

# Exhibit 31

**MASTER DOCKET CASE NO. 19-CV-01717**

**IN RE: WATTS COORDINATED  
PRETRIAL PROCEEDINGS**

**DEPONENT:**

**ELSWORTH SMITH**

**DATE:**

**July 21, 2023**

1           IN THE UNITED STATES DISTRICT COURT  
2           FOR THE NORTHERN DISTRICT OF  
3           ILLINOIS EASTERN DIVISION  
4           JUDGE FRANKLIN U. VALDERRAMA  
5           MAGISTRATE JUDGE SHEILA M. FINNEGAN  
6           MASTER DOCKET CASE NO. 19-CV-01717

7  
8  
9  
10  
11           IN RE: WATTS COORDINATED PRETRIAL PROCEEDINGS  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23           DEPONENT: ELSWORTH SMITH  
24           DATE: JULY 21, 2023  
25           REPORTER: ESTHER HEATH

<p>1 APPEARANCES</p> <p>2</p> <p>3 ON BEHALF OF THE LOEY &amp; LOEY PLAINTIFFS IN THE</p> <p>4 COORDINATED PROCEEDINGS, CHAUNCEY ALI, BEN BAKER,</p> <p>5 MILTON DELANEY, CLARISSA GLENN, STEFON HARRISON, TYRONE</p> <p>6 HERRON, OCTAVIA MCDONALD, HENRY THOMAS, PHILLIP THOMAS,</p> <p>7 AND ALVIN WADDY:</p> <p>8 Scott Rauscher, Esquire</p> <p>9 Loevy &amp; Loevy</p> <p>10 311 North Aberdeen Street</p> <p>11 3rd Floor</p> <p>12 Chicago, Illinois 60607</p> <p>13 Telephone No.: (312) 243-5900</p> <p>14 E-mail: scott@loevy.com</p> <p>15 (Appeared via videoconference)</p> <p>16</p> <p>17 ON BEHALF OF THE DEFENDANT, RONALD WATTS:</p> <p>18 Lisa McElroy, Esquire</p> <p>19 Johnson &amp; Bell, Ltd.</p> <p>20 33 West Monroe Street</p> <p>21 Suite 2700</p> <p>22 Chicago, Illinois 60603</p> <p>23 Telephone No.: (630) 765-7766</p> <p>24 E-mail: mcelroy@jbltd.com</p> <p>25 (Appeared via videoconference)</p>	Page 2	Page 4
<p>1 APPEARANCES (CONTINUED)</p> <p>2</p> <p>3 ON BEHALF OF THE WITNESS, ELSWORTH SMITH AND THE OTHER</p> <p>4 DEFENDANT OFFICERS:</p> <p>5 Brian Stefanich, Esquire</p> <p>6 Hale &amp; Monico</p> <p>7 53 West Jackson Boulevard</p> <p>8 Suite 334</p> <p>9 Chicago, Illinois 60604</p> <p>10 Telephone No.: (312) 870-6908</p> <p>11 E-mail: bstefanich@halemonico.com</p> <p>12 (Appeared via videoconference)</p> <p>13</p> <p>14 ON BEHALF OF THE DEFENDANT, KALLATT MOHAMMED:</p> <p>15 Eric S. Palles, Esquire</p> <p>16 Mohan Groble Scolaro</p> <p>17 55 West Monroe</p> <p>18 Suite 1600</p> <p>19 Chicago, Illinois 60603</p> <p>20 Telephone No.: (312) 422-9999</p> <p>21 E-mail: epalles@mohangroble.com</p> <p>22 (Appeared via videoconference)</p> <p>23</p> <p>24</p> <p>25</p>	Page 3	Page 5

INDEX		Page 6	EXHIBITS (CONTINUED)		Page 8
2	Page		2	Exhibit	Page
3	PROCEEDINGS	10	3	PLAINTIFF WILLIAM CARTER EXHIBITS	
4	DIRECT EXAMINATION BY MR. RAUSCHER	12	4	1 - William Carter Arrest Report -	
5	EXAMINATION BY MR. FLAXMAN	72	5	City-BG--031037-41	73
6	REDIRECT EXAMINATION BY MR. RAUSCHER	90	6	2 - William Carter Mugshot - City-BG-031012	77
7	CROSS-EXAMINATION BY MR. PALLE	92	7	3 - William Carter Vice Case Report -	
8	EXAMINATION BY MS. MCELROY	101	8	City-BG-031095-96	79
9	EXAMINATION BY MR. STEFANICH	107	9	4 - Sandra Berry Arrest Report -	
10	FURTHER DIRECT EXAMINATION BY MR. RAUSCHER	108	10	City-BG--031117-21	110
11	CONFIDENTIAL PORTION REDACTED	82	11	5 - Property Inventory May 19, 2006 -	
12	EXHIBITS		12	City-BG-015765-68	
13	Exhibit	Page	13	(Marked in Confidential Portion)	
14	1 - Alvin Waddy Arrest Report - AW 1-5	14	14	6 - Elsworth Smith February 1, 2007	
15	2 - Alvin Waddy Vice Case Report - AW 41-42	19	15	Deposition Transcript - PL JOINT F	
16	3 - Delaney Milton Arrest Report - City-BG		16	01168-01254	84
17	051750-54	25	17		
18	4 - Delaney Milton Vice Case Report -		18		
19	City-BG-051763-64	25	19		
20	5 - Chauncey Ali Arrest Report -		20		
21	DO-JOINT 039147-49	31	21		
22	6 - Tyrone Herron Arrest Report -		22		
23	City-BG-056836-40	31	23		
24	7 - Stefon Harrison Arrest Report -		24		
25	DO-JOINT 041049-53	32	25		
EXHIBITS (CONTINUED)		Page 7	STIPULATION		Page 9
2	Exhibit	Page	2		
3	8 - Henry Thomas Arrest Report - DO-JOINT		3	The VIDEO deposition of ELSWORTH SMITH was taken at	
4	007234-38	33	4	KENTUCKIANA COURT REPORTERS, 730 WEST MAIN STREET, SUITE	
5	9 - Ali, et al. December 4, 2006 Vice Case		5	101, LOUISVILLE, KENTUCKY 40202, via videoconference in	
6	Report - DO-JOINT 039184-85	34	6	which all participants attended remotely, on FRIDAY the	
7	10 - Ali, et al. Vice December 4, 2006 Case		7	21st day of JULY 2023 at approximately 11:03 a.m. ET;	
8	Report - DO-JOINT 19942-43	39	8	said deposition was taken pursuant to the FEDERAL Rules	
9	11 - Phillip Thomas Arrest Report -		9	of Civil Procedure. The oath in this matter was sworn	
10	DO-JOINT 007386-90	44	10	remotely pursuant to FRCP 30.	
11	12 - Phillip Thomas Vice Case Report -		11		
12	DO-JOINT 007391-93	49	12	It is agreed that ESTHER HEATH, being a Notary Public	
13	13 - McDonald August 8, 2005 Arrest Report		13	and Court Reporter for the State of ILLINOIS, may swear	
14	- DO-JOINT 039797-99	59	14	the witness and that the reading and signing of the	
15	14 - McDonald May 25, 2005 Vice Case Report		15	completed transcript by the witness is not waived.	
16	- CITY-BG-060131-32	67	16		
17	15 - McDonald May 25, 2005 Arrest Report		17		
18	- City BG 056621-25	67	18		
19	16 - McDonald CR File - City-BG-012058-12264	70	19		
20	17 - McDonald Vice Case Report - COPA-WATTS		20		
21	045467-68	110	21		
22			22		
23			23		
24			24		
25			25		

<p>1 PROCEEDINGS</p> <p>2</p> <p>3 THE REPORTER: We are now on the record.</p> <p>4 My name is Esther Heath, I'm the online video</p> <p>5 technician and court reporter today representing</p> <p>6 Kentuckiana Court Reporters located at 730 West Main</p> <p>7 Street, Suite 101, Louisville, Kentucky 40202.</p> <p>8 Today is the 21st day of July, 2023, and the current</p> <p>9 time is 11:04 a.m., Eastern Time. We are convened</p> <p>10 by video conference to take the deposition of</p> <p>11 Elsworth Smith in the matter of Watts Coordinated</p> <p>12 Pretrial Proceedings pending in the United States</p> <p>13 District Court for the Northern District of Illinois</p> <p>14 Eastern Division, Master Docket Case number</p> <p>15 19-CV-01717. Will everyone, but the witness, please</p> <p>16 state your appearance, how you're attending, and</p> <p>17 your location starting with Plaintiff's counsel?</p> <p>18 MR. RAUSCHER: Scott Rauscher, attending</p> <p>19 remotely from suburbs in Chicago, representing the</p> <p>20 Loevy &amp; Loevy plaintiffs in the coordinated</p> <p>21 proceedings, and then Alvin Waddy in his individual</p> <p>22 state court case.</p> <p>23 MR. FLAXMAN: Joel Flaxman, attending from</p> <p>24 Chicago for the Flaxman plaintiffs.</p> <p>25 MR. PALLE: Eric Palles for Kallatt Mohammed.</p>	Page 10	Page 12
<p>1 MR. STEFANICH: Brian Stefanich for the witness</p> <p>2 Elsworth Smith and the other defendant officers.</p> <p>3 MS. MCGRATH: Megan McGrath on behalf of</p> <p>4 defendants Cadman and Spaargaren.</p> <p>5 MS. MCELROY: Good morning. Lisa McElroy from</p> <p>6 Johnson &amp; Bell for Defendant Watts participating</p> <p>7 remotely by Zoom from Lake County.</p> <p>8 MS. HARRIS: Dhaviella Harris on behalf of the</p> <p>9 City and supervisory officers appearing remotely</p> <p>10 from Chicago.</p> <p>11 THE REPORTER: All right. Thank you.</p> <p>12 And Mr. Elsworth, would you please state your full</p> <p>13 name for the record?</p> <p>14 THE WITNESS: My name is Elsworth Smith,</p> <p>15 Junior.</p> <p>16 THE REPORTER: And do all parties agree that</p> <p>17 the witnesses, in fact, Elsworth Smith, Junior?</p> <p>18 MR. RAUSCHER: Yes.</p> <p>19 THE REPORTER: Thank you. Sir, would you raise</p> <p>20 your right hand? Do you solemnly swear or affirm</p> <p>21 the testimony you're about to give will be the</p> <p>22 truth, the whole truth, and nothing but the truth?</p> <p>23 THE WITNESS: Yes.</p> <p>24 THE REPORTER: Counsel, you may begin.</p> <p>25 DIRECT EXAMINATION</p>	Page 11	Page 13

<p>1 MR. RAUSCHER: Okay. Can we show him? So the  2 Arrest Report is marked INDDEF-AW000001 through  3 000005.</p> <p>4 MR. STEFANICH: That's the one I have, Scott.</p> <p>5 MR. RAUSCHER: Okay, great. Let's call that  6 Exhibit 1.</p> <p>7 (EXHIBIT 1 MARKED FOR IDENTIFICATION)</p> <p>8 MR. STEFANICH: Do you want me to show it to  9 him?</p> <p>10 MR. RAUSCHER: Sure. Yeah. Just the first  11 page.</p> <p>12 Q. Do you see Mr. Waddy's picture on that Arrest  13 Report?</p> <p>14 A. Yes, I do.</p> <p>15 Q. And is that the picture you looked at to  16 prepare for your deposition today?</p> <p>17 A. I don't recall this – the same picture that  18 I looked at in preparation for this case.</p> <p>19 Q. You don't know if that's the picture you  20 looked at?</p> <p>21 A. No, I do not.</p> <p>22 Q. All right. Well, looking at this picture,  23 does it refresh your recollection as to whether you knew  24 Mr. Waddy?</p> <p>25 A. No, it does not.</p>	Page 14	Page 16
<p>1 Q. All right. Do you see that it lists an arrest  2 date of April 4, 2007?</p> <p>3 A. Yes.</p> <p>4 Q. All right. Were you involved in this arrest?</p> <p>5 A. I don't recall without looking beyond the  6 first page.</p> <p>7 Q. Okay. Yeah. Go ahead and look at whatever  8 you need to. But I guess – so before you look at the  9 Arrest Report, you have no independent recollection of  10 being involved in Mr. Waddy's arrest on April 4, 2007?</p> <p>11 A. Not at this present moment.</p> <p>12 Q. Okay. Go ahead and look through the report.  13 And you've had a chance to look through the Arrest  14 Report?</p> <p>15 A. Yes, sir.</p> <p>16 Q. And having done that and looked through the  17 arrest – through Alvin Waddy's Arrest Report, do you  18 know whether you were involved in Mr. Waddy's arrest?</p> <p>19 A. I don't recall, but my name is on the report.</p> <p>20 Q. All right. So other than seeing your name on  21 this report, you don't have any memory of being involved  22 in Mr. Waddy's arrest?</p> <p>23 A. No, I do not.</p> <p>24 Q. Do you know if Al Jones was involved in  25 Mr. Waddy's arrest?</p>	Page 15	Page 17

<p>1 you just testified that you believe the narrative that  2 is accurate because the officers you worked with, in  3 your opinion, would not create a false report; is that  4 right?</p> <p>5 A. That's correct.</p> <p>6 Q. Are there any reasons other than that, that  7 you have to believe that the narrative is accurate?</p> <p>8 A. No, I do not.</p> <p>9 Q. Do you have any personal knowledge as to  10 whether this incident narrative is accurate?</p> <p>11 MR. STEFANICH: Objection. Form. You can  12 answer.</p> <p>13 A. I have no reason to doubt the narrative of  14 this report.</p> <p>15 BY MR. RAUSCHER:</p> <p>16 Q. Well, do you have any personal information as  17 to whether it is accurate?</p> <p>18 MR. STEFANICH: Objection. Form.</p> <p>19 BY MR. RAUSCHER:</p> <p>20 Q. Sorry, I'm going to rephrase that. Do you  21 have any personal knowledge as to whether the incident  22 narrative report – the incident narrative written on  23 this report is accurate?</p> <p>24 A. Well, like I said, I have no doubt that the  25 information in this report is – isn't inaccurate.</p>	Page 18	Page 20
<p>1 I have no doubt to believe that.</p> <p>2 Q. I know you believe it's accurate. What I'm  3 trying to ask I think is a different question, which is:  4 Do you have any personal knowledge as to whether it is  5 accurate, specific to this case?</p> <p>6 A. I don't remember this particular incident  7 regarding the specifics of this narrative from this  8 date.</p> <p>9 Q. And you never knew any of your colleagues on  10 the Second District Tactical Team to frame anybody or  11 create any false reports?</p> <p>12 MR. STEFANICH: Objection. Form. You can  13 answer.</p> <p>14 A. No, I do not.</p> <p>15 MR. RAUSCHER: All right. Let's call the Vice  16 Case Report for this Exhibit 2. And this ends -  17 AW000041 to 42.</p> <p>18 (EXHIBIT 2 MARKED FOR IDENTIFICATION)</p> <p>19 MR. STEFANICH: He's got it, Scott.</p> <p>20 BY MR. RAUSCHER:</p> <p>21 Q. Okay. Great. Did you have a chance to review  22 this Vice Case Report for today's deposition?</p> <p>23 A. I believe so.</p> <p>24 Q. Did looking at the Vice Case Report refresh  25 your recollection about this arrest at all?</p>	Page 19	Page 21

