

Exhibit 40

MASTER DOCKET CASE NO. 19-CV-01717

**IN RE: WATTS COORDINATED
PRETRIAL PROCEEDINGS**

**DEPONENT:
KALLATT MOHAMMED**

**DATE:
November 15, 2023**

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

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9 IN RE: WATTS COORDINATED
10 PRETRIAL PROCEEDINGS
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23 DEPONENT: KALLATT MOHAMMED
24 DATE: NOVEMBER 15, 2023
25 REPORTER: TALIA JACKSON

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<p>1 APPEARANCES (CONTINUED)</p> <p>2</p> <p>3 ON BEHALF OF THE DEFENDANT, KALLATT MOHAMMED:</p> <p>4 Eric S. Palles, Esquire</p> <p>5 Mohan Groble Scolaro</p> <p>6 55 West Monroe</p> <p>7 Suite 1600</p> <p>8 Chicago, Illinois 60603</p> <p>9 Telephone No.: (312) 422-5534</p> <p>10 E-mail: epalles@mohangroble.com</p> <p>11</p> <p>12 ON BEHALF OF THE DEFENDANT, RONALD WATTS:</p> <p>13 Brian Gainer, Esquire</p> <p>14 Johnson & Bell, Ltd.</p> <p>15 33 West Monroe Street</p> <p>16 Suite 2700</p> <p>17 Chicago, Illinois 60603</p> <p>18 Telephone No.: (312) 984-0236</p> <p>19 E-mail: gainerb@jbltd.com</p> <p>20 (Appeared via videoconference)</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	Page 3	<p>1 APPEARANCES (CONTINUED)</p> <p>2 ON BEHALF OF THE DEFENDANTS, MICHAEL SPAARGAREN AND</p> <p>3 MATTHEW CADMAN:</p> <p>4 James V. Daffada, Esquire</p> <p>5 Leinenweber Baroni & Daffada LLC</p> <p>6 1150 Wilmette Avenue</p> <p>7 Suite D</p> <p>8 Wilmette, Illinois 60091</p> <p>9 Telephone No.: (847) 251-4091</p> <p>10 E-mail: jim@ilesq.com</p> <p>11 (Appeared via videoconference)</p> <p>12</p> <p>13 ON BEHALF OF THE DEFENDANTS, CITY OF CHICAGO</p> <p>14 SUPERVISORY OFFICERS:</p> <p>15 Dhaviella Harris, Esquire</p> <p>16 Reiter Burns LLP</p> <p>17 311 South Wacker Drive</p> <p>18 Suite 5200</p> <p>19 Chicago, Illinois, 60606</p> <p>20 Telephone No.: (312) 782-8930</p> <p>21 E-mail: dharris@reiterburns.com</p> <p>22 (Appeared via videoconference)</p> <p>23</p> <p>24</p> <p>25</p>	Page 5

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<p>1 STIPULATION</p> <p>2</p> <p>3 The VIDEO deposition of KALLATT MOHAMMED was taken at</p> <p>4 LOEY & LOEY, 311 NORTH ABERDEEN STREET, THIRD FLOOR,</p> <p>5 CHICAGO, ILLINOIS 60607 on WEDNESDAY the 15TH day of</p> <p>6 NOVEMBER 2023 at 10:02 a.m. CT; said deposition was</p> <p>7 taken pursuant to the UNITED STATES DISTRICT COURT FOR</p> <p>8 THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION</p> <p>9 Rules of Civil Procedure.</p> <p>10</p> <p>11 It is agreed that KRYSTAL BARNES, being a Notary Public</p> <p>12 and Digital Reporter, may swear the witness and that the</p> <p>13 reading and signing of the completed transcript by the</p> <p>14 witness is not waived.</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	Page 10	Page 12
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<p>1 Q. Okay.</p> <p>2 A. – what we talked about.</p> <p>3 Q. Did I pressure you in any way to talk to me?</p> <p>4 A. I don't – I don't think so.</p> <p>5 Q. Okay. Did the bigger guy who was with me</p> <p>6 pressure you to talk to you – us in any way?</p> <p>7 A. I don't believe so.</p> <p>8 Q. Okay. Do you remember talking to me about</p> <p>9 Alvin Jones?</p> <p>10 A. I believe I said something about Alvin Jones.</p> <p>11 What I said, I don't remember.</p> <p>12 Q. Okay.</p> <p>13 A. Yeah.</p> <p>14 Q. But you do remember saying something about</p> <p>15 Alvin Jones?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. Did you say that he was the one who was</p> <p>18 engaged in the misconduct with Watts, primarily?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. What do you mean by that?</p> <p>21 A. I can't – well, whatever – you know at the</p> <p>22 time, whatever it was that they were doing, him and</p> <p>23 Watts were always together, so...</p> <p>24 Q. Okay.</p> <p>25 A. That's all I can remember. That they was</p>	Page 14	Page 16
<p>1 together.</p> <p>2 Q. Okay. And they were together engaging in</p> <p>3 criminal misconduct?</p> <p>4 A. I don't know about that, but they were</p> <p>5 together.</p> <p>6 Q. Okay. But you told me that he was the one who</p> <p>7 was – Jones was the one, not you, who were engaging in</p> <p>8 criminal misconduct with Watts, correct?</p> <p>9 A. Right, that might – yeah, but what –</p> <p>10 MR. BAZAREK: Object to the – object to the</p> <p>11 form of the question. Foundation, compound, vague,</p> <p>12 ambiguous.</p> <p>13 BY MR. TEPFER:</p> <p>14 Q. That's what you told me, correct?</p> <p>15 MR. BAZAREK: Objection. Same objection.</p> <p>16 BY MR. TEPFER:</p> <p>17 Q. You can answer.</p> <p>18 A. Yes.</p> <p>19 Q. Okay. And so what was your basis for saying</p> <p>20 that?</p> <p>21 MR. BAZAREK: Object to foundation. Form of</p> <p>22 the question.</p> <p>23 BY MR. TEPFER:</p> <p>24 Q. You can answer.</p> <p>25 A. Because of my situation.</p>	Page 15	Page 17

<p>1 Q. During their time at Chicago – there – 2 during their time as officers or sergeants with the 3 Chicago Police Department? 4 A. At the time that they were working in the Ida 5 B. Wells. 6 Q. Okay. How long were you working with Alvin 7 Jones and Ronald Watts during the time that they were 8 working in Ida B. Wells? 9 A. It had to be more than two years. I'm not 10 specific on what – how many years. 11 Q. Okay. Do you know what year you started 12 working with Al Jones and Ronald Watts in the Ida B. 13 Wells? 14 A. No, I don't. 15 Q. Okay. Do you know what two-year period or 16 more we're talking about? 17 A. Let's see. I don't have the – I can't 18 remember. It had to be about – this is not a specific 19 answer, but after '05, I believe it was. 20 Q. Okay. So you did not – you said it's not a 21 specific answer, but you don't believe that you worked 22 with Al Jones or Ronald Watts together in Ida B. Wells 23 before 2005? 24 A. Right. I came on the team later. 25 Q. Okay. So regardless of the period, for the</p>	Page 18	<p>1 Q. Okay. So there's the two-year period you 2 would see them at Ida B. Wells, but then you weren't 3 there anymore, but you would still see them together. Is 4 that what you're saying? 5 A. No, I was there. 6 Q. Okay. 7 A. I didn't ride with them. 8 Q. Okay. Did you ride with them for some period? 9 A. I had a partner. 10 Q. Did you ever ride with Jones and Watts? 11 A. Yes. 12 Q. Okay. And that was during the two-year 13 period? 14 A. Yes. 15 Q. Okay. And then after that, you had a partner? 16 A. Yes. 17 Q. Who was that partner? 18 A. I always had a partner. 19 Q. Okay. 20 A. But when a partner's not there, then you can 21 get in the car with somebody. 22 Q. Okay. 23 A. Uh-huh. 24 Q. Who was your partner? 25 A. Darryl Edwards. I had – let me see, Lamonica</p>	Page 20
<p>1 two-year time period that you were working in Ida B. 2 Wells with Kallatt Mohammed and Alvin Jones, that's the 3 – 4 MR. PALLES: You said he was working with 5 Kallatt Mohammed. 6 BY MR. TEPFER: 7 Q. I'm sorry. Strike that. During the two-year 8 or more period that you were working with Alvin Jones 9 and Ronald Watts in Ida B. Wells, that's the time period 10 you're talking about where they, meaning Alvin Jones and 11 Ronald Watts, were always together? 12 A. Yes, and thereafter. 13 Q. And thereafter? 14 A. Uh-huh. 15 Q. Okay. So even after that two-year time 16 period? 17 A. Uh-huh. 18 Q. Okay. How do you know they were always 19 together even after that two year time period when you 20 weren't working with them? 21 A. I used to see them. 22 Q. Where would you see them? 23 A. At work together. 24 Q. Okay. At Ida B. Wells, or a different place? 25 A. Ida B. Wells.</p>	Page 19	<p>1 Lewis, and sometimes me and Elsworth rode together. 2 Q. That's Elsworth Smith? 3 A. Yes. Elsworth Smith. 4 Q. Okay. And during the time period when you 5 were partners with these other three individuals, you 6 would see Watts and Jones always be together; is that 7 your testimony? 8 A. Yes. 9 MR. BAZAREK: Object to the form of the 10 question. Foundation. 11 BY MR. TEPFER: 12 Q. When I asked you if you ever witnessed 13 misconduct from Jones and Mohammed, do you remember – 14 between Jones and Watts. Do you remember that? 15 A. Yes. 16 Q. Okay. What does misconduct mean to you? 17 A. Doing something wrong. 18 Q. Okay. When I say misconduct, I'm meaning 19 violating a criminal law. Did you ever witness them 20 violate a criminal law? 21 MR. PALLES: Objection. This is beyond the 22 scope of what we agreed we were going to talk to 23 today – talk about today, Josh, which are the test 24 cases and your interview with him. 25 MR. TEPFER: Okay. I think it's continuous of</p>	Page 21

<p>1 what our interview was talking about, so I think 2 it's consistent with that. 3 MR. PALLES: Okay. Well – 4 THE WITNESS: On the advice of my attorney – 5 MR. PALLES: You – well, yes. What? 6 THE WITNESS: Oh, I'm going to take the Fifth. 7 BY MR. TEPFER: 8 Q. Okay. So you're going to take the – and 9 you're taking the Fifth because answering that question 10 would subject you to prosecution, potentially? 11 MR. PALLES: Objection. Calls for attorney- 12 client privilege. Instruct him not to answer. 13 MR. TEPFER: You're instructing him not to 14 answer what – why he's taking the Fifth? 15 MR. PALLES: Correct. 16 BY MR. TEPFER: 17 Q. Okay. And are you taking your attorney's 18 advice not to answer my question? 19 A. Yes. 20 Q. Okay. One more question before we get to the 21 cases. Have you been contacted by any federal 22 investigators? 23 A. Yes. 24 Q. Who? 25 A. I don't remember their names.</p>	Page 22	<p>1 one, but... 2 Q. They told you, you probably would not need an 3 attorney? 4 A. Yeah. 5 Q. Okay. How many people contacted you? 6 A. Two. 7 Q. Were they male or female? 8 A. Male. 9 Q. Were they FBI agents? 10 A. No. One was a assistant – assistant state's 11 attorney, and the other one – well, yeah, it was, the 12 other one. I think he was. 13 Q. Okay. So I asked about federal agents. An 14 assistant state's attorney, I understand, as being a 15 state agent. Do you believe that the people who talked 16 to you were from Cook County State's Attorney's Office, 17 or from the federal government? 18 A. No, they were from the federal government. 19 Q. Okay. So do you mean possibly it was an 20 assistant U.S. attorney? 21 A. U.S. attorney. Yeah. 22 Q. Got it. And they were both male, you said? 23 A. Yes. 24 Q. So one was an assistant U.S. attorney and 25 another was an FBI agent, is your understanding?</p>	Page 24
<p>1 Q. When? 2 A. I think it was in – it might have been 3 November. 4 Q. Of this year? 5 A. Last – last year, I believe it was. It was 6 cold outside. I remember that. 7 Q. In November of 2022 you were contacted by 8 federal investigators? 9 A. Yes. 10 Q. Did you speak to them? 11 A. None other than answering what they asked me. 12 Q. Okay. So you had a conversation with them? 13 A. No. They asked me if I – they asked me – I 14 can't remember exactly what they asked me. It had 15 something to do with giving – they wanted to question 16 me about something. 17 Q. What did you tell them? 18 A. Told them I needed an attorney. 19 Q. Okay. So your attorney was not there when 20 they approached you? 21 A. Right. They called me on the phone. 22 Q. And when you told them you wanted an attorney, 23 that was the end of the conversation? 24 A. No, they tried to say that we could get you an 25 attorney, and they said that I probably wouldn't need</p>	Page 23	<p>1 A. Yes. 2 Q. Did they ever follow up with you through your 3 attorney? 4 A. No. 5 Q. Where were you when this conversation 6 happened? 7 A. I believe I was at home. 8 Q. They just showed up at your door? 9 A. No, no, no. They called me. 10 Q. Called. I'm sorry. Okay. All right. Tell 11 me everything you remember about this conversation. 12 A. That's all I remember. 13 Q. How long was the conversation? 14 A. Brief. 15 Q. Like, under five minutes? 16 A. About four minutes. I know they told me that 17 it'll take 15 minutes. 18 Q. They told – did they want to talk to you 19 substantively, ask you questions over the phone, or did 20 they want to meet with you? 21 A. They wanted to meet with me. 22 Q. Okay. And they told you that meeting would 23 take 15 minutes? 24 A. Yes. 25 Q. And you – did you tell them that you would</p>	Page 25

