any officers plant drugs on anyone?</p> <p>18 A. No.</p> <p>19 Q. Did you ever see any officers falsely arrest 20 or frame anybody?</p> <p>21 A. No.</p> <p>22 Q. Did you ever see any officer steal money from 23 anyone?</p> <p>24 A. No.</p> <p>25 Q. Did you ever see any officers threaten people</p>
<p style="text-align: center;">Page 150</p> <p>1 cannabis you recovered, do you remember what year this 2 occurred?</p> <p>3 MR. DAFFADA: You're breaking up there, 4 Ahmed.</p> <p>5 Q. This incident regarding the cannabis, Mr. 6 Cadman, do you know what year this occurred?</p> <p>7 A. Shortly before I left the team. 2003. 3:35:44</p> <p>8 Q. And how long -- how much longer were you on 9 the team after it occurred?</p> <p>10 A. Days. I don't recall.</p> <p>11 Q. To your knowledge, was the inventory approved 12 by Sergeant Watts?</p> <p>13 A. No.</p> <p>14 Q. Who was it approved by?</p> <p>15 A. I don't recall.</p> <p>16 Q. Do you recall telling anybody else about this 17 incident?</p> <p>18 A. I don't recall.</p> <p>19 Q. While you were on the 4512 tactical team, 20 were you married?</p> <p>21 A. No.</p> <p>22 Q. Have you ever been married?</p> <p>23 A. No.</p> <p>24 Q. And during your time on the 4512 tactical 25 team, did Sergeant Watts ever direct you to arrest</p>	<p style="text-align: center;">Page 152</p> <p>1 who wouldn't provide information or drugs to them?</p> <p>2 A. No.</p> <p>3 Q. And did you ever see any officers fail to 4 inventory narcotics they recovered during a lawful 5 arrest or any money they recovered during a lawful 6 arrest?</p> <p>7 A. No.</p> <p>8 MR. ZECCHIN: Okay. I have no further 9 questions.</p> <p>10 MR. RAUSCHER: I don't have any follow-up 11 from that.</p> <p>12 MR. DAFFADA: Nor I, all good.</p> <p>13 RECORDER: Okay. Signatures?</p> <p>14 MR. DAFFADA: Reserved.</p> <p>15 RECORDER: Okay. Off the record, 2:46 p.m.</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

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1 CERTIFICATION

2 I certify that the deponent was duly sworn by me and
3 that the foregoing is a true and correct
4 transcript from the record of proceedings
5 in the above-entitled matter.

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8 Brenda L. Portillo
9 December 15, 2021

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