<p>1 know?</p> <p>2 A. From the best of my memory, it does.</p> <p>3 Q. And when you're saying the best of your memory for signatures, are you saying to the best of your memory of what your coworker's handwriting looked like?</p> <p>4 A. Yes. I – it's been – based on this report, this was in 2007, that's been 16 years ago, and I haven't talked to Sergeant Watts in several years or many years.</p> <p>5 Q. Do you recall talking to prosecutors about Alvin Waddy or Jermaine Mays?</p> <p>6 A. No, I do not.</p> <p>7 Q. Do you recall talking to Al Jones about Alvin Waddy or Jermaine Mays?</p> <p>8 A. No, I do not.</p> <p>9 Q. Do you know if you were involved in inventorying any of the items that were listed on this Vice Case Report?</p> <p>10 A. No, I do not.</p> <p>11 Q. Did you ever ask that bags of drugs be sent off to be fingerprinted?</p> <p>12 A. I do not recall.</p> <p>13 Q. You don't recall ever doing that?</p> <p>14 A. I – in the past, yes, I probably have done so. But I don't recall the – on this particular date.</p>	Page 22	<p>1 practice they request for narcotics to be fingerprinted.</p> <p>2 Q. Not narcotics to be fingerprinted – bag –</p> <p>3 the bags that narcotics were recovered in, was that common practice to have the bags fingerprinted?</p> <p>4 A. No, I don't recall.</p> <p>5 Q. Do you recall – oh, I'm sorry. Go ahead.</p> <p>6 Finish your answer, please.</p> <p>7 A. You go ahead. I –</p> <p>8 Q. Do you recall ever asking to have a bag that narcotics were recovered in fingerprinted?</p> <p>9 A. No, I do not recall.</p> <p>10 Q. Is there anything you can think of that would refresh your recollection about the arrest of Alvin Waddy or Jermaine Mays?</p> <p>11 A. I'm not certain.</p> <p>12 Q. Well, is there anything you can think of that you think would refresh your recollection?</p> <p>13 A. As I'm sitting here today, no.</p> <p>14 Q. All right. I think we can move to – why don't we go to Milton Delaney? Do you know who Milton Delaney is?</p> <p>15 A. I do not recall.</p> <p>16 Q. Did you look at a picture of Milton Delaney for today's deposition?</p> <p>17 A. No, I don't believe so.</p>	Page 24
<p>1 Q. You think that there are – have been occasions when you've asked to have the baggie that drugs were recovered in fingerprinted?</p> <p>2 A. If I was doing the inventory, yes.</p> <p>3 Q. All right. Would that be a common thing that you would do when you were doing inventory?</p> <p>4 A. Yes, that is common practice.</p> <p>5 Q. How would you memorialize if you wanted to have a bag of drugs fingerprinted?</p> <p>6 A. I have no control over that. From the best of my memory, once we inventoried the narcotics, the – the narcotics was sent to the Illinois State Crime Lab.</p> <p>7 Q. Did you have any control over what sort of testing to ask for?</p> <p>8 A. No, I do not recall that.</p> <p>9 Q. Did you have any control over what types of testing could be done?</p> <p>10 A. No.</p> <p>11 Q. So if you – when you said it was common practice to have bags of drugs fingerprinted, what were you basing that answer on?</p> <p>12 A. I – I'm – I'm sorry. If I said it – it was common practice, I thought you meant common practice to inventory narcotics. I did not mean that it was common</p>	Page 23	<p>1 MR. RAUSCHER: All right. Can you pull up – Brian, do you have the Delaney Arrest Report or should I share screen?</p> <p>2 MR. STEFANICH: Yep. Nope, I got it.</p> <p>3 MR. RAUSCHER: Let's call Exhibit 3, Milton</p> <p>4 Delaney's Arrest Report, which is City-BG-051750.</p> <p>5 (EXHIBIT 3 MARKED FOR IDENTIFICATION)</p> <p>6 MR. STEFANICH: He's got it in front of him,</p> <p>7 Scott.</p> <p>8 BY MR. RAUSCHER:</p> <p>9 Q. Great. Do you see a picture on that Arrest Report?</p> <p>10 A. Yes, I do.</p> <p>11 Q. Do you recognize the person who's pictured?</p> <p>12 A. No, I do not.</p> <p>13 MR. RAUSCHER: Do you want to – Brian, can you also just hand him the Vice Case Report and we'll call that Exhibit 4?</p> <p>14 MR. STEFANICH: Yep.</p> <p>15 BY MR. RAUSCHER:</p> <p>16 Q. Great. So that is City-BG-051763 to 1764.</p> <p>17 Can you tell me what these two documents are that we've</p> <p>18 called Exhibit 3 and Exhibit 4?</p> <p>19 (EXHIBIT 4 MARKED FOR IDENTIFICATION)</p> <p>20 A. One is a – an Arrest Report and the other one</p>	Page 25

<p>1 is a Vice Case Report.</p> <p>2 Q. And what are they an Arrest Report and a Vice</p> <p>3 Case Report of?</p> <p>4 A. Of the incident, of the occurrence.</p> <p>5 Q. Of the arrest of Milton Delaney?</p> <p>6 A. Yes.</p> <p>7 Q. Do you see your name on these reports?</p> <p>8 A. May I look through the reports to see?</p> <p>9 Q. Of course. Yeah. I can tell you, to help you</p> <p>10 find it, if you look at the last page of the Arrest</p> <p>11 Report and the first case of the Vice – first page of</p> <p>12 the Vice Case Report, I think you'll see your name,</p> <p>13 but go ahead and take your time to look through.</p> <p>14 A. Yes, I found it – found my name.</p> <p>15 Q. All right. So looking at the Arrest Report,</p> <p>16 it shows that you're an assisting arresting officer and</p> <p>17 that your partners were Kallatt Mohammed and Lamonica</p> <p>18 Louis that day; is that right?</p> <p>19 A. Yes.</p> <p>20 Q. And then – I'm sorry, go ahead.</p> <p>21 A. No. I just said, based on the reports, yes.</p> <p>22 Q. And then if you look at the Vice Case Report,</p> <p>23 it lists you in the second row of box 18?</p> <p>24 A. Yes.</p> <p>25 Q. But it doesn't say specifically what you did</p>	Page 26	Page 28
<p>1 or what role you are being listed in, right?</p> <p>2 A. No, it does not.</p> <p>3 Q. Do you have any recollection of what</p> <p>4 involvement you had in the arrest of Milton Delaney?</p> <p>5 A. No, I do not.</p> <p>6 Q. And looking at the narrative on the Vice Case</p> <p>7 Report, do you know one way or the other, whether it's</p> <p>8 accurate?</p> <p>9 A. I have no reason not to believe that it</p> <p>10 is – that it isn't – isn't accurate.</p> <p>11 Q. And that is – again, that's based on your</p> <p>12 belief that your team members would not create a false</p> <p>13 report?</p> <p>14 A. Yes.</p> <p>15 Q. But it is not based on any memory of this</p> <p>16 event itself?</p> <p>17 A. No.</p> <p>18 Q. When you said no, you were agreeing with me,</p> <p>19 right? It's not based on your memory of this event? You</p> <p>20 said no, so on the record it might be unclear what you</p> <p>21 meant. That's why I'm asking you again.</p> <p>22 A. Okay. Can you repeat your question?</p> <p>23 Q. Sure.</p> <p>24 A. I was uncertain what you meant.</p> <p>25 Q. Yeah. So your – you've answered that you</p>	Page 27	Page 29

<p>1 Q. All right. Let's – why don't we start –  2 let's take a look at Chauncey Ali's Arrest Report, which  3 is DO-Joint 039147 to 149?  4 MR. STEFANICH: It – Scott, just for the  5 record, I have – it's the same thing, but it's – I  6 have it Bates stamped as City-BG-056831, but it's  7 the Ali Arrest Report from December 4, 2006.  8 MR. RAUSCHER: Okay. You know what? I –  9 you're – I realized I just pulled out the final  10 approval. You might – that's – is that the one  11 you're looking at?  12 MR. STEFANICH: Yes.  13 BY MR. RAUSCHER:  14 Q. Okay. Okay. I just want to make sure he has  15 the picture so that's fine, whatever the Bates stamp is.  16 You have a chance to look at that picture?  17 A. Yes.  18 Q. Do you recognize the person who's pictured  19 there?  20 A. No, I do not.  21 Q. All right. Do you see that that's an Arrest  22 Report of Chauncey Ali dated December 4, 2006?  23 A. Yes.  24 Q. Does looking at that picture refresh your  25 recollection as to what your involvement was in that</p>	Page 30	Page 32
<p>1 arrest?  2 A. No, it did not.  3 MR. RAUSCHER: All right. Let's look at  4 Tyrone Herron's Arrest Report, which I have as  5 City-BG-05836 to 056840.  6 THE REPORTER: Did you want to mark the last  7 report?  8 MR. RAUSCHER: Oh, yeah. That would be 5.  9 So this would be 6.  10 (EXHIBIT 5 MARKED FOR IDENTIFICATION)  11 MR. STEFANICH: You may need to show him that  12 one, Scott.  13 BY MR. RAUSCHER:  14 Q. Okay. Give me one sec. I'll pull it up. Hold  15 on. I got to – sorry. I got to close my Adobe.  16 It's not working right now. All right. Do you see  17 Tyrone Herron Arrest Report with a picture on it up on  18 your screen?  19 A. Yes.  20 Q. All right. We're – and so that's what we're  21 calling Exhibit 6. Take a look at that picture and see  22 if you recognize the person in this picture.  23 (EXHIBIT 6 MARKED FOR IDENTIFICATION)  24 A. No, I do not.  25 BY MR. RAUSCHER:</p>	Page 31	Page 33

<p>1 recollection about your involvement in this arrest?</p> <p>2 A. No, it does not.</p> <p>3 Q. All right. I want to have you take a</p> <p>4 look – I'm going to take this one down. I want to have</p> <p>5 you take a look at the Vice Case Report from this</p> <p>6 arrest. And that is, at least, one version, DO Joint</p> <p>7 023633 to 634. And we can call that Exhibit 9. Do you</p> <p>8 have that document in front of you?</p> <p>9 (EXHIBIT 9 MARKED FOR IDENTIFICATION)</p> <p>10 A. Yes, I do.</p> <p>11 BY MR. RAUSCHER:</p> <p>12 Q. All right. Take your time and read through</p> <p>13 that, please and let me know when you're done.</p> <p>14 A. Okay.</p> <p>15 Q. You've had a chance to look at that?</p> <p>16 A. Yes.</p> <p>17 Q. Did looking at this Vice Case Report refresh</p> <p>18 your recollection as to your involvement in the arrest?</p> <p>19 A. No, it does not.</p> <p>20 Q. Do you see whose signature is listed – or</p> <p>21 whose signatures are listed on the Vice Case Report?</p> <p>22 A. Yes.</p> <p>23 Q. Whose signatures are listed on this – are on</p> <p>24 this Report?</p> <p>25 A. Myself and Alvin Jones.</p>	Page 34	Page 36
<p>1 Q. And do you know who actually signed the</p> <p>2 report?</p> <p>3 A. That is my hand signature.</p> <p>4 Q. Did you sign for both of you?</p> <p>5 A. Yes, I did.</p> <p>6 Q. And do you recall whether you got – whether</p> <p>7 Jones looked at this report before you signed his name?</p> <p>8 A. If I signed for Alvin Jones, then I would've</p> <p>9 gotten his permission.</p> <p>10 Q. You would've gotten his specific permission to</p> <p>11 sign this report before you put his name on it?</p> <p>12 A. Yes.</p> <p>13 Q. You see in Box 42, there's some reference to</p> <p>14 gang affiliation?</p> <p>15 A. Yes.</p> <p>16 Q. Where did that information come from?</p> <p>17 A. I don't recall.</p> <p>18 Q. You see on the narrative part, it looks like</p> <p>19 it's saying that you recovered drugs from two people,</p> <p>20 and Jones recovered drugs from two people; is that</p> <p>21 right? Am I reading that correctly?</p> <p>22 A. That is correct.</p> <p>23 Q. And for you, it says you recovered from</p> <p>24 Offender number 2, which is Stefon Harrison,</p> <p>25 64 pink-tinted Ziploc baggies. You see that?</p>	Page 35	Page 37

<p>1 it be same day that the report is created or some other  2 time, or did it differ?  3 A. From the best of my memory, yeah, it could  4 have occurred on the same day.  5 Q. Would it typically have occurred on the same  6 day?  7 A. Typically, yes.  8 Q. What were some reasons, if there are any, that  9 it would've maybe waited and not been approved the same  10 day?  11 A. Sitting here today, I could not tell you.  12 Maybe it was in error.  13 MR. RAUSCHER: Brian, there's another version  14 of this, which I can either share, or if you have,  15 you can hand him, which is Bates stamped, DO-Joint  16 19942 to 43.  17 MR. STEFANICH: Yeah. Why don't you show it to  18 him?  19 BY MR. RAUSCHER:  20 Q. All right. I'm going to bring up another  21 document. We're going to call that Exhibit 10. Just  22 give me one sec. And so the Bates for the one I'm about  23 to bring up on the screen is DO-Joint 19942 to 43.  24 Sorry, I was muted. Do you see a Vice Case Report up on  25 the screen?</p>	Page 38	Page 40
<p>1 (EXHIBIT 10 MARKED FOR IDENTIFICATION)  2 A. Yes. Can you enlarge it a little bit for me?  3 BY MR. RAUSCHER:  4 Q. Of course. Is that good, or you want more?  5 A. No, that's fine.  6 Q. Does this look like it's a report of the same  7 arrest that we were just looking at?  8 A. It appears so.  9 Q. All right. And then this one has supervisory  10 -- supervisor approving, and it's signed and dated.  11 Do you see that?  12 A. Yes.  13 Q. And it looks like it's dated 12 days after the  14 arrest?  15 A. Yes.  16 Q. Do you know whose signature that is on the  17 supervisor line?  18 A. I cannot tell.  19 Q. If you see it on the next page, can you tell  20 looking there?  21 A. No, I cannot.  22 Q. Who is responsible for getting the supervisor  23 to review and sign a Vice Case Report?  24 A. The arresting officer.  25 Q. And so in that case, was this you? It was</p>	Page 39	Page 41

<p>1 prosecutor – any prosecutor about these arrests?</p> <p>2 A. I don't recall so.</p> <p>3 Q. And if you look at the Arrest Reports,</p> <p>4 we – I showed you four Arrest Reports from the four</p> <p>5 people who were arrested on this Vice Case Report.</p> <p>6 On three of them, you are the attesting officer, and on</p> <p>7 the fourth one Kallatt Mohammed is the attesting</p> <p>8 officer, and that's for Henry Thomas. Do you know why</p> <p>9 that's the – why that is the case?</p> <p>10 A. No, I do not.</p> <p>11 Q. Mr. Harrison was also arrested on September</p> <p>12 27, 2006. I don't see – did you look at reports</p> <p>13 relating to that arrest?</p> <p>14 A. I don't recall. I may have.</p> <p>15 Q. Do you have any memory of – your name is not</p> <p>16 on those reports, and I just want to know if you have</p> <p>17 any memory of being involved in arresting Mr. Harrison</p> <p>18 at any time?</p> <p>19 A. As I stated before, I do not recall Stefon</p> <p>20 Harrison.</p> <p>21 Q. And you have probably been asked this question</p> <p>22 before, but it'll save a little bit of time today if I</p> <p>23 can just ask you again. You went to the Second District</p> <p>24 in 2004, correct?</p> <p>25 A. I believe that's correct.</p>	Page 42	Page 44
<p>1 Q. Okay. And were you ever involved in any</p> <p>2 arrests in the Second District prior to – it was</p> <p>3 July 2004 when you were assigned there?</p> <p>4 A. No.</p> <p>5 Q. You know, I think I have one more question or</p> <p>6 two about the Alvin Waddy case, which I skipped over.</p> <p>7 I'm going to stop sharing. Do you know if Alvin Waddy</p> <p>8 filed a CR relating to the arrest that we talked about</p> <p>9 earlier today?</p> <p>10 A. No, I do not.</p> <p>11 Q. Do you have any memory of being interviewed in</p> <p>12 connection with the CR that was – I shouldn't say Alvin</p> <p>13 Waddy filed, but that was filed on behalf of Alvin</p> <p>14 Waddy?</p> <p>15 A. No, I do not.</p> <p>16 Q. Do you know who John Farrell is?</p> <p>17 A. I believe he was the captain, at one point in</p> <p>18 time, in the Second District.</p> <p>19 Q. Do you recall him ever interviewing you about</p> <p>20 any CRs?</p> <p>21 A. Not at the present moment.</p> <p>22 Q. All right. Let's go to Phillip Thomas.</p> <p>23 Do you know who Phillip Thomas is?</p> <p>24 A. No, I do not recall.</p> <p>25 Q. Do you recall anyone who had a nickname of</p>	Page 43	Page 45

<p>1 defendant?</p> <p>2 A. Yes.</p> <p>3 Q. Someone who is representing himself?</p> <p>4 A. Yes.</p> <p>5 Q. Now, are you familiar with the term, knockout,</p> <p>6 in connection with drugs?</p> <p>7 A. Yes.</p> <p>8 Q. Now, what does knockout mean?</p> <p>9 A. That was the name that they gave to some of</p> <p>10 the – I believe, wherever the location or what building</p> <p>11 they sold drugs from, it was the description for crack</p> <p>12 cocaine.</p> <p>13 Q. Do you know which building that was for?</p> <p>14 A. No. As I stated, I do not recall which</p> <p>15 building.</p> <p>16 Q. Do you know what time period the term knockout</p> <p>17 was used to describe crack cocaine at a building?</p> <p>18 A. No, I don't recall.</p> <p>19 Q. Are you familiar with X-box, as a drug term?</p> <p>20 A. Yes, I do.</p> <p>21 Q. And what did X-box mean in that context?</p> <p>22 A. The best of my memory, I believe that was for</p> <p>23 heroin.</p> <p>24 Q. Was that something, also, you used at a</p> <p>25 specific building?</p>	Page 46	Page 48
<p>1 A. It might have been, but I don't recall which</p> <p>2 particular building.</p> <p>3 Q. And do you recall what time period X-box was a</p> <p>4 term?</p> <p>5 A. No, I don't recall.</p> <p>6 Q. Did Sandra Cartwright sell drugs?</p> <p>7 A. I – the best of my memory, I cannot recall</p> <p>8 one way or the other.</p> <p>9 Q. And what about Phillip Thomas?</p> <p>10 A. I do not remember Phillip Thomas.</p> <p>11 Q. Do you know if they knew each other – if</p> <p>12 Sandra Cartwright and Phillip Thomas knew each other?</p> <p>13 A. I don't know.</p> <p>14 Q. Do you remember what the 547 [sic] East</p> <p>15 35th – 36th Street building in Ida B. Wells looked</p> <p>16 like?</p> <p>17 A. Vaguely.</p> <p>18 Q. Do you remember what the stairwells – how the</p> <p>19 stairwells were set up?</p> <p>20 MR. STEFANICH: Sorry, Scott, can you say the</p> <p>21 address again?</p> <p>22 MR. RAUSCHER: Yeah. The address where Phillip</p> <p>23 Thomas was arrested. 5 – oh, I might have said it</p> <p>24 wrong. 574 East 36th Street.</p> <p>25 MR. STEFANICH: All right. Can we start the</p>	Page 47	Page 49