<p>1 meet with them?</p> <p>2 A. No.</p> <p>3 Q. You told them you – to talk to your lawyer?</p> <p>4 A. Yep.</p> <p>5 Q. Did you give them your lawyer's name?</p> <p>6 A. I didn't have one at the time.</p> <p>7 Q. In November 2022, you didn't have a lawyer?</p> <p>8 A. Well, federal attorney. I couldn't –</p> <p>9 Q. Okay.</p> <p>10 A. Yeah.</p> <p>11 Q. Did you give them your civil attorney's name?</p> <p>12 A. No.</p> <p>13 Q. Okay. Did you ever – you never heard from them again?</p> <p>14 A. No.</p> <p>15 Q. How did you leave the call? What was – did you just say, I'm going to get an attorney and I'll give you a call back?</p> <p>16 A. I don't – I don't remember.</p> <p>17 Q. Did you ever obtain –</p> <p>18 A. They –</p> <p>19 Q. Go ahead.</p> <p>20 A. Did I obtain an attorney? No.</p> <p>21 Q. Okay. Do you have any idea if the attorney who came and met with you was from Washington, D.C. or</p>	Page 26	<p>1 Q. Yes.</p> <p>2 A. Yes. Yes.</p> <p>3 Q. You did?</p> <p>4 A. Yes.</p> <p>5 Q. What did you think?</p> <p>6 MR. PALLE: Objection. It's beyond the scope</p> <p>7 of what we agreed to discuss today. I'm instructing</p> <p>8 you not to answer.</p> <p>9 BY MR. TEPFER:</p> <p>10 Q. Okay. Are you taking your attorney's advice</p> <p>11 not to answer?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. Did you – what else do you remember</p> <p>14 them asking you about, besides the Watts podcast?</p> <p>15 A. That's it.</p> <p>16 Q. Anything else you remember about the</p> <p>17 conversation at all?</p> <p>18 A. No.</p> <p>19 Q. Okay. You know who Ben Baker is?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. How do you know him?</p> <p>22 A. From being in Ida B. Wells.</p> <p>23 Q. Okay. Were you involved – are you aware that</p> <p>24 Ben Baker has sued you?</p> <p>25 A. Am I aware of it? Yes.</p>	Page 28
<p>1 from Chicago?</p> <p>2 A. I have no idea.</p> <p>3 Q. What did he look like?</p> <p>4 A. You said, met with me?</p> <p>5 Q. I'm sorry. You're right. That doesn't make</p> <p>6 any sense. Strike that. The one who called you, did he</p> <p>7 say he was from the Department of Justice, or the U.S.</p> <p>8 Attorney's office?</p> <p>9 A. I don't – I don't remember if he even</p> <p>10 mentioned those words.</p> <p>11 Q. Okay. If I said a name, would you remember or</p> <p>12 no?</p> <p>13 A. I don't –</p> <p>14 Q. You don't know? Was it Mark Blumberg?</p> <p>15 A. Blumberg. That – Mark – yeah, that sounds</p> <p>16 about right.</p> <p>17 Q. Did they tell you they wanted to talk to you</p> <p>18 about your time as a Chicago Police officer?</p> <p>19 A. No.</p> <p>20 Q. What did they tell you they wanted to talk to</p> <p>21 you about?</p> <p>22 A. It's – I believe it was something where Watts</p> <p>23 was on a podcast or something.</p> <p>24 Q. Did you listen to that podcast with Watts?</p> <p>25 A. Did I listen to it of him?</p>	Page 27	<p>1 from Chicago?</p> <p>2 A. I have no idea.</p> <p>3 Q. What did he look like?</p> <p>4 A. You said, met with me?</p> <p>5 Q. I'm sorry. You're right. That doesn't make</p> <p>6 any sense. Strike that. The one who called you, did he</p> <p>7 say he was from the Department of Justice, or the U.S.</p> <p>8 Attorney's office?</p> <p>9 A. I don't – I don't remember if he even</p> <p>10 mentioned those words.</p> <p>11 Q. Okay. If I said a name, would you remember or</p> <p>12 no?</p> <p>13 A. I don't –</p> <p>14 Q. You don't know? Was it Mark Blumberg?</p> <p>15 A. Blumberg. That – Mark – yeah, that sounds</p> <p>16 about right.</p> <p>17 Q. Did they tell you they wanted to talk to you</p> <p>18 about your time as a Chicago Police officer?</p> <p>19 A. No.</p> <p>20 Q. What did they tell you they wanted to talk to</p> <p>21 you about?</p> <p>22 A. It's – I believe it was something where Watts</p> <p>23 was on a podcast or something.</p> <p>24 Q. Did you listen to that podcast with Watts?</p> <p>25 A. Did I listen to it of him?</p>	Page 29

<p>1 BY MR. TEPFER:</p> <p>2 Q. You don't know because you had nothing to do</p> <p>3 with it?</p> <p>4 A. That is correct.</p> <p>5 Q. Okay. All right. I'm going to show you.</p> <p>6 Okay. There's another case that's subject to the</p> <p>7 lawsuit that involves a March 23, 2005 arrest of Ben</p> <p>8 Baker. Are you aware of that in any general way?</p> <p>9 A. No.</p> <p>10 Q. Okay. Here, let me back track for a second.</p> <p>11 All right. I'm going to show you what I'm marking as</p> <p>12 Exhibit 1. Oh, wrong way. Sorry. One second.</p> <p>13 (EXHIBIT 1 MARKED FOR IDENTIFICATION)</p> <p>14 MR. PALLES: Are we getting copies, or am I –</p> <p>15 MR. TEPFER: I'm sorry.</p> <p>16 MR. PALLES: – just have the – That's fine.</p> <p>17 I'll look with him.</p> <p>18 MR. TEPFER: I apologize. I might have</p> <p>19 another. Yeah, I do. I think I got one just for</p> <p>20 you.</p> <p>21 MR. PALLES: Thank you, sir. I can't download</p> <p>22 on my phone, the digital.</p> <p>23 MR. TEPFER: I forgot who I'm dealing with.</p> <p>24 BY MR. TEPFER:</p> <p>25 Q. This is City-BG 21 to 22. Have you ever seen</p>	Page 30	Page 32
<p>1 this document before?</p> <p>2 A. No.</p> <p>3 Q. Do you know – just in a – do you know what a</p> <p>4 vice case report is?</p> <p>5 A. Yes.</p> <p>6 Q. Okay. So you've seen a vice case report, but</p> <p>7 you don't recall ever seeing this vice case report; is</p> <p>8 that right?</p> <p>9 A. That's correct.</p> <p>10 Q. Okay. Look in the very – so this is on the –</p> <p>11 - Box 5, it says the date of occurrence is June 17,</p> <p>12 2004. Do you see that?</p> <p>13 A. Uh-huh.</p> <p>14 Q. Okay. And it says – in Box 19, it says the</p> <p>15 offender's name is Baker, Ben, correct?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. And then, in Box 40 on the first page,</p> <p>18 just at the bottom, it says, male 01, known as Ben Baker</p> <p>19 standing at the mailboxes. Do you see that? We're still</p> <p>20 on the first page, just in the narrative portion.</p> <p>21 A. You said, standing at the – so the –</p> <p>22 MR. TEPFER: Do you want to direct him through</p> <p>23 it?</p> <p>24 MR. PALLES: I'm sorry. We're talking about</p> <p>25 Box 5, did you say?</p>	Page 31	Page 33

<p>1 MR. PALLES: I don't. Is there a highlighter?</p> <p>2 MR. TEPFER: There's like – his name's</p> <p>3 highlighted there.</p> <p>4 MR. PALLES: Okay, good.</p> <p>5 BY MR. TEPFER:</p> <p>6 Q. Do you see that supplementary report?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. And do you see this is related to a</p> <p>9 supplementary report on July 11, 2004, also relating to</p> <p>10 the same mailbox case? Do you see that?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. And do you see on the bottom, it says</p> <p>13 assisting, and your name and star number are listed?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. Does this in any way refresh your</p> <p>16 recollection of whether you were involved in any way</p> <p>17 with the mailbox case?</p> <p>18 A. No, it doesn't.</p> <p>19 Q. Okay. Does it bother you that your name's on</p> <p>20 this report?</p> <p>21 A. I'd like to say that this – whenever someone</p> <p>22 did a report and everybody's on it, they were listed as</p> <p>23 a team. And I wasn't – I don't – I wasn't there</p> <p>24 because I don't remember that.</p> <p>25 Q. So you weren't there for either the incident</p>	Page 34	<p>1 C.K. that, man, it costs a lot of money to bond out and</p> <p>2 pay lawyers?</p> <p>3 A. Did I – could you say that one more time?</p> <p>4 Q. Sure. Did you ever have a conversation with</p> <p>5 Ben Baker, in the presence of someone named C.K. were</p> <p>6 you told Ben Baker, "Man, it costs a lot of money to</p> <p>7 bond out and pay lawyers?"</p> <p>8 A. No, I never said that.</p> <p>9 Q. Okay. This conversation would have happened</p> <p>10 sometime between March of December – in March and</p> <p>11 December of 2005.</p> <p>12 A. No.</p> <p>13 Q. Never happened?</p> <p>14 A. Never happened.</p> <p>15 Q. How is it that someone assists in an arrest if</p> <p>16 they weren't there?</p> <p>17 A. Well, it's the practice of the police</p> <p>18 department.</p> <p>19 Q. Okay. Is there a policy you're referring to?</p> <p>20 A. I don't know about a policy, but I said it's a</p> <p>21 practice.</p> <p>22 Q. Okay. Who instructed you or trained you to</p> <p>23 comply with this practice?</p> <p>24 A. With the practice of the team? Well, Watts</p> <p>25 was the sergeant, so...</p>	Page 36
<p>1 of the criminal acts allegedly committed by Ben Baker in</p> <p>2 June, nor the arrest on July 11th?</p> <p>3 A. No.</p> <p>4 Q. Wait, are you testifying that it's</p> <p>5 nevertheless the practice of your team to list people</p> <p>6 who weren't present in any way for the criminal act or</p> <p>7 the arrest on police reports?</p> <p>8 MR. PALLES: Object to the form.</p> <p>9 THE WITNESS: I'm saying everybody was included</p> <p>10 as a team.</p> <p>11 BY MR. TEPFER:</p> <p>12 Q. Even if they weren't there, they would be</p> <p>13 included on police reports?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. And that was the practice of the team?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. And that's what you did when you wrote</p> <p>18 reports?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. Did you ever have a conversation with</p> <p>21 Ben Baker personally?</p> <p>22 A. No.</p> <p>23 Q. Do you know someone named C.K. (phonetic)?</p> <p>24 A. No.</p> <p>25 Q. Did you ever tell Ben Baker in the presence of</p>	Page 35	<p>1 Q. Okay. So Sergeant Watts was the one who told</p> <p>2 you to put everyone's name who's on the team on the</p> <p>3 police reports –</p> <p>4 A. Yes.</p> <p>5 Q. – even if they weren't there?</p> <p>6 MR. GAINER: Object to form. And that</p> <p>7 mischaracterizes his testimony. Go ahead.</p> <p>8 BY MR. TEPFER:</p> <p>9 Q. Can you answer the question?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. So it doesn't mischaracterize your</p> <p>12 testimony, right?</p> <p>13 MR. GAINER: Just objection to argumentative. I</p> <p>14 think you're probably arguing with me instead of</p> <p>15 him, but I object anyway.</p> <p>16 THE WITNESS: Yes.</p> <p>17 BY MR. TEPFER:</p> <p>18 Q. Oh, okay. Let me ask you, just straight up</p> <p>19 again and he can make an objection. Is Sergeant Watts</p> <p>20 the one who instructed you to put everyone's name on the</p> <p>21 arrest report who's on the team, even if they weren't</p> <p>22 involved in the arrest in any way?</p> <p>23 A. Yes.</p> <p>24 MR. GAINER: This – objection. This is not an</p> <p>25 arrest report. This is a supplementary report. So</p>	Page 37

