

Exhibit 58



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Transcript of Brian Bolton, Volume I

Date: May 18, 2020
Case: Watts Coordinated Cases

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1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF ILLINOIS
3 EASTERN DIVISION
4 - - - - - x
5 WATTS COORDINATED CASES. : Master Docket
6 : Case No. 19-cv-01717
7 - - - - - x
8
9
10 CONTAINS CONFIDENTIAL INFORMATION
11 Deposition of BRIAN BOLTON, VOLUME I
12 Held Virtually
13 Monday, May 18th, 2020
14 10:09 a.m. CST
15
16
17
18
19
20
21
22 Job No.: 290251
23 Pages: 1 - 154
24 Reported by: Paula Quetsch, CSR, RPR
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1 Deposition of BRIAN BOLTON, VOLUME I,
2 held virtually:
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9 Pursuant to notice before Paula Quetsch, a
10 Certified Shorthand Reporter, Registered Professional
11 Reporter, and a Notary Public in and for the State
12 of Illinois.
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24

1 A P P E A R A N C E S C O N T I N U E D
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1 APPEARANCES CONTINUED
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19
20
21
22
23
24

5

1 PROCEEDINGS
 2 (Witness sworn.)
 3 BRIAN BOLTON,
 4 having been duly sworn, testified as follows:
 5 EXAMINATION BY COUNSEL FOR THE PLAINTIFFS
 6 BY MS. KLEINHAUS:
 7 Q Good morning, Mr. Bolton.
 8 A Good morning. How are you?
 9 Q Good. My name is Theresa. I represent
 10 the Loevy plaintiffs in these coordinated
 11 proceedings.
 12 MS. KLEINHAUS: I'm just going to put a
 13 few things on the record related to the fact that
 14 we're doing this via Zoom.
 15 So by agreement of the parties this
 16 deposition is proceeding remotely, and the court
 17 reporter administered the oath remotely, all of
 18 counsel have been provided their exhibits several
 19 days in advance.
 20 This is just a reminder to everyone that
 21 the chat function on Zoom is part of the recording.
 22 Please don't use that to communicate with one
 23 another because a copy will be included in the
 24 recording for everybody. Okay? And if everybody

CONTENTS		6
EXAMINATION OF BRIAN BOLTON	PAGE	
By Ms. Kleinhaus	7	
EXHIBITS		8
(Attached to transcript.)		
BOLTON DEPOSITION EXHIBITS		
Exhibit 1 Hicks Exhibit	105	1 can put any devices other than the one you're
Exhibit 2 Johnson Exhibit	109	2 using on silent, that will make it easier for us
Exhibit 3 Harvey Exhibit	116	3 to take town this recording.
Exhibit 4 Carter Exhibit	119	4 Q Officer Bolton, how many times have you
Exhibit 5 Warren Exhibit	122	5 been deposed before?
Exhibit 6 McDonald Exhibit	124	6 A One time.
Exhibit 7 Pearson Exhibit	132	7 Q Okay. How long ago was that?
Exhibit 8 Dobbins Exhibit	139	8 A Several years ago.
Exhibit 9 Hunt Exhibit	140	9 Q Okay. Just to make things easier today,
Exhibit 10 Hicks Exhibit	141	10 I'm going to go over a few ground rules.
Exhibit 11 Glover Exhibit	143	11 So if I ask you a question and you don't
Exhibit 12 Coleman Exhibit	150	12 understand it, I need you to let me know that. If
Exhibit 13 Lomax Exhibit	152	13 you answer my question, I'm going to assume you
CONFIDENTIAL PORTION		14 understood my question. Is that fair?
135:13 to 138:23		15 A That's fair.

2 can put any devices other than the one you're
 3 using on silent, that will make it easier for us
 4 to take town this recording.
 5 Q Officer Bolton, how many times have you
 6 been deposed before?
 6 A One time.
 7 Q Okay. How long ago was that?
 8 A Several years ago.
 9 Q Okay. Just to make things easier today,
 10 I'm going to go over a few ground rules.
 11 So if I ask you a question and you don't
 12 understand it, I need you to let me know that. If
 13 you answer my question, I'm going to assume you
 14 understood my question. Is that fair?
 15 A That's fair.
 16 Q Do you have any medical conditions or are
 17 you taking any medications right now that would
 18 prevent you from providing accurate testimony today?
 19 A No.
 20 Q What did you do to prepare for today's
 21 deposition?
 22 A I spoke with my -- with my counsel, Brian
 23 Stefanich and Bill Bazarek, and I've read some
 24 reports.

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<p>1 Q Okay. Do you know if you were provided 2 the exhibits for today's deposition in advance? 3 A Yes. They're next to me. 4 Q Okay. And have you reviewed those, sir? 5 A I looked through them, yes. 6 Q Okay. Is anyone in the room with you 7 right now? 8 A No. 9 Q Are you currently employed by the Chicago 10 Police Department? 11 A Yes. 12 Q And what do you currently do for -- 13 A I'm sorry; your question cut out. 14 Q Okay. And that's a good reminder for all 15 of us. If you have any trouble hearing anything, 16 please speak up right away. 17 So what do you currently do for the 18 Chicago Police Department? 19 A Currently I'm assigned to administrative 20 duties. 21 Q And what do those administrative duties 22 consist of? 23 A I enter these blue statistical cards into 24 a computer. I then log those onto a log that gets</p>	<p>9 1 Q Okay. And outside of this time of the 2 stay at home order, where do you perform those 3 administrative duties? 4 A I perform them in the 17th District. 5 Q How long have you been on administrative 6 duties? 7 A Since November of 2017. 8 Q And why were you placed on administrative 9 duties? 10 A I was told that I was being put on 11 administrative duties because of the events that 12 have taken place in this case. 13 Q Okay. What were you told had taken place 14 in this case? 15 A That certain individuals were exonerated 16 for -- for different events. 17 Q Okay. And who told you that you were 18 being placed on administrative duty because 19 certain individuals were exonerated? 20 A Fred Waller. 21 Q And who is Fred Waller? 22 A Well, he was the chief of patrol at the time. 23 Q Did he tell you in person? 24 A No.</p>
<p>10 1 sent to a unit within the Chicago Police Department. 2 I also answer phones for the tactical office. 3 I keep a comp stamp book for my current 4 lieutenant on a daily basis. I go into our Clear 5 system and check the arrests for the 17th District 6 for any tactical arrests that were made, and if 7 any of those arrests are noteworthy, they get put 8 into this comp stat book. 9 I look -- the 17th District has a top-10 10 gang member list. I look throughout the city to 11 see if those top 10 gang members have been 12 arrested anywhere in the city. I make copies for 13 officers of any information that may come in that 14 needs to be copied and disseminated to them before 15 they leave for the street. 16 I also am the terrorism liaison officer 17 for the 17th District. I go to -- not only 18 because of the COVID, but there's monthly meetings 19 that I attend that go over different terrorist 20 incidents and maybe what to look out for here in 21 Chicago or the district that you work in, and then 22 I write a report to the commander on the -- 23 basically a summary of the meeting. 24 And that's what I do.</p>	<p>12 1 Q How did he tell you? 2 A Telephone. 3 Q Did he tell you anything else about why 4 you were being placed on administrative duty 5 besides that individuals had been exonerated? 6 A He told me that the superintendent at the 7 time was taking me off the street due to the 8 events that, I guess took place that day. I guess 9 that was the day that people were exonerated, so I 10 was being taken off the street. 11 Q Okay. Did he tell you anything else 12 besides that about why you were being taken off 13 the street? 14 A No. 15 Q Did you ask him any questions about why 16 you were being taken off the street? 17 A No. 18 Q Were you curious about why that was 19 happening to you? 20 A No. I understood. 21 Q Okay. Did you anticipate that you were 22 going to be taken off the street? 23 A No. 24 Q So the only information you were given was</p>

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<p>1 that there were exonerations that day, and you 2 understood from that you would be taken off the 3 street, and that was sufficient information for 4 you; correct?</p> <p>5 MR. NOLAND: Object to the form.</p> <p>6 THE COURT REPORTER: Who was that?</p> <p>7 MR. NOLAND: Sorry; Dan Noland.</p> <p>8 THE COURT REPORTER: Thought so. Thank you.</p> <p>9 MR. KOSOKO: Tess, as usual can we include 10 in the record that all of the objections by any of 11 the party defendants will stand as a standing 12 objection for all of the defendants?</p> <p>13 MS. KLEINHAUS: Sure.</p> <p>14 MR. KOSOKO: Thanks.</p> <p>15 Q Did you ever complain to anyone about 16 being placed on administrative duty?</p> <p>17 A No.</p> <p>18 Q Do you have any problem with having been 19 placed on administrative duty?</p> <p>20 A I have no problem.</p> <p>21 Q And are you happy doing the work that 22 you're doing in the 17th District now?</p> <p>23 A I'm neither happy or sad. Indifferent.</p> <p>24 Q Do you know whether you will -- do you</p>	13	<p>1 A I know that.</p> <p>2 Q And who else has been placed on 3 administrative duty?</p> <p>4 A I believe Robert Gonzalez, Doug Nichols, 5 Manny Leano, and I don't know all the other -- all 6 the other officers that are on the list.</p> <p>7 Q Have you spoken with any of them about the 8 fact that you're on administrative duty?</p> <p>9 A No.</p> <p>10 Q Other than Fred Waller and leaving out any 11 conversations you may have had with your 12 attorneys, have you spoken with anyone else about 13 the fact that you're on administrative duty?</p> <p>14 A My wife.</p> <p>15 Q Okay. Have you spoken -- other than 16 Fred Waller telling you you were being placed on 17 administrative duty, have you spoken with anyone 18 within the Chicago Police Department about why 19 you're on administrative duty?</p> <p>20 A Well, I work in an office, so my lieutenant 21 knows. Obviously, my commander knows, and at the 22 time that this took place that I was put on 23 administrative duty my -- I was on a team at the 24 time, so those members of that team know.</p>	15
<p>1 know whether you'll be able to work on the street 2 again?</p> <p>3 A I don't know that.</p> <p>4 Q Okay. Do you know whether that will ever 5 be considered or if there's any end date to your 6 administrative duty?</p> <p>7 A I don't know.</p> <p>8 Q Have you ever asked?</p> <p>9 A No.</p> <p>10 Q Were you ever told that the State's 11 Attorney's Office won't call you as a witness 12 anymore?</p> <p>13 MR. STEFANICH: I'll object to the 14 extent it calls for attorney-client 15 communications.</p> <p>16 Q Outside of any communications with your 17 attorneys, were you ever told that the State's 18 Attorney's Office will not call you as a witness 19 anymore?</p> <p>20 A I only know that information from my 21 attorneys.</p> <p>22 Q Do you know if any other former members of 23 the Watts 264 tactical team have been placed on 24 administrative duty?</p>	14	<p>1 Q Did you have conversations with your 2 lieutenant about why you were on administrative duty?</p> <p>3 A Yes.</p> <p>4 Q Okay. And what did you say to your 5 lieutenant, and what did he or she say to you?</p> <p>6 A Well, there's been multiple lieutenants. 7 So the current lieutenant that I work for, I told 8 her that I was on administrative duty and explained 9 to her that I was put on administrative duty by 10 the chief of patrol, and that's about it.</p> <p>11 Q Okay. Have you spoken to any of your 12 other lieutenants that you've had since November of 13 2017 about being placed on administrative duty?</p> <p>14 A Yes.</p> <p>15 Q Okay. Which other lieutenants have you 16 spoken with about it?</p> <p>17 A Her name was Michelle Rubino. She's a 18 commander.</p> <p>19 Q Okay. And what did that conversation 20 consist of?</p> <p>21 A The same as my current lieutenant, that I 22 informed her that I was going to be placed on 23 administrative duty, and that's what I told her, 24 by Fred Waller.</p>	16

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	17		19
1	Q Okay. Did she say anything to you about it?	1	A No.
2	A I don't recall.	2	Q When I say "Watts 264 tactical team," you
3	Q Okay. Other than your conversations with	3	understand the tactical team that I mean; correct?
4	your lieutenant and commander that you've already	4	A The 264 tactical team, I understand.
5	told us, who else within Chicago Police Department	5	Q When did you start working for Sergeant
6	have you talked to about why you were placed on	6	Watts as your sergeant?
7	administrative duty?	7	A I would say approximately -- I'd say 2002,
8	A Members of my former tac team.	8	2003, somewhere around there.
9	Q And who was on your former tac team?	9	Q Okay. And when did you join the Chicago
10	A Matt Rogus, Nick Urban, Rich Torak, Andrew	10	Police Department?
11	Thomas, Don Daniels, and John Sago.	11	A The 8th of June, 1998.
12	Q With an S?	12	Q Did you attend the Chicago Police Academy?
13	A Yes. S-a-g-o, I believe.	13	A I did.
14	Q Okay. And what conversations did you have	14	Q Okay. What were the dates that you went
15	15 with those members of your former tac team about	15	15 to the academy?
16	16 why you were placed on administrative duty?	16	A The academy, 8 June '98, and I graduated
17	A I informed them that I received a phone	17	from the academy, I believe it was October of 1998.
18	call from Fred Waller and that I would be having	18	Q Where were you assigned after you --
19	19 to not work to street because I was being placed	19	excuse me. Where were you assigned after you left
20	20 on administrative duty.	20	20 the academy?
21	Q Did you talk to them about the exonerations?	21	A I was assigned to the 15th District.
22	A No.	22	Q And what were your duties in the
23	Q Do you know why -- you said that when you	23	15th District?
24	24 were told by Fred Waller in November of 2017 it	24	A I was a patrolman.
	18		20
1	1 was because there had been exonerations of	1	Q What shift were you assigned to?
2	2 individuals. Do you know why those individuals	2	A Third watch.
3	3 were exonerated?	3	Q For what period of time did you work as a
4	A No.	4	patrolman in the 15th District?
5	Q Do you know what allegations they made	5	A A short time.
6	6 about Chicago police officers in order to be	6	Q Okay. What was the next assignment that
7	7 exonerated?	7	you had after that?
8	A No.	8	A I was assigned to the 17th District.
9	Q Did you ever try to find out why they were	9	Q And when were you first assigned to the
10	10 exonerated?	10	17th District?
11	A No.	11	A Somewhere around, I'd say November of 1998.
12	Q Who was the sergeant of your former tac	12	Q And what were your duties in the
13	team that you were on with Matt Rogus, Nick Urban,	13	17th District?
14	14 and the other individuals you just mentioned?	14	A I was a patrol officer.
15	A His name was Don Daniels.	15	Q Which shift did you work?
16	Q Don Daniels was the sergeant?	16	A Third watch.
17	A Yes.	17	Q How long did you work as a patrol officer
18	Q Okay. And what area or district was that	18	18 on the third watch in the 17th District?
19	19 out of?	19	A Approximately three months.
20	A 17th District.	20	Q What was the next assignment that you had?
21	Q In your current administrative role, do	21	A I was assigned to the traffic unit.
22	22 you work alongside or work as coworkers with	22	Q And where was that assignment? What district
23	23 anyone else who is a former member of the	23	23 or area? Do you know?
24	24 Watts 264 tactical team?	24	A It was -- it was not a district. It was a