<p>1 Q. Were you conducting surveillance with Al  2 Jones, together?</p> <p>3 A. Based on the narrative of this report, it  4 appears so.</p> <p>5 Q. But you don't know because you don't have a  6 memory of the event?</p> <p>7 A. No, sir. I do not.</p> <p>8 Q. Was it common for you to conduct surveillance  9 for 20 minutes or longer?</p> <p>10 A. Yes.</p> <p>11 Q. Where were some places you would typically  12 conduct surveillance from at Ida B. Wells?</p> <p>13 A. It was so many years ago, I could not tell  14 you specifically.</p> <p>15 Q. What about just generally?</p> <p>16 A. I – there again, it's been many years ago.  17 This was in 2007. I do not recall.</p> <p>18 Q. Well, let's try if we can think of some  19 examples. Would you conduct surveillance from your  20 squad car?</p> <p>21 A. From the best of my memory, sometimes, yes.</p> <p>22 Q. Okay.</p> <p>23 A. But again, I cannot not tell you specifically  24 where I was on this particular date or any other time  25 involving any arrest that I made.</p>	Page 50	Page 52
<p>1 Q. Would you conduct surveillance standing  2 outside?</p> <p>3 A. It could – it could have happened.</p> <p>4 And again, I – like I said, don't specifically  5 remember.</p> <p>6 Q. Would you –</p> <p>7 A. You can do surveillance based off of my  8 experience and my memory as a police officer.</p> <p>9 Q. All right. Well, based on your experience and  10 memory of a police officer, what were some of the ways  11 you conducted surveillance?</p> <p>12 A. I don't recall, but I say it could be done in  13 many different forms. It could be done from any – on  14 foot. You know, it could be done inside the squad car.  15 Could been done inside a covert vehicle.</p> <p>16 Q. Any other ones you can think of?</p> <p>17 A. Not off the top of my head, no.</p> <p>18 Q. Do you recall ever reading your testimony  19 from Phillip Thomas' trial?</p> <p>20 A. Yes.</p> <p>21 Q. Now, when did you last read your testimony  22 from Mr. Thomas's trial?</p> <p>23 A. I believe the day before yesterday.</p> <p>24 Q. Did it – did you – did reading that  25 testimony refresh your recollection at all as to what</p>	Page 51	Page 53

<p>1 A. On the best of my memory, yes.</p> <p>2 Q. All right. And then you would review the</p> <p>3 relevant police reports?</p> <p>4 A. Yes. Based off of my memory, yes.</p> <p>5 Q. Would you talk to your partner if he was also</p> <p>6 going to be testifying?</p> <p>7 A. If they were in the same room with me, yes.</p> <p>8 Q. Well, would they be in the same room with you,</p> <p>9 typically?</p> <p>10 A. Typically, from the best of my memory, yes.</p> <p>11 Q. And what would you talk to the prosecutor</p> <p>12 about?</p> <p>13 A. I do not recall. It's been many years since</p> <p>14 I've testified in court.</p> <p>15 Q. You don't recall even a general topic that you</p> <p>16 would talk to a prosecutor about before testifying in a</p> <p>17 criminal case?</p> <p>18 A. No, sir. As I sit here today, no.</p> <p>19 Q. Would you talk about the case?</p> <p>20 A. I'm certain that we would have talked about</p> <p>21 the case.</p> <p>22 Q. All right. What else would you have talked</p> <p>23 about? Anything?</p> <p>24 A. Based on that, like I said, I don't recall</p> <p>25 any other conversations that we would discuss. I'm sure</p>	Page 54	Page 56
<p>1 we probably had other conversations, in general, but I</p> <p>2 can't say one way or the other what we specifically</p> <p>3 talked about.</p> <p>4 Q. Would the prosecutors tell you what kind of</p> <p>5 questions they were going to ask?</p> <p>6 A. I don't recall. I'm certain they probably</p> <p>7 could have, but I don't recall.</p> <p>8 Q. What do you mean you're certain they probably</p> <p>9 could have?</p> <p>10 A. If you're going to trial, they probably would</p> <p>11 ask you questions, you know, that they – or that they</p> <p>12 may ask you or –</p> <p>13 Q. Yeah. But you're not sure one way or the</p> <p>14 other, whether that is what typically happened in your</p> <p>15 experience?</p> <p>16 A. I don't recall, sir.</p> <p>17 Q. When you read your trial testimony from</p> <p>18 Phillip Thomas' case, did it reflect your recollection</p> <p>19 about what the building in question looked like or how</p> <p>20 it was set up?</p> <p>21 A. No. It's – no, it does not. That was many</p> <p>22 years ago, and the Ida B. Wells have been torn down.</p> <p>23 Q. Would it be all right if we take like five- or</p> <p>24 10-minute break?</p> <p>25 MR. STEFANICH: Yep. I need one anyways, so.</p>	Page 55	Page 57

<p>1 answer.</p> <p>2 A. It's been many years ago. I just recall</p> <p>3 seeing her.</p> <p>4 BY MR. RAUSCHER:</p> <p>5 Q. All right. Do you recall being involved in</p> <p>6 arresting her?</p> <p>7 A. Yes.</p> <p>8 Q. All right. So how many times did you</p> <p>9 arrest – were you involved in arresting Ms. McDonald's?</p> <p>10 A. I don't recall.</p> <p>11 Q. Do you know if it was more than once?</p> <p>12 A. I don't recall.</p> <p>13 Q. How many arrests do you recall of Ms. – how</p> <p>14 many arrests of Ms. McDonald do you recall?</p> <p>15 A. Only one.</p> <p>16 Q. Which one do you recall? do you know?</p> <p>17 A. It was one involving a pink purse.</p> <p>18 Q. Do you have a specific memory of arresting</p> <p>19 someone with a – let me rephrase. Do you have a</p> <p>20 specific memory of arresting Octavia McDonald with a</p> <p>21 pink purse?</p> <p>22 A. Yes, I do.</p> <p>23 Q. And was that – did you have that memory</p> <p>24 before you looked at reports to prepare for your</p> <p>25 deposition today?</p>	Page 58	Page 60
<p>1 A. No, I did not.</p> <p>2 Q. And so was it seeing a report refreshed your</p> <p>3 recollection about the arrest?</p> <p>4 A. Yes.</p> <p>5 Q. And do you know which report that was?</p> <p>6 A. No, I do not.</p> <p>7 MR. RAUSCHER: I'm going to show you – why</p> <p>8 don't we mark Exhibit 13 as DO joint 039797 through</p> <p>9 99. Brian, do you need me to pull this up?</p> <p>10 (EXHIBIT 13 MARKED FOR IDENTIFICATION)</p> <p>11 MR. STEFANICH: No, I got it. Is it the arrest</p> <p>12 or the vice case?</p> <p>13 MR. RAUSCHER: That's arrest.</p> <p>14 MR. STEFANICH: Okay. Okay, let me find it.</p> <p>15 No, Scott, you better just pull it up.</p> <p>16 BY MR. RAUSCHER:</p> <p>17 Q. Okay. All right. Are you seeing an Arrest</p> <p>18 Report?</p> <p>19 A. Yes.</p> <p>20 Q. All right. Do you see this as – I know the</p> <p>21 picture's not great, but you see this as an Arrest</p> <p>22 Report of Octavia McDonald with an arrest date of</p> <p>23 August 8, 2005?</p> <p>24 A. Yes.</p> <p>25 Q. And arrested for possession of less than 15</p>	Page 59	Page 61

<p>1 A. No. I thought you was going to ask a  2 different question. I'm sorry.  3 Q. That's all right. What question did you think  4 I was going to ask?  5 A. No. I – I didn't know. I just, you  6 know –  7 Q. Okay. All right. Were you tactical unit  8 264C on August 8, 2005?  9 A. That's what it state's in the report, yes.  10 Q. Do you know who was working with you that day?  11 Let me rephrase that. Do you know who your partner or  12 partners were that day?  13 A. Can you go down, then I can see? According to  14 this report, it states Robert Gonzalez.  15 Q. And is – that's because he's got the same  16 beat as you?  17 A. For that particular day, that might been.  18 That wasn't my normal beat.  19 Q. But I – what I'm saying is you're basing the  20 fact – you're basing your statement that he was your  21 partner that day on the fact that this report lists you  22 as both having the same beat, right?  23 A. Yes. That particular day, on that date and  24 time at that arrest, if I was listed as 264 Charlie,  25 then that's the beat that we was assigned to. But at</p>	Page 62	Page 64
<p>1 that – as I was – stated before, my normal beat at  2 that time was 264 David.  3 Q. All right. And who were your normal partners  4 at the time? Was it Kallatt Mohammed and Lamonica  5 Louis?  6 A. I believe in 2005, that would've been before  7 mon – Lamonica Louis was assigned to the second  8 district. And in 2005, I don't recall who my partner  9 was at that time. May have or may not have been Kallatt  10 Mohammed.  11 Q. Do you know who else was involved in this  12 arrest?  13 A. Not off the top of my head, no.  14 Q. Okay. Looking at this report, can – does it  15 tell you anything about who else was involved in the  16 arrest?  17 A. No, it does not.  18 Q. Have you seen any other reports that tell you  19 who else was involved in the arrest?  20 A. I don't recall.  21 Q. You don't recall seeing any other reports  22 that showed you who else was involved in the arrest?  23 A. Not off the top of my head, no.  24 Q. You didn't see anything that refreshed your  25 recollection about anybody else being involved in the</p>	Page 63	Page 65

<p>1 A. Yes, I do.</p> <p>2 Q. Okay. Is the concerned citizen the same</p> <p>3 person as the anonymous citizen in this report?</p> <p>4 A. I cannot determine one way or the other.</p> <p>5 Q. Do you recall recovering a medicine bottle</p> <p>6 from the pink purse?</p> <p>7 A. That's stated in the report, but that does not</p> <p>8 specify who made the actual recovery.</p> <p>9 Q. Do you recall a medicine bottle being</p> <p>10 recovered, whether you were the one who did it or not?</p> <p>11 A. No, I do not.</p> <p>12 Q. Did you witness Ms. McDonald selling drugs?</p> <p>13 A. I do not recall.</p> <p>14 Q. Anything you can think of that would refresh</p> <p>15 your recollection?</p> <p>16 A. No, sir.</p> <p>17 Q. Do you know who read Octavia McDonald her</p> <p>18 Miranda warnings?</p> <p>19 A. No, I do not.</p> <p>20 Q. Do you know if Ronald Watts was on scene?</p> <p>21 A. I don't recall.</p> <p>22 Q. Do you know who Pamela Noonan (phonetic) is?</p> <p>23 A. No, I do not.</p> <p>24 Q. Do you recall a CR being filed over Octavia</p> <p>25 McDonald's arrest?</p>	Page 66	Page 68
<p>1 MR. STEFANICH: Object to form. You can</p> <p>2 answer.</p> <p>3 A. I believe I saw a report concerning the CR</p> <p>4 number that she filed.</p> <p>5 MR. RAUSCHER:</p> <p>6 Q. Okay. And do you recall seeing your name on</p> <p>7 Arrest Reports from a different arrest of Octavia</p> <p>8 McDonald?</p> <p>9 A. No, I do not recall.</p> <p>10 Q. All right. Why don't we mark it Exhibit 14 as</p> <p>11 the Vice Case Report from a May 25, 2005 arrest, which</p> <p>12 is CDBG 060131 to 32. Have you had a chance to look at</p> <p>13 that?</p> <p>14 (EXHIBIT 14 MARKED FOR IDENTIFICATION)</p> <p>15 A. Yes, I have.</p> <p>16 BY MR. RAUSCHER:</p> <p>17 Q. Do you recall whether you were involved in</p> <p>18 arresting Octavia McDonald on May 20 – May 25, 2005?</p> <p>19 A. No, I do not.</p> <p>20 MR. RAUSCHER: All right. Let's make Exhibit 15</p> <p>21 the Arrest Report from that arrest. And that one,</p> <p>22 I have a CDBG 056621 to 6625.</p> <p>23 (EXHIBIT 15 MARKED FOR IDENTIFICATION)</p> <p>24 MR. STEFANICH: Yes, Scott, you're going to</p> <p>25 pull – have to pull that one up, actually.</p>	Page 67	Page 69

<p>1 Q. That's CR?</p> <p>2 A. Yes.</p> <p>3 Q. And you've said – I think you've already</p> <p>4 testified you don't recall a CR being filed about an</p> <p>5 arrest of Octavia McDonald?</p> <p>6 A. I don't recall.</p> <p>7 Q. All right. This is a to/from. It looks like</p> <p>8 it's from you and I want you to read it over. Let me</p> <p>9 know if you need me to change the size.</p> <p>10 MR. STEFANICH: We have a copy here.</p> <p>11 MR. RAUSCHER: Oh, okay. Then I'll take it</p> <p>12 down.</p> <p>13 MR. PALLE: What page, Scott.</p> <p>14 MR. RAUSCHER: Oh, it's page 95 of the PDF on</p> <p>15 your computer or City BG 012154. Why don't we just</p> <p>16 mark that whole CR file as Exhibit 16?</p> <p>17 (EXHIBIT 16 MARKED FOR IDENTIFICATION)</p> <p>18 A. Yes, I've read it.</p> <p>19 BY MR. RAUSCHER:</p> <p>20 Q. Does reading this to/from refresh your</p> <p>21 recollection at all about Octavia McDonald?</p> <p>22 A. No, it does not.</p> <p>23 Q. Do you know who Octavia McDonald is?</p> <p>24 A. No, I do not.</p> <p>25 Q. All right. Did you prepare this to/from</p>	Page 70	<p>1 A. No, sir.</p> <p>2 Q. Any other documents you can think of that</p> <p>3 could refresh your recollection about Ms. McDonald or</p> <p>4 her arrests?</p> <p>5 A. No, sir.</p> <p>6 Q. All right. I think I can turn it over to Joel</p> <p>7 now for his case.</p> <p>8 MR. STEFANICH: Okay.</p> <p>9 MR. FLAXMAN: One second. Hi, this is Joel</p> <p>10 Flaxman. Can you hear me?</p> <p>11 THE WITNESS: Yes.</p> <p>12 EXAMINATION</p> <p>13 BY MR. FLAXMAN:</p> <p>14 Q. Okay. I have a few questions for you about an</p> <p>15 arrest of somebody named William Carter. Do you</p> <p>16 remember William Carter?</p> <p>17 A. No, I do not.</p> <p>18 Q. Did you look at any documents about William</p> <p>19 Carter before today's deposition?</p> <p>20 A. Yes, I did.</p> <p>21 Q. Okay. And did looking at those refresh your</p> <p>22 recollection about Mr. Carter?</p> <p>23 A. No, sir. They do not.</p> <p>24 Q. Okay. Was one of the documents an Arrest</p> <p>25 Report?</p>	Page 72
<p>1 statement yourself?</p> <p>2 A. Yes, I did.</p> <p>3 Q. Is that your signature on the to/from</p> <p>4 statement?</p> <p>5 A. Yes, it is.</p> <p>6 Q. And when I say your signature, I mean,</p> <p>7 did you sign it?</p> <p>8 A. That's my actual handwritten signature.</p> <p>9 Q. Okay. And do you know whether you've – your</p> <p>10 answers in this to/from statement are – or the</p> <p>11 statements you made in this to/from statement are</p> <p>12 accurate?</p> <p>13 A. Yes.</p> <p>14 Q. Do you know that they are?</p> <p>15 A. Yes.</p> <p>16 Q. Now, how do you know that everything you've</p> <p>17 written in here is accurate?</p> <p>18 A. Because I would not have lied on a to/from</p> <p>19 report.</p> <p>20 Q. Did you talk to any of the other officers</p> <p>21 about their to/from reports related to the CR?</p> <p>22 A. I don't recall.</p> <p>23 Q. Is there anything else that you remember about</p> <p>24 Octavia McDonald or any of her arrests that we haven't</p> <p>25 talked about yet today?</p>	Page 71	<p>1 A. Yes, sir.</p> <p>2 Q. Okay. Could I ask you to look at that Arrest</p> <p>3 Report? We marked it at the top as Plaintiff Carter</p> <p>4 Exhibit 1. Are you looking at the Arrest Report of</p> <p>5 William Carter dated May 19, 2006?</p> <p>6 (PLAINTIFFS EXHIBIT 1 MARKED FOR</p> <p>7 IDENTIFICATION)</p> <p>8 A. Yes, I am.</p> <p>9 Q. Okay. And do you know who wrote the narrative</p> <p>10 section of this Arrest Report?</p> <p>11 A. Well, on page 3 of the report, it says I'm the</p> <p>12 attesting officer, but the first arresting officer was</p> <p>13 Alvin Jones. So according to this, I would've been the</p> <p>14 person who did the narrative.</p> <p>15 Q. So it's your understanding that the attesting</p> <p>16 officer is the one who wrote the narrative?</p> <p>17 A. Yes, sir.</p> <p>18 Q. Is it your understanding that the first</p> <p>19 arresting officer should not also be the attesting</p> <p>20 officer?</p> <p>21 A. No. I did not say that.</p> <p>22 MR. STEFANICH: Objection. Form. You can</p> <p>23 answer.</p> <p>24 A. No. I – I did not state that. I just said</p> <p>25 based on page 3 of this particular Arrest Report, I was</p>	Page 73