<p>1 I object to the mischaracterization of the document.</p> <p>2 BY MR. TEPFER:</p> <p>3 Q. Okay. I'll ask it again. Is it Sergeant</p> <p>4 Watts's -- is it Sergeant Watts who instructed you to</p> <p>5 put any member of your team on a supplemental report or</p> <p>6 a vice case report or an arrest report if they were --</p> <p>7 even when they weren't present?</p> <p>8 MR. GAINER: Object to form.</p> <p>9 THE WITNESS: He didn't instruct me personally,</p> <p>10 but that's the way the team wrote up a report.</p> <p>11 BY MR. TEPFER:</p> <p>12 Q. Okay. So he instructed the team to do that?</p> <p>13 A. Yes.</p> <p>14 MR. GAINER: Objection. Foundation.</p> <p>15 MR. BAZAREK: Yeah. And I'm going to join in</p> <p>16 the objection. And then Mr. Tepfer, is it agreed</p> <p>17 that an objection by, you know, one party, that it</p> <p>18 will also be adopted by the other parties, so we</p> <p>19 don't have to say join and have multiple objections</p> <p>20 throughout the deposition?</p> <p>21 MR. TEPFER: Absolutely.</p> <p>22 MR. BAZAREK: Okay. Thank you.</p> <p>23 MR. TEPFER: You're welcome.</p> <p>24 BY MR. TEPFER:</p> <p>25 Q. Do you know Clarissa Glenn or Clarissa Baker?</p>	Page 38	Page 40
<p>1 A. I heard of her.</p> <p>2 Q. Have you ever met her?</p> <p>3 A. I've met her.</p> <p>4 Q. You have met her?</p> <p>5 A. I've -- I've met her. I know who she is.</p> <p>6 Q. When did you meet her?</p> <p>7 A. I couldn't tell you when I met her, but in my</p> <p>8 travels as a police officer.</p> <p>9 Q. Okay. Did you ever arrest her?</p> <p>10 A. No.</p> <p>11 Q. Okay. Can you --</p> <p>12 A. Not that I can -- no.</p> <p>13 Q. Okay. Do you recall any conversations you've</p> <p>14 ever had with her?</p> <p>15 A. Not offhand, no.</p> <p>16 Q. Okay. How is it that you remember her?</p> <p>17 A. She was always in Ida B. Wells.</p> <p>18 Q. Okay. So you would just see her and you knew</p> <p>19 her name?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. Do you recall speaking to Clarissa at</p> <p>22 the police station at 51st and Wentworth on July 11,</p> <p>23 2004?</p> <p>24 A. No, I don't -- I don't -- I don't recall. No.</p> <p>25 Q. Okay. It would have been actually outside --</p>	Page 39	Page 41

<p>1 A. I don't remember, yes.</p> <p>2 Q. Okay. Do you recall ever hearing about Ben</p> <p>3 Baker getting arrested at 527 East Browning and running</p> <p>4 away from some of the members of your team?</p> <p>5 A. I don't – I can't recall any arrest about Ben</p> <p>6 Baker.</p> <p>7 Q. Okay. All right. There's one more then.</p> <p>8 December 11, 2005, that's another arrest involved in</p> <p>9 this current case. Do you recall that at all?</p> <p>10 A. No.</p> <p>11 Q. Okay. Do you recall ever being involved in</p> <p>12 any arrest of Ben Baker?</p> <p>13 A. No.</p> <p>14 Q. Are you testifying you've never been involved</p> <p>15 in an arrest of Ben Baker?</p> <p>16 A. I didn't say. I just don't remember.</p> <p>17 Q. Okay. So you just don't know one way or the</p> <p>18 other?</p> <p>19 A. Right.</p> <p>20 MR. TEPFER: Okay. All right, I'm going to</p> <p>21 show you what's marked as Exhibit 3, right?</p> <p>22 THE REPORTER: Yes.</p> <p>23 MR. TEPFER: There. She's going to mark it.</p> <p>24 (EXHIBIT 3 MARKED FOR IDENTIFICATION)</p> <p>25 BY MR. TEPFER:</p>	Page 42	Page 44
<p>1 Q. Okay. This is City-BG-29 to 30. This is</p> <p>2 another vice case report, okay?</p> <p>3 A. Uh-huh.</p> <p>4 MR. PALLE: You got to answer verbally, yes or</p> <p>5 no.</p> <p>6 A. Oh. Oh, yes. Yes.</p> <p>7 BY MR. TEPFER:</p> <p>8 Q. I want you to look right at the top, paragraph</p> <p>9 – or I'm sorry, Box 5. That's the date of occurrence.</p> <p>10 It says December 11, 2005. Do you see that?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. And then I want you to look at Box 46,</p> <p>13 the second reporting officer. That's your name and star</p> <p>14 number, right?</p> <p>15 A. Correct.</p> <p>16 Q. Okay. Now, I want you to spend a minute –</p> <p>17 have you looked at this document before? Have you ever</p> <p>18 seen this document?</p> <p>19 A. No.</p> <p>20 Q. Okay. I want you to take a minute and read</p> <p>21 it. The – read the entire thing you want. Look at the</p> <p>22 Narrative 40 – Paragraph 40 through the back. Take</p> <p>23 whatever time you need to read that, okay? Just tell me</p> <p>24 when you're done.</p> <p>25 MR. BAZAREK: Hey, Josh, what's the number on</p>	Page 43	Page 45

<p>1 Q. Okay. What else do you remember? 2 A. That's – that's about it. 3 Q. Did you speak to either of them? 4 A. I spoke to them. They spoke back. 5 Q. What did you talk about? 6 A. Nothing. 7 Q. Do you remember what you talked about? 8 A. No, I don't remember. No. 9 Q. How long was the conversation – well, let me 10 break it up. Did you speak to Ben Baker? 11 A. No. 12 Q. Did you speak to Clarissa Glenn? 13 A. No. Nothing other than hi, and that's it. 14 Q. Okay. So you remember saying hi? 15 A. That's it. 16 Q. And did you say hi to Clarissa? 17 A. I spoke to both of them at the same time. 18 Q. Okay. And they both said hi back? 19 A. Yeah. And then they just stared at me. 20 Q. Okay. So they didn't say anything to you? 21 A. Not really, no. They just stared at me. 22 Q. Okay. So you remember seeing them, and you 23 remember them staring at you, and you remember you 24 saying hi. Is there anything else? And you remember 25 them on a bench, right?</p>	Page 46	Page 48
<p>1 A. Yeah. Right. 2 Q. Is there anything else that you remember? 3 A. I don't – I don't remember anything else. 4 Q. What were you doing at the police station when 5 you saw them? 6 A. Well, I had just came in to work. 7 Q. You had just come into work? 8 A. Yes. 9 Q. What time was it? 10 A. I don't remember the time. 11 Q. Well, what shift did you work in December of 12 2005? 13 A. I believe it was the morning shift. 14 Q. That would've been 7:00 a.m.? 15 A. Yes. I believe it was the morning shift. 16 Q. Okay. Well, this arrest time is listed as 17 noon. Is there any shift that starts at noon? 18 A. No. 19 Q. Okay. So are you sure you just had arrived to 20 work? 21 A. Yes. 22 Q. Do you know why you were late to work? 23 A. Yes. 24 Q. Why? 25 A. My mother was sick, and she was – I was</p>	Page 47	Page 49

<p>1 MR. TEPFER: Then we're going to have to call 2 the judge. That's ridiculous. 3 MR. PALLES: I'll tell you what. You don't 4 have to call the judge. He's taken five on any 5 question having to do with this (inaudible). 6 MR. TEPFER: All right. Then I'm going to ask 7 the questions. 8 MR. PALLES: Fine. 9 MR. TEPFER: Okay. See the Exhibit 6 is City- 10 B- 11 MR. BORKAN: Counsel, excuse me just one 12 moment. Could we dispense with the pejoratives and 13 ad hominem attacks going forward, okay? 14 MR. TEPFER: What ad hominem attacks? 15 MR. BORKAN: Like, that's ridiculous, and 16 things like that. We don't need that, sir, okay? 17 MR. TEPFER: Who's talking? 18 MR. PALLES: That's Steve Borkan. And I'm 19 going to take a five-minute break. 20 MR. TEPFER: Okay. 21 THE VIDEOGRAPHER: All right. We are off the 22 record. The time is 10:50 a.m. 23 (OFF THE RECORD) 24 THE VIDEOGRAPHER: Back on the record. The 25 time is 10:56 a.m.</p>	Page 50	Page 52
<p>1 MR. PALLES: Let me simply say for the record, 2 Josh, that I seem to recall, and maybe Bill could 3 back me up on this, but during the course of the 4 deposition of Elsworth Smith concerning the Baker 5 case, at the time that this – these events came up 6 in the deposition, it was agreed that those would 7 not be the subject because they weren't disclosed at 8 the time. I'm simply saying that. 9 BY MR. TEPFER: 10 Q. Okay. So Exhibit 6 is City-BG-56721 to 725. 11 Exhibit 7 is City-BG-56716 to 720. City-BG is 56711 to 12 715. Sorry. That was Exhibit 8, did I just say? 13 Exhibit 9 is City-BG-56706 to 710. And Exhibit 10 is 14 City-BG-56701 to 705. Go ahead and take a look at all 15 of those documents and tell me when you're finished 16 looking at them. 17 MR. PALLES: You want me to take a look at 18 them, at least one or two of them? 19 BY MR. TEPFER: 20 Q. Are you done? 21 A. Yes. 22 Q. Okay. And those are all arrest reports 23 related to an arrest on December 11, 2005, just after 24 noon; is that right? 25 A. That's what it says, yes.</p>	Page 51	Page 53

<p>1 A. I wrote. Before we got into the type, I wrote 2 my - 3 Q. Okay. So you would hand-write police reports 4 during your career, but there wasn't any time during 5 your career as Chicago Police Officer where you typed 6 reports? 7 A. I'm quite sure I did, but I didn't type those 8 reports. 9 Q. You didn't type those reports, but there were 10 reports that you typed? 11 A. Right. 12 Q. Okay. And you - are you testifying that you 13 just weren't a quick typer, or not a good typer? 14 A. Correct. Yes. 15 Q. Did Watts ever call you a dumbass for being a 16 slow typer? 17 A. I don't - I can't remember. 18 Q. You can't remember? 19 A. Uh-huh. 20 Q. Did you see anyone else at the police station 21 with Ben and Clarissa on 12-11-05? 22 A. I don't remember. It was - it was just - I 23 just remember seeing them. I don't recall. I just 24 remember seeing them there. 25 Q. Do you ever have a conversation with any of</p>	Page 54	Page 56
<p>1 the other guys and said that Ben Baker always took his 2 own weight? 3 A. No. 4 Q. Did you ever have a conversation on 12-11-05 5 with Clarissa where she complained that you were typing 6 the report? 7 A. No. 8 Q. You're sure these conversations never 9 happened, or you just don't remember? 10 A. I don't remember. 11 MR. PALLES: My objection would've been asked 12 and answered. 13 BY MR. TEPFER: 14 Q. Okay. But you're testifying you just don't 15 remember these conversations happening? 16 A. I don't remember. 17 Q. Okay. What do they call that testimony - 18 we've talked about it a little bit. Is there a name for 19 the type of proceeding where they - where they impound 20 the car and there - there's a determination of whether 21 or not the individual can get their car back? 22 A. I don't - I don't remember what - it's been 23 a while, so I don't know. 24 Q. Okay. But you know what I'm talking about? 25 A. Yes.</p>	Page 55	Page 57

<p>1 A. No.</p> <p>2 Q. Okay. Do you recall being involved in any way</p> <p>3 whatsoever in the arrest of Chauncey Ali on December 4,</p> <p>4 2006?</p> <p>5 A. No, I don't recall.</p> <p>6 Q. Do you recall stealing money in the summer of</p> <p>7 2006 from Chauncey Ali?</p> <p>8 A. No.</p> <p>9 Q. Okay. Money that he won in a dice game, and</p> <p>10 you were with Watts, and the two of you stole it?</p> <p>11 A. No.</p> <p>12 Q. Do you recall detaining Chauncey Ali two times</p> <p>13 prior to December 4, 2006?</p> <p>14 A. Don't recall.</p> <p>15 Q. Do you recall telling Chauncey Ali on December</p> <p>16 4, 2006 that he needs to come up with some money while</p> <p>17 Watts was present with you?</p> <p>18 A. No, I don't.</p> <p>19 Q. Do you recall telling Chauncey Ali, in</p> <p>20 reference to Watts, that you know the dude want the</p> <p>21 money?</p> <p>22 A. No, I don't.</p> <p>23 Q. Do you recall taking Chauncey Ali from the</p> <p>24 lobby of the 527 building to the second floor and then</p> <p>25 again asking him for money?</p>	Page 58	Page 60
<p>1 A. No, I don't.</p> <p>2 Q. Do you recall witnessing Ronald Watts slap</p> <p>3 Chauncey Ali on the second floor?</p> <p>4 A. No, I don't.</p> <p>5 Q. Do you recall, after Ali's arrest, him asking</p> <p>6 why he was being arrested and Watts told him that you'll</p> <p>7 find out?</p> <p>8 A. No, I don't.</p> <p>9 Q. Do you recall Watts at the police station</p> <p>10 later that day telling Ali that he's taking some of the</p> <p>11 bags?</p> <p>12 A. No, I don't.</p> <p>13 Q. Do you know who Stefon Harrison is?</p> <p>14 A. No recollection.</p> <p>15 MR. TEPFER: Okay. I'm going to show you</p> <p>16 Exhibit 12. Is -- we're at 12, right?</p> <p>17 THE REPORTER: Yes.</p> <p>18 MR. TEPFER: Okay. It's a DO-Joint 41059.</p> <p>19 (EXHIBIT 12 MARKED FOR IDENTIFICATION)</p> <p>20 A. I'm sorry. No -- no recollection who he is.</p> <p>21 BY MR. TEPFER:</p> <p>22 Q. You have no recollection of that person? Is</p> <p>23 that what you're saying?</p> <p>24 A. Yes.</p> <p>25 Q. Okay. Do you recall arresting Stefon Harrison</p>	Page 59	Page 61