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	25
1 Housing South, it was Robert Gonzalez.	
2 Q Had you ever met Robert Gonzalez before that?	
3 A I met him on one occasion.	
4 Q And when was that?	
5 A It was at a 25th District Christmas party.	
6 Q Who else was assigned to work for Sergeant	
7 Bennett on the third watch in Public Housing South	
8 besides you and Officer Gonzalez?	
9 A I don't remember everybody but I could	
10 list -- I can remember some names. Is that okay	
11 with you?	
12 Q Sure. Go ahead.	
13 A It was Shannon Spaulding, Franky Lane,	
14 Eddie Bryant, Beverly Cole, I believe her name	
15 was. There was another officer. I don't remember	
16 his first name. His last name was Trinidad. I	
17 don't recall his first name.	
18 Q How long were you assigned to work for	
19 Sergeant Bennett Public Housing South on the third	
20 watch?	
21 A A short time.	
22 Q Can you estimate about how long?	
23 A A couple months.	
24 Q Had you ever met Shannon Spaulding before	
26	
1 that?	
2 A No.	
3 Q Did you have an opportunity to get to know	
4 Shannon Spaulding during that time?	
5 A Yes.	
6 Q Okay. Did you have any opinion of her	
7 work as a police officer when she was working for	
8 Sergeant Bennett?	
9 A I had no opinion.	
10 Q What was the next assignment that you had?	
11 A My next assignment after Public Housing	
12 South?	
13 Q After Public Housing South with Sergeant	
14 Bennett on the third watch, what was your next	
15 assignment, please?	
16 A I was assigned to the tactical team in	
17 Public Housing South.	
18 Q And who was the sergeant for that team?	
19 A I can't remember his name at this time.	
20 Q It wasn't Sergeant Watts; correct?	
21 A No, it was not Sergeant Watts.	
22 Q Okay.	
23 A I'm drawing a blank right now on that --	
24 on that sergeant's name.	
27	
1 Q Do you recall the names of anyone who	
2 worked with you on that tactical team?	
3 A Yes.	
4 Q Who worked with you on that tactical team?	
5 A Matthew Cadman, Robert Gonzalez, James Davis,	
6 Carl Witherspoon, another officer whose his last	
7 name was Macon. I think his last name was Macon;	
8 his first name was Darren, if I remember. The	
9 sergeant's name was Henry Harris, I believe. Did	
10 I say Michael Spaargaren?	
11 Q You didn't.	
12 A Mike Spaargaren and I think Al Jones.	
13 Q Had you ever met Al Jones before you were	
14 on Sergeant Harris' tactical team?	
15 A Yes.	
16 Q And how did you meet Al Jones before that?	
17 A I met Al Jones while working on the	
18 vertical patrol team in uniform.	
19 Q And were you ever partners with Al Jones?	
20 A No.	
21 Q Had you ever met Michael Spaargaren before	
22 your work on Sergeant Harris' tactical team?	
23 A Yes.	
24 Q Where did you meet Officer Spaargaren?	
28	
1 A In Public Housing South while I was	
2 working on the vertical patrol team.	
3 Q Were you ever partnered with Officer	
4 Spaargaren?	
5 A No.	
6 Q Other than Officer Cadman, was there --	
7 who you had already mentioned had become a friend	
8 of yours at the academy, was there anyone else on	
9 Sergeant Harris' tactical team that you would	
10 consider a friend of yours?	
11 A I would consider Robert Gonzalez a friend	
12 of mine, and at that time I would consider -- at	
13 that time I would consider Michael Spaargaren a	
14 friend.	
15 Q Did you request to be part of the tactical	
16 team?	
17 A I was asked.	
18 Q Who asked you to be part of the tactical	
19 team?	
20 A Ernie Brown. He was the commander of	
21 Public Housing South.	
22 Q And how were your duties different when	
23 you became a member of a tactical team versus when	
24 you were on vertical patrol?	
	25
1 Housing South, it was Robert Gonzalez.	
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3 A I met him on one occasion.	
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18 vertical patrol team in uniform.	
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22 your work on Sergeant Harris' tactical team?	
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1 A In Public Housing South while I was	
2 working on the vertical patrol team.	
3 Q Were you ever partnered with Officer	
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5 A No.	
6 Q Other than Officer Cadman, was there --	
7 who you had already mentioned had become a friend	
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9 Sergeant Harris' tactical team that you would	
10 consider a friend of yours?	
11 A I would consider Robert Gonzalez a friend	
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13 that time I would consider Michael Spaargaren a	
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21 Public Housing South.	
22 Q And how were your duties different when	
23 you became a member of a tactical team versus when	
24 you were on vertical patrol?	

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	29		31
1 A The tactical team that I was placed on		1 team, had you met Sergeant Watts before?	
2 worked during the daytime hours. It was plain		2 A No.	
3 clothes. Those are the two main differences.		3 Q Did you request to move from Sergeant Harris'	
4 Q How long did you work as a member of		4 tactical team to starting at Watts tactical team?	
5 Sergeant Harris' tactical team?		5 A No.	
6 A It was a short term.		6 Q Were you just told that that move was	
7 Q Less than six months?		7 going to happen?	
8 A I would say somewhere around there.		8 A I believe Sergeant Harris was reassigned	
9 Q What was the next assignment that		9 to a different unit, if I'm not mistaken.	
10 you had?		10 Q Who was on the Watts tactical team when	
11 A From there it was the 2nd District.		11 you first joined?	
12 Q And what was your role when you were		12 A It was -- well, the -- the same members	
13 assigned to the 2nd District?		13 that were on the Henry Harris team.	
14 A I was on a tac team at the 2nd District.		14 Q So everyone from the Harris team came over	
15 Q Who was the sergeant of that tac team?		15 into the Watts team?	
16 A Ronald Watts.		16 A There was --	
17 Q So is that the Watts 264 team?		17 MR. STEFANICH: I'll object that you're	
18 A The 264 team.		18 mischaracterizing his prior testimony.	
19 Q If I refer to the Watts tactical team, do		19 You can answer, Officer Bolton.	
20 you know what I mean?		20 Q I may have misunderstood. Other than you,	
21 A That Ron Watts was the supervisor.		21 were there other people who were on the Harris	
22 Q Right. For what period of time were you		22 team who also were reassigned to the Watts team?	
23 on the Watts team?		23 MR. STEFANICH: Again, I'll object it's	
24 A I would say approximately, if you count		24 mischaracterizing his prior testimony.	
	30		32
1 Public Housing South and the 2nd District team, I		1 But you can answer, Officer Bolton.	
2 would say somewhere around 10 years.		2 A There was no reassigned. There was no	
3 Q So would it have been approximately		3 reassignment.	
4 2002 to 2012?		4 Q So what happened -- when Sergeant Harris	
5 A Somewhere around there. There was a break		5 was reassigned, what happened to you and the other	
6 in the supervision while at public housing.		6 people that had been on his team?	
7 Q Okay. At some point during that 10-year		7 A Nothing.	
8 period, Sergeant Watts was not the sergeant of		8 Q Did Watts become your sergeant?	
9 that tactical team?		9 A Yes.	
10 A Correct.		10 Q Okay. So Watts took over the team from	
11 Q And who -- who took over as the sergeant		11 Harris; is that right?	
12 then?		12 A Correct.	
13 A His name was Nate Silas.		13 Q Okay. Other than the change in who was	
14 Q Okay. And how long was Sergeant Silas in		14 the sergeant, were there any other changes to who	
15 charge of that tactical team?		15 was on the team?	
16 A Not very long. Only a few months.		16 A Not at that time.	
17 Q And was that towards the beginning of the		17 Q When you were on Watts tactical team, did	
18 time that you were on that team?		18 you have a partner?	
19 A Yes.		19 MR. STEFANICH: Objection to form. What	
20 Q Why was it that Sergeant Silas took over		20 time?	
21 as the sergeant of that team for a short period of		21 Q Well, let's start when you first were part	
22 a few months?		22 of Watts tactical team, did you have a partner?	
23 A I was never told.		23 A Yes.	
24 Q Before you became part of Watts tactical		24 Q Who was that?	

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	33		35
1	A Matthew Cadman.	1	Q Eventually, Officer Young left the Watts
2	Q How long was Officer Cadman your partner?	2	tactical team; right?
3	A I would say a few years.	3	A Yes.
4	Q And who was your next partner after Cadman?	4	Q Why did Officer Young leave the tactical
5	A It was Robert Gonzalez.	5	team?
6	Q And how long was he your partner?	6	A He was -- he went to be assigned at the
7	A Up until I left the 2nd District in 2013.	7	Chicago police headquarters. I think it's called
8	So several years.	8	the DOCK. I don't -- I don't really know what
9	Q Okay. And why did your partner switch	9	that stands for. I know that sounds pretty bad.
10	10 from Cadman to Gonzalez?	10	I don't know what it stands for, but it's a
11	A Officer Cadman told me that he wanted to	11	position in the headquarters.
12	work on the third watch in Public Housing South,	12	Q Did you ever hear that Officer Young was
13	13 and I did not want to go to the third watch. So	13	dumped from the tactical team?
14	14 he left and went to the third watch. At the same	14	A I don't believe he was dumped. From what --
15	15 time Michael Spaargaren took a leave of absence	15	15 my recollection is that he went to go work at the --
16	16 from the Chicago Police Department, and that's how	16	16 in the Chicago Police headquarters.
17	17 I wound up being partners with Robert Gonzalez.	17	Q You already mentioned that you considered
18	Q Had Gonzalez been partners with Spaargaren	18	18 Cadman a friend from the academy, and would you
19	19 previously?	19	19 consider him a friend as of today?
20	A Yes.	20	A No.
21	Q What were the other partner pairs on the	21	Q And why not?
22	22 Watts tactical team?	22	A I haven't spoken to Matt Cadman in years,
23	A Well, the team changed at different --	23	several years.
24	24 people would come and go. So I don't know what --	24	Q And why not?
	34		36
1	1 what -- I guess the team members would change, so	1	A I don't know.
2	2 I don't know -- do you want throughout the --	2	Q When was the last time that you spoke with
3	3 throughout the time in Public Housing South, ma'am?	3	Officer Cadman?
4	Q Let's start from when you -- when the --	4	A I have no idea. Years. Several years.
5	when you became part of the Watts tactical team.	5	Q Were you in contact with him after he went
6	Other than Officer Cadman, who were the other --	6	to the third watch in Public Housing South and you
7	I'm sorry -- strike that.	7	remained on the Watts tactical team?
8	When you first became part of the Watts	8	A I saw him at work.
9	tactical team, what were the partner pairs?	9	Q And were you friendly?
10	A Sure. It was myself and Officer Cadman;	10	A Yes.
11	11 it was Robert Gonzalez and Mike Spaargaren --	11	Q Before Cadman left the Watts tactical
12	12 pardon me -- it was Witherspoon and James Davis,	12	team, did you and he spend time together outside
13	13 and Darren and I can't remember the other -- the	13	13 of work?
14	14 other officer, and Al Jones and I believe it was	14	A Yes.
15	15 Kenny Young.	15	Q And after Officer Cadman left the Watts
16	Q Had you ever worked with Officer Young	16	tactical team, did you spend time together outside
17	17 before you were a member of the Watts tactical team?	17	17 of work?
18	A No.	18	A Not as often.
19	Q Do you know why Officer Witherspoon left	19	Q Okay. So you did see him sometimes
20	20 the Watts tactical team?	20	20 socially but not as much?
21	A I don't know why.	21	A Yes.
22	Q Do you know why Officer Davis left the	22	Q Is there a reason that your friendship
23	23 Watts tactical team?	23	23 with Officer Cadman ended?
24	A I don't know why.	24	A I have no reason.

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	37		39
1	Q Did it have anything to do with anything	1	A No.
2	that happened on the Watts tactical team?	2	Q And had you met John Rodriguez before you
3	A No.	3	worked with him on the tactical team?
4	Q You said earlier that you considered	4	A Yes.
5	Officer Spaargaren a friend at one point; correct?	5	Q Okay. And when had you met John Rodriguez?
6	A Yes.	6	A In the early '90s.
7	Q And was there a time that you would see	7	Q Okay. And what were the circumstances
8	him outside of work?	8	when you met him in the early '90s?
9	A Yes.	9	A John Rodriguez was dating my cousin.
10	Q And when was the last time that you were	10	Q And were you -- did you become friends
11	in contact with Officer Spaargaren?	11	11 with him at that time?
12	A Again, several years ago. I can't recall.	12	A Friends, no.
13	Q Were you in contact after he left the	13	Q Did you see him between the time that you
14	Watts tactical team?	14	14 encountered him in the early '90s when he was
15	A Yes.	15	15 dating your cousin and the two of you were on the
16	Q And did you spend time together outside of	16	16 Watts tactical team?
17	work after he left the Watts tactical team?	17	A Yes.
18	A Yes.	18	Q How often would you see him?
19	Q Do you consider Officer Spaargaren a	19	A He married my cousin. So probably -- often.
20	friend of yours today?	20	Q Okay. You would see him at family events?
21	A No.	21	A Yes.
22	Q And why not?	22	Q And that would be at least a few times a
23	A I don't talk to him.	23	23 year?
24	Q Is there any reason that you don't talk	24	A A few times a year.
	38		40
1	to him?	1	Q Do you know why he was not assigned a
2	A No reason.	2	partner on the Watts tactical team?
3	Q Okay. You told me earlier about the	3	A I don't know why.
4	partner pairs on the team when you first became	4	Q Did you become friends with Officers
5	part of the Watts tactical team, and a number of	5	Ridgell and Edwards?
6	the members of that tactical team left and other	6	A We had a working relationship. I wouldn't
7	people joined; right?	7	call it a friendship.
8	A Yes.	8	Q Okay. Did you spend time with either
9	Q Can you tell me the next set of partner	9	one of them outside of work?
10	pairs?	10	A Other than a police department function, no.
11	A Sure. It was Jerome Summers and Calvin	11	Q Okay. What about Officers Edwards and
12	Ridgell, and Daryl Edwards and Kallatt Mohammed,	12	12 Mohammed? Did you become friends with either
13	and then there was another officer, his name was	13	13 of them?
14	John Rodriguez. He didn't have a partner; he just	14	A No.
15	came by himself.	15	MR. STEFANICH: I think you just asked
16	Q Had you ever met Officer Summers before he	16	16 about Edwards.
17	17 was on the Watts tactical team with you?	17	MS. KLEINHAUS: I'm sorry; I meant to ask
18	A No.	18	18 about Summers.
19	Q Had you ever met Officer Ridgell before he	19	THE WITNESS: I knew what you meant. But
20	20 was on the Watts tactical team with you?	20	20 no, neither one of them I would consider a
21	A No.	21	21 friendship.
22	Q What about Edwards?	22	Q Okay. So Summers, Ridgell, Edwards,
23	A No.	23	23 Mohammed were friendly relationships at work; is
24	Q What about Officer Mohammed?	24	24 that fair to say?

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	41		43
1	A I would say working relationship.	1	Q When was the last time that you were in
2	Q Okay. And am I right that you weren't	2	contact with Officer Young?
3	friends with any of those four individuals outside	3	A Several years ago I saw Kenny Young at, I
4	of work?	4	believe it was a Chicago Bulls game. He works
5	A Correct.	5	part time there.
6	Q Okay. What's the next set of partner pairs?	6	Q Okay. And was that just a friendly
7	A In Unit 715 or the 2nd District?	7	conversation?
8	Q Well, during the time that Watts was your	8	A It wasn't even a conversation. It was a
9	sergeant.	9	hug and an introduction to my wife -- girlfriend
10	A Okay. So after Unit 715, it was	10	10 at the time which became my wife.
11	disbanded, and then we went to the 2nd District.	11	Q Did you become friends with Officer Nichols?
12	During the -- when we first got to the 2nd District,	12	A Yes.
13	it was myself and Robert Gonzalez; it was Alvin	13	Q And do you consider him a friend today?
14	Jones and Kenny Young; it was Doug Nichols and	14	A Yes.
15	Manny Leano, and Elsworth Smith and I forgot the	15	Q When you were part of the Watts tactical
16	last person's name. It's a female. I forgot	16	team, did you spend time with Officer Nichols
17	her name.	17	outside of work?
18	Q Would it be Monica Lewis?	18	A Yes.
19	A No.	19	Q And what types of things would you two do
20	Q Cynthia?	20	20 together?
21	A Cynthia Cornez or -- Cynthia. Cynthia	21	A We played 16-inch softball together. We
22	Cornez, Cor -- something like that. Her name was	22	would go out to a local bar afterwards, out to
23	Cynthia.	23	23 dinner with him and his wife, that type of activity.
24	Q Okay. Did you become friends with Officer	24	Q When was the last time that you were in
	42		44
1	Jones?	1	1 contact with Officer Nichols?
2	A I would say that we had a working	2	A I believe it was about two weeks ago.
3	relationship.	3	Q Did you speak with Officer Nichols about
4	Q Did you spend any time together outside	4	4 your deposition today?
5	of work?	5	A No.
6	A At police functions.	6	Q Have you had any conversation with Officer
7	Q Anything besides police functions?	7	Nichols about these lawsuits outside the presence
8	A I believe his 40th birthday party.	8	8 of your attorneys?
9	Q When was the last time that you were in	9	A No.
10	10 contact with Officer Jones?	10	Q Did you know Officer Nichols before you
11	A It was around the time of the birth of my	11	11 were on the Watts tactical team with him?
12	first child. My daughter will be 5 years old	12	A No.
13	in June.	13	Q Did you become friends with Officer Leano
14	Q So about five years ago?	14	14 while you were a member of the Watts tactical team?
15	A Around there, yes.	15	A Yes.
16	Q And what was the occasion that you were	16	Q And would the two of you spend time
17	17 communicating with Officer Jones?	17	17 together outside of work?
18	A He called me and he told me that he found	18	A Not frequently. Occasionally.
19	out that I had a child, and it was a congratulatory	19	Q And what types of things would the two of
20	phone call.	20	20 you do together outside of work?
21	Q Have you ever spoken with Officer Jones	21	A We went to a bar, had drinks.
22	22 about these coordinated lawsuits outside of the	22	Q And do you consider Officer Leano a friend
23	23 presence of your attorneys?	23	23 of yours today?
24	A No.	24	A I do.