<p>1 the attesting officer, but the first arresting officer  2 listed was Alvin Jones.  3 BY MR. FLAXMAN:  4 Q. Okay. And my question was: Would you expect  5 to see on every Arrest report a different officer as the  6 first arresting and the attesting?  7 A. Based on my knowledge and experience, no,  8 this is –  9 Q. Okay. So sometimes the first arresting  10 officer could also be the attesting officer?  11 A. Yes.  12 Q. Do you know why on this one you're the  13 attesting, but Officer Jones is the first arresting?  14 A. Since we were partners, to save time, usually  15 on an arrest, we would – you know, one person would do  16 one step. He might have been writing a case report and  17 he might have asked me to do the arrest report.  18 Q. Is case report the same thing as a vice case  19 report?  20 A. It's slightly different.  21 Q. Oh, okay. What's the difference?  22 A. One is an arrest report and one is a vice case  23 report. Usually, the vice – vice case report –  24 MR. STEFANICH: I just – he – he's – he  25 asked you a different question.</p>	Page 74	Page 76
<p>1 MR. FLAXMAN: Yes.  2 THE WITNESS: I'm sorry.  3 MR. FLAXMAN:  4 Q. Sure. You said you and your partner, one of  5 you might be working on the arrest report, one of you  6 might be working on the case report, correct?  7 A. Sometimes that would happen.  8 Q. And when you said case report, that's just the  9 same thing as a vice case report, right?  10 A. It could be any report.  11 Q. But when you say case report for a drug  12 arrest, do you mean the vice case report?  13 A. Yes. It'd be – if it was a narcotics arrest,  14 we do a vice case report.  15 Q. Okay. And that's what you meant when you said  16 case report, right?  17 A. Yes. But, in general, it could be any report.  18 It could have been a general offense case report or  19 another – or – or the – meet the appropriate  20 situation or circumstances for a particular arrest.  21 Q. Okay. The – let me ask you to look at the  22 narrative section of this Arrest Report, and it begins  23 by saying, this is an arrest by TAC Units 264 A and D.  24 Do you see that?  25 A. Yes, I do.</p>	Page 75	Page 77

<p>1 A. Yes.</p> <p>2 Q. Okay. And do you take that to me that you</p> <p>3 were the one who wrote the narrative of this Arrest</p> <p>4 Report?</p> <p>5 A. Based on this report, yes.</p> <p>6 Q. Just looking at the Arrest Report of Ms. Berry</p> <p>7 refresh your recollection about her arrest on June –</p> <p>8 excuse me – on May 19, 2006.</p> <p>9 A. No, it does not.</p> <p>10 Q. All right. And the – just going back quickly</p> <p>11 to Exhibit 1, the Arrest Report from Mr. Carter, can I</p> <p>12 ask you to take a look at that? Okay. And the first</p> <p>13 page lists the location of the arrest as 527 East</p> <p>14 Browning. Do you see that?</p> <p>15 A. Yes, sir.</p> <p>16 Q. Okay. That's a building at the Ida B. Wells</p> <p>17 Housing; is that right?</p> <p>18 A. To be best – best of my memory, yes.</p> <p>19 Q. Okay. And the – underneath Chicago, it has a</p> <p>20 location code of 122. Do you see that?</p> <p>21 A. Yes, sir.</p> <p>22 Q. And is that – and after that, it lists CHA</p> <p>23 hallway/stairwell/elevator. Do you see that?</p> <p>24 A. Yes, I do.</p> <p>25 Q. Okay. Would you have been the one who put in</p>	Page 78	<p>1 arresting officer?</p> <p>2 A. In box 46, yes. In box – eight –</p> <p>3 Q. And – I'm sorry. What was the second thing</p> <p>4 you said?</p> <p>5 A. But as I'm looking at box 18, it has me in</p> <p>6 position three.</p> <p>7 Q. Okay. And what do you take that to mean?</p> <p>8 A. According to this report, in position three,</p> <p>9 that would mean I would've been the assisting officer</p> <p>10 and down at the bottom in box 46, it has me listed as</p> <p>11 the second arresting officer.</p> <p>12 Q. And could you tell me anything about what that</p> <p>13 means?</p> <p>14 A. I don't know. It could have been a mistake.</p> <p>15 Q. Okay. And you also said the signature.</p> <p>16 Do you recognize your signature under your name?</p> <p>17 A. That's a signature, but it's not my signature.</p> <p>18 Q. Okay. Do you know who signed it?</p> <p>19 A. It appears to be Alvin Jones and right from</p> <p>20 the best of my memory.</p> <p>21 Q. Okay. And do you know why Alvin Jones signed</p> <p>22 under your name?</p> <p>23 A. Because I might have given him permission to</p> <p>24 sign for me.</p> <p>25 Q. Was that the regular practice?</p>	Page 80
<p>1 that information to the Arrest Report?</p> <p>2 A. If I prepared – according to the report,</p> <p>3 my name is listed as the attesting officer, yes.</p> <p>4 Q. Okay. And if Mr. Carter had been arrested</p> <p>5 inside of an apartment at that building, you wouldn't</p> <p>6 have put in that location, right?</p> <p>7 A. No, I would not.</p> <p>8 Q. All right. Could you take a look at Plaintiff</p> <p>9 Carter Exhibit 3? That is the Vice Case Report, please.</p> <p>10 And are you looking now at the Vice Case Report for</p> <p>11 Mr. Carter and Ms. Berry dated May 19, 2006?</p> <p>12 (PLAINTIFF'S EXHIBIT 3 MARKED FOR</p> <p>13 IDENTIFICATION)</p> <p>14 A. Yes, I am.</p> <p>15 BY MR. FLAXMAN:</p> <p>16 Q. Okay. Could you tell from this Report who</p> <p>17 drafted the narrative section?</p> <p>18 A. Well, based on the signature and the</p> <p>19 positioning of our names on the Report, it looks like</p> <p>20 Alvin Jones.</p> <p>21 Q. Okay. What do you mean by the positioning of</p> <p>22 the names?</p> <p>23 A. Because he's listed as the – on the report as</p> <p>24 the first arresting officer.</p> <p>25 Q. Okay. And are you listed as the second</p>	Page 79	<p>1 A. Yes.</p> <p>2 Q. You said – you mentioned that you were the</p> <p>3 third officer in box 12. Do you see that?</p> <p>4 A. That's box 18.</p> <p>5 Q. Okay. I'm sorry. Thank you. And after your</p> <p>6 name in box 18 are Officers Muhammad and Sergeant Watts?</p> <p>7 A. Yes.</p> <p>8 Q. And what do you take it to mean that their</p> <p>9 names are listed in box 18?</p> <p>10 A. That they may have somehow assisted in this</p> <p>11 arrest on this particular date.</p> <p>12 Q. Okay. And I take it you don't recall how they</p> <p>13 may have assisted, correct?</p> <p>14 A. No, I do not.</p> <p>15 Q. Okay. And if you look at the Report, are you</p> <p>16 able to tell how they may have assisted?</p> <p>17 A. Based on the narrative, this Report, no,</p> <p>18 I cannot tell.</p> <p>19 Q. Okay. In a situation where you were filling</p> <p>20 out an arrest report and Officer Jones was doing a case</p> <p>21 report, would you talk to each other about what to put</p> <p>22 in the narrative section?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. Is it possible that you wrote the</p> <p>25 arrest and he copied it or vice versa?</p>	Page 81

<p>1 A. I don't recall.</p> <p>2 Q. Okay. Would that be a normal thing to do</p> <p>3 that, to copy one narrative from one report onto another</p> <p>4 report?</p> <p>5 MR. STEFANICH: Objection. Form.</p> <p>6 A. No. The vice case report is more descriptive.</p> <p>7 Generally, that's what I recall based on my training,</p> <p>8 that they wanted you – more description in the case</p> <p>9 reports than the arrest report. The arrest report is</p> <p>10 basically a summary and they wanted – from my – based</p> <p>11 on my experience and memory of what I was taught in the</p> <p>12 academy, they wanted just the probable cause in the</p> <p>13 arrest report.</p> <p>14 Q. And was it your practice to draft one of those</p> <p>15 reports before the other?</p> <p>16 A. I don't recall.</p> <p>17 Q. When Officer Jones would sign your name, would</p> <p>18 he do that after letting you review the report?</p> <p>19 A. Yes.</p> <p>20 Q. All right. And does reviewing the Vice Case</p> <p>21 Report, Exhibit number 3, refresh your recollection</p> <p>22 about these arrests?</p> <p>23 A. No, sir, it does not.</p> <p>24</p> <p>25 (CONFIDENTIAL PORTION REDACTED)</p>	Page 82	Page 84
<p>1</p> <p>2 Q. Okay. I'm going to – we can go off the</p> <p>3 confidential because I'm not going to – I just have a</p> <p>4 general question about inventory sheets. The – you</p> <p>5 didn't prepare the inventory sheets we just looked at,</p> <p>6 but you as a police officer, you had experience</p> <p>7 preparing inventory sheets, correct?</p> <p>8 A. Yes, sir.</p> <p>9 Q. And what was your understanding of which</p> <p>10 officer should be listed in the found by section?</p> <p>11 A. Based on my experience and my memory, usually</p> <p>12 the recovering officer.</p> <p>13 Q. Meaning whichever officer recovered the item</p> <p>14 listed on the inventory sheet?</p> <p>15 A. Yes, sir.</p> <p>16 Q. Do you have a recollection of testifying at a</p> <p>17 trial for William Carter?</p> <p>18 A. No, I do not.</p> <p>19 Q. Okay. Was it a routine part of your job as a</p> <p>20 police officer in the 2000's to testify in court?</p> <p>21 A. Based on my memory, yes.</p> <p>22 Q. Right. And was it your regular practice</p> <p>23 to – strike that. Did you testify in court more than</p> <p>24 once a month in the 2000's?</p> <p>25 A. I don't recall.</p>	Page 83	Page 85

<p>1 Q. And that was the time that was in the Arrest  2 Reports for -- that was close to the time in the Arrest  3 Report for Mr. Carter and Ms. Berry; is that right?  4 A. I believe so.  5 Q. Okay. And I should have said the date, so I  6 mean that's 15 minutes -- forget it. I don't need to  7 ask that. Okay. And at the time you were giving this  8 testimony in 2007, did you have a recollection of the  9 arrest that you were testifying to?  10 A. I don't recall.  11 Q. Okay. Would you have testified to the things  12 you testified to if you didn't remember them?  13 MR. STEFANICH: Objection. Form. You can  14 answer.  15 A. No. I would not have testified if I -- at  16 that time, if I did not have a memory.  17 BY MR. FLAXMAN:  18 Q. Would you expect within a year of the arrest  19 that you would remember the events that happened?  20 A. I couldn't say at this particular point in  21 time.  22 Q. Okay. The -- at the bottom of this -- the  23 third page we were looking at, the lawyer asked you if  24 you were in uniform or plain clothes. Do you see that?  25 A. Yes, sir.</p>	Page 86	Page 88
<p>1 Q. Okay. And you answered plain clothes?  2 A. Yes.  3 Q. Okay. Do you recall that it was your usual  4 practice to be in plain clothes when you were at Ida B.  5 Wells?  6 A. Yes.  7 Q. Okay. But this says, in your answer at the  8 bottom of the page, was, "I probably had on a jacket, a  9 regular shirt, and a pair of jeans." Does that match  10 your recollection today of what you would've worn as  11 plain clothes?  12 A. If that's what it states in the report, yes.  13 Q. And is that what you remember as we sit here  14 today about what you might wear as -- in plain clothes?  15 A. I'm sure in my uniform or my clothing changed  16 from day to day. I'm just giving -- based off of this,  17 I just probably was giving a general description of what  18 -- what type of clothing we might have worn.  19 Q. Okay.  20 A. It would change on the season.  21 Q. I don't have specific questions about the  22 testimony, but I do need to make sure that looking at it  23 doesn't help you remember the events. So I -- have you  24 looked at the testimony before?  25 A. Yes.</p>	Page 87	Page 89

<p>1 BY MR. RAUSCHER:</p> <p>2 Q. All right. I'm going to just – I'm going to</p> <p>3 bring up on one more document. I'm going to just share</p> <p>4 it. All right. Do you see a Vice Case Report?</p> <p>5 A. Can you enlarge it a little bit for me?</p> <p>6 Q. Yeah, of course.</p> <p>7 A. Thank you. That's fine.</p> <p>8 Q. All right. Do you see that this is a Vice</p> <p>9 Case Report of the arrest of Octavia McDonald of August</p> <p>10 8, 2005?</p> <p>11 A. Yes.</p> <p>12 Q. All right. Did you look at this report to</p> <p>13 prepare for your deposition?</p> <p>14 A. I believe so.</p> <p>15 Q. And do you know if you prepare – if you were</p> <p>16 the one who created this report?</p> <p>17 A. Can you scroll down to the bottom?</p> <p>18 Q. Yeah. I'll go back to the first page.</p> <p>19 A. Based on the positioning of where my name is</p> <p>20 listed at, I think that's box 12, and then down at there</p> <p>21 in the lower left-hand corner, yes.</p> <p>22 Q. And to see any other names of officers in box</p> <p>23 12 refresh your recollection as to what anybody else may</p> <p>24 have done in relation to the arrest of Octavia McDonald</p> <p>25 in August 2005?</p>	Page 90	Page 92
<p>1 A. No, it does not.</p> <p>2 Q. And you also – do you see that there's a</p> <p>3 court date listed in box 28 and a court branch in box</p> <p>4 27?</p> <p>5 A. Yes.</p> <p>6 Q. What's the significance of that court date</p> <p>7 listed in August 28th?</p> <p>8 A. Based on my memory and the experience, that</p> <p>9 would be the preliminary date for the probable cause</p> <p>10 hearing.</p> <p>11 Q. All right. Is that court date something you</p> <p>12 choose?</p> <p>13 A. Usually, but based off my memory, when we</p> <p>14 scheduled the court appearances for felony arrest, it</p> <p>15 had to be between seven to 14 days. And I'm not – I</p> <p>16 don't recall specifically because it's been many years</p> <p>17 ago since I've actually done any reports.</p> <p>18 Q. But you didn't need – well, I shouldn't –</p> <p>19 let me ask it a different way. Did you need approval</p> <p>20 from a prosecutor or anyone else to schedule that court</p> <p>21 date or was that something you just did when you filled</p> <p>22 out the arrest in vice case reports?</p> <p>23 A. Based on my memory, what – what I recall, as</p> <p>24 I said, we tried to – well, from what I remember, we</p> <p>25 scheduled the dates from seven to 14 days, and I don't</p>	Page 91	Page 93

<p>1 MR. STEFANICH: You can answer.</p> <p>2 A. Generally, yes, but according to this report,</p> <p>3 it doesn't appear that I see Mohammad's name was</p> <p>4 the -</p> <p>5 BY MR. PALLES:</p> <p>6 Q. Well, that's the point. You don't see</p> <p>7 Mohammed's name listed. You don't see Lamonica Louis.</p> <p>8 You don't see Doug Nichols. You don't see Manny Leano;</p> <p>9 am I correct?</p> <p>10 A. That's correct.</p> <p>11 Q. Okay. So may we infer from that fairly that</p> <p>12 in those circumstances those individuals were not at the</p> <p>13 scene during the course of the arrest?</p> <p>14 MR. RAUSCHER: Object to foundation.</p> <p>15 MR. STEFANICH: Object to the form. You can</p> <p>16 answer.</p> <p>17 A. Based on the report, it doesn't list them, but</p> <p>18 I don't know at the present time.</p> <p>19 MR. PALLES:</p> <p>20 Q. Okay. And when we looked at the Arrest</p> <p>21 Reports for each of the arrestees that day, you recall</p> <p>22 Mr. Rauscher noted that only - Kallatt Mohammed's name</p> <p>23 was only included as the attesting officer for the</p> <p>24 Stefon Harrison arrest. Do you recall that?</p> <p>25 A. Yes.</p>	Page 94	Page 96
<p>1 Q. Okay. And -</p> <p>2 MR. RAUSCHER: If I said that I was - that was</p> <p>3 not right. Sorry. Did I say that? It was Henry</p> <p>4 Thomas. He's listed as Henry Thomas.</p> <p>5 MR. PALLES: I'm sorry. And Henry Thomas.</p> <p>6 I thought it was Stefon Harrison.</p> <p>7 MR. RAUSCHER: I might have misspoke if I said</p> <p>8 it like that, or maybe - I can double check if it</p> <p>9 was both, but I'm looking at Henry Thomas right now.</p> <p>10 MR. PALLES: And he - is he a - and Kallatt</p> <p>11 Mohammed, is he attesting officer?</p> <p>12 MR. RAUSCHER: Yeah. Sorry. I didn't mean to</p> <p>13 interrupt you -</p> <p>14 MR. STEFANICH: So he's looking at the Stefon</p> <p>15 Harris -</p> <p>16 MR. PALLES: Yeah.</p> <p>17 MR. STEFANICH: -- report.</p> <p>18 MR. PALLES: Yeah, let's get it straight.</p> <p>19 I just want to understand. And then you know,</p> <p>20 I'd have to go back on my screen behind me to get</p> <p>21 them.</p> <p>22 MR. RAUSCHER: I have Harrison, too. I can</p> <p>23 double check. But I think Brian just said</p> <p>24 he's - yeah, sorry. Smith is attesting for</p> <p>25 Harrison.</p>	Page 95	Page 97