<p>1 MR. PALLES: 13.</p> <p>2 BY MR. TEPFER:</p> <p>3 Q. - 13? All right. Take whatever time you</p> <p>4 need to review this document, okay?</p> <p>5 A. Okay.</p> <p>6 Q. You've now reviewed this entire exhibit. Is</p> <p>7 there anything about that that refreshes your</p> <p>8 recollection about who Stefon Harrison is, or your</p> <p>9 involvement in this arrest?</p> <p>10 A. No.</p> <p>11 Q. Okay. And it does say that you're the second</p> <p>12 reporting officer in this vice case report, correct?</p> <p>13 A. Yes.</p> <p>14 Q. And you're also listed as - in Exhibit - in</p> <p>15 Box 18 as witnessing the event, correct?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. But you don't recall --</p> <p>18 A. No. No.</p> <p>19 Q. - one way or the other?</p> <p>20 A. No.</p> <p>21 Q. Okay. Do you recall an incident where Stefon</p> <p>22 Harrison was talking back to Jones when he felt that</p> <p>23 Jones was harassing him?</p> <p>24 A. No, I don't.</p> <p>25 Q. Or Stefon Harrison was holding some barbecue</p>	Page 62	<p>1 BY MR. TEPFER:</p> <p>2 Q. Actually, this relates not just to Stefon</p> <p>3 Harrison's arrest, but also Chauncey Ali, Henry Thomas,</p> <p>4 and someone else named Tyrone Herron, okay? Is that</p> <p>5 right?</p> <p>6 A. What - what was the question?</p> <p>7 Q. It wasn't really a question. It was a -</p> <p>8 A. A statement.</p> <p>9 Q. - a fact. Sorry. Does this - take your</p> <p>10 time to review it -</p> <p>11 A. Yeah.</p> <p>12 Q. - and you're going to answer when you're</p> <p>13 ready, but - because I'm going to ask you if this Vice</p> <p>14 Case Report refers to a - an arrest on December 4, 2006</p> <p>15 of Henry Thomas, Stefon Harrison, Chauncey Ali, and</p> <p>16 Tyrone Herron. Does it relate to that?</p> <p>17 A. Does this relate to this?</p> <p>18 Q. No. I'm sorry. Let me strike it. I'm just</p> <p>19 confirming - can you just confirm for me that this vice</p> <p>20 case report that you looked at, December 4, 2006</p> <p>21 arrests, relates to the arrest of Henry Thomas, Stefon</p> <p>22 Harrison, Chauncey Ali, and Tyrone Herron?</p> <p>23 A. I don't - I don't recall.</p> <p>24 Q. Okay. You don't recall this arrest in any</p> <p>25 way, correct?</p>	Page 64
<p>1 or eating some barbecue?</p> <p>2 A. No, I don't recall.</p> <p>3 Q. Okay. And then Jones said to him - and then</p> <p>4 Watts approached, and Jones said to him that this guy,</p> <p>5 meaning Harrison, was being a smart-ass?</p> <p>6 A. No, I don't - I don't -</p> <p>7 Q. You don't recall?</p> <p>8 A. No, I don't recall that. No.</p> <p>9 Q. Okay. And then Watts asked Jones if he wanted</p> <p>10 any drugs to put on Harrison?</p> <p>11 A. I don't - I don't remember that.</p> <p>12 Q. Okay. And then Watts pushed Harrison up</p> <p>13 against the wall and cuffed him, and took him to the</p> <p>14 police station?</p> <p>15 A. No, I don't - don't recall that.</p> <p>16 Q. Okay. All right. You can put that one to the</p> <p>17 side. This is Exhibit 14. Oh, no, this is already -</p> <p>18 did we already do this exhibit? Well, let me see. Okay.</p> <p>19 All right. Exhibit 14 is DO-Joint 31258, which is non-</p> <p>20 readable, but to 31259, so I assume it's 31258. It's a</p> <p>21 vice case report for the 12-4-06 arrest.</p> <p>22 (EXHIBIT 14 MARKED FOR IDENTIFICATION)</p> <p>23 MR. PALLES: You have another one?</p> <p>24 MR. TEPFER: Oh, sure. Sorry.</p> <p>25 MR. PALLES: Thanks.</p>	Page 63	<p>1 A. No.</p> <p>2 Q. Okay. And your name's not on this report in</p> <p>3 any place, as far as you can see, right?</p> <p>4 A. No, it isn't.</p> <p>5 Q. It is not, right?</p> <p>6 A. It's not.</p> <p>7 Q. Okay. And there's nothing upon reading this</p> <p>8 report that refreshes your recollection of this matter</p> <p>9 in any way whatsoever?</p> <p>10 A. No.</p> <p>11 Q. Okay. Do you remember putting a gun to Stefon</p> <p>12 Harrison's face on December 4, 2006?</p> <p>13 A. No.</p> <p>14 Q. Do you remember telling Stefon Harrison to</p> <p>15 freeze while he was in the stairwell on December 4,</p> <p>16 2006, of the 527 building?</p> <p>17 A. No.</p> <p>18 Q. Do you remember Watts, in your presence,</p> <p>19 saying to Stefon Harrison that since you have the money</p> <p>20 to bond out, you should have money to pay him?</p> <p>21 A. No.</p> <p>22 Q. Did you ever see Stefon Harrison at the</p> <p>23 station on December 4, 2006?</p> <p>24 A. No.</p> <p>25 Q. You don't recall seeing -</p>	Page 65

<p>1 A. I don't recall. Uh-uh.</p> <p>2 MR. TEPFER: Okay. You off the – well, can we</p> <p>3 go off the record one second?</p> <p>4 MR. PALLES: For one second, guys. We're going</p> <p>5 off the record for a second.</p> <p>6 THE VIDEOGRAPHER: We're off the record. It's</p> <p>7 11:24 a.m.</p> <p>8 (OFF THE RECORD)</p> <p>9 THE VIDEOGRAPHER: Back on the record. The</p> <p>10 time is 11:25 a.m.</p> <p>11 BY MR. TEPFER:</p> <p>12 Q. Okay. Do you know who Henry Thomas is?</p> <p>13 A. I don't recall.</p> <p>14 Q. Okay. I'm going to try to show you pictures.</p> <p>15 See if that sparks some memory, and it's going to be</p> <p>16 DO-Joint 7380.</p> <p>17 MR. TEPFER: And that's Exhibit 15?</p> <p>18 THE REPORTER: 15.</p> <p>19 (EXHIBIT 15 MARKED FOR IDENTIFICATION)</p> <p>20 MR. TEPFER: I'm crushing it on exhibits today.</p> <p>21 MR. PALLES: Yes, you are.</p> <p>22 BY MR. TEPFER:</p> <p>23 Q. Does that individual look familiar?</p> <p>24 A. No.</p> <p>25 Q. No recollection?</p>	Page 66	Page 68
<p>1 A. No recollection.</p> <p>2 Q. No recollection of ever being involved in any</p> <p>3 arrest with Henry Thomas?</p> <p>4 A. No.</p> <p>5 Q. Okay. All right, I'm going to show you an</p> <p>6 arrest report. It's Exhibit 16. This is City-BG-32862</p> <p>7 to 863. Sorry. You see that you're listed on this</p> <p>8 arrest report as an assisting officer –</p> <p>9 (EXHIBIT 16 MARKED FOR IDENTIFICATION)</p> <p>10 A. Yes.</p> <p>11 BY MR. TEPFER:</p> <p>12 Q. – in assisting in the arrest?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. And this is an arrest dated February 5,</p> <p>15 2003, of Henry C. Thomas. Do you see that?</p> <p>16 A. Yes.</p> <p>17 Q. All right. Do you recall arresting anyone who</p> <p>18 was on crutches that day?</p> <p>19 A. No.</p> <p>20 Q. Do you recall ever arresting anyone on</p> <p>21 crutches?</p> <p>22 A. No, I don't. No.</p> <p>23 Q. Do you remember – recall ever seeing any</p> <p>24 individual on crutches at the police station?</p> <p>25 A. No, I don't.</p>	Page 67	Page 69

<p>1 A. Yes, I'm aware.</p> <p>2 Q. Okay. Do you recall the arrest of Lionel</p> <p>3 White Junior – Lionel White Senior in any way on that</p> <p>4 date?</p> <p>5 A. No, I don't.</p> <p>6 Q. I'm going to show you what's marked as Exhibit</p> <p>7 17. It's City-LW-66. Actually, make it 66 to 67. We</p> <p>8 can put them together.</p> <p>9 (EXHIBIT 17 MARKED FOR IDENTIFICATION)</p> <p>10 MR. PALLES: Yeah, that's fine.</p> <p>11 BY MR. TEPFER:</p> <p>12 Q. Do you – is this the person you remember as</p> <p>13 Lionel White Senior, or do you just not recall?</p> <p>14 A. Yes. This – this is him.</p> <p>15 Q. Okay. Seeing this picture, do you recall the</p> <p>16 arrest of Lionel White?</p> <p>17 A. No, I don't – I don't recall the – the</p> <p>18 arrest of him</p> <p>19 Q. Okay. Look at that second page of that photo,</p> <p>20 City-LW-67. Do you see that scratch on the side of his</p> <p>21 – Lionel White Senior's face?</p> <p>22 A. Yes.</p> <p>23 Q. Okay. Do you recall Lionel White Senior and</p> <p>24 Alvin Jones ever getting in a physical altercation?</p> <p>25 A. No.</p>	Page 70	<p>1 2006, sometime in March, three to four weeks earlier,</p> <p>2 going to the same – or going with Watts to Lionel</p> <p>3 White's home and threatening to break the door down, or</p> <p>4 tear the door down, if he didn't open the door?</p> <p>5 A. No.</p> <p>6 Q. No recollection of that?</p> <p>7 A. No. No recollection.</p> <p>8 MR. TEPFER: Okay. Can we go off the record</p> <p>9 for a second?</p> <p>10 MR. PALLES: Sure.</p> <p>11 THE VIDEOGRAPHER: We're off the record. The</p> <p>12 time is 11:35 a.m.</p> <p>13 (OFF THE RECORD)</p> <p>14 THE VIDEOGRAPHER: Back on the record. The</p> <p>15 time is 11:36 a.m.</p> <p>16 MR. PALLES: All right. I understand that Mr.</p> <p>17 Tepfer's going to go into a bunch of arrests that</p> <p>18 are not involved in the target cases but are</p> <p>19 contemporaneous – roughly contemporaneous to Mr.</p> <p>20 White's arrest on April 24, 2006. I object to the</p> <p>21 relevance of this line of questioning, but I'm going</p> <p>22 to allow it to proceed.</p> <p>23 MR. TEPFER: Thank you. Actually, I guess I</p> <p>24 need a minute to get this ready. Hold on.</p> <p>25 MR. BAZAREK: Eric, I think he called it the</p>
<p>1 Q. Do you know Kimberly Collins (phonetic)?</p> <p>2 A. Name doesn't sound familiar.</p> <p>3 Q. Rasaan Brakes (phonetic)?</p> <p>4 A. Nope.</p> <p>5 Q. All right. I'm going to show you Exhibit 18.</p> <p>6 This is City-LW-30 to 31. I want you to take as much</p> <p>7 time as you need to read this. Okay. Does that – you</p> <p>8 – have you finished reviewing –</p> <p>9 (EXHIBIT 18 MARKED FOR IDENTIFICATION)</p> <p>10 A. Yes.</p> <p>11 BY MR. TEPFER:</p> <p>12 Q. – Exhibit 18? Does that in any way refresh</p> <p>13 your recollection of this arrest?</p> <p>14 A. No, it doesn't.</p> <p>15 Q. If you have any idea why you're named as a</p> <p>16 witnessing officer on that report in number 18 – in Box</p> <p>17 18?</p> <p>18 A. Because it's a – it was a team arrest.</p> <p>19 Q. Okay. But beyond it being a team arrest, and</p> <p>20 it being the practice of your team to list everyone on</p> <p>21 the team on the police reports, do you have any</p> <p>22 recollection of any act you took in regards to this</p> <p>23 arrest?</p> <p>24 A. No, I don't.</p> <p>25 Q. Okay. Do you recall prior to this April 24,</p>	Page 71	<p>1 target cases, the test cases.</p> <p>2 MR. PALLES: I – you know, I always do. Why</p> <p>3 did – I did that in court the other day. Test</p> <p>4 cases. I'll never get that right.</p> <p>5 MR. TEPFER: I think someday, Eric, you may get</p> <p>6 it right. I have confidence in you.</p> <p>7 MR. PALLES: Yeah. In my closing.</p> <p>8 MR. TEPFER: I'm missing one. I've got five in</p> <p>9 this one and three in that one. Okay.</p> <p>10 MR. PALLES: Are these going to – just give</p> <p>11 them to her. Are these –</p> <p>12 MR. TEPFER: Yeah. I'm just trying to get them</p> <p>13 all in one and I already screwed up. Sorry guys, I</p> <p>14 need a minute. There's a lot of them. There's</p> <p>15 going to be one more that's added. I got to see</p> <p>16 which one I duplicated here. Sorry, I'm sorry. All</p> <p>17 right, put that one as the fourth one, maybe.</p> <p>18 MR. PALLES: Whatever.</p> <p>19 MR. TEPFER: Or you want to do this, the last</p> <p>20 one?</p> <p>21 MR. PALLES: Huh?</p> <p>22 MR. TEPFER: Nothing. Put that at the end. All</p> <p>23 right.</p> <p>24 MR. PALLES: See you.</p> <p>25 MR. TEPFER: Here we go. We're going to mark</p>