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	45		47
1	Q When was the last time that you spoke with	1	Q Were you told why?
2	Officer Leano?	2	A No.
3	A I would say somewhere around in the	3	Q What conversation did you have with
4	wintertime. Somewhere around wintertime.	4	Officer Mohammed that day?
5	Q Have you spoken with Officer Leano about	5	A I called him in the evening after I got
6	the coordinated lawsuits outside the presence of	6	home from work and spoke with him and asked if he
7	your attorneys?	7	was okay.
8	A No.	8	Q And what did he say?
9	Q Have you and Officer Leano ever talked	9	A He said he was okay.
10	about the fact that you're both on administrative	10	Q Did the two of you talk about why he had
11	leave?	11	been stripped of his police powers?
12	A We never talk about it.	12	A I asked him, I go, "What did" -- I asked
13	Q Why not?	13	him, "What did you do?" He then said, "I don't
14	A I don't think it's a pleasant thing to	14	know. They won't tell me."
15	talk about.	15	Q So you weren't curious about why he had
16	Q And why is it unpleasant?	16	been stripped?
17	A I just think there's other things to talk	17	A I was more -- I called to console him, to
18	about, our families and things of this nature, so	18	make sure that he was okay, but then I asked what
19	that's what we talk about.	19	he did.
20	Q So the two of you have never commiserated	20	Q And did you ever find out what he did?
21	about being on administrative leave?	21	A Yes.
22	A Not that I can recall.	22	Q And what was that?
23	Q What about you and Officer Nichols? Have	23	A That he -- that he was charged with theft
24	the two of you ever talked about the fact that	24	of government funds.
	46		48
1	you're both on administrative leave?	1	Q And how did you find that out?
2	A No.	2	A Well, I knew that he was arrested through
3	Q Do you know why Officer Nichols is on	3	the -- through the media, and I believe my
4	administrative leave?	4	attorneys told me -- what the charge was.
5	A Because he worked on the Ron Watts	5	Q Okay. At the time that Officer Mohammed
6	tactical team.	6	was arrested, did anyone from the Chicago Police
7	Q Okay. And do you know why Officer Leano	7	Department talk to you about his arrest or why he
8	is on administrative leave?	8	was stripped of his police powers?
9	A Same reason.	9	A No one from the police department, no.
10	Q When was the last time that you were in	10	Q Okay. Did anyone from the police
11	touch with Officer Mohammed?	11	department have any questions for you about things
12	A It was the day that he was stripped of his	12	13 that had happened on the Watts 264 team at the
13	police powers. I don't know the date.	13	time that Mohammed was arrested?
14	Q Would it have been -- do you know	14	A No.
15	approximately when it would have been?	15	Q What's the next set of partner pairs while
16	A I don't know, ma'am.	16	16 you were on the Watts tactical team?
17	Q Okay. How did you find out that he had	17	A It was -- if I recall correctly, it was
18	been stripped of his police powers?	18	Lamonica Lewis, and I believe she worked with
19	A I was told.	19	Kallatt. Then there was another guy that came.
20	Q Who told you that?	20	Miguel Cabrales came to the team, and I think
21	A At the time his name was Sergeant Dave	21	21 that's -- I think that's it.
22	Keating.	22	Q Did you ever become friends with Officer
23	Q And what were you told?	23	Smith?
24	A That was stripped.	24	A No.

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	49		51
1	Q When was the last time you were in contact	1	Q When have you done that?
2	with Officer Smith?	2	A Throughout my career. It would be very
3	A I have been in the 17th District now	3	difficult for me to give you the -- the years. It
4	eight years. So over eight years.	4	would be just easier if I just told you what I've
5	Q Did you become friends with Lamonica Lewis?	5	attempted to do --
6	A No.	6	Q Sure.
7	Q As of today, would you consider Officer	7	A -- rather than give the year that I
8	Gonzalez a friend?	8	attempted to do it.
9	A Yes.	9	Q That's fine.
10	Q And during the time that you were on the	10	A Is that okay with you?
11	Watts tactical team, did you spend time with	11	Q Sure.
12	Officer Gonzalez outside of work?	12	A Sure. So I have taken -- I believe I've
13	A I did.	13	taken two detective exams, one sergeant exam,
14	Q And what types of things would the two of	14	two K9 exams. I attempted to go to the medical
15	you do together?	15	integrity unit. And those would be the -- I guess
16	A We would go to rock concerts; we'd go to	16	the promotional things that I've attempted to do
17	bars, things like that.	17	in my career.
18	Q Okay. And when was the last time that you	18	Q And were any of those during the time that
19	were in contact with Officer Gonzalez?	19	you were on the Watts tactical team?
20	A Early April of this year.	20	A The K9 exam I believe I was on the team,
21	Q Have you spoken with Officer Gonzalez	21	and I believe the -- a sergeant's test was while I
22	about the coordinated lawsuits outside the	22	was on the team, and possibly detective. I'm
23	presence of your attorneys?	23	not sure.
24	A No.	24	Q Okay. And were you successful in either
	50		52
1	Q Do you know whether or not Officer	1	of the detective exams?
2	Gonzalez is on administrative duty?	2	A No.
3	A I do.	3	Q And what about the K9 exams?
4	Q And have the two of you ever talked about it?	4	A I was -- I was never assigned to the K9 unit.
5	A Yes, we talk about what we do at work.	5	Q Okay.
6	Q Have you ever talked about why you were on	6	A I passed the -- I passed the test. I was
7	administrative duty?	7	not chosen.
8	A No.	8	Q Okay. Do you know how you did on the
9	Q And why not?	9	sergeant exam?
10	A I think we both know the reason. We both	10	A I don't remember. I didn't do well enough
11	worked on the same tactical team, so I think we both	11	to move on to the next portion of the exam.
12	know the reason why we are on administrative duty.	12	Q Okay. And what about the medical integrity
13	Q What is your understanding of the reasons?	13	unit? Do you know how you did on that exam?
14	When you say you were both on the same tactical team	14	A It wasn't an exam, ma'am; it was just kind
15	and that's the reason you're on administrative	15	of a résumé. They told me that I wasn't qualified.
16	duty, tell me what you mean by that.	16	Q Other than those -- well, strike that,
17	A I mean that I was -- that I was told that	17	please.
18	I was being placed on administrative duty and	18	During the time that you were on the Watts
19	taken off the street because of the exonerations	19	tactical team, did you ever ask to be moved to a
20	that occurred and that I would be inside.	20	new assignment?
21	Q Have you ever applied for any promotions	21	A I never -- well, I attempted to go to work
22	or taken any tests for any promotions within the	22	at O'Hare Airport.
23	Chicago Police Department?	23	Q Okay.
24	A Yes.	24	A The air -- whatever unit that is. I don't

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	53		55
1 know the unit.		1 A I was asked to go to a different tac team	
2 Q Approximately when during your 10 years on		2 within the 17th District.	
3 that tactical team did you request to go to the		3 Q And who was the sergeant for that second	
4 airport unit?		4 tac team at the 17th District?	
5 A I can't give you an exact date. Not early		5 A His name was Don Daniels.	
6 on. Probably somewhere in the middle of that		6 Q And is that the tac team that you were on	
7 tenure.		7 when you were asked -- made to go to administrative	
8 Q And why were you interested in going to		8 leave?	
9 the airport unit?		9 A Yes.	
10 A It's close to my house, and it's quite a		10 Q When you were assigned to the Watts	
11 coveted thing to go work there.		11 tactical team, where would you report to when you	
12 Q After your time on the Watts tactical team,		12 were at the beginning of your shift?	
13 what was your next assignment?		13 A Well, are you talking during the 715 years	
14 A I transferred to the 17th District.		14 or the 264 years, ma'am?	
15 MR. STEFANICH: Hey, Tess, can we take a		15 Q Let's start with the 715 years, please.	
16 couple-minute break?		16 A Okay. The 715 years the police -- well,	
17 MS. KLEINHAUS: Sure. If everybody can		17 the station was at 38th and Cottage Grove.	
18 turn off your video and mute yourself, we'll come		18 Q And for what period of time was it that	
19 back in five minutes. Okay? I'm going to stop		19 you were reporting to the station at 38th and	
20 the recording now.		20 Cottage Grove?	
21 (Recess taken, 11:21 a.m. to 11:32 a.m.)		21 A From the time that I got there in the --	
22 BY MS. KLEINHAUS:		22 you know, when I was in vertical patrol in uniform	
23 Q Sir, before the break I had asked you		23 until the unit was disbanded.	
24 about your assignment after the Watts tactical		24 Q When was the unit disbanded?	
	54		56
1 team, and you said that you were assigned to the		1 A I think it was around '05, I think.	
2 17th District; is that right?		2 Q And when you would report for the 264 team,	
3 A Yes, ma'am.		3 where would you go to report at the beginning of	
4 Q And what was your assignment at the		4 your shift?	
5 17th District?		5 A The station was at 51st and Wentworth.	
6 A When I originally got to the		6 Q And where -- where would you go within	
7 17th District, I was assigned to uniformed patrol.		7 51st and Wentworth, to a tactical room or some	
8 Within three months I was then placed on a tac team.		8 other part?	
9 Q And what was the time frame that you were		9 A Yeah, the tac office is in the -- it would	
10 on that tac team?		10 be the south end of the building.	
11 A I was on that tac team from say 2013 to		11 Q And what was -- can you describe the	
12 2016 or '17. Somewhere around there.		12 layout or what was inside of the tac office?	
13 Q Okay. And who was the sergeant for that		13 A Sure. There were multiple file cabinets	
14 tac team?		14 within the room. There was a bench along the --	
15 A That team had multiple sergeants. When I		15 along the wall, and there were three rows of desks	
16 first got there it was -- when I first got to that		16 that were put together, and there were computers --	
17 tac team it was Tom Beasley. And then from Tom		17 the computers on those desks.	
18 Beasley it became Mike Nowacki, and then from Mike		18 Q And how many desks in each room?	
19 Nowacki it became Bill Grassi.		19 A I would -- I don't know the exact amount.	
20 Q And is that the tac team that you were on		20 The middle row did not have -- the middle row did	
21 when you were placed on administrative duty?		21 not have computers, but the front -- the first row	
22 A No, ma'am.		22 and the last row had computers. I can't tell you	
23 Q So what was the next assignment you had		23 how many.	
24 after that 17th District tac team?		24 Q Okay. Would it be like about a dozen desks?	

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1 Does that sound right?
 2 **A I don't know.**
 3 Q Okay. Did Sergeant Watts have an assigned
 4 desk or an assigned area within the tac office?
 5 **A Yes. There's the tac office and then**
 6 **there's -- there was a doorway, and then like**
 7 **administrative tactical personnel were in that**
 8 **other -- in that side kind of office that was on**
 9 **the -- it would be the east side of the building.**
 10 Q And did Watts have an office in that area?
 11 **A It wasn't -- it wasn't his office. There**
 12 **was a sergeant's office. It wasn't assigned to**
 13 **him. It was for all supervisors to use. And then**
 14 **there was a lieutenants' office, which that was**
 15 **assigned to the lieutenant. And there was -- then**
 16 **a common area where the -- pardon me -- the tac**
 17 **secretary would be at her desk.**
 18 Q At the beginning of your shift when you
 19 were part of the Watts tact team, would you have
 20 any sort of roll call or meeting?
 21 **A In 715 and in the 2nd District we would**
 22 **have roll call.**
 23 Q Okay. Would that be led by Sergeant Watts?
 24 **A It would be led by -- well, in 715, it**

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1 **year there would be different events, or things**
 2 **would happen within the city, and they would take**
 3 **us out of our plain clothes, and they would put us**
 4 **in our uniforms. You know, certain things would**
 5 **happen within the city where they would need more**
 6 **police presence, so they would put us in our**
 7 **uniforms. So I wouldn't say always.**
 8 Q Okay. When you were in Ida B. Wells, were
 9 you usually in plain clothes or usually in
 10 uniform?
 11 **A While on the tactical team or -- different**
 12 **times here. So yes, while on the tactical team,**
 13 **plain clothes.**
 14 Q And would Sergeant Watts also be in plain
 15 clothes when he was out with the tactical team?
 16 **A Yes.**
 17 Q Would Watts typically go out with the team
 18 when you-all would go out on the street or go to
 19 the housing projects?
 20 MR. STEFANICH: Objection.
 21 MS. KLEINHAUS: Go ahead, sir.
 22 **A I would say it would vary. You know, it**
 23 **would vary.**
 24 Q Okay. Do you know that there were times

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 1 **depends. Sometimes the lieutenant would do the**
 2 **roll call; sometimes Ron would do the roll call.**
 3 **Same thing within the 2nd District; sometimes if**
 4 **the lieutenant was there, he would conduct the**
 5 **roll call, and if not, Ron or another supervisor**
 6 **there at the time would conduct the roll call.**
 7 **And there were also occasions when there was no**
 8 **roll call, either.**
 9 Q Okay. On the occasions that there was no
 10 roll call, what would you start out your shift
 11 doing then?
 12 **A Talking amongst -- are you talking about**
 13 **on the street or within the office?**
 14 Q Well, either -- I think I'm just trying to
 15 understand a typical shift. Am I right that a
 16 typical shift would start with the roll call?
 17 **A A typical shift would -- you would come in**
 18 **and, you know, go on the computer, check your**
 19 **court, shoot the breeze with other people within**
 20 **the office. Then a roll call would happen, and**
 21 **then you would go on the street.**
 22 Q And were you always in plain clothes while
 23 you were part of the Watts tactical team?
 24 **A I wouldn't say always. Throughout the**

1 **that he went out with the team?**
 2 **A Yes.**
 3 Q And would he typically join one of the
 4 other cars like make it a three-man car or go out
 5 by himself?
 6 **A He would go out with other -- he would**
 7 **make a three-man car.**
 8 Q And did he ever go out with you and your
 9 partner to make a three-man car?
 10 **A Hardly ever.**
 11 Q And do you know why he hardly ever went
 12 with you and your partner?
 13 **A I don't know why.**
 14 Q Describe what Sergeant Watts was like as a
 15 supervisor.
 16 **A I would say he was fair, you know, never --**
 17 **just I would say fair.**
 18 Q Okay. Was he responsible for doing your
 19 performance reviews?
 20 **A Yes.**
 21 Q Okay. Do you recall what feedback he gave
 22 you about your performance as part of the tactical
 23 team?
 24 **A I don't know. I don't recall the**