<p>1 Q. Okay.</p> <p>2 A. It's possible.</p> <p>3 Q. Okay. Let me now switch to the Alvin Waddy</p> <p>4 case for just a minute, and because of the</p> <p>5 particularized types of complaints that are made there,</p> <p>6 let me -- let me ask you this: Do you have an</p> <p>7 independent recollection -- I know we have -- you don't</p> <p>8 remember the Waddy arrest. Do you remember testifying</p> <p>9 at a preliminary hearing where probable cause was found</p> <p>10 against Alvin Waddy?</p> <p>11 A. I don't recall.</p> <p>12 Q. In the normal course of events, would you</p> <p>13 expect that the officer who -- I'm sorry. Strike that.</p> <p>14 Would -- in the normal course of events, would you</p> <p>15 expect that the officer who testified at the preliminary</p> <p>16 hearing would be -- either be Jones or you as the</p> <p>17 arresting officer?</p> <p>18 A. I believe so.</p> <p>19 Q. Okay. And did -- well, let me ask you this:</p> <p>20 Did you and Jones enter into any agreement to falsely</p> <p>21 prosecute Alvin Waddy?</p> <p>22 A. No.</p> <p>23 Q. Okay. And I take it -- well, would</p> <p>24 you -- would your answer be the same if I asked you the</p> <p>25 question concerning whether or not you had an agreement</p>	Page 98	Page 100
<p>1 with Kallatt Mohammed? Maybe I should phrase that</p> <p>2 differently. Did you ever enter into an agreement with</p> <p>3 Kallatt Mohammed to falsely prosecute Alvin Waddy?</p> <p>4 A. No, I did not.</p> <p>5 Q. Okay. And that would be true as well as any</p> <p>6 of the other officers who were out on that scene that</p> <p>7 day, am I correct?</p> <p>8 MR. RAUSCHER: Object to form.</p> <p>9 MR. STEFANICH: You can answer, sir.</p> <p>10 THE WITNESS: Oh.</p> <p>11 MR. PALLES: You can answer.</p> <p>12 A. That would be true for any arrest that I made</p> <p>13 as a --</p> <p>14 BY MR. PALLES:</p> <p>15 Q. Of course.</p> <p>16 A. -- police officer.</p> <p>17 Q. Of course. Of course, and that's because you</p> <p>18 never agreed with anybody to falsely pin a case on</p> <p>19 anybody, correct?</p> <p>20 A. That's correct.</p> <p>21 Q. Okay. And by the same token, you'd never</p> <p>22 entered into agreement -- any agreement to protect</p> <p>23 anybody who you -- who -- let me strike that. In fact,</p> <p>24 I'm going to strike the whole line of question. I just</p> <p>25 want to go -- that's the end of my questioning on Waddy.</p>	Page 99	Page 101

<p>1 looked at it, and then I can continue with my  2 questioning.  3 A. You said page 3?  4 Q. Yes. I believe it is Individual Defendant's  5 AW 3, and on the bottom right-hand corner of each page,  6 there are what are called Bates numbers, so if you need  7 some assistance from your attorney, he can show you.  8 A. Yes, I see it.  9 Q. Okay. Thank you so much. So can you tell me,  10 on that page, who is the attesting officer of this  11 Arrest Report?  12 A. It says Douglas Nichols.  13 Q. And who is the first arresting officer on this  14 report?  15 A. Alvin Jones.  16 Q. And who is the second arresting officer on  17 this report?  18 A. Myself.  19 Q. And who is the approving supervisor on this  20 Arrest Report?  21 A. It says Barrel (phonetic).  22 Q. Do you see Sergeant Watts's name listed under  23 the reporting personnel section of Mr. Waddy's Arrest  24 Report?  25 A. No, I do not.</p>	Page 102	Page 104
<p>1 Q. Okay. So now I want you to go to Individual  2 Defendant AW 5, which is the last page of the exhibits  3 you have in your hand, and it's still Mr. Waddy's April  4 4, 2007 Arrest Report. Let me know when you're there.  5 A. I'm there.  6 Q. And can you tell me who the arrestee  7 processing personnel were for Mr. Waddy's arrest on  8 records?  9 A. The assisting officers listed are Gonzalez,  10 Nichols, Mohammed, Bolton, Louis, and Leano.  11 Q. And the final approval of charges were  12 approved by who?  13 A. Barrel.  14 Q. Okay. So do you see Sergeant Watts's name  15 listed under any of the processing personnel on  16 Individual Defendant AW 5?  17 A. No, I do not.  18 Q. Do you see Sergeant Watts's name appear  19 anywhere in Mr. Waddy's Arrest Report? And that's  20 Exhibit 1 that you're currently looking at. Feel free  21 to review the Arrest Report in its entirety to you again  22 if that will help you refresh your recollection on the  23 contents of the Arrest Report. Just let me know when  24 you're done.  25 A. No, I do not see his name listed anywhere on</p>	Page 103	Page 105

<p>1 had played a role in Mr. Waddy's arrest on April 4,  2 2007?  3 MR. RAUSCHER: Object to the form and misstates  4 the document.  5 MR. FLAXMAN: Foundation.  6 MR. STEFANICH: You can answer.  7 A. Yes.  8 BY MS. MCELROY:  9 Q. Does Sergeant Watts' name appear anywhere on  10 this Vice Case Report?  11 A. Yes, it does.  12 Q. And where does it appear?  13 A. On page 1, it is listed in box 48 and in box  14 50. And then on the second page, his name is listed on  15 the supervisor's signature with the date and time box  16 next to his signature.  17 Q. Okay. So it appears that Sergeant Watts  18 approved this Vice Case Report, correct?  19 A. It appears so, yes.  20 Q. Okay. Do you recognize Sergeant Watts'  21 signature?  22 A. Based on my memory, it does appear to be his  23 hand, his signature.  24 Q. Okay. In your experience as a Chicago police  25 officer, if an officer played a role in an individual's</p>	Page 106	Page 108
<p>1 arrest, would that officer's name be documented as  2 either an arresting officer or an assisting arresting  3 officer on a case report?  4 A. Yes.  5 Q. Okay. And in your experience as a Chicago  6 police officer, if an officer was involved in an  7 individual's arrest, would that officer's name also be  8 documented as a complainant in a vice case report?  9 MR. STEFANICH: Objection to form. You can  10 answer.  11 A. Generally, yes.  12 MS. MCELROY: I think those are all my  13 questions. Thank you so much, Mr. Smith, for your  14 time.  15 MR. STEFANICH: Scott, I just want to clean  16 that up.  17 MR. RAUSCHER: Okay. I got a couple  18 follow-ups, but you can go ahead if you want.  19 EXAMINATION  20 BY MR. STEFANICH:  21 Q. So I want to – officer Smith, I want to have  22 you keep on looking at the Alvin Waddy Vice Case Report,  23 first page, box 12. Do you see box 12?  24 A. Yes.  25 Q. Okay. Is box 12 where the complainant's name</p>	Page 107	Page 109

1 address read and sign?  
2 MR. STEFANICH: Yeah, we'll reserve, and I'll  
3 order a copy.  
4 THE REPORTER: Okay. And then would anyone  
5 else like a copy of the transcript or the video at  
6 this time?  
7 MR. RAUSCHER: I don't need it yet.  
8 THE REPORTER: Okay.  
9 MR. STEFANICH: I just --  
10 MR. FLAXMAN: Me neither.  
11 MR. STEFANICH: I just want to order the  
12 transcript, not the video.  
13 THE REPORTER: Oh, okay.  
14 MS. MCELROY: No thank you.  
15 THE REPORTER: Okay, perfect. Then I can get  
16 us off the record. Standby. The time is 1:44 p.m.  
17 We're going off the record.  
18 (PLAINTIFF'S EXHIBIT 4 MARKED FOR IDENTIFICATION)  
19 (EXHIBIT 17 MARKED FOR IDENTIFICATION)  
20 (DEPOSITION CONCLUDED AT 1:45 P.M. ET)  
21  
22  
23  
24  
25

Page 110

1 CERTIFICATE OF REPORTER  
2 STATE OF ILLINOIS  
3  
4 I do hereby certify that the witness in the foregoing  
5 transcript was taken on the date, and at the time and  
6 place set out on the Title page hereof, by me after  
7 first being duly sworn to testify the truth, the whole  
8 truth, and nothing but the truth; and that the said  
9 matter was recorded digitally by me and then reduced to  
10 typewritten form under my direction, and constitutes a  
11 true record of the transcript as taken, all to the best  
12 of my skill and ability. I certify that I am not a  
13 relative or employee of either counsel and that I am in  
14 no way interested financially, directly or indirectly,  
15 in this action.  
16  
17  
18  
19  
20  
21  
22 ESTHER HEATH,  
23 COURT REPORTER/NOTARY  
24 MY COMMISSION EXPIRES ON: 01/09/2024  
25 SUBMITTED ON: 08/29/2023

Page 111

<b>Exhibits</b>	<b>CarterExhibit2</b> <u>Smith</u> 77:5,6	107:23,25 108:5	<b>2000's</b> 83:20, 24	96:23 101:22, 23 102:3,5
<b>Exhibit1</b> <u>Smith</u> 14:6,7 73:4	<b>CarterExhibit3</b> <u>Smith</u> 79:12, 13	<b>122</b> 78:20 <b>12:05</b> 56:3	<b>2004</b> 42:24 43:3 88:4	<b>303-sidewalk</b> 61:7,12
<b>Exhibit2</b> <u>Smith</u> 19:16,18	<b>CarterExhibit4</b> <u>Smith</u> 110:18	<b>12:22</b> 56:7	<b>2005</b> 12:6 59:23 62:8 <b>13</b> 59:8,10	<b>32</b> 67:12 <b>35th</b> 47:15
<b>Exhibit3</b> <u>Smith</u> 25:5,7, 23	<b>CarterExhibit6</b> <u>Smith</u> 84:4,5	<b>14</b> 44:21 45:2 67:10,14 91:15, 25	63:6,8 64:8 65:3 67:11,18 68:13,22 69:6 90:10,25	<b>36th</b> 47:15,24 48:7 <b>37th</b> 61:3 68:15
<b>Exhibit4</b> <u>Smith</u> 25:18, 23,24 77:19	<b>0</b>	<b>149</b> 30:3	<b>2006</b> 29:15 30:7,22 32:2,22	<b>393</b> 49:7
<b>Exhibit5</b> <u>Smith</u> 31:10	<b>000005</b> 14:3	<b>15</b> 59:25 67:20, 23 86:6	40:11 42:12 <b>007234</b> 33:2	<b>4</b>
<b>Exhibit6</b> <u>Smith</u> 31:21,23 84:2,4 88:9	<b>007386</b> 44:14	<b>15:00</b> 97:13	<b>15:20</b> 97:13	<b>4</b> 15:2,10 20:14 25:18,23,24
<b>Exhibit7</b> <u>Smith</u> 32:14,17	<b>007391</b> 49:7	<b>16</b> 22:7 40:11	<b>2007</b> 15:2,10 20:14 22:7	30:7,22 32:2,22
<b>Exhibit8</b> <u>Smith</u> 33:3,4	<b>012154</b> 70:15	70:16,17	28:21 44:21	77:19 101:14
<b>Exhibit9</b> <u>Smith</u> 34:7,9	<b>023633</b> 34:7	<b>17</b> 110:19	45:3 50:17	103:4 104:5
<b>Exhibit10</b> <u>Smith</u> 38:21 39:1	<b>039147</b> 30:3	<b>1764</b> 25:21	84:10 85:11,13, 17 86:8 101:14	105:4 106:1 110:18
<b>Exhibit11</b> <u>Smith</u> 44:12, 14,17	<b>039797</b> 59:8	<b>18</b> 26:23 80:5 81:4,6,9 108:8, 9,12	<b>10:4</b> 104:5 <b>044237</b> 32:14	<b>40202</b> 10:7 <b>404(b)</b> 12:8
<b>Exhibit12</b> <u>Smith</u> 49:9	<b>056621</b> 67:22	<b>19</b> 73:5 77:21	<b>2008</b> 64:4	<b>41</b> 32:14 105:2, 12
<b>Exhibit13</b> <u>Smith</u> 59:8,10	<b>056840</b> 31:5	78:8 79:11 85:23 88:10,15	<b>2023</b> 10:8 56:7 89:21	<b>42</b> 19:17 35:13 105:2
<b>Exhibit14</b> <u>Smith</u> 67:10,14	<b>06-13571</b> 84:8	<b>19-CV-01717</b> 10:15	<b>21</b> 56:7 89:21	<b>43</b> 38:16,23
<b>Exhibit15</b> <u>Smith</u> 67:20,23	<b>060131</b> 67:12	<b>19942</b> 38:16,23	<b>212</b> 61:14,17	<b>46</b> 80:2,10
<b>Exhibit16</b> <u>Smith</u> 70:16,17	<b>1</b>	<b>1999</b> 85:13	<b>21st</b> 10:8	<b>48</b> 106:13
<b>Exhibit17</b> <u>Smith</u> 110:19	<b>1</b> 14:6,7 73:4,6 78:11 84:10 101:9,10,13,18 103:20 106:13	<b>19:29</b> 97:9	<b>238</b> 33:2	<b>4th</b> 97:9
<b>CarterExhibit1</b> <u>Smith</u> 73:6,7	<b>10-minute</b> 55:24	<b>1:09</b> 89:15	<b>25</b> 67:11,18 <b>1:15</b> 89:21	<b>5</b>
	<b>101</b> 10:7	<b>1:44</b> 110:16	<b>264</b> 17:15 20:7 62:24 63:2 <b>2:45</b> 110:20	<b>5</b> 31:8,10 47:23 68:18 76:7,9 101:10 103:2, 16
	<b>11</b> 12:6 44:12, 14,17	<b>2</b> 17:6 19:16,18 35:24 60:5 <b>11737</b> 84:23,25	<b>27</b> 42:12 91:4 <b>28</b> 91:3	<b>50</b> 106:14 <b>527</b> 68:15 78:13
	<b>11:04</b> 10:9	68:25 77:3,5 104:24	<b>28th</b> 91:7	<b>5274</b> 61:3 <b>547</b> 47:14
	<b>12</b> 39:13 49:5,9 81:3 90:20,23	<b>20</b> 49:18 50:9 67:18	<b>3</b> 25:5,7,23 73:11,25 77:24 79:9,12 82:21	<b>574</b> 47:24 48:7

<b>6</b>	<b>Adam</b> 76:3 <b>add</b> 40:14 <b>address</b> 47:21, 22 48:5 61:19 110:1 <b>Adobe</b> 31:15 <b>affiliation</b> 35:14 <b>affirm</b> 11:20 <b>afternoon</b> 92:20,21 <b>agree</b> 11:16 109:8 <b>agreed</b> 99:18 <b>agreeing</b> 27:18 <b>agreement</b> 98:20,25 99:2, 22 <b>ahead</b> 15:7,12 24:6,8 26:13,20 41:6 52:14 64:23 68:17 89:2 104:9,19 107:18 <b>Ali</b> 29:14 30:7, 22 93:3 <b>Ali's</b> 30:2 <b>alleged</b> 100:14 <b>Alvin</b> 10:21 12:13 13:4,10, 18 15:17 20:18 21:9 22:11,13 24:13 34:25 35:8 43:6,7,12, 13 73:13 74:2 76:3 79:20 80:19,21 98:3, 10,21 99:3 101:5,13 102:15 105:4 107:22 <b>Acknowledgin</b> <b>g</b> 100:2 <b>activities</b> 49:18,21 <b>actual</b> 45:13 66:8 71:8	100:20 <b>anytime</b> 65:5 <b>apartment</b> 79:5 <b>apologize</b> 93:8 <b>appearance</b> 10:16 <b>appearances</b> 91:14 <b>appeared</b> 21:24 53:11 <b>appearing</b> 11:9 <b>appears</b> 21:19 39:8 50:4 80:19 97:8,16 106:17, 19 <b>approval</b> 30:10 91:19 92:1 103:11 <b>approved</b> 37:24 38:9 103:12 106:18 <b>approving</b> 39:10 102:19 <b>approximately</b> 85:23 97:11,14 <b>April</b> 15:2,10 20:14 101:14 103:3 104:5 105:4 106:1 <b>AR</b> 16:14 <b>arrest</b> 13:14, 15,19,23 14:2, 12 15:1,4,9,10, 13,17,18,22,25 16:12,16,20,22, 24 17:6,9 19:25 20:13,16 21:9 24:13 25:2,6, 11,25 26:2,5, 10,15 27:4 28:7,10 29:13 30:2,7,21 31:1, 4,17 32:1,5,8, 21 33:1,8,12 34:1,6,18 39:7, 14 40:18 41:9,	17 42:3,4,13 43:8 44:10,13, 16,21,22 45:9 48:4 49:12,14, 22 50:25 52:1 53:8,14,20 58:9 59:3,11,13,17, 21,22 60:11,22 62:24 63:12,16, 19,22 64:1,4,7 66:25 67:7,11, 21 68:2,12,19, 22 70:5 72:15, 24 73:2,4,10,25 74:5,15,17,22 75:5,12,13,20, 22,23 77:19,20 78:3,6,7,11,13 79:1 81:11,20, 25 82:9,13 86:1,2,9,18 88:4,10,15,19 90:9,24 91:14, 22 93:1,11,22 94:13,20,24 96:5 97:11,12, 15,23 98:8 99:12 100:3 101:13,15,24 102:11,20,23 103:4,7,19,21, 23 104:4,11,16, 22 105:4 106:1 107:1,7 <b>arrested</b> 20:19 37:12 42:5,11 47:23 48:6 59:25 60:17 69:9 79:4 <b>arrestee</b> 103:6 <b>arrestees</b> 94:21 <b>arresting</b> 16:7, 22,24 26:16 39:24 42:17 45:2,6 58:6,9, 18,20 60:14 67:18 68:8,19 69:6,8 73:12,19 74:1,6,9,13 79:24 80:1,11 93:5,14,17 98:17 102:13, 16 104:5 107:2	<b>arrests</b> 12:6 42:1 43:2 44:23 56:12 58:13,14 71:24 72:4 82:22 93:2 <b>arrived</b> 53:17 <b>assigned</b> 17:15 20:6 43:3 62:25 63:7 76:2,6 84:22 109:6 <b>assignment</b> 84:19 85:14 <b>assistance</b> 102:7 <b>assisted</b> 81:10,13,16 <b>assisting</b> 16:6, 21,22,24 26:16 68:19 80:9 93:15,22 103:9 107:2 108:13 <b>attending</b> 10:16,18,23 <b>attention</b> 85:22 97:10 101:22 <b>attesting</b> 16:9, 11 42:6,7 73:12,15,19 74:1,6,10,13 77:25 79:3 94:23 95:11,24 96:2,6,23 97:3, 4,22 102:10 <b>attorney</b> 53:25 85:21 102:7 <b>attorney's</b> 92:1 <b>attorneys</b> 53:18 <b>August</b> 59:23 62:8 64:4,8 90:9,25 91:7 <b>AW</b> 101:10,23 102:5 103:2,16 105:2,12
<b>8</b>	<b>9</b>			