<p>1 as Exhibit 19, City-LW-127 to 128. And I give a 2 whole bunch. 3 (EXHIBIT 19 MARKED FOR IDENTIFICATION) 4 MR. PALLES: It would be the same, so... 5 MR. TEPFER: Okay. So that is – that – which 6 one? What's the name on that one? Can I just see 7 real quick? Sorry. All right. That's the George 8 Green arrest vice case report. Then Exhibit 20 is 9 City-LW-121 to 122. This is the Teresa Butler vice 10 case report. And 21, it's going to be LW-113 to 11 114. This is the John Pierce vice case report. 22 12 is going to be LW-125 to 126. This is the Dale 13 Morrow Vice Case Report. 14 (EXHIBIT 20 MARKED FOR IDENTIFICATION) 15 (EXHIBIT 21 MARKED FOR IDENTIFICATION) 16 (EXHIBIT 22 MARKED FOR IDENTIFICATION) 17 THE WITNESS: Excuse me. 18 MR. TEPFER: Okay. Then 20 – where are we at? 19 23? 20 THE REPORTER: 23. 21 BY MR. TEPFER: 22 Q. 23 is LW-111 to 112. This is the Cleothus 23 Morris vice case report. I might want – all right. 24 24 is LW-119 to 120. It's the Lynn Howard vice case 25 report. 25 is LW-123 to 124. It's the Charles Riley </p>	Page 74	<p>1 these individuals? 2 A. No, I don't. I don't recall. 3 Q. Okay. And nothing in any of these vice case 4 reports, in anything that you've read, refreshes your 5 recollections? 6 A. No. 7 Q. And I just – 8 A. No. 9 Q. I know you and your lawyer had a brief 10 conversation, saying you've read a couple of them. I 11 really – I want to give you a chance to read as much or 12 little as you want to make sure. Because I just want to 13 make sure there's nothing in any of these reports that 14 refresh your recollection. So just whenever you're 15 ready to comfortably answer that question. 16 A. It – 17 MR. PALLES: He's – what you can't ask me 18 anything. He is asking you if you've read enough 19 that you feel comfortable – 20 THE WITNESS: Oh, yeah. Yeah. 21 MR. PALLES: Well, is there any – it – from 22 what you've seen, will it refresh your recollection 23 if you continue to look at this right now? 24 THE WITNESS: No. The only thing that we – is 25 the attempt possession narcotics. To – to me, </p>	Page 76
<p>1 vice case report. And 26 is LW-117 to 118. And that's 2 the Lorene Williams vice case report. All right. You 3 can go ahead and take as much time as you need. I want 4 you to look at all of those exhibits. They all relate 5 to arrest on April 24, 2006 during various times of that 6 day. Do you want to take a look at them, or you already 7 have them? Just take whatever time you need. 8 (EXHIBIT 23 MARKED FOR IDENTIFICATION) 9 (EXHIBIT 24 MARKED FOR IDENTIFICATION) 10 (EXHIBIT 25 MARKED FOR IDENTIFICATION) 11 (EXHIBIT 26 MARKED FOR IDENTIFICATION) 12 MR. PALLES: What are the – 13 THE WITNESS: I don't know. 14 MR. PALLES: – you've read what? A couple of 15 them? 16 THE WITNESS: Yeah. Yeah. 17 MR. PALLES: Okay. If you have any specifics 18 about signature lines or whatever, he'll look at 19 those separately. 20 BY MR. TEPFER: 21 Q. Okay. Your name is the reporting officer 2 on 22 the Box 45 and or Box – I'm sorry, Box 46 on each of 23 those exhibits, correct? 24 A. Yes. 25 Q. Okay. Do you recall the arrests of any of </p>	Page 75	<p>1 that's the only recollection is this is – was a 2 suppress – narcotics suppression mission. 3 BY MR. TEPFER: 4 Q. Where are you looking at? 5 MR. PALLES: The very top. 6 THE WITNESS: The very top, secondary 7 classification. 8 BY MR. TEPFER: 9 Q. The very top of which exhibit? 10 A. It's Box number 2. 11 MR. PALLES: All of them. 12 A. All of them. 13 BY MR. TEPFER: 14 Q. Box number 2. Okay. Secondary attempt 15 possession of narcotics? 16 A. Yes. 17 Q. Okay. What did you – explain. Can you 18 repeat what you said? 19 A. I said that it is a – a suppression mission 20 of narcotics. 21 Q. Okay. 22 A. And that's people who came down and attempted 23 to buy narcotics. 24 Q. Okay. But do you recall any of these 25 individuals, or witnessing, or being involved in the </p>	Page 77

<p>1 arrest in any way of any, of these individuals –</p> <p>2 A. No.</p> <p>3 Q. – attempting to buy narcotics that day?</p> <p>4 A. No, I don't recall.</p> <p>5 Q. Oh, okay. So you're just saying that point –</p> <p>6 correct me if I'm wrong, but noting that it was a</p> <p>7 secondary classification as attempt possession of</p> <p>8 narcotics, why is that significant to you, I guess, is</p> <p>9 my question?</p> <p>10 A. Because all these – they read the same, just</p> <p>11 about. And it – they come in at every 15 minutes –</p> <p>12 every five minutes, I think.</p> <p>13 Q. Okay. So is that different than some of the</p> <p>14 other vice case reports we looked, where it was actual</p> <p>15 non-attempts, but they were, like, actual possession of</p> <p>16 narcotics?</p> <p>17 A. Right.</p> <p>18 Q. Is that of some significance to you?</p> <p>19 A. Yes.</p> <p>20 Q. But that doesn't in any way refresh your</p> <p>21 recollection of this actual attempt, as opposed –</p> <p>22 A. No.</p> <p>23 Q. Okay. I got it. I think that's all on that</p> <p>24 one. You don't recall one way or the other – actually,</p> <p>25 it's not one, whether you were at 575 East Browning on</p>	Page 78	Page 80
<p>1 April 24, 2006?</p> <p>2 A. No.</p> <p>3 Q. Okay.</p> <p>4 A. No.</p> <p>5 Q. Okay. We're going to get lunch today.</p> <p>6 MR. PALLE: Great.</p> <p>7 BY MR. TEPFER:</p> <p>8 Q. Okay. Okay. Do you know who Bobby Coleman</p> <p>9 is?</p> <p>10 A. Yes.</p> <p>11 Q. You do?</p> <p>12 A. Yes, sir.</p> <p>13 Q. What do you recall about Bobby Coleman?</p> <p>14 A. That he was always in Ida B. Wells.</p> <p>15 Q. Okay. Could you recognize him if you saw him?</p> <p>16 A. Yes.</p> <p>17 Q. Have you ever arrested Bobby Coleman?</p> <p>18 A. I can't remember.</p> <p>19 Q. Is there anything else you remember about him,</p> <p>20 besides that he was always in Ida B. Wells?</p> <p>21 A. None other than that. And he was – yeah.</p> <p>22 Narcotics.</p> <p>23 Q. He wasn't – he was narcotics?</p> <p>24 A. Yeah.</p> <p>25 Q. You mean he was involved? What do you mean by</p>	Page 79	Page 81

<p>1 A. Okay. Gonzalez and Bolton. Yeah.</p> <p>2 Q. Okay.</p> <p>3 A. Leano.</p> <p>4 Q. Leano was there as well?</p> <p>5 A. Yeah, I believe Doug (phonetic).</p> <p>6 Q. Okay. And you said, if I – what I heard you</p> <p>7 say was you were waiting until they come. Is that what</p> <p>8 you said?</p> <p>9 A. Yes. We were waiting until they got set up.</p> <p>10 Q. And who were you talking – who were you</p> <p>11 waiting for? Who's they?</p> <p>12 A. Fuzz. Leonard Gipson.</p> <p>13 Q. And anyone else?</p> <p>14 A. And Bob.</p> <p>15 Q. Meaning Bobby Coleman?</p> <p>16 A. Bobby Coleman, yeah.</p> <p>17 MR. TEPFER: All right. This is city – what</p> <p>18 number are we on? 27?</p> <p>19 THE REPORTER: 27.</p> <p>20 (EXHIBIT 27 MARKED FOR IDENTIFICATION)</p> <p>21 BY MR. TEPFER:</p> <p>22 Q. This is City BD-51-681. Is that Bobby</p> <p>23 Coleman?</p> <p>24 A. Yes.</p> <p>25 Q. Okay. So why were you waiting for them to set</p>	Page 82	Page 84
<p>1 up?</p> <p>2 A. Because we had information that they were</p> <p>3 selling drugs. And –</p> <p>4 Q. Did – go ahead. Sorry.</p> <p>5 A. I don't recall who gave us the information,</p> <p>6 but we had the information that they were setting up</p> <p>7 drugs and it usually started at 6:00. Bob brought the</p> <p>8 drugs in and Fuzz gave it to the workers.</p> <p>9 Q. Okay. So some –</p> <p>10 A. That was the information.</p> <p>11 Q. Okay. And you – wherever you were set up,</p> <p>12 you had information that they were going to start their</p> <p>13 day's drug sales on 6:00 a.m. in or around that</p> <p>14 building?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. And you don't recall who gave you the</p> <p>17 information?</p> <p>18 A. No.</p> <p>19 Q. Do you recall if it was a citizen or a police</p> <p>20 officer that gave you the information?</p> <p>21 A. It was a citizen.</p> <p>22 Q. Okay. And do you recall whether that citizen</p> <p>23 gave the information directly to you, or did it give it</p> <p>24 to one of your police officer teammates?</p> <p>25 A. Teammates. Didn't give it directly to me.</p>	Page 83	Page 85

<p>1 you-all ass in the – in – in order, and told them 2 where to set up at, the lookouts and the workers. And 3 then I guess he gave them they work – work – wake-up. 4 That's what it's called. He gave them the drugs. 5 Q. Okay. So he when you say he gave them the 6 wake-up, you're – you say the wake-up is the drugs? 7 A. Uh-huh. 8 Q. And he would – who did he – 9 THE REPORTER: Is that a yes? 10 THE WITNESS: Yes. Oh, yes. I'm sorry. 11 BY MR. TEPFER: 12 Q. That's okay. 13 A. Yes. 14 Q. And who was he giving the drugs? 15 A. Whoever was arrested. I don't remember their 16 names, but – 17 Q. Okay. So what you're saying is he wasn't 18 giving drugs to people who were purchasing drugs, he was 19 giving people drugs who were – 20 A. Guys who working for him. 21 Q. Who were working for him. Just try to let me 22 finish the question, but I know you know where I'm 23 going. It's just for her. So let me just make sure 24 it's clear. Leonard Gipson started announcing that he 25 was giving the drugs to individuals who were working for </p>	Page 86	Page 88
<p>1 him. And by working for him, you mean that they were 2 going to sell the drugs that he provided to them? 3 A. No. 4 Q. No. Okay. 5 A. No. 6 Q. Go ahead. Then what did I get wrong? 7 A. What – what you got wrong was he had – the 8 people that was outside, he gave them what they call a 9 wake-up, that being they gave him the – I think it was 10 heroin, to do in the morning, in the evening, and in the 11 afternoon. They gave them three of them. That was for 12 their personal use. 13 Q. Okay. 14 A. Then, Bob showed up. 15 Q. Okay. Let's stop there before Bob shows up. 16 When you say he gave individuals the wake-up and I 17 believe you mean like – did he give him each three 18 baggy – bags – 19 A. Yeah. 20 Q. – of heroin? 21 MR. PALLES: Wait until he finishes. 22 A. Yes. That's what they told us. Yes. 23 BY MR. TEPFER: 24 Q. Who told you that? 25 A. The arrestees. </p>	Page 87	Page 89