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<p>1 performance review during -- during that time.</p> <p>2 Q Okay. You don't remember any performance</p> <p>3 reviews during that time?</p> <p>4 A No.</p> <p>5 Q Do you recall generally whether you thought</p> <p>6 he was pleased by your performance or satisfied</p> <p>7 with your performance or not?</p> <p>8 A I was never -- I was never told that my</p> <p>9 performance was good or bad.</p> <p>10 Q You were never told anything either way?</p> <p>11 A He -- I never was told either way.</p> <p>12 Q Okay. Did you have any impression of how</p> <p>13 you were doing compared to other people on the team?</p> <p>14 A I'm sorry, something -- I missed that --</p> <p>15 what you said.</p> <p>16 Q Sure. I'll repeat it. Did you have an</p> <p>17 impression of how you were doing as compared to</p> <p>18 other members of the team?</p> <p>19 A I thought I was doing fine.</p> <p>20 Q Were there members of the team that you</p> <p>21 knew Watts was especially pleased with or were</p> <p>22 favorites of his?</p> <p>23 MR. STEFANICH: Objection to form.</p> <p>24 MS. KLEINHAUS: Go ahead, sir.</p>	<p>61</p> <p>1 keeps cutting out at certain parts of the question</p> <p>2 that you're asking me.</p> <p>3 Q Okay. I will not increase my volume then.</p> <p>4 A You don't have to.</p> <p>5 Q But just let us know when it's not coming</p> <p>6 through clearly.</p> <p>7 A Right. Completely understand, ma'am. Can</p> <p>8 you ask it again?</p> <p>9 Q Did you spend time with Sergeant Watts</p> <p>10 outside of work?</p> <p>11 A No, other than a police function or, I</p> <p>12 guess a milestone event, a wedding or birthday.</p> <p>13 That was it.</p> <p>14 Q Did Sergeant Watts ever attend any wedding,</p> <p>15 or birthdays, or milestone events in your family?</p> <p>16 A He was at my stepgrandmother's funeral. I</p> <p>17 don't know if that's a pleasant event but it's an</p> <p>18 event.</p> <p>19 Q It's a milestone. Okay. Did you ever</p> <p>20 attend any weddings or other milestone events in</p> <p>21 Sergeant Watts' family?</p> <p>22 A No.</p> <p>23 Q Other than Jones and Mohammed, do you know</p> <p>24 other members of the team that Watts spent time</p>
<p>1 A Favorites, yes. But as performance, I'm</p> <p>2 not sure about that. But favorites, yes.</p> <p>3 Q Okay. Who did you believe were his</p> <p>4 favorites?</p> <p>5 A People that he had a -- more of a</p> <p>6 friendship relationship with.</p> <p>7 Q Who was that?</p> <p>8 A Alvin Jones, Kallatt Mohammed.</p> <p>9 Q Anyone else?</p> <p>10 A I would say that they were -- those were</p> <p>11 his friends.</p> <p>12 Q Did he spend time with Jones and Mohammed</p> <p>13 outside of work?</p> <p>14 MR. STEFANICH: Objection; foundation.</p> <p>15 You can answer.</p> <p>16 A Yes.</p> <p>17 Q Did you ever -- sorry. I just heard --</p> <p>18 A It's like an in-and-out type of thing.</p> <p>19 Q Sure. I'll keep my voice up, and if you</p> <p>20 can't hear anything --</p> <p>21 A It's not your voice. It just keeps</p> <p>22 cutting out. The volume is fine. It's just like</p> <p>23 I'm only getting a word, and a pause, and like</p> <p>24 five other words. So I can hear your voice. It</p>	<p>62</p> <p>1 with outside of work?</p> <p>2 A I believe that he hung out with Lamonica</p> <p>3 Lewis occasionally.</p> <p>4 Q Anyone else?</p> <p>5 A I'd say possibly Elsworth Smith.</p> <p>6 Q At some point you learned that Sergeant</p> <p>7 Watts had been arrested; correct?</p> <p>8 A Yes.</p> <p>9 Q How did you learn that?</p> <p>10 A WGN news.</p> <p>11 Q Did anyone --</p> <p>12 A Television.</p> <p>13 Q Did anyone from the Chicago Police</p> <p>14 Department ever tell you that Sergeant Watts had</p> <p>15 been arrested?</p> <p>16 A No.</p> <p>17 Q Did anyone from the Chicago Police</p> <p>18 Department ever come to you and ask you any</p> <p>19 questions about what had been happening on</p> <p>20 Sergeant Watts tactical team?</p> <p>21 A No.</p> <p>22 Q Were you surprised when you heard that</p> <p>23 Sergeant Watts had been arrested?</p> <p>24 A Yes.</p>

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	65		67
1 Q When was the last time that you spoke with 2 Ronald Watts?		1 Echevarria is?	
3 A The last time that I spoke with him was 4 when he left -- he went on vacation prior to him 5 being arrested. So somewhere around there.		2 A I don't know who that is.	
6 Q And what was that conversation about, just 7 that he was going on vacation?		3 Q Are you aware that Officer Spaargaren alleges 4 that he was retaliated against for reporting 5 misconduct by Watts?	
8 A I believe I told him to have a nice trip 9 and that was it.		6 A I'm sorry. Could you repeat that again?	
10 Q After Watts and Mohammed were arrested, 11 did you have any conversation with any other 12 members of the Watts tactical team about those 13 arrests?		7 MS. KLEINHAUS: Sure. Paula, could you 8 read it back, please? 9 (Pending question read.)	
14 A I can't recall any specific conversations 15 that we had in the tac team or tac office. I 16 remember Sergeant Keating coming in and saying how 17 terrible it was and how they're never going to be 18 the police again. I remember that, but as far as 19 a one-on-one conversation amongst my teammates at 20 that time, I don't remember a conversation.		10 A I'm not aware of that.	
21 Q Okay. You don't have any recollection of 22 any of you discussing that your supervisor had 23 been arrested for misconduct?		11 Q Have you ever reviewed an affidavit or 12 sworn statement by Officer Spaargaren about 13 misconduct by Sergeant Watts?	
24 A I don't remember any conversation like that.		14 A I don't remember seeing an affidavit.	
	66	15 Q I'll represent to you that Officer Spaargaren 16 has provided an affidavit in support of Shannon 17 Spaulding's lawsuit alleging that he was 18 retaliated against for reporting misconduct by 19 Watts. Given that, would you have any reason to 20 doubt the word of Officer Spaargaren about that?	
1 Q Before Watts was arrested, had you ever 2 heard any rumors or allegations of misconduct by 3 Watts?		21 MR. NOLAND: Object to the form, 22 foundation.	
4 A No.		23 MR. BAZAREK: I'll add further objection. 24 I think it mischaracterize the whole of that	
5 Q Are you aware of Shannon Spaulding's 6 allegations about the Chicago Police Department 7 related to the Watts team?			68
8 A Other than what I saw on television, I 9 don't know the exact allegation other than briefly 10 what I saw on the news.		1 Q affidavit.	
11 Q What did you see briefly on the news?		2 MS. KLEINHAUS: Okay. Well, we're not	
12 A That she is suing the police department, 13 that -- that's what I know, that she was suing the 14 police department.		3 going to do double defense of this deposition but	
15 Q Do you know what the basis was for her 16 lawsuit?		4 that's duly noted.	
17 A If I recall, I think that she went to 18 somebody to -- she went to somebody and wasn't -- 19 and wasn't taken seriously, and they blew her off 20 and -- and she was then reassigned, and that's -- 21 that was the basis of what I heard about her 22 lawsuit. I don't know verbatim what the lawsuit 23 is, but that's what I recall.		5 MR. BAZAREK: We're allowed to add if it's	
24 Q Okay. And do you know who Danny		6 not covered by the first objection. So it's not	
		7 like we're objecting left and right throughout	
		8 this dep. So that's all that is.	
		9 MS. KLEINHAUS: Let's handle it on the	
		10 break.	
		11 Go ahead, sir.	
		12 A I'm unaware of any retaliatory anything by 13 Mike Spaargaren.	
		14 Q Okay. Do you have any reason to doubt the	
		15 credibility of Michael Spaargaren?	
		16 MR. BAZAREK: Object to the form of the	
		17 question, foundation, vague, ambiguous.	
		18 A I have no reason to believe that Mike 19 Spaargaren is a liar or anything like that.	
		20 MS. KLEINHAUS: Okay. Let's go off the	
		21 record for a second. We're going to stop recording.	
		22 (Recess taken, 11:57 a.m. to 11:57 a.m.)	
		23 BY MS. KLEINHAUS:	
		24 Q Sir, have you been interviewed by COPA?	

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1 **A I have.**
 2 Q How many times?
 3 **A One time.**
 4 Q And what was the subject matter of that
 5 interview?
 6 **A The subject matter was an arrest of Ben
 Baker.**
 7 Q I want to talk to you about the training
 8 that you received about report writing as a member
 9 of the Chicago Police Department.
 11 Am I correct that report writing was
 12 covered at the academy?
 13 **A Yes.**
 14 Q Okay. And were you given any training
 15 about who was supposed to write up the narrative
 16 of the arrest report?
 17 **A I don't recall them ever saying who needs
 18 to -- needs to write the narrative of an arrest
 19 report. I don't remember that.**
 20 Q Okay. Were you given any training about
 21 which officers to include -- to list on an arrest
 22 report?
 23 **A I -- I don't recall that.**
 24 Q Are you familiar with the terms first

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1 is why it's important to write up the events soon
 2 after they happen; right?
 3 **A I think it's just the way you should write
 4 what -- write on the report to recall when you go
 5 to court, things of that nature.**
 6 Q When you were working as a tactical -- as
 7 a member of the Watts tactical team, you knew that
 8 you would be relying on -- and other members of
 9 your team would be relying on the police reports
 10 that you-all wrote up, right, when you would go to
 11 court and testify?
 12 **A Yes.**
 13 Q Did you ever testify in court related to
 14 an arrest that you were part of as a member of the
 15 Watts tactical team?
 16 **A Go ahead. Could you resay that?**
 17 Q Sure. Did you ever testify in court about
 18 an arrest you made while you were part of the
 19 Watts tactical team?
 20 **A Yes. I made arrests while I was on the
 21 tactical team, so yes.**
 22 Q Did you ever have to testify in court as a
 23 result of those arrests that you made as part of
 24 the Watts tactical team?

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1 arresting officer and second arresting officer?
 2 **A Yes.**
 3 Q Were you provided any training about who
 4 should be listed as the first arresting officer or
 5 the second arresting officer?
 6 **A I'm sure I was.**
 7 Q What is your understanding of who is
 8 supposed to be listed as the first arresting
 9 officer and the second arresting officer?
 10 **A My understanding of the first arresting
 11 officer and the second arresting officer are the
 12 officers that are going to court on that subject
 13 or place that person under arrest. That's my
 14 understanding.**
 15 Q Okay. And you would expect the first
 16 arresting officer and second arresting officer to
 17 have some personal knowledge related to the
 18 arrest; correct?
 19 **A I would say they should have -- it all
 20 depends on the length of time from when that
 21 arrest was. You know, obviously, you know,
 22 people's memories fade through time, and that's
 23 what I would say to that.**
 24 Q People's memories fade through time, which

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1 **A Yes.**
 2 Q How many times did you testify related to
 3 an arrest you made as part of the tactical team?
 4 **A I can't give a number, ma'am.**
 5 Q More than a dozen times?
 6 **A I'd say a lot.**
 7 Q Do you remember any cases or any arrests
 8 that came out of your time on the Watts tactical
 9 team where you testified in court?
 10 **A No.**
 11 Q What would you do to prepare to testify in
 12 court about an arrest you made on the tactical team?
 13 **A Well, if I was in Box 1, if I was going to
 14 go court, and I was going to be the officer
 15 testifying in court, I would obviously be summoned
 16 to go to court and review the report while I was
 17 in the State's Attorney room or where the State's
 18 Attorneys go over the cases.**
 19 Q Okay. So you'd prepare with the prosecutor;
 20 right?
 21 **A Yes.**
 22 Q I think if I understood you correctly, if
 23 you were in Box 1, that typically is the officer
 24 who writes up the report; right?

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<p>1 A It could -- the officer in Box 1 or Box 2 2 are usually the typical officers that are writing 3 the reports.</p> <p>4 Q And those are the officers who typically 5 go to court; right?</p> <p>6 A Yes.</p> <p>7 Q Were you ever provided any training on 8 testifying in court?</p> <p>9 A It's been over 22 years, ma'am, so I am 10 assuming that that probably took place. I can't 11 remember.</p> <p>12 Q When you would prepare to testify with the 13 prosecutor, would other police officers listed on 14 the report for the arrest also be present for that 15 prep session?</p> <p>16 A Sometimes, yes.</p> <p>17 Q When you were a member of the Watts 18 tactical team, how would you communicate with 19 other members of the team throughout your shift? 20 Would that be like your radio, or cell phones, or 21 some other mode of communication?</p> <p>22 A Radio.</p> <p>23 Q Did you all have each other's cell phone 24 numbers?</p>	<p>73</p> <p>1 A No.</p> <p>2 MR. STEFANICH: Just object to the term 3 "confidential informant" as vague and ambiguous.</p> <p>4 Q Okay. Did you have anyone who was a 5 registered confidential informant who gave you 6 information?</p> <p>7 A No.</p> <p>8 Q Did you ever have citizens who wished to 9 remain anonymous who gave you information?</p> <p>10 A That would happen very rarely, but, yes, 11 that would happen. But not often.</p> <p>12 Q And do you recall any of the people from 13 Ida B. Wells who gave you information?</p> <p>14 A No.</p> <p>15 Q Do you know if other members of the team 16 received information from registered confidential 17 informants?</p> <p>18 A Not that I know of. Registered -- I don't 19 know of anyone who had registered confidential 20 informants.</p> <p>21 Q Okay. Do you know of anyone who received 22 information from residents at Ida B. Wells?</p> <p>23 A Doug Nichols would receive information, 24 you know.</p>
<p>1 A Yes.</p> <p>2 Q And then would you sometimes communicate 3 that way during a shift?</p> <p>4 A Sometimes, yes.</p> <p>5 Q Did any members of the Watts tactical team 6 smoke cigars?</p> <p>7 A Yes.</p> <p>8 Q Who was that?</p> <p>9 A Al Jones smoked cigars; Elsworth Smith 10 smoked cigars; Lamonica smoked cigars; I believe 11 Ron smoked cigars. Those are the people that I 12 remember that smoked cigars.</p> <p>13 Q Did you ever receive information from a 14 confidential informant when you were a member of 15 the Watts tactical team?</p> <p>16 A I'm sure at some point, yes, ma'am.</p> <p>17 Q Okay. And did you have people at 18 Ida B. Wells or who were familiar with Ida B. Wells 19 who were confidential informants for you?</p> <p>20 A I didn't -- how can I put this? Not many 21 people would give me information, ma'am. It 22 rarely happened.</p> <p>23 Q Okay. You didn't have any confidential 24 informants that were your confidential informants?</p>	<p>74</p> <p>1 Q And how would he get that information?</p> <p>2 A I'm not sure. You'd have to -- you'd have 3 to ask him.</p> <p>4 Q You don't know who any of his sources of 5 information were?</p> <p>6 A Not -- not offhand. You would have to ask 7 him who these people -- who they were.</p> <p>8 Q When you were part of the Watts tactical 9 team, did you know anyone who worked in the 10 Chicago Housing Authority management of the public 11 housing projects?</p> <p>12 A No.</p> <p>13 Q Do you know if any members of the Watts 14 tactical team had relationships with the managers 15 of the housing projects?</p> <p>16 A I don't know anyone that had a 17 relationship with anyone from public housing 18 management office.</p> <p>19 Q I want to talk to you about some terms 20 used in some of the tactical team reports that 21 I've seen related to Ida B. Wells.</p> <p>22 So can you tell me what a premise check is?</p> <p>23 A A premise check is just walking into the 24 building and just checking on the building.</p>

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	77		79
1	Q So it wouldn't be in response necessarily	1	narcotics mission?
2	to a specific report of criminal activity?	2	A Usually calls -- a ton of calls for that
3	A It could be. There's no really -- a	3	type of activity we'll develop that -- a mission
4	definition of it other than what I would -- what I	4	to see if we could oppress that type of activity.
5	would think of it. You know, there's no set	5	Q And if something was a designated narcotics
6	definition.	6	mission, would the team meet ahead of time to
7	Q Okay. It's just anytime you check on a	7	decide what you're going to do to perform the
8	building it could be considered a premise check?	8	narcotics mission?
9	A Could be considered a premise check, yes,	9	A Not necessarily. It would just -- not
10	ma'am.	10	necessarily, ma'am.
11	Q Okay. When you would arrive at a building	11	Q When you would arrive at buildings in the
12	in the Ida B. Wells, was it typical for you and	12	Ida B. Wells, would you typically search the
13	your teammates to run into the building?	13	people standing in the lobby of the building?
14	A I wouldn't say typical.	14	A Well, we would ask if they lived in the
15	Q Okay. So sometimes you would run in, and	15	building, things of that nature. Some people
16	other times you wouldn't?	16	would get searched, yes. That would happen, yes.
17	A Sometimes run, sometimes walk.	17	Q Did you ever have occasions where you
18	Q Okay. What about a building walk-down?	18	searched everyone in the lobby?
19	A Well, there's no set plan for that,	19	A That would -- that would happen occasionally,
20	either, ma'am. Some people would start at -- some	20	yes, ma'am.
21	people would take the elevator up to the top of	21	Q And what would be the circumstances where
22	the building and walk the building down floor by	22	you would search everyone in the lobby?
23	floor. Some people would start at the bottom of	23	MR. KOSOKO: Objection to form,
24	the building and walk the building up floor by	24	foundation.
	78		80
1	floor. You know, some people walk up and then	1	A Could you repeat that question one more
2	walk down. So it was -- there was no set game	2	time, ma'am?
3	plan for that, either. It's basically a	3	Q Sure. What were the circumstances when
4	preference of how you wanted to walk the building	4	you would search everyone in the lobby?
5	down, ma'am.	5	A People would gamble in the lobby area.
6	Q Okay. What's the purpose of building	6	There would be a large group of people gambling,
7	walk-down?	7	something like that. That would be an occasion.
8	A Well, there's vacant apartments within	8	Q When you would make arrests at Ida B. Wells
9	those buildings where you'd have to go in and see	9	buildings, would you transport people to the
10	if there was any type of illegal activity going on	10	police station yourself, or would you usually call
11	within those vacant apartments, walk the building	11	11 for a wagon?
12	down to see if people were selling drugs or hiding	12	A That would vary. Sometimes the -- you
13	13 in different areas of the building, or squatting,	13	know, the wagon would take people, and then if the
14	14 or things of that nature.	14	wagon wasn't available, we would have to take
15	Q Okay. And what about narcotics mission?	15	15 people ourselves.
16	Is that for situations where you get a call about	16	Q Do you know what a reverse sting is?
17	drug activity, or would all of the checks at the	17	A Yes, ma'am.
18	Ida B. Wells be considered a narcotics mission?	18	Q And what's a reverse sting?
19	A Well, I know within the police department	19	A reverse sting is where -- in the context
20	there's mission numbers and things of that nature.	20	20 of that would be where officers would pose as
21	So I can't really speak about -- sometimes there's	21	21 narcotics dealers and arrest people for attempt
22	numbers associated with these missions, so that's	22	22 possession of narcotics.
23	23 how I understand it.	23	Q So the officers would pose as drug dealers
24	Q Okay. Do you know what makes something a	24	and arrest people who tried to buy drugs from them?