<b>AW000041</b>	22:25 63:1	95:23	26:1,3,11,12,22	<b>Chicago</b>
19:17	<b>begin</b> 11:24	<b>Brian's</b> 93:9	27:6 28:13	10:19,24 11:10
<b>aware</b> 88:18,20	53:18	<b>briefly</b> 17:7	34:5,17,21	78:19 104:15
<hr/>	<b>begins</b> 75:22	<b>bring</b> 38:20,23	37:15,20 38:24	106:24 107:5
<b>B</b>	85:22	69:13 90:3	39:23,25 40:24	108:19 109:9
<b>back</b> 49:1 56:4	<b>behalf</b> 11:3,8	<b>brought</b> 68:25	42:5,9 43:6	<b>choose</b> 91:12
61:3 65:3 78:10	43:13	<b>Browning</b>	45:23 49:4,13,	<b>circulated</b>
89:18 90:18	<b>behavior</b>	78:14	17 53:7,13,24	32:13
95:20 97:18	57:23	<b>building</b> 46:10,	54:17,19,21	<b>circumstance</b>
100:1	<b>belief</b> 17:17	13,15,17,25	55:18 59:12	<b>s</b> 75:20 94:12
<b>bad</b> 33:20	27:12 28:2	47:2,15 48:8,	67:11 72:7	<b>citizen</b> 65:10,
<b>bag</b> 23:9 24:2,9	<b>Bell</b> 11:6	11,15,20,23	14,16,18 77:18	14,22 66:2,3
<b>baggie</b> 23:2	<b>Berry</b> 76:22,25	55:19 65:24	<b>City</b> 11:9 70:15	
<b>baggies</b> 35:25	77:20,21 78:6	78:16 79:5	<b>City-bg-</b>	
36:3,10,13	<b>BG</b> 70:15	<hr/>	<b>051750</b> 25:6	
<b>bags</b> 22:20	<b>big</b> 69:1,12	<b>Cadman</b> 11:4	<b>City-bg-</b>	
23:21 24:3,4	96:22	<b>call</b> 14:5 19:15	<b>051763</b> 25:21	
36:5	<b>bigger</b> 33:17,	25:5,18 32:14	<b>City-bg-</b>	
<b>Baker</b> 12:7,9	19	34:7 38:21	<b>056831</b> 30:6	
<b>Barrel</b> 102:21	<b>bit</b> 39:2 42:22	44:12 96:10	<b>City-bg-05836</b>	
103:13	90:5	<b>called</b> 25:23	31:5	
<b>based</b> 16:13,17	<b>black</b> 65:23	77:11 84:14	<b>clean</b> 107:15	
17:13 21:19	<b>block</b> 65:11	102:6	<b>clear</b> 84:17	
22:6 26:21	<b>Bolton</b> 93:17	<b>calling</b> 31:21	<b>clients</b> 12:8	
27:11,15,19	103:10 105:19	<b>candy</b> 44:4	<b>close</b> 31:15	
28:2,6,19 29:8	<b>bottle</b> 66:5,9	<b>Candyman</b>	86:2	
50:3 51:7,9	<b>bottom</b> 80:10	44:1	<b>closed</b> 96:11	
54:4,24 73:25	86:22 87:8	<b>captain</b> 43:17	<b>clothes</b> 86:24	
74:7 76:16 78:5	90:17 102:5	<b>car</b> 50:20 51:14	87:1,4,11,14	
79:18 81:17	<b>box</b> 26:23	<b>career</b> 40:14	<b>clothing</b> 87:15,	
82:7,10 83:11,	35:13 80:2,5,10	<b>Carter</b> 72:15,	18	
21 87:16 90:19	81:3,4,6,9	16,19,22 73:3,5	<b>cocaine</b> 46:12,	
91:8,13,23	90:20,22 91:3	76:22 77:3,10	17 60:1	
93:12 94:17	105:10,12	78:11 79:4,9,11	<b>code</b> 61:13	
97:16 100:12	106:13,15	83:17 84:2,3	78:20	
104:7,9,10,14,	107:23,25	86:3 88:4,10,15	<b>colleagues</b>	
23 106:22	108:5,8,9,11	<b>Cartwright</b>	19:9	
<b>basically</b>	<b>branch</b> 91:3	44:25 45:9	<b>commander</b>	
82:10	<b>break</b> 55:24	47:6,12	41:7	
<b>basing</b> 23:22	89:11,12	<b>case</b> 10:14,22	<b>common</b> 23:5,	
62:19,20	<b>Brian</b> 11:1 12:5	13:13 14:18	7,20,24,25 24:4	
<b>Bates</b> 30:6,15	25:2,16 32:7	19:5,16,22,24	28:21 36:7,12	
38:15,22 102:6	33:3 38:13 59:9	20:18 21:14,15	50:8	
<b>Bates-labeled</b>	69:11 88:23	22:18 25:17	<b>checking</b> 96:7	
101:9,22 105:2				
<b>beat</b> 61:14,17,				
18,24 62:16,18,				

<b>complainant</b> 60:4 105:22 107:8	12:17 16:12 43:12 46:6 93:2	54:14 83:20,23 85:9 91:3,6,11, 14,20 92:6,10	73:5 77:21 79:11 84:10	92:24 101:8,15, 19 105:6 110:20
<b>complainant's</b> 107:25 108:3	<b>consolidated</b> 101:6	<b>cover</b> 49:6 56:12	<b>dates</b> 91:25	<b>describe</b> 46:17
<b>complainants</b> 105:11,13,17 108:12	<b>content</b> 36:6	<b>covert</b> 51:15	<b>David</b> 63:2 76:7	<b>describes</b> 76:21
<b>complaining</b> 69:9	<b>context</b> 12:25 46:21	<b>coworker's</b> 22:5	<b>day</b> 10:8 12:11 26:18 38:1,4,6, 10 51:23 52:15, 18 61:25 62:10, 12,17,21,23	<b>describing</b> 36:5
<b>Complaint</b> 69:24	<b>continue</b> 102:1	<b>CR</b> 43:8,12 66:24 67:3 69:11,17,20	76:2,6,12,14,20 87:16 94:21 99:7	<b>description</b> 46:11 65:22 82:8 87:17
<b>complaints</b> 98:5	<b>control</b> 23:10, 13,16	<b>crack</b> 46:11,17	<b>days</b> 39:13 91:15,25	<b>descriptive</b> 82:6
<b>completion</b> 97:5	<b>convened</b> 10:9	<b>create</b> 18:3 19:11 27:12 28:3	<b>dealer</b> 108:21	<b>desk</b> 41:8
<b>Complex</b> 85:15	<b>conversations</b> 54:25 55:1 65:3	<b>created</b> 28:13 38:1 90:16	<b>December</b> 12:6 29:15 30:7,22 32:2,22 40:11 97:9	<b>details</b> 20:16 92:4
<b>computer</b> 70:15	<b>convicted</b> 109:4,5	<b>creating</b> 37:20		<b>determine</b> 28:19 66:4
<b>computer's</b> 96:17	<b>coordinated</b> 10:11,20	<b>Crime</b> 23:12		<b>Dhaviella</b> 11:8
<b>concerned</b> 65:10,22 66:2	<b>copied</b> 81:25	<b>criminal</b> 45:23 52:10 53:8,24 54:17	<b>defendant</b> 11:2,6 45:23 46:1 53:8 101:5,10 103:2, 16 105:2	<b>differ</b> 38:2
<b>CONCLUDED</b> 110:20	<b>copy</b> 70:10 82:3 110:3,5	<b>CROSS-</b> <b>EXAMINATIO</b> <b>N</b> 92:17	<b>Defendant's</b> 102:4	<b>difference</b> 74:21
<b>concrete</b> 48:17	<b>corner</b> 90:21 102:5	<b>CRS</b> 43:20	<b>defendants</b> 11:4 101:23 105:12	<b>differently</b> 99:2
<b>conduct</b> 50:8, 12,19 51:1	<b>correct</b> 16:10 18:5 20:19,20 28:5 35:22	<b>current</b> 10:8 56:7	<b>defense</b> 92:15	<b>direct</b> 11:25 97:10 101:21 108:16
<b>conducted</b> 51:11 56:5 89:19	42:24,25 68:16 75:6 77:25 81:13 83:7 93:5,21 94:9,10	<b>custody</b> 60:25 64:11 65:6	<b>Delaney</b> 24:20, 21,23 25:2 26:5 27:4 28:11 29:7,11	<b>directing</b> 85:22
<b>conducting</b> 50:1	97:15,19,20,24 99:7,19,20 100:6 106:18	<b>cut</b> 93:8		<b>discuss</b> 54:25
<b>conference</b> 10:10 56:6 89:20		<b>D</b>	<b>Delaney's</b> 25:6 28:7	<b>discussing</b> 101:6
<b>confidential</b> 82:25 83:3	<b>correctly</b> 35:21	<b>date</b> 15:2 19:8 20:16,19 21:5 22:25 29:16	<b>department</b> 104:15 108:20 109:9	<b>district</b> 10:13 19:10 42:23 43:2,18 63:8 84:23
<b>confrontation</b> 100:15	<b>counsel</b> 10:17 11:24 32:25 92:16	33:2 44:22,23 50:24 56:7 59:22 62:23	<b>deposition</b> 10:10 13:10 14:16 19:22 24:24 29:21 44:10 53:12 56:5 58:25	<b>Division</b> 10:14
<b>confronted</b> 100:5	<b>couple</b> 107:17	81:11 86:5 91:3,6,9,11,21 92:6,10 106:15	72:19 88:1	<b>DO-JOINT</b> 30:3 38:15,23
<b>connection</b>	<b>court</b> 10:5,6, 13,22 53:11,17	<b>dated</b> 30:22 32:2 39:10,13	89:19 90:13	<b>Docket</b> 10:14
				<b>document</b> 32:16 34:8 38:21 90:3 106:4

<b>documented</b>	89:19	79:9,12 82:21 84:2,4,13 88:9, 24 101:9,13,18 103:20 104:24	<b>felony</b> 91:14 <b>female</b> 60:16 65:23	<b>foot</b> 51:14 <b>forget</b> 86:6
<b>documents</b>	57:5,11	<b>encountered</b> 57:12	<b>file</b> 45:17 69:12,17,18,20 70:16	<b>form</b> 17:1,21 18:11,18 19:12 36:21 40:5 41:22 57:25
25:22 53:19 72:2,18,24 88:14		<b>encountering</b> 57:15,21	<b>expect</b> 74:4 76:17 86:18 98:13,15 104:2 105:24	64:18 67:1 73:22 82:5 86:13 93:25
<b>double</b> 95:8,23		<b>ends</b> 19:16	<b>filled</b> 91:21 <b>filling</b> 81:19	94:15 99:8 100:7 104:17 106:3 107:9
<b>doubt</b> 18:13,24 19:1 36:23		<b>enlarge</b> 39:2 90:5	<b>experience</b> 16:23 28:22 51:8,9 55:15 74:7 82:11 83:6,11 91:8 104:10,14,22, 23 106:24 107:5 108:18	108:23 109:11
<b>Doug</b> 16:5,6 94:8		<b>enter</b> 98:20 99:2	<b>final</b> 30:9 103:11	<b>forms</b> 51:13
<b>Douglas</b>		<b>entered</b> 99:22	<b>find</b> 12:11 26:10 59:14 96:16	<b>found</b> 20:21 21:6 26:14 83:10 98:9
102:12		<b>entirety</b> 103:21	<b>finding</b> 20:24 21:8	<b>foundation</b> 94:14 104:6 106:5 109:11
<b>draft</b> 82:14		<b>Eric</b> 10:25 92:22 100:8	<b>fine</b> 30:15 33:22 39:5 89:14 90:7 100:11	<b>fourth</b> 42:7
<b>drafted</b> 79:17		<b>error</b> 38:12 85:9	<b>eyesight</b> 33:20	<b>frame</b> 13:5 19:10
<b>drug</b> 46:19 65:11 75:11 76:21 108:21		<b>Esther</b> 10:4 56:6 89:20	<b>face</b> 100:16,20	<b>free</b> 103:20
<b>drugs</b> 20:21,24 21:6,8 22:20 23:3,9,21 35:19,20 46:6, 11 47:6 65:24 66:12		<b>event</b> 27:16,19 50:6 92:24 93:21	<b>facility</b> 53:11 <b>fact</b> 11:17 36:3, 10 62:20,21 99:23	<b>front</b> 13:25 25:8 34:8 37:16 48:25 65:23 77:4,21 93:12 101:11
<b>E</b>				
<b>E-L-L-I-S</b>		<b>events</b> 86:19 87:23 98:12,14	<b>fairly</b> 94:11 96:22	<b>full</b> 11:12
84:13,22		<b>EXAMINATIO</b>	<b>false</b> 17:16 18:3 19:11 27:12 28:3 37:5,9,13	<b>function</b> 97:14
<b>earlier</b> 43:9 101:8,15,18 105:5		<b>N</b> 11:25 72:12 89:25 101:2 107:19 108:16	<b>facilit</b> 98:20 99:3,18	<b>functions</b> 97:21
<b>East</b> 47:14,24 48:7 61:3 68:15 78:13		<b>examples</b> 37:8 50:19	<b>fa</b> 17:16 18:3 19:11 27:12 28:3 37:5,9,13	<b>G</b>
<b>Eastern</b> 10:9, 14 56:3,8 89:16,21		<b>excuse</b> 78:8	<b>falsely</b> 98:20 99:3,18	<b>gang</b> 35:14
<b>ecstasy</b> 28:22 29:2		<b>exempt</b> 37:24	<b>falsified</b> 36:25 37:6	<b>gave</b> 17:25 46:9 65:22
<b>efficiency</b>		<b>exhibit</b> 14:6,7 19:16,18 25:5, 7,18,23,24 31:10,21,23	<b>familiar</b> 29:19 46:5,19	<b>general</b> 17:17 41:1 54:15 55:1 75:17,18 83:4 87:17 92:9
12:10		32:14,17 33:3,4 34:7,9 38:21	<b>Farrell</b> 43:16	<b>generally</b> 50:15 53:7 82:7 94:2 96:23 104:21 107:11
<b>Ellis</b> 84:13,22 85:2		39:1 44:12,14, 17 49:6,9 59:8, 10 67:10,14,20, 23 70:16,17	<b>fashion</b> 104:12	
<b>Elsworth</b>		73:4,6 77:3,5, 18,19 78:11	<b>February</b> 84:10	
10:11 11:2,12, 14,17 56:5 85:6		<b>feel</b> 41:8 103:20	<b>follow</b> 52:10 107:18	