<p>1 Q. Okay. So you just have an independent memory 2 of this incident on January 4, 2003?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. All right. So you -- we left off 5 Leonard -- you hear Leonard Gipson. What did he say 6 again? What were -- what did you hear him say?</p> <p>7 A. He said -- want me start over?</p> <p>8 Q. Sure.</p> <p>9 A. Okay. He said, walk the building down and get 10 you-all ass in gear. And then he -- he said, I got your 11 wake-up. And he went toward -- inside the building. 12 That's where everybody was.</p> <p>13 Q. Okay.</p> <p>14 A. And then they, before they can get out good, I 15 believe that's when we came down. Because they -- we 16 had a radio and they told us Bob was coming.</p> <p>17 Q. Okay. So somebody -- did somebody radio from 18 one of the blue and white cars?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. And someone said Bob was coming and 21 that was the other target?</p> <p>22 A. Yep.</p> <p>23 Q. Okay. And did you see Bob arrive?</p> <p>24 A. Yeah, I saw him coming.</p> <p>25 Q. Okay. Was he on foot or in a car?</p>	Page 90	Page 92
<p>1 A. No, he was in a car.</p> <p>2 Q. Okay. What kind of car?</p> <p>3 A. I can't remember his car.</p> <p>4 Q. Okay.</p> <p>5 A. But he drove the same car.</p> <p>6 Q. Do you remember the color?</p> <p>7 A. No, I don't remember the color of it.</p> <p>8 Q. Big car, small car, anything?</p> <p>9 A. Big car.</p> <p>10 Q. Okay. And could you see him coming up, like, 11 Bobby Coleman actually in the car, or could you just -- 12 did you just recognize his car?</p> <p>13 A. I seen him come up the lane.</p> <p>14 Q. Okay.</p> <p>15 A. In his car.</p> <p>16 Q. Okay.</p> <p>17 A. I recognized it.</p> <p>18 Q. Okay. And you could see through the 19 windshield or the window that it was him driving the 20 car?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. And he was coming up the lane?</p> <p>23 A. Uh-huh.</p> <p>24 Q. And then what happened?</p> <p>25 A. Then, once they said that, it was -- it --</p>	Page 91	Page 93

<p>1 Q. When you say those were closed off, do you 2 mean there was police presence there? 3 A. Yes. 4 Q. Okay. Who were the police officers who were 5 guarding the stairways? 6 A. The ones on the team. 7 Q. Do you remember who? 8 A. I don't remember who was in what stairway, but 9 we came down the stairwells. The police officers that I 10 named. 11 Q. Okay. 12 A. Yeah. We came down the stairways and one – a 13 couple went to the back and a couple went to the front. 14 Q. Oh, I see. So is it the same officers who 15 closed off the stairways who were in that build – in 16 the apartment – or rat-infested apartment – 17 A. Yes. 18 Q. – that you were surveilling? 19 A. Yes. 20 Q. Okay. I see. So as soon as you got the radio 21 notification, you – what floor were you surveilling 22 from? 23 A. The fourth floor, I think it was. I believe 24 it was the fourth floor. 25 Q. Okay. Did you witness any drug transaction?</p>	Page 94	Page 96
<p>1 A. They didn't have any. Nobody got a chance to 2 do that. 3 Q. Okay. 4 A. Yeah. 5 Q. So why did – you know why you broke – 6 A. Because we – when we came down, that's when 7 we – we had got everybody. So the people that was 8 coming went away once they saw the police come. 9 Q. Okay. And you're talking – the people you're 10 talking about – 11 A. The – the – the drug – people that was 12 buying drugs. 13 Q. Okay. 14 A. Yeah. 15 Q. Right. So that's what I meant. So you're 16 anticipating that they were about to begin some sales of 17 drugs, but you'd never witnessed it because people left 18 after you broke surveillance – 19 A. Right. 20 Q. – correct? 21 A. Uh-huh. 22 Q. Okay. So my question is, did you see any drug 23 transactions at all that day before you broke 24 surveillance? 25 A. No.</p>	Page 95	Page 97

<p>1 what did you testify, while he was driving or while it 2 was stopped? I can't remember. 3 A. Did I testify? 4 Q. Yeah. Just five minutes ago, when I asked you 5 was the car stopped when you got the radio surveillance, 6 or was it still driving? 7 A. It was stopped. 8 Q. It was stopped. Okay. And it was two feet 9 away from Leonard Gipson at the time? 10 A. Yes. 11 Q. But Bobby Coleman was still in the car? 12 A. Yes. 13 Q. Was Bobby Coleman's window open? 14 A. Yes, it was. 15 Q. Okay. This was January 2003? 16 A. Yes. 17 Q. Okay. Was it open the entire time he was 18 driving, or did it open – 19 A. I don't – 20 Q. – after that? 21 A. I don't know. 22 Q. How long were you on surveillance before you 23 saw Leonard Gipson? 24 A. I can't recall. It just seemed like forever. 25 So it could've been four hours to – I think we got </p>	Page 98	Page 100
<p>1 there about 2:00. Not for sure, but... 2 Q. Did you ever see Leonard Gipson in a car that 3 day? 4 A. No. 5 Q. Do you remember testifying in any proceeding 6 relating to this arrest? 7 A. I don't remember. 8 Q. Do you know who George Ollie is? 9 A. I heard of him. 10 Q. What do you remember about him? 11 A. He was – he was a worker. 12 Q. Okay. 13 A. Selling drugs. Yeah. 14 Q. Was – did you see him that day? 15 A. I don't recall. 16 Q. Do you know who Larry Lomax is? 17 A. Larry. I heard that name before. 18 Q. Do you recall how you heard it? 19 A. No, I don't. In Ida B. Wells, I heard his 20 name, but that's it. 21 Q. Okay. Do you recall if you saw Larry Lomax 22 that day? 23 A. I – I can't remember. 24 Q. You can't recall? 25 A. No, I can't recall. </p>	Page 99	Page 101

<p>1 Q. Did you go to one of the stairwells?</p> <p>2 A. Yeah. I went to one of the stairwells and I</p> <p>3 grabbed somebody. I can't remember who it was, that</p> <p>4 they was trying to go up the stairs and I grabbed</p> <p>5 somebody. I can't remember who.</p> <p>6 Q. Okay. But the person you grabbed, is that the</p> <p>7 person you arrested?</p> <p>8 MR. PALLES: You know what, I'm going to object</p> <p>9 to the form. I think it calls for a legal</p> <p>10 conclusion. But if you -</p> <p>11 BY MR. TEPFER:</p> <p>12 Q. Well, let me ask you. Sure. Okay. The</p> <p>13 person that you grabbed, did that person end up getting</p> <p>14 arrested?</p> <p>15 A. Yes.</p> <p>16 Q. Did you cuff that person?</p> <p>17 A. I could have, yes.</p> <p>18 Q. Okay. What was that person arrested for?</p> <p>19 A. Attempt narcotics.</p> <p>20 Q. Attempt narcotics?</p> <p>21 A. Uh-huh.</p> <p>22 Q. Okay. Meaning attempt -</p> <p>23 A. That would - not to cut you off, but that</p> <p>24 would be the reason.</p> <p>25 Q. For attempting to sell narcotics?</p>	Page 102	Page 104
<p>1 A. Yes.</p> <p>2 Q. Okay. And what was the facts or the evidence</p> <p>3 that you saw that person attempted to sell narcotics?</p> <p>4 A. That they were out there selling narcotics.</p> <p>5 Well, attempting to sell narcotics. Setting up. I</p> <p>6 would have to read the case report of how it was</p> <p>7 written.</p> <p>8 Q. Okay. When you say case report, do you mean</p> <p>9 the vice case report?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. I will show to you, this is Exhibit 30.</p> <p>12 This is Plaintiff's Joint 827 - 82-107 to 82-108. I</p> <p>13 have a redacted one but it should be fine. You know</p> <p>14 what? Let's do a better one. Here's one that's not</p> <p>15 redacted. Sorry.</p> <p>16 MR. PALLES: Okay.</p> <p>17 MR. TEPFER: Can we strike that?</p> <p>18 MR. PALLES: Yeah. Here, I'll take to use.</p> <p>19 THE WITNESS: Okay.</p> <p>20 MR. TEPFER: This is City-BG-52039 to 040.</p> <p>21 Still Exhibit 30, right?</p> <p>22 THE REPORTER: Uh-huh.</p> <p>23 (EXHIBIT 30 MARKED FOR IDENTIFICATION)</p> <p>24 MR. TEPFER: Do you need one? I'm sorry. Do</p> <p>25 you need one, Eric?</p>	Page 103	Page 105

<p>1 MR. PALLES: What is that, the suppression 2 hearing? 3 MR. TEPFER: Yeah. 4 BY MR. TEPFER: 5 Q. And I'm going to direct you particularly to 6 41368 through 4137 – 4 – through 41372, okay? 7 MR. PALLES: Why don't you put on, like, a 8 mark. Here, take a look. This is what you call it 9 here. Look. I'm sorry. Did you give us the last 10 page or – I'm looking at – 11 MR. TEPFER: Want the whole exhibit or just 12 that? It's – 13 MR. PALLES: What pages are you – are we 14 supposed to be looking at? 15 MR. TEPFER: His testimony, 368 to 372. 16 MR. PALLES: 368. Okay. Here you go. There 17 you go. 18 BY MR. TEPFER: 19 Q. When you're done through your testimony, okay? 20 A. Is that – you just wanted me to read my 21 testimony? 22 Q. Yeah. Not the rest. 23 A. Oh. 24 Q. And then you can look at the very first page 25 too, which just shows what date this was and what</p>	Page 106	Page 108
<p>1 proceeding. 2 A. Okay. 3 Q. Okay. So if you go to the very first page – 4 MR. PALLES: Oops. Okay. Here. To where he 5 was at. 6 MR. TEPFER: The very – 7 MR. PALLES: Okay. Yeah. 8 MR. TEPFER: The very first page of the exhibit 9 – 10 MR. PALLES: Oh. 11 BY MR. TEPFER: 12 Q. – not the testimony. That's proceeding 13 related to people the – Bobby Coleman, Leonard Gipson, 14 and George Ollie. Do you see that? 15 A. Yes. 16 Q. Okay. And you reviewed your testimony at 17 these proceedings, which was, I don't know what you 18 reviewed says it, but it was a pretrial motion hearing, 19 correct? 20 A. Uh-huh. 21 Q. Okay. 22 A. Yes. 23 Q. And after reviewing that, does that in any way 24 refresh your recollection of who is the individual that 25 you detained at the stairway?</p>	Page 107	Page 109
<p>1 A. No, it doesn't. 2 Q. Okay. It doesn't – it – the fact that you 3 took – on Plaintiff joint 41372, you testified that you 4 arrested Ollie. Do you see that right on top? 5 A. On – 6 Q. Page 20, Plaintiff joint 41372, right at the 7 bottom. 8 MR. PALLES: 20. 9 BY MR. TEPFER: 10 Q. So the very top of the page. The Court asked, 11 who did you arrest? And the witness is you, it says, I 12 arrested Ollie. Do you see that? 13 A. Yes. 14 Q. Okay. Does that in any way indicate to you 15 that that's the person that you detained at the 16 stairway? 17 A. Yes. 18 Q. Okay. 19 A. If it's on here, yes. 20 Q. Okay. So you don't – if I'm understanding 21 correctly, and these are always complicated questions, 22 it's not that you independently really remember that 23 it's George Ollie, but you're making some sort of 24 conclusion in your mind that – that's the person in the 25 stairway that you – based on this testimony –</p>		

<p>1 A. Correct.</p> <p>2 Q. And you don't remember any of the other guys I 3 mentioned, Marc Giles, Larry Lomax, or Clifford Roberts, 4 right?</p> <p>5 A. No.</p> <p>6 Q. Okay. And you don't remember George Ollie?</p> <p>7 A. No.</p> <p>8 Q. Okay. Is there anything else you remember 9 about this incident?</p> <p>10 A. No.</p> <p>11 Q. Okay. I want you to go back now and look at- 12 - I think it's Exhibit 30. It's this one here. It's 13 the vice case report, okay?</p> <p>14 A. Okay.</p> <p>15 Q. I think you started to review that, maybe 16 finished, and I maybe I didn't ask you enough questions 17 about it.</p> <p>18 MR. PALLES: He did look at it before.</p> <p>19 MR. TEPFER: He did look at, right?</p> <p>20 MR. PALLES: Right. We've looked at this?</p> <p>21 THE WITNESS: Yes. I looked at it.</p> <p>22 BY MR. TEPFER:</p> <p>23 Q. Okay. So the narrative portion in 40, up 24 until the next page, it talks about an Offender number 25 1, correct?</p>	Page 110	Page 112
<p>1 A. One minute.</p> <p>2 Q. And it talks about it both in Offender number 3 1 and an Offender number 2, correct?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. And if I'm reading this report 6 correctly - well, tell me if I am, does Offender number 7 1 refer to Bobby Coleman and Offender number 2 refer to 8 Leonard Gipson?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. All right. I want to go to the one, 11 two, three, four, fifth line of the narrative on this - 12 - on the second page, on BG-5204, so the back, and it 13 says - I'm going to start reading. It says, the driver 14 of the silver, now known as Offender number 2, parked 15 that vehicle in the rear of 527 East Browning and 16 approached the rear door. Do you see that?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. So Offender number 2 is Leonard Gipson. 19 So that means he was in a car, correct?</p> <p>20 A. I - I don't know. I just seen - I told you 21 I'd seen him walking up.</p> <p>22 Q. You saw him walking? That's what I was going 23 to ask.</p> <p>24 A. Yeah.</p> <p>25 Q. So you didn't actually ever see Leonard Gipson</p>	Page 111	Page 113