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	81		83
1	A Yes, ma'am.	1	of the building.
2	Q And did you -- were you part of reverse	2	Q Okay. So you knew because you were white
3	stings and Ida B. Wells?	3	that you weren't going to pose as a drug dealer
4	A I was.	4	you said; correct?
5	Q And about how often would your team do a	5	A Yes, ma'am. Yes. There were -- yes.
6	reverse sting at Ida B. Wells?	6	Q Okay. And would you agree with me that
7	A Quite often.	7	residents of Ida B. Wells would be able to
8	Q Okay. And was that fairly effective for	8	recognize you as a police officer?
9	the team? Were you able to make arrests that way?	9	A Yeah.
10	A We made arrests that way.	10	MR. STEFANICH: Objection; foundation.
11	Q What role did you play in the reverse	11	You can answer.
12	stings?	12	A Yes.
13	A I would describe it as more of a support	13	Q And did some of them know you by name?
14	role.	14	A I assume so.
15	Q Okay. What did that consist of?	15	Q Okay. And when you say you would be
16	A Making sure that the individuals that were	16	assigned to the back lobby area during reverse
17	attempting to purchase the narcotics were	17	stings, that would be at the back of the first
18	detained, that they didn't try to run out of the	18	floor; right?
19	building.	19	A Yeah. On the first floor towards the back
20	Q Okay. Where would the reverse -- or	20	out of the way.
21	strike that, please.	21	Q Okay. Can you describe what's in the back
22	Where would the officers pretending to be	22	lobby area where you would be?
23	drug dealers go in the building?	23	MR. STEFANICH: Objection; form.
24	MR. STEFANICH: Object to form, foundation.	24	MS. KLEINHAUS: Go ahead, please.
	82		84
1	MS. KLEINHAUS: Go ahead, please.	1	THE WITNESS: Should I answer, Brian?
2	A Sure. The officers that were posing as	2	MR. STEFANICH: Yeah, you can answer.
3	the drug dealers would either be in the back or	3	A So there was no -- once again, there was
4	the front of the building.	4	no set play of once these people came in and they
5	Q So outside the building or inside the	5	were detained and they were going to be arrested,
6	building?	6	we would -- the lobby went left and/or right, so
7	A Well, ma'am, I -- I was in the back lobby	7	wherever we had the room to put people out of the
8	area, so I don't know their movement within that,	8	way, out of sight, that's where we -- where we put
9	but I know that they were in the back and/or front	9	people.
10	of the building. I don't know if they were to	10	Q Okay. So you -- am I correct you would be
11	venture -- how far they would venture out.	11	in the back lobby area while another member of
12	Q Okay. So before you would do a reverse	12	your team was posing as a drug dealer doing a fake
13	sting, your team would talk about what you were	13	drug sale in another area; correct?
14	going to do and who would play which role; right?	14	A Yeah, I would be out of the area. I
15	A Well, I think it was -- we didn't talk	15	would --
16	about who would play any role. We didn't do	16	Q Okay.
17	that, no.	17	A -- be somewhere else.
18	Q Okay. How did you know what you were	18	Q Were you hidden behind something or just
19	supposed to do?	19	standing around in the back lobby area?
20	A Well, the, I guess race demographic of	20	A My -- I would just be standing in the back
21	Ida B. Wells is of people that don't look like me,	21	lobby area by the offenders.
22	so my role in that would not be of a -- posing as	22	Q Okay. But before any arrests had taken
23	a narcotics dealer. So my role was to make sure	23	place, would you just be standing back there
24	that people were safe, secure, and not running out	24	waiting for something to happen?

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1 **A Just be -- before any arrests would take**
 2 **place, I'd just be standing out of the way.**

3 Q Okay. In the back lobby area?

4 **A Back lobby area, yes.**

5 Q Okay. And would other officers from the
 6 team be there with you?

7 **A Yes.**

8 Q Okay. And am I correct that other white
 9 officers would be assigned to that same role that
 10 you had?

11 **A Well, Robert Gonzalez isn't white and**
 12 **Manny Leano wasn't white. So officers that did**
 13 **not look like the people of Ida B. Wells would be**
 14 **in that area.**

15 Q Okay. So were there black officers on the
 16 team who would pose as drug dealers?

17 **A That's correct.**

18 Q Who were those officers?

19 **A Alvin Jones, Kallatt Mohammed, Ron Watts,**
 20 **Elsworth Smith. Those are the officers that I**
 21 **remember.**

22 Q Are you familiar with the term reverse
 23 sting kit?

24 **A Kit?**

1 left-hand corner, and the you can unmute when you
 2 come back. Or you can skip that.

3 **THE WITNESS:** I'm not really technically
 4 savvy. Is it the mute microphone button; is that
 5 what I'm trying to do here?

6 **MS. KLEINHAUS:** Yes.

7 (Recess taken, 12:26 p.m. to 12:33 p.m.)

8 **MS. KLEINHAUS:** Back on the record and
 9 we're recording.

10 **BY MS. KLEINHAUS:**

11 Q Sir, before the break we were talking
 12 about reverse stings. Do you recall that?

13 **A Yes, ma'am.**

14 Q How would you document what occurred
 15 during a reverse sting?

16 **MR. STEFANICH:** Objection; form, foundation.

17 You can answer, Brian.

18 **A I believe it was an arrest report, a**
 19 **complaint, and a case report, if I'm not mistaken.**

20 Q Okay. And do you know what reports or
 21 other documents you would bring with you for the
 22 reverse stings?

23 **A I don't recall bringing any documents to**
 24 **the reverse sting. I don't recall bringing**

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1 Q Yes, sir.

2 **A No, I don't know what a reverse sting kit is.**

3 Q Who would decide that the team should do a
 4 reverse sting?

5 **A I don't know. I don't know if it was -- I**
 6 **don't know if it was a sergeant or above.**

7 Q After an arrest at Ida B. Wells, whether
 8 it was the result of a reverse sting, or a
 9 narcotics mission, or anything else, any type of
 10 arrest, how would you decide who would write up
 11 the report?

12 **A Usually, the officer that is apprehending**
 13 **that person for whatever -- whatever charge that**
 14 **is would be writing the report.**

15 Q And for --

16 **A The arrest report and a case report that is.**

17 Q Okay.

18 **A There's multiple reports that go into an**
 19 **arrest.**

20 **MR. STEFANICH:** Hey, Tess, can we take a
 21 couple-minute break?

22 **MS. KLEINHAUS:** Let's take a five-minute
 23 break. Officer Bolton, if you could mute yourself.
 24 You should be able to see it in the bottom

1 **documents with us.**

2 Q Okay. And how is it that you would know
 3 the times the different events happened in the
 4 course of a reverse sting when you would later go
 5 write up your reports?

6 **MR. STEFANICH:** Objection; form.

7 You can answer.

8 **A They would be estimated time.**

9 Q And would you write the reports on-site at
 10 Ida B. Wells, or back at the station, or at some
 11 other point?

12 **MR. STEFANICH:** Objection; form.

13 You can answer.

14 **A The reports were not -- not done on-site.**

15 **We didn't have the ability to write a report**
 16 **within a building.**

17 Q And during the time that you were part of
 18 the Watts tactical team, did you typically type up
 19 the reports that you would generate from a
 20 narcotics arrest?

21 **A I don't mean to be rude, ma'am, but you**
 22 **were cutting in and out when you were asking the**
 23 **question, and I don't -- I only got basically the**
 24 **back end of your question. I apologize.**

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	89		91
1	Q I'll repeat it.	1	Bennett or Shock?
2	A Sure.	2	A You broke up again. I apologize, but I
3	Q So when you were a member of the Watts	3	didn't get the question.
4	tactical team, would you typically type up your	4	Q No problem. What do you know about
5	arrest reports and case reports?	5	Roy Bennett or Shock?
6	A Typically, yes.	6	A I know that Roy Bennett was a drug dealer
7	Q And would you usually do that in the	7	from Ida B. Wells, and if I recall, I believe he
8	tactical team office back at the station?	8	is deceased.
9	A Yes.	9	Q Do you know whether or not you ever
10	Q Did you sometimes write up report	10	arrested Roy Bennett?
11	11 narratives before you would go out to conduct a	11	A I don't know.
12	12 reverse sting?	12	Q Do you know what drug line he sold?
13	A I would not do that, no.	13	A I don't recall.
14	Q Are you aware of officers doing that?	14	Q What drug lines were sold at the Ida B. Wells
15	A Preprinting complaints and things of that	15	15 while you were part of the Watts tactical team?
16	nature?	16	A There were -- basically, heroin, and crack
17	Q Or narratives of reports.	17	cocaine, and marijuana were sold within Ida B. Wells.
18	A Yes, narratives of reports were sometimes	18	Q Okay. Were you aware of any specific
19	preprinted.	19	lines or brands, for lack of a better word, of
20	Q Okay. And what would you preprint in the	20	20 those drugs that were sold there?
21	21 narrative of the report?	21	A I don't recall the -- what they called it.
22	A Like the address of where we were, things	22	I just know that they had sold heroin, they sold
23	of that -- things of that nature.	23	crack cocaine, and they sold marijuana.
24	Q Okay. And is that something that was	24	Q Okay. Do you know who Roy Bennett sold
	90		92
1	specific to reverse stings, or would you sometimes	1	drugs with?
2	preprint the narrative portion of the report for	2	A Sold drugs with?
3	3 other -- other types of missions or arrests?	3	Q Yeah.
4	A No, usually just when there was going to	4	A I don't know.
5	be like, I guess you'd say a mass arrest situation.	5	Q Okay. Do you know any other -- I'm sorry;
6	Q And at times would your narratives in the	6	I'll start fresh.
7	7 preprinted narratives include arrestee names?	7	A No, it was fine. Just the Wi-Fi is
8	A No.	8	cutting in and out in the middle of your question.
9	Q Okay. Other than addresses, what would	9	So -- and plus, I'm hearing these verbals. That's
10	10 the preprinted narratives include?	10	why I keep turning my head to figure out what
11	A From what I remember, it would give the	11	you're asking. It just keeps cutting in and out.
12	sup portion of the case report, the UCR code, the	12	That's all.
13	address, things of that nature. Obviously, if	13	MR. STEFANICH: Tess, do you want to break
14	someone had a vehicle, you'd have to print --	14	for lunch now? Maybe we can set him up on the
15	you'd have to type that in, things like that. But	15	other side of our room where like the router is.
16	certain areas of the report that were not going to	16	Maybe he'll have better luck with the connection
17	change, you know, you would -- you could -- you	17	17 there.
18	could work on that.	18	MS. KLEINHAUS: Try making that change at
19	Q Do you know who Roy Bennett is?	19	lunch -- if you don't mind, I'd like to get a
20	A I do.	20	little bit further now -- if it doesn't work.
21	Q Who is Roy Bennett?	21	MR. STEFANICH: Okay. We can do that.
22	A His name -- his nickname, I believe is	22	THE WITNESS: Can you ask your question
23	Shock.	23	again, ma'am? I apologize.
24	Q Okay. And what do you know about Roy	24	MS. KLEINHAUS: Sure.

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1 Q Do you know who Arthur Kirksey is?
 2 A No.
 3 Q Do you know who Wilbert Moore is?
 4 A **Wilbert Moore was a drug dealer from**
 5 **Ida B. Wells.**
 6 Q And do you know who he sold drugs for
 7 or with?
 8 A **I don't know that. I know he's deceased.**
 9 Q Do you know who killed him?
 10 A No.
 11 Q Did you ever hear rumors that Sergeant
 12 Watts was involved in his death?
 13 A No.
 14 Q Do you know who Willie Gatty is?
 15 A No.
 16 Q Do you know who Stacy Graham?
 17 A No.
 18 Q Other than Roy Bennett, do you know of
 19 anyone else that sold drugs at Ida B. Wells?
 20 MR. STEFANICH: Objection; misstates his
 21 prior testimony.
 22 You can answer, Brian.
 23 A **Not off my -- offhand, no, by personal**
 24 **name or anything like that, not that I know of.**

95
 1 name. I remember him. He was pretty flamboyant.
 2 That's -- I remember him. But there are other --
 3 that's what I remember. I remember that person.
 4 Q Okay. We're going to talk later today
 5 about specific arrests of some of my clients, but
 6 do you remember any arrests that you made at
 7 Ida B. Wells?
 8 A Yeah, I can't really recall any specific
 9 arrest. I remember -- like I said prior, I
 10 remember -- I'm pretty sure that I arrested a
 11 person named Smoke, you know, but -- he sticks out
 12 but I don't recall many of the others.
 13 Q And what did Smoke look like?
 14 A He was very short. He was a male black.
 15 Super short, that's how I remember him.
 16 Q When you were part of the Watts tactical
 17 team, did you ever hear complaints from people at
 18 Ida B. Wells about how police officers were
 19 treating them?
 20 A No.
 21 Q Did anyone ever tell you that they had
 22 been -- they were framed for a narcotics crime?
 23 A No.
 24 Q Did anyone ever tell you that drugs had

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1 Q Do you know anyone who sold there who you
 2 know by nickname?
 3 A **I remember a guy named Smoke. I don't**
 4 **know his real name.**
 5 Q Do you know whether or not you arrested
 6 someone whose nickname was Smoke?
 7 A **I believe I did.**
 8 Q Do you know of anyone --
 9 A **But I would have to double-check his**
 10 **arrest records to see if I actually did that, but**
 11 **I'm pretty sure I did arrest him one time.**
 12 Q Okay. Do you remember anyone else by name
 13 or nickname who sold drugs at Ida B. Wells?
 14 A **No one offhand that I can recall.**
 15 Q Do you -- putting aside just drug dealers,
 16 do you remember anyone who lived at Ida B. Wells?
 17 A **I remember people but I don't know their**
 18 **exact name or anything like that, no.**
 19 Q Do you remember anyone by nickname?
 20 A Yes.
 21 Q Okay. Tell me who you recall from
 22 Ida B. Wells that you know by nickname.
 23 A **There was a guy -- there was a guy, his**
 24 **name was Fantasia. I don't remember his actual**

96
 1 been planted on them?
 2 A No.
 3 Q Did anyone ever tell you that the police
 4 claimed to have found drugs on them but they didn't?
 5 A No.
 6 Q Did you ever see Watts pull drugs out of a
 7 desk in the tactical room?
 8 A No.
 9 Q Did you ever see Sergeant Watts pull drugs
 10 out of his pocket?
 11 A No.
 12 Q Did you ever see Sergeant Watts pull drugs
 13 out of his shirt sleeve?
 14 A No.
 15 Q Did you ever see Watts or any member of
 16 the Watts tactical team demand information from
 17 someone in exchange for not being arrested?
 18 A No.
 19 Q Did you ever see Sergeant Watts or any
 20 member of the Watts tactical team demand that
 21 someone provide drugs in exchange for not being
 22 arrested?
 23 A No.
 24 Q Did you ever observe Sergeant Watts or any

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1 member of the tactical team ask someone to provide
 2 guns in exchange for not being arrested?