give 11:21 31:14 38:22 88:21 96:15 105:8	55:14 86:19	I	105:2,12 <b>individual's</b> 106:25 107:7	item 83:13 <b>items</b> 22:17	
<b>giving</b> 86:7 87:16,17	<b>happening</b> 100:17	<b>icam</b> 77:11	<b>individuals</b> 94:12 100:5 105:17	<b>J</b>	
<b>glanced</b> 17:7	<b>Harris</b> 11:8 95:15	<b>Ida</b> 20:6,11,21, 25 28:22 29:3 44:1,4 47:15 48:8 50:12 55:22 56:17	<b>infer</b> 94:11 <b>information</b> 18:16,25 35:16 40:14,15 65:10, 16 79:1	<b>jacket</b> 87:8 <b>jeans</b> 87:9	
<b>Glenn</b> 12:7,9	<b>Harrison</b> 29:15 32:8 35:24 42:11,17,20 93:3 94:24 95:6,22,25 96:2 100:2	48:8 50:12 55:22 56:17 57:4,7 61:5 78:16 85:15 87:4	<b>initial</b> 57:5,10 <b>inside</b> 51:14,15 79:5	<b>Jermaine</b> 20:2, 4,8,14,18 21:10 22:11,14 24:14	
<b>glove</b> 20:21,24 21:6,9	<b>Harrison's</b> 100:16	<b>IDENTIFICATI</b> <b>ON</b> 14:7 19:18 25:7,24 31:10, 23 32:17 33:4 34:9 39:1 44:17 49:9 59:10 67:14,23 70:17 73:7 77:6 79:13 84:5 110:18,19	<b>interrupt</b> 95:13 <b>interviewed</b> 43:11	<b>job</b> 83:19 85:16,17 104:10	
<b>good</b> 11:5 39:4 92:19,21	<b>head</b> 48:18 51:17 52:25 63:13,23	<b>identify</b> 12:5	<b>interviewing</b> 43:19	<b>Joel</b> 10:23 72:6,9 88:23 89:4	
<b>goods</b> 44:4	<b>hear</b> 13:6 72:10	<b>Illinois</b> 10:13 23:12	<b>inventoried</b> 23:11	<b>John</b> 43:16	
<b>grams</b> 60:1	<b>heard</b> 12:25 13:4 109:15	<b>inaccurate</b> 18:25 36:24	<b>inventory</b> 23:4,6,25 83:4, 5,7,14	<b>Johnson</b> 11:6	
<b>great</b> 14:5 19:21 25:11,21 59:21	<b>hearing</b> 12:14, 15,17,20 13:8 91:10 98:9,16	<b>incident</b> 18:10, 21,22 19:6 21:12 26:4 53:19 60:8 93:21	<b>inventorying</b> 22:17	<b>joint</b> 32:14 33:2 34:6 44:14 49:6,7 59:8	
<b>guess</b> 15:8 33:20 37:14	<b>Heath</b> 10:4 56:6 89:20	<b>include</b> 12:7	<b>involved</b> 15:4, 10,18,21,24 16:3,15,19,24 20:13 22:16	<b>Jones</b> 15:24 21:17,20 22:13 34:25 35:7,8,20 50:2 73:13 74:2,13 76:4,15 79:20 80:19,21 81:20 82:17 93:4,17 98:16, 20 100:4 102:15 105:19 108:7	
<b>gun</b> 61:23 100:16,19	<b>Henry</b> 29:14 33:1,9 42:8 93:2 95:3,4,5,9 96:4,19	<b>included</b> 93:23 94:23	<b>Investigation</b> 69:24	<b>July</b> 10:8 43:3 56:7 89:21	
<hr/>					
<b>H</b>	<b>heroin</b> 46:23	<b>includes</b> 49:6	<b>involved</b> 15:4, 10,18,21,24 16:3,15,19,24 20:13 22:16	<b>jump</b> 12:12	
<b>hallway/</b> <b>stairwell/</b> <b>elevator</b> 78:23	<b>Herron</b> 29:14 31:17 93:3	<b>INDEF-</b> <b>AW000001</b> 14:2	<b>independent</b> 29:13 42:17 43:1 44:20 45:2,6,9 53:9, 13 58:5,9 63:11,15,19,22, 25 67:17 68:21 69:6 97:5 107:6	<b>jumping</b> 61:23	
<b>hand</b> 11:20 25:17 35:3 38:15 103:3 106:23	<b>Herron's</b> 31:4	<b>indicating</b> 105:10	<b>involvement</b> 27:4 30:25 32:5,21 34:1,18 49:14 52:1	<b>June</b> 78:7	
<b>handed</b> 32:16	<b>hey</b> 40:17 88:23	<b>individual</b> 10:21 12:3 101:10,22 102:4 103:1,16	<b>involving</b> 50:25 53:14 58:17	<b>Junior</b> 11:15, 17	
<b>handwriting</b> 22:5	<b>Hold</b> 31:14			<hr/>	
<b>handwritten</b> 71:8	<b>holding</b> 60:17, 25			<b>K</b>	
<b>happen</b> 37:25 41:2,3,7 53:16 75:7 109:9,10	<b>honest</b> 17:18				
<b>happened</b> 40:25 41:10,13, 17,19,20 51:3	<b>hours</b> 97:11,15			<b>Kallatt</b> 10:25 26:17 42:7 63:4,9 76:9	

92:22 94:22	60:4 62:24	<b>M</b>	104:8,18,20 106:8 109:13, 20 110:14	<b>minutes</b> 49:18 50:9 86:6
95:10 96:5	68:18 74:2	<b>made</b> 36:15,25 48:16 50:25 66:8 71:11 98:5 99:12	<b>MCELRY</b> 107:12	<b>Miranda</b> 66:18 <b>misspoke</b> 95:7 <b>misstates</b> 106:3
97:3,13 99:1,3	77:24 79:3,23, 25 80:10 81:9 83:10,14 90:20 91:3,7 93:4	<b>Main</b> 10:6 <b>make</b> 17:16 30:14 33:17,19 44:13 67:20 69:18 87:22 105:9	<b>Meaning</b> 83:13 <b>means</b> 80:13 <b>meant</b> 23:24 27:21,24 75:15	<b>mistake</b> 80:14 <b>Mohammad's</b> 94:3
100:15	94:7 95:4 96:2, 6 102:22 103:9, 15,25 104:12 105:17 106:13, 14 108:10,11	<b>Manny</b> 94:8 <b>mark</b> 31:6 33:2 49:4 59:8 67:10 70:16	<b>medicine</b> 66:5, 9	<b>Mohammed</b> 10:25 26:17 42:7 63:4,10 76:10,15 92:23 95:11 96:5 97:3,9,22 99:1, 3 100:15,19 103:10 105:20 109:3,5
<b>Kenny</b> 76:8	<b>listing</b> 96:6 <b>lists</b> 15:1 20:18 26:23 62:21 78:13,22 105:13	<b>marked</b> 14:2,7 19:18 25:7,24 31:10,23 32:17 33:4 34:9 39:1 44:17 49:9 59:10 67:14,23 70:17 73:3,6 77:3,5,18 79:12	<b>Megan</b> 11:3 <b>members</b> 27:12 28:3 93:22	<b>Mohammed's</b> 94:7,22
<b>Kentuckiana</b> 10:6	<b>litigation</b> 12:18 <b>located</b> 10:6 48:20	<b>memorialize</b> 23:8	<b>memory</b> 15:21 21:19 22:2,3,5 23:11 27:15,19	<b>moment</b> 15:11 43:21 64:12 100:1 105:8
<b>Kentucky</b> 10:7	<b>location</b> 10:17 46:10 49:2,3 60:17,25 61:2, 7,18 65:24 68:15 78:13,20 79:6	<b>Master</b> 10:14	<b>mon</b> 63:7	
<b>kind</b> 55:4	<b>Loevy</b> 10:20	<b>match</b> 87:9	<b>money</b> 108:20 109:1,10	
<b>knew</b> 14:23 19:9 47:11,12 57:6	<b>long</b> 64:14 69:22	<b>matter</b> 10:11 41:1	<b>month</b> 83:24	
<b>knockout</b> 46:5,8,16	<b>longer</b> 50:9 101:8 109:6	<b>Mays</b> 20:2,4,8, 14,18 21:10 22:11,14 24:14	<b>months</b> 68:12	
<b>knowledge</b> 17:8,11,13 18:9,21 19:4 28:7 36:18 44:7 74:7 104:23	<b>longtime</b> 108:19	<b>Mcdonald</b> 56:11,13,16,22 57:8,15 58:14, 20 59:22 60:15, 24 64:4,7,13 66:12,17 67:8, 18 68:6 69:6 70:5,21,23	<b>morning</b> 11:5 12:5	
<b>L</b>	<b>looked</b> 14:15, 18,20 15:16 22:5 28:16 35:7 47:15 48:11,14 55:19 58:24 68:13 83:5 87:24 94:20 102:1	<b>Milton</b> 24:20, 23 25:5 26:5 27:4 28:7,11 29:7,11	<b>move</b> 24:19 56:10 96:22	
<b>Lab</b> 23:12	<b>Louise</b> 26:18 63:5,7 94:7 103:10 105:20	<b>Mcdonald's</b> 58:9 60:11 66:25	<b>mugshot</b> 77:9, 13	
<b>Lake</b> 11:7	<b>Louisville</b> 10:7 <b>lower</b> 90:21	<b>Mcelroy</b> 11:5 100:25 101:3,4	<b>Muhammad</b> 81:6	
<b>Lamonica</b> 26:17 63:4,7 94:7			<b>muted</b> 38:24	
<b>lawyer</b> 86:23			<b>N</b>	
<b>Leano</b> 28:15 94:8 103:10 105:20				
<b>left</b> 41:8			<b>name's</b> 89:20	
<b>left-hand</b> 90:21			<b>named</b> 29:18 72:15	
<b>letting</b> 82:18			<b>names</b> 28:14 29:19 79:19,22	
<b>lied</b> 71:18				
<b>life</b> 52:16				
<b>Lisa</b> 11:5 101:4				
<b>list</b> 12:4 76:9 94:17 105:11 108:8				
<b>listed</b> 16:1,6,9, 21,23 22:17 27:1 28:14 34:20,21,23				

81:9 90:22	104:6,17 106:3	<b>officers</b> 11:2,9 17:15,18 18:2 71:20 76:2 81:6	<b>past</b> 22:24 41:14	18 14:12,15,17, 19,22 24:23
<b>narcotics</b> 23:11,12,25 24:1,2,3,10 60:16 75:13	<b>Objection</b> 17:21 18:11,18 19:12 41:22 64:18 73:22 82:5 86:13 107:9 108:23 109:11	90:22 93:5,15 99:6 103:9 108:10,11,13, 14 109:10	<b>patrol</b> 85:15 <b>PDF</b> 70:14 <b>pending</b> 10:12	25:11 30:15,16, 24 31:17,21,22 32:4,15 33:11 44:14,15 56:23, 25 77:14
<b>narrative</b> 17:5, 9,19 18:1,7,10, 13,22 19:7 21:12 27:6 28:1 33:15,16 35:18 36:19 50:3 60:8 68:24 69:4 73:9,14,16 75:22 76:21 78:3 79:17 81:17,22 82:3	<b>occasions</b> 23:2	<b>online</b> 10:4 <b>opinion</b> 18:3	<b>people</b> 29:17 35:19,20 42:5 44:3,6 84:3	<b>picture's</b> 59:21
<b>necessarily</b> 52:22	<b>occurred</b> 38:4, 5	<b>order</b> 110:3,11	<b>perfect</b> 56:1 101:21 110:15	<b>pictured</b> 25:14 30:18 68:5
<b>needed</b> 92:1		<b>P</b>	<b>performed</b> 97:13	<b>pictures</b> 29:20, 23
<b>Nichols</b> 16:5,6 94:8 102:12 103:10 105:20	<b>Octavia</b> 56:10, 13,16,22 57:8 58:20 59:22 60:24 64:4,7,13 66:17,24 67:7, 18 68:5 69:6 70:5,21,23 71:24 88:25 90:9,24	<b>p.m.</b> 56:3,8 85:23 89:16,21 110:16,20	<b>performing</b> 97:21	<b>pin</b> 99:18
<b>nickname</b> 43:25	<b>pair</b> 87:9	<b>pair</b> 87:9	<b>period</b> 13:3 28:21 46:16 47:3	<b>pink</b> 58:17,21 60:17,18,24,25 64:10,11 65:24 66:6 68:9
<b>nicknames</b> 44:6	<b>Palles</b> 10:25	<b>Palles</b> 10:25	<b>permission</b> 35:9,10 80:23	<b>pink-tinted</b> 35:25 36:3,10, 12,15
<b>Nooner</b> 66:22	<b>offender</b> 35:24	70:13 92:18,22 93:13 94:5,19 95:5,10,16,18 96:4,10,14,19, 21,25 99:11,14 100:10,13,22 101:1	<b>person</b> 16:13 25:14 30:18 31:22 32:15 33:11 44:15 57:7 65:7,19 66:3 68:8 73:14 74:15 77:15	<b>PL</b> 32:14
<b>normal</b> 62:18 63:1,3 82:2 98:12,14	<b>offense</b> 75:18	<b>Pamela</b> 66:22	<b>personal</b> 18:9, 16,21 19:4 28:6 36:18 52:16	<b>place</b> 61:4,19 65:5,11 68:15 97:13
<b>Northern</b> 10:13	<b>officer</b> 16:7,9, 11,22,24 21:17, 19 26:16 28:15 39:24 42:6,8 51:8,10 52:7,9, 20 68:19 73:12, 16,19,20 74:1, 5,10,13 76:13, 14,15,17 77:25 79:3,24 80:1,9, 11 81:3,20	<b>part</b> 35:18 61:5 83:19 85:14,17, 20 104:11	<b>personnel</b> 101:24 102:23 103:7,15	<b>places</b> 50:11
<b>noted</b> 94:22	<b>participating</b> 11:6	<b>participated</b> 97:23	<b>Philip</b> 47:12	<b>plain</b> 86:24 87:1,4,11,14
<b>number</b> 10:14 35:24 67:4 82:21 84:8,18, 23,25 88:25	<b>participation</b> 93:23	<b>particularized</b> 98:5	<b>Phillip</b> 43:22, 23 44:9,13 45:11 47:9,10, 22 48:6 49:14 51:19 55:18	<b>plaintiff</b> 56:11 73:3 77:3 79:8 84:1
<b>numbers</b> 102:6	<b>parties</b> 11:16	<b>partner</b> 54:5 62:11,21 63:8 75:4 76:18	<b>phone</b> 65:19 <b>phonetic</b> 66:22 102:21	<b>plaintiff's</b> 10:17 73:6 77:5 79:12 84:4 110:18
<b>O</b>	<b>partnered</b> 76:13,14	<b>partners</b> 26:17 62:12 63:3 74:14	<b>photo</b> 77:11 <b>photos</b> 29:8	<b>plan</b> 52:17
<b>Object</b> 17:1 36:21 40:5 57:25 67:1 93:25 94:14,15 99:8 100:7	<b>officer's</b> 107:1, 7		<b>phrase</b> 99:1 <b>picture</b> 13:16,	<b>played</b> 104:4, 11 106:1,25
				<b>point</b> 41:20 43:17 45:7 57:6 86:20 94:6
				<b>pointed</b> 100:15
				<b>police</b> 51:8,10 52:7,8,19,23

54:3 83:6,20 85:11 99:16 104:15 106:24 107:6 108:19 109:9	<b>probable</b> 41:9 82:12 91:9 98:9	102:2	89:5	15:9 16:13 19:25 24:13,17
<b>PORTION</b> 82:25	<b>proceedings</b> 10:1,12,21	<b>questions</b> 55:5,11 69:12 72:14 87:21 88:25 89:23 92:14,16,25 100:22,25 101:7 107:13 109:18	18:13 27:9 28:1	27:3 28:10 29:24 30:25
<b>position</b> 80:6,8	<b>process</b> 37:19	<b>reasons</b> 17:19	18:6 38:8 40:9 64:23	32:5,21 33:18 34:1,18 49:13 51:25 55:18 57:1 59:3
<b>positioning</b> 79:19,21 90:19	<b>processing</b> 103:7,15	<b>recall</b> 12:14,15, 17,20,21,22,25 14:17 15:5,19 20:15,23,24 21:7,8,11 22:10,12,13,22, 23,25 23:15	60:11,14 63:25 66:15 69:5 70:21 72:3,22 77:15 78:7 82:21 83:16 86:8 87:10 88:4,10,15,19	
<b>possession</b> 59:25	<b>prosecute</b> 98:21 99:3	<b>quickly</b> 78:10	90:23 93:20 98:7 100:3 103:22	
<b>postpone</b> 12:9	<b>prosecutor</b> 42:1 54:11,16 91:20	<b>R</b>	<b>record</b> 10:3 11:13 12:4 13:22 20:17 27:20 30:5 56:2,4 88:22 89:14,15,17,18 105:3 110:16, 17	
<b>practice</b> 23:7, 21,24 24:1,4 52:6,9,13 53:6 80:25 82:14 83:22 87:4 92:10	<b>prosecutors</b> 22:10 55:4	<b>raise</b> 11:19	<b>records</b> 13:9 103:8	
<b>preliminary</b> 91:9 98:9,15	<b>protect</b> 99:22	<b>ranked</b> 37:24	<b>recovered</b> 23:3 24:3,10 35:19,20,23 66:10 83:13	
<b>preparation</b> 14:18	<b>pull</b> 25:1 31:14 59:9,15 67:25	<b>Rauscher</b> 10:18 11:18 12:1 14:1,5,10 17:4,24 18:15, 19 19:15,20 25:1,5,10,16,20 30:8,13 31:3,8, 13,25 32:7,12, 19,24 33:7 34:11 37:2 38:13,19 39:3 40:8 41:24 44:19 47:22 48:2 49:11 56:1,9 58:4 59:7,13,16 67:5,16,20 68:1 69:11,15 70:11, 14,19 88:23 89:3 90:1 92:13 93:25 94:14,22 95:2,7,12,22 96:13,15,20,24 99:8 100:7 101:8 104:6,17, 19,24 106:3 107:17 108:17 109:2,17 110:7	<b>recovering</b> 29:2 66:5 83:12	
<b>prepared</b> 52:3, 4,25 53:7 79:2	<b>put</b> 12:3 35:11 64:17 77:17 78:25 79:6 81:21 92:6	<b>putting</b> 64:24 92:10	<b>recovery</b> 66:8	
<b>preparing</b> 29:21 53:12 83:7	<b>Q</b>	<b>read</b> 17:5 33:16 34:12 49:10 51:21 55:17 60:9 66:17 69:3 70:8,18 110:1	<b>REDACTED</b> 82:25	
<b>presence</b> 93:23	<b>question</b> 16:25	<b>received</b> 65:9	<b>REDIRECT</b> 89:25	
<b>present</b> 15:11 43:21 64:12 94:18	17:23 19:3 21:4 27:22 42:21 43:5 48:1 55:19 61:21 62:2,3 74:4,25 83:4 84:17 98:25 99:24 109:20	<b>recognize</b> 25:14 30:18 31:22 32:15 33:11 44:15 80:16 106:20	<b>reference</b> 35:13	
<b>previous</b> 92:24	<b>question's</b> 101:17	<b>realized</b> 30:9	<b>reflect</b> 28:10 55:18	
<b>previously</b> 64:10	<b>questioned</b> 45:23	<b>recollection</b> 13:19 14:23	<b>refresh</b> 13:19 14:23 19:24 24:13,17 29:23 30:24 32:4,20 33:25 34:17 49:13 51:25 66:14 69:5	
<b>prior</b> 43:2				
<b>pro</b> 45:23,25				