<p>1 Q. Right. Okay. That's what I was going to ask 2 about. 3 A. Okay. 4 Q. So where do you see -- wait, sorry. Where do 5 you see the '99 Chrysler? 6 A. On Page 1. 7 MR. PALLES: Box 36. 8 A. Yeah. 36. 9 BY MR. TEPFER: 10 Q. Terrific. All right. That's very helpful. 11 Thank you. All right. Is that green Chrysler the car 12 you associated with Bobby Coleman? 13 A. I don't -- I don't remember. 14 Q. You don't recall? 15 A. No. 16 Q. Okay. But on Page -- 17 A. But I know he drove -- is this a -- Chrysler. 18 I don't remember. 19 Q. You don't recall one way or the other? 20 A. No. 21 Q. Okay. On Page 2, back to the next page, in 22 the second -- there's a narrative that starts, in 23 summary, and I want to go to the second sentence of 24 that. It says, the CI -- well, let's just read the 25 whole thing. In summary, R/Os received information from </p>	Page 114	Page 116
<p>1 a CI that two male Blacks known as Bob and Fuzz would be 2 delivering narcotics to 527 East Browning," correct? 3 A. Correct. 4 Q. Right. Does that refresh your recollection of 5 whether or not you were setting up surveillance at 527 6 East Browning, because I think you said you didn't 7 remember? 8 A. Yeah, it was 527. Yes. 9 Q. It was 527? 10 A. Yes. 11 Q. Okay. All right. Seeing this sentence and 12 the fact that there was a CI, does that in any way 13 refresh your recollection of who the CI was? 14 A. No. 15 Q. Okay. 16 A. No. 17 Q. Do you think you ever knew who the CI was? 18 A. No. 19 Q. So no -- 20 A. I don't -- no. 21 Q. So the police just told you that a -- one of 22 your partners, who you're don't -- one of your pro- 23 police officers involved in this surveillance and arrest 24 just told you that they got information from a CI, but 25 you don't think they ever told you who the CI was? </p>	Page 115	Page 117
<p>1 A. Right. And I never asked because everybody -- 2 you got different information from -- some was credible 3 and some was not. 4 Q. And that's why you didn't ask? 5 A. No, I didn't ask. It wasn't my CI because 6 they -- nobody is going to tell who is the CI. 7 Q. You're -- you generally didn't share the 8 identities of CIs with your partners on the team? 9 A. Well, they did, but I didn't ask who it was. 10 Q. In this case, you didn't ask? 11 A. Right. 12 Q. Okay. Okay. And then it says, the CI stated 13 that Bob would be driving a green car and that Fuzz 14 would be in a silver car similar to an unmarked police 15 vehicle. Do you see that? 16 A. Yes. 17 Q. Okay. And you just said you're -- we 18 referenced a green Chrysler earlier. Do you recall now 19 that Bobby Coleman's car was green, or does this not 20 refresh your recollection? 21 A. No, it doesn't. No. 22 Q. Okay. And the next sentence says, R/Os and 23 their sergeant then set up surveillance points within 24 the building and outside the perimeter. Do you see 25 that? It's just the next sentence. </p>		

<p>1 Q. Who was the one that asked?</p> <p>2 A. I believe Sergeant asked.</p> <p>3 Q. Sergeant Watts?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. But you don't recall who they were?</p> <p>6 A. No.</p> <p>7 Q. Were you there when Sergeant Watts asked them?</p> <p>8 A. No.</p> <p>9 Q. Did he – did Sergeant Watts – did he tell you if he briefed them on the mission, so to speak?</p> <p>10 A. Yes.</p> <p>12 Q. And he did –</p> <p>13 A. That's what he told us, that he briefed them on it.</p> <p>15 Q. Okay. So they – he told them what cars they should look for?</p> <p>17 A. Right. Correct.</p> <p>18 Q. And a general description of who these –</p> <p>19 A. Yes.</p> <p>20 Q. – individuals were?</p> <p>21 A. Uh-huh.</p> <p>22 Q. Yes?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. If you know, is this – are they – are those blue and white cars, are those the ones that are</p>	Page 118	Page 120
<p>1 referenced as surveilling from outside the perimeter, or</p> <p>2 is outside – are the – or is that something else?</p> <p>3 MR. PALLES: Objection. Lack of foundation.</p> <p>4 THE WITNESS: I'm – I'm not for sure.</p> <p>5 BY MR. TEPFER:</p> <p>6 Q. You're not for sure? Okay. Okay. Do you</p> <p>7 recall seeing Bobby Coleman circling the area in his</p> <p>8 car?</p> <p>9 A. No.</p> <p>10 Q. Okay. You just recall –</p> <p>11 A. Seeing him pull up.</p> <p>12 Q. – seeing him pull up and right next to where</p> <p>13 Leonard Gipson was standing, right?</p> <p>14 A. That's right. That's correct.</p> <p>15 Q. Okay.</p> <p>16 A. Yes.</p> <p>17 Q. Okay. And then you never saw the individuals</p> <p>18 Leonard Gipson was talking to, or handed three bags of</p> <p>19 heroin for their wake-up, correct?</p> <p>20 A. No, I never saw that.</p> <p>21 Q. All right. Was Ridgell in the apartment with</p> <p>22 you?</p> <p>23 A. Yes.</p> <p>24 Q. How many windows were the – in the apartment</p> <p>25 that you were surveilling on?</p>	Page 119	Page 121
<p>1 A. I think – two, three, I believe it was three</p> <p>2 – three or four.</p> <p>3 Q. Okay. Were they all facing the same</p> <p>4 direction, or a different direction?</p> <p>5 A. Same direction.</p> <p>6 Q. Okay. So were you all looking out the same</p> <p>7 three or four windows?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. You never saw Bobby Coleman exit the</p> <p>10 vehicle, right?</p> <p>11 A. No, I – I didn't see him.</p> <p>12 Q. Did you see him arrested?</p> <p>13 A. I – I don't believe I saw his arrest.</p> <p>14 Q. Did you see Gipson's arrest?</p> <p>15 A. Yes.</p> <p>16 Q. Who arrested Gipson?</p> <p>17 A. I don't recall who arrested –</p> <p>18 Q. Where were you when you saw him arrested?</p> <p>19 A. In – standing outside the building.</p> <p>20 Q. Like were you – had you already arrested the</p> <p>21 individual we believe is probably Ollie?</p> <p>22 A. Right.</p> <p>23 Q. Okay. Was it – how long after you arrested</p> <p>24 Ollie did you see Gipson get arrested?</p> <p>25 A. Maybe two or three minutes.</p>		

<p>1 recall who it was?</p> <p>2 A. I don't recall, no.</p> <p>3 Q. Okay. And you never saw Bobby Coleman reach</p> <p>4 into his front pants pocket and hand a clear plastic bag</p> <p>5 to Leonard Gipson, right?</p> <p>6 A. Right. No, I didn't see that.</p> <p>7 Q. You never saw Leonard - oh, let me ask you</p> <p>8 this. I know you don't remember who they were, but this</p> <p>9 report reflects that there's -- besides Leonard Gipson</p> <p>10 and Bobby Coleman, five other individuals arrested,</p> <p>11 right?</p> <p>12 A. Yes.</p> <p>13 Q. And I never - I haven't even mentioned this</p> <p>14 name yet. Do you remember George Scroggins?</p> <p>15 A. No, I don't remember that name.</p> <p>16 Q. Okay. Besides Leonard - I already asked you</p> <p>17 about Bobby Coleman and Leonard Gipson, and we already</p> <p>18 know about what we think is George Ollie, the one you</p> <p>19 detained. Did you see any of the other individuals who</p> <p>20 were arrested actually getting arrested, like being</p> <p>21 detained by the officer?</p> <p>22 A. No, I - I - I didn't.</p> <p>23 Q. Okay. And you never saw Gipson give Clifford</p> <p>24 Roberts or Mark Giles a bundle of suspect narcotics,</p> <p>25 right?</p>	Page 122	Page 124
<p>1 A. No, I didn't.</p> <p>2 Q. No, you did not?</p> <p>3 A. No, I didn't see that. No.</p> <p>4 Q. Okay. And you never heard Leonard Gipson tell</p> <p>5 Clifford Roberts to give Larry Lomax, George Ollie, or</p> <p>6 George Scroggins their wake-up, right?</p> <p>7 A. Yeah. You could hear that.</p> <p>8 Q. Oh, okay. So you did hear that?</p> <p>9 A. Yeah. That's what I told you he was going</p> <p>10 toward the building.</p> <p>11 Q. Okay. Okay. You heard him - you heard</p> <p>12 Leonard Gipson talk about wake-up and giving individuals</p> <p>13 their wake-up, correct?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. But you didn't see him hand it?</p> <p>16 A. No.</p> <p>17 Q. If you didn't see him hand it, how do you know</p> <p>18 that he gave them each three bags?</p> <p>19 A. If he said it, that's what happened.</p> <p>20 Q. Okay. So you heard him say wake-up?</p> <p>21 A. Yes.</p> <p>22 Q. Did you hear him say three bags?</p> <p>23 A. No, but for me working out there, I know what</p> <p>24 it is because they - when we catch them, they tell us</p> <p>25 what it is.</p>	Page 123	Page 125

<p>1 searched until they got back to the station?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. Did you witness Marc Giles in</p> <p>4 possession of 20 small, clear Ziploc baggies with white</p> <p>5 powder, suspect heroin, in his hand?</p> <p>6 A. Don't recall.</p> <p>7 Q. Okay. Do you witness or, in fact, recover</p> <p>8 from George Ollie, three small Ziploc baggies with white</p> <p>9 powder, suspect heroin?</p> <p>10 A. Don't recall.</p> <p>11 Q. That was in his hand?</p> <p>12 A. Don't recall.</p> <p>13 Q. Okay. Well, when you arrested him, whoever</p> <p>14 you arrested, did they have any drugs in their hands?</p> <p>15 A. I don't recall. He could have, but I didn't -</p> <p>16 - don't recall.</p> <p>17 Q. Just don't recall? Okay. Did you witness</p> <p>18 either Larry Lomax or George Scroggins with one clear -</p> <p>19 let's just do one at a time. Strike it. Did you</p> <p>20 witness Larry Lomax in possession of one clear plastic</p> <p>21 baggy with white powder, suspect heroin?</p> <p>22 A. Don't recall.</p> <p>23 Q. Did you witness George Scroggins with one</p> <p>24 clear plastic baggy, white powder, suspect heroin?</p> <p>25 A. Don't recall.</p>	Page 126	Page 128
<p>1 Q. Did you ever witness Bobby Coleman or Leonard</p> <p>2 Gipson attempt to flee?</p> <p>3 A. No.</p> <p>4 Q. Did you ever witness Leonard Gipson holding or</p> <p>5 possessing 53 small, Ziploc baggies with white powder,</p> <p>6 suspect heroin, in his - period, did you?</p> <p>7 MR. BAZAREK: Objection. Foundation.</p> <p>8 THE WITNESS: Don't recall.</p> <p>9 BY MR. TEPFER:</p> <p>10 Q. Did you ever search Leonard Gipson's jacket?</p> <p>11 A. Don't recall.</p> <p>12 Q. Do you recall witnessing anyone search his</p> <p>13 jacket and recover 53 small Ziploc baggie with white</p> <p>14 powder, suspect heroin?</p> <p>15 A. Don't recall.</p> <p>16 Q. Do you recall any interaction - do you recall</p> <p>17 driving any of the individuals to the police station?</p> <p>18 A. No.</p> <p>19 Q. Do you recall any of them being in a car that</p> <p>20 you were in, whether you drove or not?</p> <p>21 A. No.</p> <p>22 Q. Do you recall any interactions at the police</p> <p>23 station with any of these individuals?</p> <p>24 A. No. I don't remember. I don't -</p> <p>25 Q. Do you recall anything else about this arrest?</p>	Page 127	Page 129