3 **A No.**

4 Q Did you ever see Sergeant Watts or other
 5 members of the Watts tactical team store drugs
 6 anywhere in the Ida B. Wells?

7 **A No.**

8 Q Did you ever see Sergeant Watts or any
 9 member of the tactical team use force on someone
 10 at Ida B. Wells?

11 **A "Use force," could you explain that?**

12 Q Well, some examples would be slapping,
 13 kicking, punching, throwing someone to the ground,
 14 throwing someone into a wall. Did you ever see
 15 anything like that?

16 **A No.**

17 Q Never?

18 **A No.**

19 Q Did you ever see Watts offer residents of
 20 Ida B. Wells a garbage can or other container and
 21 tell them to put their drugs or guns in it?

22 **A No.**

23 Q Have you ever been disciplined by the
 24 Chicago Police Department?

99
 1 **Gonzalez and I were sued for -- someone sued us
 2 from prison, said that we planted a beer on him
 3 and that we arrested him for -- like false arrest.
 4 That case was dropped, also.**

5 Q Okay. For the one that was from about
 6 20 years ago, do you know what the allegations
 7 were, what you allegedly did?

8 **A I don't remember the allegation.**

9 Q Okay. And the first one with Gonzalez,
 10 not the planting a beer one, but the other one, do
 11 you know what the allegation was in that?

12 **A I think it was excessive force or
 13 something like that.**

14 Q Do you know what happened to that lawsuit,
 15 what the resolution was?

16 **A I think it was settled. I'm not too sure.**

17 **I don't know the proper term. Settled, I guess
 18 you'd say.**

19 Q You didn't go to trial on any of those
 20 three cases you just talked about?

21 **A No.**

22 Q Okay.

23 **A No, ma'am.**

24 Q Were you ever disciplined by the Chicago

100
 1 Police Department in connection with any of those
 2 lawsuits?

3 **A No, ma'am.**

4 Q Do you know whether any members of the
 5 Watts tactical team had grown up in or around
 6 Ida B. Wells?

7 **A Could you repeat it? I'm sorry. I missed
 8 the first portion of your question.**

9 Q Sure. Do you know whether Sergeant Watts
 10 or any member of the Watts tactical team grew up
 11 in or around Ida B. Wells?

12 **A Yes, I do.**

13 Q And who was that?

14 **A I believe Kenny Young grew up in Stateway
 15 Gardens, and I believe that Ron Watts grew up in
 16 and/or around Ida B. Wells.**

17 Q Did Watts ever talk to you or talk to the
 18 team about having grown up in Ida B. Wells?

19 **A I don't think it was Ida B. Wells. I
 20 think he called it like Darrell Homes, Darrell.
 21 They weren't around when I was working down there,
 22 so I may be mispronouncing that, but I think that
 23 he called it the Darrell Homes, and I think they
 24 were near Ida B. Wells.**

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	101		103
1 Q	Okay. And did he tell you anything about	1 THE COURT REPORTER:	At what time?
2 his experience growing up in that area?		2 MS. KLEINHAUS:	At 1:00 p.m.
3 A Not really. He just said he grew up in		3 MR. STEFANICH:	2:00 p.m. -- sorry.
4 that area. He didn't really describe any		4 (Recess taken, 12:59 p.m. to 2:01 p.m.)	
5 particular things.		5 MS. KLEINHAUS:	Can you hear me okay?
6 Q	Did it seem to you that Sergeant Watts	6 THE WITNESS:	Your picture is frozen right
7 knew a lot of the residents of Ida B. Wells?		7 now, but I can hear you somewhat.	
8 A Yes.		8 MS. KLEINHAUS:	Okay. It's up to you.
9 Q	And did you have a sense of how he had	9 Would you like to move to a different spot, or do	
10 formed those relationships?		10 you want to keep going?	
11 A I never asked how he formed those		11 MR. BAZAREK:	Brian, if it's noticeably
12 relationships.		12 worse, then maybe we should go back to --	
13 Q	Could you tell how he knew so many people	13 THE WITNESS:	It's worse here than it was
14 there?		14 in the other room, Bill.	
15 A I just thought it was because he grew up		15 MR. BAZAREK:	Let's go to the other
16 near and around there, that's why he knew a lot of		16 room here.	
17 the people that lived there.		17 THE WITNESS:	I apologize but it's
18 Q	I'm going to ask you about reports. If	18 worse here.	
19 one is listed as the attesting officer on a report,		19 MS. KLEINHAUS:	I'm going to stop the
20 can you tell me what that means?		20 recording. Let's go off the record.	
21 A The -- the attesting officer is the		21 MR. BAZAREK:	Okay.
22 officer -- I believe is the one writing the report		22 (Recess taken, 2:02 p.m. to 2:06 p.m.)	
23 or having the -- yeah, writing the report.		23 BY MS. KLEINHAUS:	
24 Q	And that's the person swearing to the	24 Q	Okay. Sir, are you able to see me and
	102		104
1 truth of the contents of the report?		1 hear me okay?	
2 A Yes, ma'am.		2 A Yeah. It's a lot better. Thank you.	
3 Q	Did you ever sign anyone else's name on a	3 Q	Okay. Before our lunch break I asked you
4 report?		4	some questions about officers on the Watts tactical
5 A I have with their permission.		5	team who smoked cigars. Do you recall that?
6 Q	And have you given anyone else permission	6 A I do.	
7 to sign your name to a report?		7 Q	Did you ever observe any members of the
8 A Yes.		8	team smoke cigars while they were on duty?
9 Q	Was it your practice when you would sign	9 A Yes.	
10 someone else's name with their permission to put		10 Q	Okay. And did you ever observe any of
11 anybody else or other symbols to show that you		11	them smoke cigars while at a crime scene?
12 were signing for someone else?		12 A I don't recall that.	
13 A I believe in -- I don't know if I've ever		13 Q	Earlier in this deposition you testified
14 done that or not done that, you know, if someone --		14	that prior to Sergeant Watts being arrested you
15 if Robert Gonzalez told me to sign his name, I		15	had never heard any rumors of any misconduct on
16 took that as a -- as permission to do that.		16	his part; correct?
17 Q	Did you ever sign anyone else's name to a	17 A That's correct.	
18 Chicago police report without their permission?		18 Q	Did you ever hear any rumors or allegations
19 A Not without their permission, no, ma'am.		19	of misconduct about any other members of the Watts
20 MS. KLEINHAUS:	Okay. I think that's a	20	tactical team?
21 good stopping spot for our lunch break. If you		21 A No.	
22 all want to change position relative to the router		22 Q	Did you ever demand that money be paid to
23 in the deponent's room, maybe you'll have time to		23	you by a civilian so that person would not be
24 do that, and we'll reconvene at 1:00 p.m.		24	arrested?

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	105		107
1 A No.		1 it's about three pages into that exhibit.	
2 Q Did you ever lie under oath during a		2 A Okay. Can I have minute to read it?	
3 criminal proceeding?		3 Q Sure. Absolutely.	
4 A No.		4 A Thank you. Okay. I've read it.	
5 Q Did you ever plant drugs on someone?		5 Q That affidavit refers to a Sierra Clark.	
6 A No.		6 Do you know who that is?	
7 Q Did you ever claim to have found drugs on		7 A No.	
8 someone that you did not actually find?		8 Q It also refers to Kianna Mabel. Do you	
9 A No.		9 know who that is?	
10 Q Did you ever deliberately fail to inventory		10 A No.	
11 drugs that you found?		11 Q What about Sandra Clark? Do you know who	
12 A No.		12 that is?	
13 Q Do you know who Derrick Lewis is?		13 A No.	
14 A Derrick Lewis? I don't know that person.		14 Q Do you know Winnie Lewis?	
15 Q Okay. I want to talk to you about an		15 A No.	
16 arrest of Derrick Lewis on July 3rd of 2004. Do		16 Q How about Amanda Parker?	
17 you recall the July 3rd, 2004, arrest of Mr. Lewis?		17 A No.	
18 A No.		18 Q Do you have any basis on which to dispute	
19 Q Do you have there with you what's been		19 what's contained in Mr. Lewis' affidavit?	
20 marked as Exhibit 1?		20 A I believe that this is -- this affidavit is	
21 A PLEX1, yes.		21 completely false and that they're lying.	
22 (Bolton Deposition Exhibit 1 marked for		22 Q What's the basis of that belief?	
23 identification and attached to the transcript.)		23 A That these events didn't take place. I	
24 Q And have you previously reviewed the		24 never observed any of my teammates do any of these	
	106		108
1 contents of Exhibit 1?		1 things that -- that are in this affidavit.	
2 A Yes.		2 Q And so is it your testimony that you don't	
3 Q Okay. And did the contents of Exhibit 1		3 recall this particular arrest, but you don't	
4 refresh your recollection at all as to the July 3rd,		4 believe Mr. Lewis' account because you don't think	
5 2004, arrest of Derrick Lewis?		5 your teammates would do the things described in	
6 A No.		6 his affidavit?	
7 Q Okay. Did you look at the photo that's		7 A I don't remember this arrest, ma'am, like	
8 included in Exhibit 1?		8 you said, and I believe that these statements in	
9 A Yes, ma'am.		9 this affidavit are false because I've never seen	
10 Q Do you recognize the person depicted in		10 any of my teammates do these things.	
11 the photos?		11 Q Other than not having seen your teammates	
12 A No.		12 do those things, is there any other reason that	
13 Q Do you know what your role or your		13 you believe the affidavit is false?	
14 involvement was in Mr. Lewis' arrest?		14 A I just -- I just believe it's false.	
15 A No.		15 Q Okay. Looking further in that exhibit	
16 Q Okay. Having reviewed the documents		16 there's an arrest report and a vice case report	
17 contained in Exhibit 1 which did not refresh your		17 for this arrest.	
18 recollection about the arrest, can you think of		18 A Okay.	
19 anything that would refresh your recollection?		19 Q Have you reviewed those reports in advance	
20 A Not at this time.		20 of this deposition?	
21 Q Did you have an opportunity to review the		21 A I did.	
22 affidavit of Mr. Lewis that's contained in Exhibit 1?		22 Q Okay. And did either of those reports	
23 A No.		23 refresh your recollection as to what your role was	
24 Q Okay. If you can review that affidavit,		24 in this arrest?	

Transcript of Brian Bolton, Volume I

28 (109 to 112)

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	109		111
1	A No.	1	were obviously a part of the arrest on scene or
2	Q Okay. You can put Exhibit 1 to the side.	2	observed criminal activity; right?
3	Do you know who a Zarice Johnson is?	3	A That could also be possible.
4	A No.	4	Q Okay. And if you had been needed to testify
5	Q Do you know someone by the name of Zarice	5	in the criminal matter against Mr. Johnson, would
6	Johnson?	6	you then have just been relying on your memory of
7	A No.	7	what you did to assist with the arrest?
8	Q Do you have any recollection of arresting	8	MR. BAZAREK: Object to the form of the
9	someone named Zarice Johnson?	9	question.
10	A No.	10	You can answer, Brian, if you understand it.
11	Q Okay. Do you have there with you something	11	A If I -- could you ask the question one more
12	that's been marked as Exhibit 2?	12	time so that way I understand it?
13	A Yes, ma'am.	13	Q Sure. Let me ask it a different way.
14	Q Okay. And have you had a chance to review	14	These reports that you've just reviewed as part of
15	Exhibit 2?	15	Exhibit 2 don't tell you what you did during these
16	A I didn't -- I didn't review it, ma'am.	16	16 arrests; right?
17	Q Okay. Go ahead and do that now. Take a	17	A Correct.
18	moment to review Exhibit 2, please.	18	Q And if you were called to testify in these
19	A Okay. Thank you.	19	19 cases in the criminal matters, you just would have
20	(Bolton Deposition Exhibit 2 marked for	20	20 been relying on your memory at that point; right?
21	identification and attached to the transcript.)	21	A I would have to tell the -- during that
22	THE WITNESS: Okay. I apologize but I	22	process that I don't remember what I did during
23	read slow. Sorry.	23	this event.
24	MS. KLEINHAUS: No problem.	24	Q Okay. And did you ever have occasions
	110		112
1	Q Having reviewed Exhibit 2, did it refresh	1	where you were listed as an assisting arresting
2	your recollection about the July 2006 and February	2	officer, and when you were asked to testify you
3	2008 arrests of Mr. Johnson?	3	3 explained to the prosecutor that you didn't recall
4	A No.	4	4 what you did during that arrest?
5	Q You were listed as an assisting officer.	5	A I don't know if that's ever happened.
6	Do you know what your role was in those arrests as	6	Q You reviewed the affidavit of Mr. Johnson
7	an assisting officer?	7	7 that's included in Exhibit 2; correct?
8	A I don't know.	8	A Yes.
9	Q Okay. What are some of the things -- some	9	Q That affidavit mentions Maurice Harris.
10	10 of the roles that would be encompassed if you're --	10	10 Do you know who that is?
11	11 that you could have performed if you were an	11	A No.
12	12 assisting officer?	12	Q Also mentions Willie Johnson. Do you know
13	A Well, an assisting officer is a -- is a	13	13 who that is?
14	broad thing. You could -- I could have done a	14	A No.
15	complaint; I could have sat with this person to	15	Q Do you know Gwendolyn Johnson?
16	make sure that he didn't harm himself; I could	16	A No.
17	have taken this person to the bathroom; I could	17	Q Do you know --
18	have transported him to the station.	18	A I couldn't hear that. I'm sorry, ma'am, I
19	So assisting officer is a -- is a broad	19	19 didn't hear that.
20	spectrum, I guess you'd say. So I don't know.	20	Q I'll try it again.
21	Those are things that an assisting officer could	21	A Yes, ma'am.
22	do. Could have gotten him a bottle of water,	22	Q Do you know Gwendolyn Johnson?
23	things like that.	23	A No.
24	Q Okay. And it could have been that you	24	Q Do you know Dolores Allen?

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	113		115
1 A No.		1 Q Would it change your opinion at all if	
2 Q Okay. Having reviewed Mr. Johnson's		2 they used their position as police officers to	
3 affidavit, do you have any basis on which to		3 obtain drugs or money from someone?	
4 dispute it?		4 MR. BAZAREK: Object to the form of the	
5 A Once again, I think this affidavit is		5 question; foundation.	
6 false. I've never known any of my teammates to		6 A I don't think I quite understand your	
7 act in this manner, so I believe that this is false.		7 question, ma'am. Can you --	
8 Q Okay. And when you say any of your		8 Q Sure. You said, you know, things they did	
9 teammates, you include Sergeant Watts in that;		9 off duty, it's your understanding that they got	
10 correct?		10 some drug money that was being moved while off	
11 A Yes.		11 duty, and I'm asking you if it would change your	
12 Q And you don't believe what's alleged here		12 opinion of their credibility and their conduct as	
13 about Sergeant Watts' conduct; is that right?		13 police officers if you knew that they did that	
14 A In this affidavit I don't believe that		14 while on duty as police officers.	
15 this event took place. I never saw any -- anything		15 A Yes, that would -- that would change my	
16 like any of these events take place or anything		16 opinion, of course.	
17 like these events.		17 Q Other than the fact that you don't believe	
18 Q Okay. And that's because of your faith in		18 that your teammates, including Ronald Watts, would	
19 Sergeant Watts; right?		19 act in the manner described in Mr. Johnson's	
20 MR. BAZAREK: Object to the form of the		20 affidavit, do you have any other basis on which to	
21 question. It's also argumentative.		21 dispute his account?	
22 MS. KLEINHAUS: Go ahead.		22 A No.	
23 A Like I said, I never observed any of this		23 Q Okay. You can put Exhibit 2 to the side.	
24 type of behavior take place while I was working on		24 Do you know who Sydney Harvey is?	
	114		116
1 the 264 team or the public housing team, so that's		1 A No.	
2 why I believe this is not a truthful document.		2 Q Do you recall an arrest of Sydney Harvey	
3 Q Okay. Did the arrests of Watts and		3 on October 1st of 2006?	
4 Mohammed change your opinion of the way that they		4 A No.	
5 conducted themselves as police officers?		5 MS. KLEINHAUS: Okay. Take a look at	
6 A Yes. But during this time I never		6 what's been marked as Exhibit 3, please.	
7 observed any of this behavior, and Ron Watts and		7 (Bolton Deposition Exhibit 3 marked for	
8 Kallatt Mohammed were arrested off duty for theft		8 identification and attached to the transcript.)	
9 of government funds, so that has nothing to do		9 Q Have you previously had an opportunity to	
10 with what is being said in this affidavit.		10 look at what's been marked as Exhibit 3?	
11 Q Okay. What's your understanding of how		11 A No.	
12 they stole government funds?		12 Q Okay. Please take a moment to review it.	
13 A It's my understanding that Kallatt and Ron		13 A Okay.	
14 off duty had some information on drug money being		14 Q Okay. Having reviewed Exhibit 3, does	
15 moved, and they intercepted that drug money and		15 that refresh your recollection at all about the	
16 took it. That's what my understanding is.		16 arrest of Mr. Harvey on October 1st of 2006?	
17 Q And it's your understanding that they did		17 A No.	
18 that as private citizens unrelated to their role		18 Q Okay. Turning to the affidavit that's	
19 as police officers?		19 contained there for Mr. Harvey, do you have any	
20 MR. KOSOKO: Objection; misstates his		20 basis on which to dispute his account?	
21 testimony.		21 A I've never seen any of my teammates act in	
22 MS. KLEINHAUS: Go ahead, please.		22 the manner that this person said in this affidavit.	
23 A Yes, it was off duty in a non--		23 Q Okay. Other than that, do you have any	
24 nonduty-related thing.		24 basis on which to dispute it?	