70:20 72:3,21	<b>report</b> 13:13, 14:15,19,23	14,18,22,25 106:10,18	<b>role</b> 27:1 104:4 106:1,25	75:22 79:17 81:22 83:10
77:14 78:7	14:2,13 15:9, 12,14,17,19,21	107:3,8,22 108:6,21	<b>Ronald</b> 66:20	101:24 102:23
82:21 88:3,9, 14,19 90:23	16:1,14,17 17:6,9,16 18:3, 14,22,23,25	<b>reporter</b> 10:3,5 11:11,16,19,24	<b>room</b> 54:7,8	<b>sell</b> 44:3 47:6
103:22	19:16,22,24 20:18 21:13,15, 16,18 22:6,18	31:6 56:2,4 85:10 89:15,18 109:25 110:4,8, 13,15	<b>ROS</b> 65:9,22	<b>selling</b> 60:16 65:11,24 66:12
<b>refreshed</b>	25:2,6,12,17,25	<b>Reporters</b>	<b>routine</b> 52:18, 21 83:19	<b>sentence</b>
56:25 59:2	26:1,2,3,11,12, 15,22 27:7,13	10:6	<b>row</b> 26:23	65:22
60:10,13,21	28:3,13,14,18	<b>reporting</b>		<b>September</b>
63:24	29:9 30:2,7,22	101:24 102:23		42:11
<b>refreshes</b>	31:4,7,17 32:2, 20 33:1,9,12,25	<b>reports</b> 19:11	<b>s</b>	<b>sergeant</b>
33:17	34:5,17,21,24	26:7,8,21 28:9, 20 32:8 37:1	<b>safe</b> 29:10	21:23 22:8 41:8
<b>Register</b> 69:24	35:2,7,11	42:3,4,12,16	<b>Sandra</b> 44:25	81:6 102:22
<b>regular</b> 80:25	36:19,24 37:5, 7,9,13,15,20,23	44:9 52:23	103:14,18	
83:22 87:9	38:1,24 39:6,23	53:13 54:3	104:3,4 105:21,	
<b>relate</b> 92:25	40:15 42:5	58:24 63:18,21	24,25 106:9,17, 20	
<b>related</b> 41:9	44:13,16 45:4, 13 48:4 49:4,	67:7 71:21	<b>set</b> 47:19 52:21	
71:21	12,13,17 50:3	82:9,15 86:2	55:20	
<b>relating</b> 13:10	59:2,5,18,22	91:17,22 92:3	<b>share</b> 25:3	
21:9 42:13 43:8	60:10,13 62:9, 14,21 63:14	93:1,4 94:21	32:8 33:3,5	
44:9	64:17,24 66:3,7	97:16 101:25	38:14 90:3	
<b>relation</b> 90:24	67:3,11,21	104:16,22	<b>sharing</b> 43:7	
<b>relevant</b> 54:3	68:2,11 71:19	<b>represent</b>	<b>sheet</b> 83:14	
<b>remember</b>	72:25 73:3,4, 10,11,25 74:5, 16,17,18,19,22,	92:22 101:5	<b>sheets</b> 83:4,5, 7	
13:5,7 19:6	23 75:5,6,8,9, 10,11,12,14,16, 17,18,22 76:1,	<b>representing</b>	<b>shirt</b> 87:9	
20:5,8,10,13	3,5,16 77:18,20	10:5,19 46:3	<b>show</b> 14:1,8	
29:13,16 40:20	78:4,5,6,11	<b>request</b> 24:1	31:11 32:24	
45:8 47:10,14,	79:1,2,9,10,16, 19,23 80:8	<b>reserve</b> 110:2	38:17 53:19	
18 48:3,11,14,	81:15,17,20,21	<b>responsibility</b>	59:7 77:2 88:24	
19 49:20,23	82:3,4,6,9,13, 18,21 86:3	40:1	89:5 102:7	
51:5 56:13,15,	87:12 90:4,9, 12,16 93:11,12,	<b>responsible</b>	<b>showed</b> 42:4	
17,19 57:21	24 94:2,17	39:22	63:22 88:14	
60:21,23 68:8	95:17 96:1,9	<b>review</b> 19:21	101:9 104:24	
71:23 72:16	97:6 100:4,9, 10,11,12	39:23 52:22	<b>shown</b> 77:15	
86:12,19 87:13,	101:14,15	53:13 54:2	<b>shows</b> 26:16	
23 91:24 92:3	102:11,14,17, 20,24 103:4,19,	82:18 103:21	<b>shrink</b> 96:22	
93:20 98:8	21,23 104:1,4, 13,25 105:3,5,	<b>reviewing</b>	<b>sic</b> 47:14	
100:16		82:20 88:8	<b>side</b> 49:1 77:17	
<b>remembered</b>		101:14,18	<b>sidewalk</b>	
13:8		105:5	61:11,13	
<b>remembering</b>		<b>right-hand</b>	<b>sec</b> 31:14	
37:22		102:5	38:22 96:15,16	
<b>remotely</b>		<b>Robert</b> 62:14	<b>section</b> 17:6,9	
10:19 11:7,9			36:19 73:10	40:4,19 71:7
<b>repeat</b> 27:22				
<b>rephrase</b>				
18:20 36:9				
40:23 58:19				
62:11				

80:24 82:17	84:13,17,22	<b>star</b> 84:18,23, 25	99:9 100:8,24 106:6 107:9,15, 20 108:15,23 109:11,14,19 110:2,9,11	<b>switch</b> 98:3 <b>system</b> 16:14
<b>signature</b> 21:14,23,24 28:19 34:20 35:3 39:16 71:3,6,8 79:18 80:15,16,17 92:7,11 106:15, 16,21,23	85:3,6 89:19 92:20 95:24 97:2 101:4 105:4 107:13, 21 108:18 109:21	<b>start</b> 12:3,13 30:1 47:25 52:8	<b>Stefon</b> 29:14 <b>state</b> 10:16,22 11:12 23:12 53:21 73:24 84:18	<b>T</b>
<b>signatures</b> 21:15 22:4 28:16 34:21,23	<b>sold</b> 28:22,25 46:11	<b>state's</b> 53:18, 25 62:9 92:1	<b>step</b> 74:16	<b>TAC</b> 75:23 <b>tactical</b> 17:16 19:10 20:7 62:7 109:6
<b>signed</b> 21:18, 21,25 28:18,20 35:1,7,8 37:16, 23 39:10 40:10 80:18,21	<b>sound</b> 29:19 <b>Spaargaren</b> 11:4	<b>stated</b> 16:21 20:15 21:11 41:16 42:19 46:14 48:13 53:17,22 63:1	<b>sticking</b> 100:19	<b>taking</b> 65:11 96:16
<b>significance</b> 36:2 91:6	<b>speaking</b> 104:21	64:10 66:7 101:16	<b>sticks</b> 57:23 <b>stop</b> 33:21 43:7	<b>talk</b> 53:18 54:5, 11,16,19 71:20 81:21
<b>single</b> 85:20	<b>specific</b> 12:12 19:5 20:15 21:1,12 35:10 40:22,24 46:25 49:3 58:18,20 87:21 92:4	<b>statement</b> 62:20 71:1,4, 10,11	<b>stories</b> 109:15	<b>talked</b> 12:4 22:8 41:25 43:8 54:20,22 55:3 71:25
<b>sip</b> 89:8	<b>specifically</b> 12:6 26:25 50:14,23 51:4	<b>statements</b> 71:11	<b>straight</b> 95:18 <b>Street</b> 10:7 47:15,24 48:7	<b>talking</b> 22:10, 13 29:11
<b>sir</b> 11:19 15:15 50:7 52:2 54:18 55:16 64:2,25 66:16 72:1,5,23 73:1,17 77:16 78:15,21 82:23 83:8,15 84:11 85:7 86:25 88:5 99:9 104:9,25	53:6 55:2 64:3, 7,9 91:16 100:21	<b>states</b> 10:12 62:14 87:12 93:16	<b>strike</b> 83:23 98:13 99:23,24 108:8	<b>tap</b> 52:8 <b>taught</b> 82:11
<b>sister</b> 69:9	<b>specificity</b> 21:3	<b>station</b> 97:18	<b>suburbs</b> 10:19 <b>Suite</b> 10:7	<b>team</b> 17:16 19:10 20:7 27:12 28:3 93:22
<b>sit</b> 40:10 54:18 87:13	<b>specifics</b> 19:7 49:22	<b>steal</b> 109:1	<b>summary</b> 82:10	<b>technician</b> 10:5
<b>sitting</b> 21:5 24:18 38:11 41:12 60:24 65:23	<b>squad</b> 50:20 51:14	<b>stealing</b> 109:10	<b>supervisor</b> 37:16,21,24 39:10,17,22 40:4,10,14,17 92:7 102:19	<b>term</b> 46:5,16, 19 47:4
<b>situation</b> 75:20 81:19	<b>stairwell</b> 48:23 100:5	<b>steals</b> 108:20	<b>supervisor's</b> 92:11 106:15	<b>testified</b> 18:1 45:11,16 52:23 54:14 70:4 86:11,12,15 98:15
<b>size</b> 70:9	<b>stairwells</b> 47:18,19 48:14, 19,24	<b>Stefanich</b> 11:1	<b>supervisory</b> 11:9 37:21 39:9	<b>testify</b> 52:10 53:8,23 83:20, 23
<b>skipped</b> 43:6	<b>stamp</b> 30:15	13:24 14:4,8 17:1,21 18:11, 18 19:12,19 25:4,8,19 30:4, 12 31:11 32:10	<b>Supplement</b> 105:3	<b>testifying</b> 53:3 54:6,16 83:16 86:9 98:8
<b>slightly</b> 74:20	<b>stamped</b> 30:6 38:15	33:5 36:21 38:17 40:5 41:22 47:20,25 55:25 57:25 59:11,14 64:18	<b>supposed</b> 37:23 109:10	<b>testimony</b> 11:21 51:18,21, 25 53:1 55:17 86:8 87:22,24
<b>small</b> 88:25	<b>Standby</b> 110:16	67:1,24 69:14 70:10 72:8 73:22 74:24 82:5 86:13 88:6	<b>surrounding</b> 20:16	<b>testing</b> 23:14, 17 97:14
<b>Smith</b> 10:11 11:2,14,17 56:5,13 76:13	<b>standing</b> 51:1	89:2,7,10 92:15 93:10 94:1,15 95:14,17 96:8	<b>surveillance</b> 50:1,8,12,19 51:1,7,11	

<b>thing</b> 23:5 30:5 36:12 41:2,3 60:23 74:18 75:9 80:3 82:2	87:10,14 89:20 101:7 105:5 109:24	<b>U</b>	74:18,22,23 75:9,12,14 77:18 79:9,10 <b>Uh-uh</b> 93:6 <b>uncertain</b> 27:24	<b>Watt's</b> 21:23 <b>Watts</b> 10:11 11:6 22:8 66:20 81:6 101:5 104:4 105:25 106:17 109:3,5
<b>things</b> 64:24 86:11 109:8	19:22 24:24 72:19			<b>Watts'</b> 105:24 106:9,20
<b>Thomas</b> 29:14 33:1,9 42:8 43:22,23 47:9, 10,12,23 48:6 49:14 93:2 95:4,5,9 96:5, 19	<b>token</b> 99:21 <b>told</b> 12:22 36:25	<b>unclear</b> 27:20 <b>uncommon</b> 36:7 40:21	105:3,13,18,22, 25 106:10,18 107:8,22 108:5	<b>Watts's</b> 102:22 103:14,18 104:3 105:21
<b>Thomas'</b> 51:19 55:18	<b>top</b> 45:13 48:17 51:17 52:25 63:13,23 69:17, 23 73:3 77:9 84:13	<b>underneath</b> 78:19	<b>victim</b> 60:4 108:3	<b>ways</b> 51:10
<b>Thomas's</b> 44:10,13,20 45:11 51:22	<b>topic</b> 54:15 <b>torn</b> 55:22 <b>training</b> 82:7	<b>understand</b> 17:23 41:1 95:19	<b>video</b> 10:4,10 56:6 89:20 110:5,12	<b>wear</b> 87:14
<b>thought</b> 23:24 61:22 62:1 95:6	<b>transaction</b> 76:22	<b>understanding</b> 73:15,18 83:9 93:19	<b>viewed</b> 93:1 <b>voice</b> 84:18	<b>Wells</b> 20:6,11, 22,25 28:22 29:3 44:1,4 47:15 48:9 50:12 55:22 56:18 57:4,7 61:5 78:16 85:15 87:5
<b>three-minute</b> 89:11	<b>transcript</b> 45:20 84:2 85:21 88:9 110:5,12	<b>uniform</b> 86:24 87:15	<b>W</b>	<b>West</b> 10:6
<b>time</b> 10:9 13:3, 5 20:6 21:5 26:13 28:21 34:12 38:2 40:13 42:18,22 43:18 46:16 47:3 50:24 56:3,7,8 62:24 63:2,4,9 74:14 86:1,2,7,16,21 89:16,21,22,24 94:18 100:20 106:15 107:14 109:23 110:6, 16	<b>trial</b> 45:11,16 51:19,22 52:3 53:8,18,24 55:10,17 83:17	<b>unit</b> 62:7 84:18 109:6	<b>Waddy</b> 10:21 12:13 13:7,10 14:24 20:19	<b>whichever</b> 83:13
<b>times</b> 20:9,11 57:14 58:8	<b>true</b> 99:5,12 104:15,22	<b>United</b> 10:12	21:9 22:11,14	<b>William</b> 72:15, 16,18 73:5 77:10 83:17 84:3 88:10,15
<b>to/from</b> 70:7, 20,25 71:3,10, 11,18,21	<b>truth</b> 11:22 36:25	<b>Units</b> 75:23 76:2	24:14 43:6,7, 13,14 98:3,8, 10,21 99:3,25	<b>witnesses</b> 11:17
<b>today</b> 10:5,8 12:3 14:16 21:5 24:18 29:21 38:11 40:10 41:12 42:22 43:9 44:10 54:18 56:12 58:25 71:25	<b>type</b> 87:18 <b>typed</b> 16:14, 16,18	<b>unusual</b> 36:7,9 60:18	101:5 104:5 107:22 108:5	<b>witnessing</b> 108:13
	<b>types</b> 23:16 98:5	<b>usual</b> 87:3	<b>Waddy's</b> 13:4, 18 14:12 15:10, 17,18,22,25 16:12 101:13, 24 102:23	<b>woman</b> 68:5
	<b>typical</b> 52:6, 13,17 53:6		103:3,7,19 104:3 105:4 106:1	<b>wonky</b> 96:18
	<b>typically</b> 37:25 38:5,7 50:11 52:10 54:9,10 55:14	<b>versa</b> 81:25 <b>version</b> 34:6 38:13	<b>wait</b> 89:3 <b>waited</b> 38:9	<b>work</b> 17:15
	<b>Tyrone</b> 29:14 31:4,17 93:3	<b>vice</b> 19:15,22, 24 20:18 21:14, 15 22:18 25:17 26:1,2,11,12,22 27:6 28:13 34:5,17,21 37:15,20 38:24 39:23 42:5 49:4,13,17 59:12 67:11	<b>wanted</b> 23:8 61:20 82:8,10, 12 89:4 93:8	<b>worked</b> 17:18 18:2
			<b>warnings</b> 66:18	<b>working</b> 31:16 57:3 62:10 75:5,6 109:7
			<b>watch</b> 41:7	<b>worn</b> 87:10,18
			<b>watching</b> 49:17,20,24	<b>would've</b> 35:8, 10 36:15 38:9 63:6 73:13 80:9 85:5 87:10 93:23 97:5,17,
			<b>water</b> 89:9	

18  
**wrap** 88:22  
**write** 108:21  
**writing** 74:16  
**written** 18:22  
71:17  
**wrong** 47:24  
64:6  
**wrote** 36:24  
73:9,16 78:3  
81:24

---

**X**

---

**X-BOX** 46:19,  
21 47:3

---

**Y**

---

**year** 64:6 86:18  
**years** 22:7,8,9  
50:13,16 54:13  
55:22 58:2  
85:12 91:16  
92:2,23 104:10

**yesterday**  
51:23

**Young** 76:8,17

---

**Z**

---

**Ziploc** 35:25  
**Zoom** 11:7