<p>1 Q. And if that's the vice case report for the 2 January 4, 2003, arrest?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. And on the break, you were reviewing 5 that and your Counsel is telling us that you want to 6 change one of your answers or something?</p> <p>7 A. Yes.</p> <p>8 Q. All right. What do you want to tell me?</p> <p>9 A. With – as the officers that was listed was 10 Spaargaren, Cadman, and Young, instead of – and it 11 wasn't Doug, Manny (phonetic), or Gonzalez.</p> <p>12 Q. Okay. Can I see that?</p> <p>13 A. Sure.</p> <p>14 Q. All right. So now – so what does that mean 15 to you? Does that mean you're – are you saying now 16 that the individuals that you named who are not listed 17 on this report, you're now are testifying, they were not 18 with you in that rat-infested apartment?</p> <p>19 A. Right. Correct.</p> <p>20 Q. And that – and that they weren't involved in 21 this arrest in any way?</p> <p>22 A. Correct.</p> <p>23 Q. Okay. And are you now saying that Cadman was 24 with you in that rat-infested apartment?</p> <p>25 A. Yes.</p>	Page 130	Page 132
<p>1 Q. All right. But – do you -- as you sit here 2 today, do you specifically remember Cadman being there?</p> <p>3 A. I remember Cadman there, yeah.</p> <p>4 Q. Okay. Same question for Spaargaren. As you 5 sit here today, do you remember Spaargaren being with 6 you?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. As you sit here today, you remember 9 Bolton being with you?</p> <p>10 A. Yes.</p> <p>11 Q. As you sit here today, you remember Kenny 12 Young being with you?</p> <p>13 A. Yes.</p> <p>14 Q. As you sit here today, you remember Al Jones 15 being with you?</p> <p>16 A. Yes.</p> <p>17 Q. And you – as you sit here today, you remember 18 Gerome Summers being with you?</p> <p>19 A. Yes.</p> <p>20 Q. As you sit here today, you remember Darryl 21 Edwards being with you?</p> <p>22 A. Yes.</p> <p>23 Q. As you sit here today, you remember Sergeant 24 Watts being there with you?</p> <p>25 A. Yes.</p>	Page 131	Page 133

<p>1 A. None, other than I would see him driving 2 around.</p> <p>3 Q. Okay. Did you ever solicit a bribe from him?</p> <p>4 A. No.</p> <p>5 Q. Did you ever witness Watts solicit a bribe 6 from him?</p> <p>7 A. No.</p> <p>8 Q. And I guess I'm asking prior to January 4, 9 2003, on January 4, 2003, or after January 4, 2003, did 10 you ever solicit a bribe from Bobby Coleman?</p> <p>11 A. No.</p> <p>12 Q. Did you ever witness Watts solicit a bribe 13 from Bobby Coleman during any time in your life?</p> <p>14 A. No.</p> <p>15 MR. TEPFER: I think that's all the questions I 16 have for you today on these topics.</p> <p>17 THE WITNESS: Okay.</p> <p>18 MR. PALLES: Important caveat. Okay, 19 gentlemen, it looks like Bill, you're ready to roll 20 here with some questions?</p> <p>21 MR. BAZAREK: Yes. Yes.</p> <p>22 MR. TEPFER: Okay. Let her go.</p> <p>23 CROSS-EXAMINATION</p> <p>24 BY MR. BAZAREK:</p> <p>25 Q. Good afternoon, Mr. Mohammed.</p>	Page 134	Page 136
<p>1 A. Good afternoon.</p> <p>2 Q. Nice to see you again.</p> <p>3 A. Yes.</p> <p>4 Q. I have a question. Earlier in the deposition, 5 you talked about this meeting that you had with 6 Mr. Tepfer; do you recall that?</p> <p>7 A. Yes.</p> <p>8 Q. And what year was that?</p> <p>9 A. I don't – I don't remember what year it was.</p> <p>10 Q. Was it after –</p> <p>11 A. Might have been –</p> <p>12 Q. Go ahead.</p> <p>13 A. It might've been 2011 or '12. I'm – I'm not 14 for sure.</p> <p>15 Q. Okay. Where were you at when you had this 16 interview with Mr. Tepfer and this other individual he 17 was with?</p> <p>18 MR. PALLES: Objection. Asked and answered, 19 Bill.</p> <p>20 BY MR. BAZAREK:</p> <p>21 Q. Go ahead.</p> <p>22 A. At my house.</p> <p>23 Q. Who was the other person Mr. Tepfer was with?</p> <p>24 A. I don't – I don't remember. It was just big 25 guy that was with him. He was a big guy. I don't</p>	Page 135	Page 137

<p>1 Q. Did Mr. Tepfer, during this time, tell you 2 that he was representing Ben Baker? 3 A. No. 4 Q. Did Mr. Tepfer tell you that if he was able to 5 vacate Ben Baker's convictions, that he would be able to 6 bring a lawsuit against you and other members of the 7 Chicago Police Department? 8 A. I can't remember, but I – I remember him 9 saying that it was – some other people were done wrong, 10 to that effect. 11 Q. Mr. Tepfer said some other people had done 12 wrong? 13 A. Had been done wrong by, you know, the police 14 department, or Watts. I'm not for sure the exact 15 wording. 16 Q. So what – what's your understanding of what 17 Mr. Tepfer wanted you to do – 18 A. Well – 19 Q. – when he met with you? 20 A. At – 21 MR. TEPFER: Objection. Calls for speculation. 22 Go ahead. 23 THE WITNESS: At that point, once I thought 24 about it, you know, I thought about, anything I say 25 can will be used against you, that's what I thought</p>	Page 138	Page 140
<p>1 about myself. And I didn't want to get too much 2 into it, so I cut off the conversation – that it 3 wouldn't have been good for me. 4 BY MR. BAZAREK: 5 Q. So at that point you knew you'd – you know, I 6 should consult with an attorney on this, right? 7 A. Correct. 8 Q. Did Mr. Tepfer ask you if you had an attorney 9 when he was inside your house? 10 A. I – I don't remember that. I don't remember. 11 Q. You think if he did, you would've remembered 12 that? 13 A. Yeah. 14 MR. TEPFER: Objection. Calls for speculation. 15 THE WITNESS: Yes. 16 BY MR. BAZAREK: 17 Q. How was it – how was it arranged that Mr. 18 Tepfer was going to come inside your house? 19 A. Well, I don't – I don't know how they got 20 there in the first place. I'm not for sure about that, 21 but because of everything going on, I invited them in 22 because they said they wanted to talk to me. 23 Q. But were – did they phone you first, or just 24 you had some people show up in your doorstep? 25 A. Showed up at my doorstep.</p>	Page 139	Page 141

<p>1 Q. Did Mr. Tepfer ever make any further attempts 2 to, you know, contact you? 3 A. No. 4 Q. So the – so he never showed up again, no 5 phone calls, nothing like that? 6 A. No. Uh-uh. No. 7 Q. Did you mention to him when you were meeting 8 with him that you wanted to consult with an attorney? 9 A. I don't know if I was thinking that or I said 10 it to him, but I – I think – I don't – I don't know 11 if I said it to him or I was just thinking that, and I 12 just cut it off. 13 Q. Did Mr. Tepfer mention Ben Baker by name to 14 you while he was inside your home? 15 A. No, not that I remember. No. 16 Q. If you know, did he mention any of the – any 17 of the plaintiffs in these lawsuits involving, you know, 18 your former team? 19 A. No. 20 Q. Did Mr. Tepfer make any promises to you while 21 he was inside your home? 22 A. No, not that I can remember. 23 Q. Let me ask you, that – when Mr. Tepfer made 24 this unannounced visit to your house, how long of a time 25 period had it been since you were released from federal</p>	Page 142	Page 144
<p>1 prison? 2 A. I'm not for sure. I don't – I don't 3 remember. I can't remember when it happened, because 4 everything was a blur to me, so I really wasn't paying 5 attention. 6 Q. Okay. Did Mr. Tepfer ever e-mail you, or 7 write you letters, anything like that? 8 A. No. No. Uh-uh. 9 Q. Did any other attorneys, you know, show up – 10 or strike that. Not talking about federal prosecutors, 11 FBI agents, but did any other criminal defense attorneys 12 or plaintiff's attorneys ever show up at your home 13 unannounced before? 14 A. No. 15 Q. I want to make sure I understand. I want to 16 go to the – do you recall getting a – was it a phone 17 call from Mr. Bloomberg and another individual who 18 identified himself as an FBI agent; is that right? 19 A. Yes, that's correct. 20 Q. That was just over the phone? 21 A. Over the phone, yes. 22 Q. Okay. Did Mr. Bloomberg or the FBI agent tell 23 you that they were investigating Ben Baker for 24 falsifying his interrogatory answers in his case? 25 A. No.</p>	Page 143	Page 145

<p>1 Q. Okay. So when you say that everyone on the 2 team was listed on the reports, it was everyone that was 3 in attendance that day that was listed on the report? 4 A. Yes. 5 Q. Okay. So if you were not working that day, 6 you were not listed on the report? 7 A. If you weren't working, you weren't on that. 8 Q. Okay. Understand. And you said that he never 9 personally instructed you to complete a report this way? 10 MR. TEPFER: Objection. Misstates the 11 evidence. 12 THE WITNESS: No, it was just – made 13 understand, put everybody on the report so that they 14 get credit for the arrest. 15 BY MS. HARRIS: 16 Q. Okay. 17 A. For helping. 18 Q. And was this ever memorialized in a Post-It, 19 an e-mail, a text message? 20 A. No. 21 Q. Okay. And did this occur before narcotic 22 missions or other missions? 23 A. It was just something that was – that was 24 done. It wouldn't be – you know, if you were – if we 25 went on a narcotics mission, or – or however, that's</p>	Page 146	Page 148
<p>1 how it would be understood. 2 Q. Okay. 3 A. To do – to put everybody on it. 4 Q. And where did this conversation or instructing 5 – instruction usually occur? 6 A. In the office. In the tact office. 7 Q. Where – 8 A. To – in the station. 9 Q. Which station is that? I know there was two 10 of them. 11 A. Second district. 12 MS. HARRIS: Okay. Okay. Those are all my 13 questions. Thank you. 14 THE WITNESS: You're welcome. 15 REDIRECT EXAMINATION 16 BY MR. TEPFER: 17 Q. And a couple more follow-up, based on Bill's 18 line of questioning. Just for context, I'm not asking 19 about this, but what year did you get out of prison? 20 A. It was 2012, I believe it was. 21 Q. Okay. And I didn't come and see you before 22 you went to prison, right? 23 A. No. 24 Q. So when you testified it was 2011, 2012, 25 that's probably not right, correct?</p>	Page 147	Page 149
		<p>1 A. It's – yeah, it's probably after because it – 2 - I think everything happened in 2011. 3 MR. PALLES: Yep. Let's stipulate – 4 THE WITNESS: Okay. 5 MR. PALLES: – that he wasn't arrested until 6 February of 2012. 7 BY MR. TEPFER: 8 Q. Okay. So you probably got out of prison in 9 2013 sometime? 10 A. Right, right. 11 Q. Okay. And it was after that, correct? 12 A. Yes. 13 Q. Okay. And it was a garden apartment, correct? 14 A. My house? 15 Q. Yeah. 16 A. No. 17 Q. It was like a garden house. Like, it was a – 18 you know, bottom floor, correct? 19 A. No, it was the basement. 20 Q. Basement. 21 A. Yeah, basement. Uh-huh. 22 Q. Okay. And you opened the door? 23 A. Uh-huh. 24 Q. Okay. And I told you who I was? 25 A. Yes.</p>

Page 150 1 A. I don't remember. 2 Q. You don't remember. Okay. All right. And I 3 told you that I wanted to talk to you about Watts 4 related case, correct? 5 A. Yes. 6 Q. And you invited me in? 7 A. Yes. 8 Q. Okay. And we talked for, I think you said ten 9 minutes? 10 A. About ten minutes. 11 Q. Okay. 12 A. Ten, 15 minutes. 13 Q. Okay. And then at some point, you indicated 14 that you wanted to consult an attorney, right? 15 A. Yes. 16 Q. And then I left, right? 17 A. Yes. 18 MR. TEPFER: Okay. That's it. 19 MR. PALLES: Okay. Boy, let me think. All 20 right. For now, I'm going to reserve signature if 21 it's printed. 22 THE REPORTER: Okay. 23 MR. PALLES: Okay. Thank you, everybody. 24 MR. TEPFER: Thank you. 25 THE REPORTER: We're now off the record. It is	1 CERTIFICATE OF DIGITAL 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, after first 7 being duly sworn to testify the truth, the whole truth, 8 and nothing but the truth by KRYSTAL BARNES; and that 9 the said matter was recorded digitally by TALIA JACKSON 10 and then reduced to typewritten form under my direction, 11 and constitutes a true record of the transcript as 12 taken, all to the best of my skill and ability. I 13 certify that I am not a relative or employee of either 14 counsel and that I am in no way interested financially, 15 directly or indirectly, in this action. 16 17 18 KRYSTAL BARNES, 19 NOTARY 20 MY COMMISSION EXPIRES: 02/18/2026 21 22 23 TALIA JACKSON, 24 DIGITAL REPORTER 25 SUBMITTED ON: 11/21/2023
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