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	117		119
1 A No.		1 A No.	
2 Q Okay. You can put that to the side.		2 Q Do you recall an arrest of Raynard Carter	
3 You testified earlier that it would matter		3 from February 2006?	
4 to you if Watts and Mohammed committed their theft		4 A No.	
5 of government property while they were on duty;		5 Q Did you -- have you had a chance to review	
6 right?		6 what's been marked as Exhibit 4?	
7 A Yes.		7 A I didn't look at it, ma'am.	
8 Q And how would it change your opinion of		8 MS. KLEINHAUS: Okay. Go ahead and review	
9 their credibility or their integrity as police		9 it now, please.	
10 officers?		10 (Bolton Deposition Exhibit 4 marked for	
11 A Well, I really don't know what Ron and		11 identification and attached to the transcript.)	
12 Kallatt did off duty, so I can't, you know, really		12 THE WITNESS: Okay.	
13 speak to that. I can only speak to what's written		13 Q Okay. Having reviewed Exhibit 4, did it	
14 on these reports, and, you know, that's what I can		14 refresh your recollection about the arrest of	
15 speak to. I have no idea what Ron and Kallatt did		15 Raynard Carter on February 17th, 2006?	
16 off duty, so I can only speak about that opinion,		16 A No.	
17 you know.		17 Q Do you know what your role was in the	
18 Q My question is a little bit different. If		18 arrest of Mr. Carter?	
19 what they did happened on duty, would that change		19 A No.	
20 your opinion of them as police officers?		20 Q Do you know of anything that would refresh	
21 MR. BAZAREK: I'd object to the foundation		21 your recollection?	
22 and form of the question.		22 A Not at this time.	
23 MS. KLEINHAUS: Okay. Go ahead, please.		23 Q Okay. You reviewed Mr. Carter's affidavit	
24 A It matters, yes. It matters if a police		24 that's contained in Exhibit 4; right?	
	118		120
1 officer is on duty doing these, well, what are		1 A Yes.	
2 alleged things here. Yes, it matters. It matters		2 Q And other than your faith in the credibility	
3 a lot.		3 and integrity and Watts and his team, do you have	
4 Q Okay. And if you knew that they were		4 any other basis on which to dispute or agree with	
5 taking drug money that was being moved while they		5 that affidavit?	
6 were on duty, would that cause you to question		6 A No.	
7 their behavior in other contexts, in other arrests?		7 Q If you look in the affidavit, in	
8 MR. BAZAREK: I'd object again to the form		8 paragraph 8 it describes that Watts started asking	
9 of the question, foundation, also calls for		9 for money. Do you see that part?	
10 speculation.		10 A Yes, I see that.	
11 THE WITNESS: Can I answer the question now?		11 Q Does the fact that Sergeant Watts was	
12 MR. BAZAREK: Yes.		12 arrested and convicted of shaking someone down for	
13 MS. KLEINHAUS: Yes.		13 money change your opinion of the credibility of	
14 A If I knew that -- what is being said in		14 Mr. Carter's account?	
15 these affidavits, and I observed those types of --		15 MR. KOSOKO: Object to the form; foundation,	
16 that type of behavior, I would not stand for that		16 argumentative.	
17 type of behavior. I would notify -- well, through		17 A Well, Ron Watts was arrested for theft of	
18 these documents that you show me here or that I'm		18 government funds. That's what he was arrested for.	
19 looking at here, Ron at the time was a sergeant,		19 Q Who had the government funds?	
20 so I would notify a lieutenant that this is -- I		20 A I don't know.	
21 observed that type of behavior. So I wouldn't --		21 Q You don't know who he took them from?	
22 I wouldn't stand for that type of behavior.		22 A No.	
23 Q All right. Do you know who		23 Q When your boss was Federally convicted,	
24 Raynard Carter is?		24 were you ever curious about what it was that he	

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	121		123
1	had done?	1	it mischaracterizes his prior testimony on things
2	A I never -- I just knew what he was charged with, ma'am.	2	he observed or didn't observe.
3		3	MS. KLEINHAUS: Go ahead, sir.
4	Q Okay. Did you find out that he pled guilty?	4	A Like I said previously, I never observed
5	A I know that he pled guilty, yes.	5	any of my teammates conduct themselves in any
6	Q Okay. And that he was convicted?	6	manner that is in this affidavit. So, therefore,
7	A Yes, ma'am.	7	I believe this affidavit is completely false.
8	Q And you were shocked by the charges; right?	8	Q Okay. Because you didn't see it?
9	A Yes, ma'am.	9	A I didn't see this type of behavior.
10	Q Okay. But you didn't do anything to try	10	Q Okay. You can put that exhibit to the
11	11 to find out what he had done?	11	side, please.
12	A There's nothing for me to do, ma'am.	12	Do you know who Octavia McDonald is?
13	Q Well, I mean, did you care --	13	A No.
14	A You asked if I did something. I knew -- I	14	Q Do you know someone named Octavia McDonald?
15	15 knew what he was charged with. That's what I	15	A No.
16	16 know, ma'am. I didn't conduct an investigation or	16	Q Do you know someone named Patricia Noonan?
17	17 anything like that.	17	A No.
18	Q Did you ever Google it?	18	Q What about Patrick Noonan?
19	A No, ma'am.	19	A Patrick Noonan was a drug dealer from
20	Q Okay. You can put that exhibit to the side.	20	Ida B. Wells.
21	Do you know who Gregory Warren is?	21	Q Do you know who he sold drugs for?
22	A No, ma'am.	22	A No.
23	Q Do you recall an arrest of Gregory Warren	23	Q Do you know anyone who worked for him?
24	24 on February 4th of 2006 that you were involved in?	24	A No.
	122		124
1	A No.	1	Q Do you know if you were ever part of an
2	(Bolton Deposition Exhibit 5 marked for	2	arrest of Patrick Noonan?
3	identification and attached to the transcript.)	3	A I don't know.
4	Q Okay. Please take a look at what's been	4	Q Have you reviewed any documents related to
5	marked as Exhibit 5. Have you reviewed Exhibit 5	5	Patrick Noonan?
6	previously?	6	A No.
7	A I may have viewed portions of it, ma'am,	7	Q Do you recall an arrest of Octavia
8	8 not -- not this affidavit.	8	McDonald on May 25th, 2005?
9	Q Okay. Please go ahead and review the	9	A No.
10	affidavit.	10	Q Do you recall an arrest of Octavia
11	A Okay.	11	McDonald on August 5th, 2008?
12	Q Having reviewed Exhibit 5, did that	12	A No.
13	refresh your recollection about the arrest of	13	(Bolton Deposition Exhibit 6 marked for
14	Warren on February 5th of 2006.	14	identification and attached to the transcript.)
15	A No.	15	Q Okay. Please take a look at Exhibit 6.
16	Q Okay. And you reviewed the affidavit of	16	A Okay.
17	Mr. Warren; is that correct?	17	Q Having reviewed Exhibit 6, did that
18	A Yes.	18	refresh your recollection at all about the arrest
19	Q Other than your belief in your fellow	19	of Octavia McDonald?
20	teammates and Sergeant Watts, do you have any	20	A No.
21	other basis on which to dispute Mr. Warren's	21	Q Okay. There's an arrest report included
22	account?	22	there for a coarrestee named Vincent Randall. Do
23	MR. BAZAREK: I'd object to the form of	23	you see that?
24	24 the question and the use of the terms that I think	24	A Yes, ma'am.

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	125		127
1 Q	Do you recall ever meeting Vincent Randall?	1 Q	You have that in front of you?
2 A	No.	2 A	Yes, ma'am.
3 Q	Does that arrest report for Vincent Randall	3 Q	Okay. It refers there to R/Os. Do you
4 refresh your recollection at all?		4 see that part?	
5 A	No.	5 A	Yes.
6 Q	Okay. If you look at the vice case report	6 Q	And R/O stands for reporting officers;
7 for the May 2005 arrest -- so it's the first vice		7 correct?	
8 case report in your packet.		8 A	Yes.
9 A	May 25th?	9 Q	And in this case that would refer to you
10 Q	Yes, sir. Do you see that one?	10 and Officer Gonzalez; correct?	
11 A	Yes.	11 A	Yes.
12 Q	Okay. You're listed there in Box 46. Do	12 Q	So the description here in the narrative
13 you see that part?		13 portion of the vice case report is what you and	
14 A	Yes.	14 Officer Gonzalez observed; correct?	
15 Q	And is that what you would refer to as Box 2?	15 A	Well, I may not have observed it. Officer
16 A	Yes.	16 Gonzalez may have observed it.	
17 Q	Meaning that you were the second arresting	17 Q	Okay. Where he uses "R/Os," that refers
18 officer?		18 to both of you, doesn't it?	
19 A	I would have to look at the arrest report	19 A	It could also mean other officers. You
20 and see.		20 know, we reported -- from what I'm looking at here	
21 Q	Okay. That could be a little bit earlier	21 on the report, it looks like we reported the --	
22 in the packet if you want to look there. It's		22 we're the ones that reported it. I don't know --	
23 page -- the sixth page, if that helps you.		23 I don't remember the -- I don't remember that.	
24 A	Vincent Randall, yeah, I got that, and	24 This is 15 years old or so. I don't remember what	
	126		128
1 yes, I'm in Box 2 for that, ma'am, yes.		1 role, or what Robert Gonzalez observed, and I	
2 Q	And for Ms. McDonald there's an arrest	2 don't know what I observed.	
3 report for Octavia McDonald; it's after her		3 Q	And you don't know who wrote the narrative
4 affidavit and her photo.		4 portion of the report; right?	
5 A	Octavia McDonald, yes.	5 A	All I can go by is what's -- I don't know.
6 Q	And you see that you're listed there as	6 Q	Okay. If Officer Gonzalez was the one to
7 the second arresting officer; correct?		7 write up the narrative portion of the report,	
8 A	Yes.	8 would you review it before signing your name on	
9 Q	What are the -- what do you do when you're	9 the vice case report?	
10 the second arresting officer? What does that term		10 A	No, not necessarily.
11 mean?		11 Q	Okay. You might sign it without reading it?
12 A	The term just means that I was -- I'm on	12 A	If Robert Gonzalez wrote the report, I
13 the -- in the second arresting officer portion of		13 would trust that what is in this report or in any	
14 this arrest, and I was -- I think I had helped		14 report that he wrote was truthful. So there would	
15 conducted the actual arrest of her.		15 be no need for me to review the report.	
16 Q	And then as you sit here today, you don't	16 Q	Okay. Looking at the signature underneath
17 recall what your role was in that arrest besides		17 your name on the vice case report, do you recognize	
18 that you were part of it; right?		18 that as your signature?	
19 A	Yes.	19 A	No, that's not my signature.
20 Q	Okay. If you look in the narrative portion	20 Q	Okay. Do you recognize the signature
21 of the vice case report, so this is about 15 pages		21 shown there underneath Gonzalez' name as his	
22 into the exhibit, it's marked at the bottom as		22 signature?	
23 CITY-BG-12235 -- I'm sorry -- 12236.		23 A	I don't recall how Robert Gonzalez signed
24 A	I think I have it.	24 his name.	

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	129		131																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																					
1	Q Okay. Do you recognize the signature	1	A Okay.																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																					
2	under Watts, R., as Sergeant R. Watts' signature?	2	Q Correct?																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																					
3	A I don't recall how Ron signed his name, so	3	A That's correct.																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																					
4	I'd have to, I guess compare that to other	4	Q And you don't recall answering these																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																					
5	signatures, I guess.	5	questions; correct?																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																					
6	Q Okay. And you don't know what role	6	A That's correct, ma'am.																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																					
7	Sergeant Watts had in this arrest; correct?	7	Q But you don't have -- seeing this here																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																					
8	A I don't know.	8	now, you have no reason to dispute that this was																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																					
9	Q Okay. The vice case report refers to --	9	given to you and that you answered these																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																					
10	I'm hearing a lot of feedback.	10	questions; right?																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																					
11	A Yeah.	11	A At some point this -- this was given to me																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																					
12	Q Okay. The vice case report refers to a	12	and I -- and I answered the -- the to/from is a																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																					
13	narcotic called "911." Are you familiar with	13	witness statement, not an accused, and I -- it																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																					
14	that term?	14	looks to me that I wrote a witness statement to																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																					
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16	Q Do you know who -- the vice case report	16	Q Other than this occasion when you were																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																					
17	lists a D. Smith who assisted in the arrest. Do	17	given a summary of a complaint against Sergeant																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																					
18	you know who that is?	18	19	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																						
19	A There was a -- we had a teammate Dorian	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100	101	102	103	104	105	106	107	108	109	110	111	112	113	114	115	116	117	118	119	120	121	122	123	124	125	126	127	128	129	130	131	132	133	134	135	136	137	138	139	140	141	142	143	144	145	146	147	148	149	150	151	152	153	154	155	156	157	158	159	160	161	162	163	164	165	166	167	168	169	170	171	172	173	174	175	176	177	178	179	180	181	182	183	184	185	186	187	188	189	190	191	192	193	194	195	196	197	198	199	200	201	202	203	204	205	206	207	208	209	210	211	212	213	214	215	216	217	218	219	220	221	222	223	224	225	226	227	228	229	230	231	232	233	234	235	236	237	238	239	240	241	242	243	244	245	246	247	248	249	250	251	252	253	254	255	256	257	258	259	260	261	262	263	264	265	266	267	268	269	270	271	272	273	274	275	276	277	278	279	280	281	282	283	284	285	286	287	288	289	290	291	292	293	294	295	296	297	298	299	300	301	302	303	304	305	306	307	308	309	310	311	312	313	314	315	316	317	318	319	320	321	322	323	324	325	326	327	328	329	330	331	332	333	334	335	336	337	338	339	340	341	342	343	344	345	346	347	348	349	350	351	352	353	354	355	356	357	358	359	360	361	362	363	364	365	366	367	368	369	370	371	372	373	374	375	376	377	378	379	380	381	382	383	384	385	386	387	388	389	390	391	392	393	394	395	396	397	398	399	400	401	402	403	404	405	406	407	408	409	410	411	412	413	414	415	416	417	418	419	420	421	422	423	424	425	426	427	428	429	430	431	432	433	434	435	436	437	438	439	440	441	442	443	444	445	446	447	448	449	450	451	452	453	454	455	456	457	458	459	460	461	462	463	464	465	466	467	468	469	470	471	472	473	474	475	476	477	478	479	480	481	482	483	484	485	486	487	488	489	490	491	492	493	494	495	496	497	498	499	500	501	502	503	504	505	506	507	508	509	510	511	512	513	514	515	516	517	518	519	520	521	522	523	524	525	526	527	528	529	530	531	532	533	534	535	536	537	538	539	540	541	542	543	544	545	546	547	548	549	550	551	552	553	554	555	556	557	558	559	560	561	562	563	564	565	566	567	568	569	570	571	572	573	574	575	576	577	578	579	580	581	582	583	584	585	586	587	588	589	590	591	592	593	594	595	596	597	598	599	600	601	602	603	604	605	606	607	608	609	610	611	612	613	614	615	616	617	618	619	620	621	622	623	624	625	626	627	628	629	630	631	632	633	634	635	636	637	638	639	640	641	642	643	644	645	646	647	648	649	650	651	652	653	654	655	656	657	658	659	660	661	662	663	664	665	666	667	668	669	670	671	672	673	674	675	676	677	678	679	680	681	682	683	684	685	686	687	688	689	690	691	692	693	694	695	696	697	698	699	700	701	702	703	704	705	706	707	708	709	710	711	712	713	714	715	716	717	718	719	720	721	722	723	724	725	726	727	728	729	730	731	732	733	734	735	736	737	738	739	740	741	742	743	744	745	746	747	748	749	750	751	752	753	754	755	756	757	758	759	760	761	762	763	764	765	766	767	768	769	770	771	772	773	774	775	776	777	778	779	780	781	782	783	784	785	786	787	788	789	790	791	792	793	794	795	796	797	798	799	800	801	802	803	804	805	806	807	808	809	810	811	812	813	814	815	816	817	818	819	820	821	822	823	824	825	826	827	828	829	830	831	832	833	834	835	836	837	838	839	840	841	842	843	844	845	846	847	848	849	850	851	852	853	854	855	856	857	858	859	860	861	862	863	864	865	866	867	868	869	870	871	872	873	874	875	876	877	878	879	880	881	882	883	884	885	886	887	888	889	890	891	892	893	894	895	896	897	898	899	900	901	902	903	904	905	906	907	908	909	910	911	912	913	914	915	916	917	918	919	920	921	922	923	924	925	926	927	928	929	930	931	932	933	934	935	936	937	938	939	940	941	942	943	944	945	946	947	948	949	950	951	952	953	954	955	956	957	958	959	960	961	962	963	964	965	966	967	968	969	970	971	972	973	974	975	976	977	978	979	980	981	982	983	984	985	986	987	988	989	990	991	992	993	994	995	996	997	998	999	1000	1001	1002	1003	1004	1005	1006	1007	1008	1009	1010	1011	1012	1013	1014	1015	1016	1017	1018	1019	1020	1021	1022	1023	1024	1025	1026	1027	1028	1029	1030	1031	1032	1033	1034	1035	1036	1037	1038	1039	1040	1041	1042	1043	1044	1045	1046	1047	1048	1049	1050	1051	1052	1053	1054	1055	1056	1057	1058	1059	1060	1061	1062	1063	1064	1065	1066	1067	1068	1069	1070	1071	1072	1073	1074	1075	1076	1077	1078	1079	1080	1081	1082	1083	1084	1085	1086	1087	1088	1089	1090	1091	1092	1093	1094	1095	1096	1097	1098	1099	1100	1101	1102	1103	1104	1105	1106	1107	1108	1109	1110	1111	1112	1113	1114	1115	1116	1117	1118	1119	1120	1121	1122	1123	1124	1125	1126	1127	1128	1129	1130	1131	1132	1133	1134	1135	1136	1137	1138	1139	1140	1141	1142	1143	1144	1145	1146	1147	1148	1149	1150	1151	1152	1153	1154	1155	1156	1157	1158	1159	1160	1161	1162	1163	1164	1165	1166	1167	1168	1169	1170	1171	1172	1173	1174	1175	1176	1177	1178	1179	1180	1181	1182	1183	1184	1185	1186	1187	1188	1189	1190	1191	1192	1193	1194	1195	1196	1197	1198	1199	1200	1201	1202	1203	1204	1205	1206	1207	1208	1209	1210	1211	1212	1213	1214	1215	1216	1217	1218	1219	1220	1221	1222	1223	1224	1225	1226	1227	1228	1229	1230	1231	1232	1233	1234	1235	1236	1237	1238	1239	12310	

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<p>1 Q Please take a look at Exhibit 7 and 2 review it.</p> <p>3 A Okay.</p> <p>4 Q Having reviewed Exhibit 7, did it refresh 5 your recollection about an arrest of Mr. Pearson 6 that you were involved in?</p> <p>7 A No.</p> <p>8 Q Do you know someone named Sandra 9 Cartwright?</p> <p>10 A No.</p> <p>11 Q Do you know someone named Latrice Harris?</p> <p>12 A No.</p> <p>13 Q What about Vanessa King?</p> <p>14 A No.</p> <p>15 Q Other than your belief that your teammates 16 would not commit the kind of misconduct described 17 in the affidavit, do you have any other basis on 18 which to dispute it?</p> <p>19 MR. BAZAREK: Object to the form of the 20 question and also mischaracterizes prior testimony 21 he's given in his deposition.</p> <p>22 MS. KLEINHAUS: Go ahead.</p> <p>23 A I don't believe these events that took 24 place on this affidavit.</p>	<p>133</p> <p>1 supervisor of that misconduct.</p> <p>2 MR. BAZAREK: Hey, let's keep this under 3 protective order to the extent it's the subject of 4 a CR.</p> <p>5 MS. KLEINHAUS: Sure. I guess what you mean 6 is you want to mark this portion of the transcript 7 confidential and whatever our terms are for that 8 would apply here?</p> <p>9 MR. BAZAREK: Yeah.</p> <p>10 MS. KLEINHAUS: Okay.</p> <p>11 (The following portion from 135:13 to 12 138:23, was designated Confidential.)</p> <p>13 Q Sir, what was the misconduct that you were 14 asked to commit?</p> <p>15 A Sure. While I was working in the 16 15th District as a young officer, I was working 17 with an individual who was not a field training 18 officer. That individual asked me to remove a beat 19 tag from the 15th District car that we were working 20 in so that we could go into the 11th District 21 unnoticed.</p> <p>22 Q And what is the beat tag?</p> <p>23 A The beat tag is in between -- it's on a 24 marked squad car. It is a piece of</p>
<p>1 Q Well, why?</p> <p>2 A I've never observed any member of my team, 3 any member of the Chicago Police Department 4 conduct themselves in any way that is in this 5 affidavit.</p> <p>6 Q Okay. Have you ever seen any member of 7 the Chicago Police Department break any of the 8 rules or regulations of the Chicago Police 9 Department?</p> <p>10 MR. NOLAND: Objection, overly broad.</p> <p>11 MS. KLEINHAUS: Go ahead.</p> <p>12 A Yes.</p> <p>13 Q What violations of the rules have you 14 observed?</p> <p>15 A Well, I don't know the exact rule, but I 16 made a supervisor aware of what I thought was 17 misconduct.</p> <p>18 Q And what was the misconduct at issue in 19 that instance?</p> <p>20 A It was early on in my career, and someone 21 that I was working with asked me to do something 22 that I thought was misconduct. So I -- I did not 23 do that misconduct. I made up a story that I had 24 to use the restroom, and after that I notified a</p>	<p>134</p> <p>1 black-and-white plastic that is in the Mars light 2 of the top of the vehicle. It's a sequential 3 number that gives the district that you work in 4 and the beat that you are assigned to.</p> <p>5 Q Okay. And what was the reason that this 6 person asked you to remove the beat tag?</p> <p>7 A The reason that I was given was that we 8 were going to go into the 11th District and hit a 9 drug house.</p> <p>10 Q What do you mean by "hit"?</p> <p>11 A I understood the word hit to mean raid the 12 house.</p> <p>13 Q Okay. And raid the house in order to do 14 what?</p> <p>15 A Well, it was a drug house, so I assumed it 16 was for narcotics.</p> <p>17 Q Was the suggestion that you would make any 18 arrests at the house?</p> <p>19 A I could only -- this was 20 -- 21, 22 years 20 ago, ma'am. That's what I recall. I recall that.</p> <p>21 Q Okay. But was the plan to raid the house 22 to remove narcotics? Was the plan to make arrests 23 or what was the plan?</p> <p>24 A That was told to me. I don't know anything</p>

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<p>1 further than what was told to me, and that's what 2 was told to me. I don't know if it was to raid to 3 get narcotics or to raid to make arrests for 4 narcotics. That's what I know. That's what was 5 told to me.</p> <p>6 Q Okay. Who suggested that you remove the 7 beat tag and go to raid the drug house?</p> <p>8 A His name is Andy Napolitano.</p> <p>9 Q And who did you report that misconduct to?</p> <p>10 A Well, I was assigned -- I was detailed to 11 the 15th District but assigned to the Chicago 12 Police Academy. So I went to the Chicago Police 13 Academy, and I spoke with a detective. His last 14 name was -- I believe it was Clemens.</p> <p>15 Q And is that --</p> <p>16 A I told him -- I told him about the events 17 that took place. He then brought me to a sergeant 18 in the academy. Her name was Eve Gushes. She's a 19 commander now.</p> <p>20 Q And did you explain what had happened to 21 Commander Gushes?</p> <p>22 A Well, she was a sergeant at the time, 23 ma'am, but yes, I did.</p> <p>24 Q Okay. And what happened then?</p>	<p>1 Q Okay. You can put that exhibit to the side. 2 Do you know who Greg Dobbins is?</p> <p>3 A No.</p> <p>4 Q Do you know someone named Brenda Reid?</p> <p>5 A No.</p> <p>6 Q Do you know a person called Rasan Shannon?</p> <p>7 A No.</p> <p>8 Q Do you recall an arrest of those 9 individuals on March 14th of 2004?</p> <p>10 A No.</p> <p>11 (Bolton Deposition Exhibit 8 marked for 12 identification and attached to the transcript.)</p> <p>13 Q Okay. Please take a look at Exhibit 8.</p> <p>14 A Okay.</p> <p>15 Q Did reviewing Exhibit 8 refresh your 16 recollection at all about an arrest of Greg 17 Dobbins on March 14th of 2004.</p> <p>18 A No.</p> <p>19 Q Do you know of anything that would refresh 20 your recollection?</p> <p>21 A Not at this time.</p> <p>22 Q And you reviewed Mr. Dobbins' affidavit; 23 correct?</p> <p>24 A I did.</p>
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<p>1 A I believe a CR number was generated.</p> <p>2 Q Okay. Do you know what the outcome of 3 that CR was?</p> <p>4 A I don't know the outcome, ma'am.</p> <p>5 Q Okay. Other than reporting that instance 6 of misconduct, did you have any other occasions 7 where you have reported misconduct by another 8 police officer?</p> <p>9 A No.</p> <p>10 Q Okay. So turning your attention back to 11 the affidavit of Mr. Pearson, you dispute the 12 accuracy of his affidavit not based on your personal 13 knowledge but based on what you believe your 14 teammates would or would not do; is that right?</p> <p>15 MR. BAZAREK: Objection to the form of the 16 question; it's argumentative and also 17 mischaracterizes his prior testimony on these 18 subjects with the other affidavits.</p> <p>19 MS. KLEINHAUS: Go ahead, sir.</p> <p>20 A I've never observed any of my teammates do 21 any of this type of -- any type of this behavior. 22 So it would lead me to believe that this is a 23 false affidavit.</p> <p>24 (This concludes the confidential portion.)</p>	<p>1 Q And I assume that you believe that it's 2 false. Is that correct?</p> <p>3 A I believe it's false. I've never seen any 4 of my teammates act in the manner that is stated 5 in this affidavit.</p> <p>6 Q And that's the reason that you believe his 7 affidavit is false; right?</p> <p>8 A Yes.</p> <p>9 Q Any other reasons that we haven't talked 10 about?</p> <p>11 A No.</p> <p>12 Q Okay. You can put that exhibit to the side.</p> <p>13 Do you know who Brian Hunt is?</p> <p>14 A No.</p> <p>15 Q Do you recall the arrest or being involved 16 in the arrest of Brian Hunt on February 23rd of 2008?</p> <p>17 A No.</p> <p>18 (Bolton Deposition Exhibit 9 marked for 19 identification and attached to the transcript.)</p> <p>20 Q Please take a look at what's been marked 21 as Exhibit 9.</p> <p>22 A Okay.</p> <p>23 Q Did reviewing Exhibit 9 refresh your 24 recollection about the arrest of Brian Hunt on</p>

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1	February 23rd of '2008?	1	A Yes.
2	A No.	2	Q And what's the basis?
3	Q Do you know someone named Deonta Smith?	3	A I've never observed any of my teammates
4	A No.	4	conduct themselves in the manner that's stated in
5	Q Do you dispute the contents of Mr. Hunt's	5	this affidavit.
6	affidavit?	6	Q Okay. Any other reasons?
7	A Yes.	7	A No.
8	Q Why?	8	Q Okay. You can put that affidavit to
9	A I've never observed my teammates to	9	the side.
10	conduct themselves in this manner.	10	Do you know someone named Cleon Glover?
11	Q Anything else?	11	A No.
12	A Therefore, I believe that the affidavit is	12	Q Do you know anyone by the nickname Gambino?
13	false.	13	A No.
14	Q Any other reason for that belief?	14	Q Do you recall the arrest of Cleon Glover
15	A No.	15	on June 6, 2006?
16	Q Okay. You can put that exhibit to the side.	16	A No.
17	Do you know who Kenneth Hicks is?	17	(Bolton Deposition Exhibit 11 marked for
18	A No.	18	identification and attached to the transcript.)
19	Q Do you recall the arrest of Kenneth Hicks	19	Q Please take a look at Exhibit 11.
20	on October 3rd of 2007?	20	A Okay.
21	A No.	21	Q Having reviewed Exhibit 11, does that
22	(Bolton Deposition Exhibit 10 marked for	22	refresh your recollection about an arrest that you
23	identification and attached to the transcript.)	23	were part of for Cleon Glover on June 6 of 2006?
24	Q Please take a look at Exhibit 10.	24	A No.
	142		144
1	A Okay.	1	Q Do you know of anything that would refresh
2	Q Do you recognize the person depicted on	2	your recollection?
3	the last page of Exhibit 10?	3	A Not at this time.
4	A No.	4	Q Do you dispute what Mr. Glover says in his
5	Q Okay. Having reviewed Exhibit 10, did it	5	affidavit?
6	refresh your recollection at all about the	6	A I do.
7	October 3rd, 2007, arrest of Kenneth Hicks?	7	Q And why do you dispute it?
8	A No.	8	A I dispute it because I never observed any
9	Q Looking at the handwriting in the vice case	9	of my teammates conduct themselves in this manner
10	report in this exhibit -- so that's pages 8 and	10	that's stated in this affidavit.
11	9 of this 10-page exhibit -- do you recognize that	11	Q Any other reason?
12	handwriting?	12	A No.
13	A I believe it's Robert Gonzalez' handwriting.	13	MS. KLEINHAUS: Okay. You can put that to
14	Q Okay. And your name and signature are on	14	the side.
15	the first page of the vice case report; right?	15	MR. BAZAREK: Can we take a five-minute
16	A That's not my signature.	16	break?
17	Q Okay. Do you know whether or not you gave	17	MS. KLEINHAUS: Sure. Let's go off the
18	someone else permission to sign for you?	18	record.
19	A I would have given Robert Gonzalez	19	(Recess taken, 4:14 p.m. to 4:23 p.m.)
20	permission to write -- to sign my name.	20	BY MS. KLEINHAUS:
21	Q Sorry; hang on one second. Do you dispute	21	Q Sir, you testified earlier that for a
22	Mr. Hicks' account of this arrest?	22	period of time you were on the Watts tactical team
23	A In the affidavit that you mentioned, ma'am?	23	with Michael Spaargaren; correct?
24	Q Yes.	24	A Yes.

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<p>1 Q And do you know why Officer Spaargaren 2 left the Watts tactical team?</p> <p>3 A Yes.</p> <p>4 Q Why?</p> <p>5 A Michael Spaargaren and Ron Watts got into 6 an argument, and Mike Spaargaren was then removed 7 from the team.</p> <p>8 Q And what was the argument about?</p> <p>9 A It was about race.</p> <p>10 Q Okay. And what did that argument 11 consist of?</p> <p>12 A Well, from what I heard through the closed 13 door screaming match, it was Michael Spaargaren 14 thought he was being treated differently from the 15 black officers.</p> <p>16 Q In what sense?</p> <p>17 A Mike Spaargaren started a business, a home 18 inspection business and was having to leave on a 19 daily basis taking time to go and conduct these 20 home inspections during -- he would have to take 21 time to do it because they would be during our 22 work hours. So I believe that it was brought to 23 his attention that he can't be taking off of work 24 all the time to be doing these things, and he felt</p>	<p>145</p> <p>1 Q Where were you when you overheard this 2 argument?</p> <p>3 A I was in the upstairs roll call room.</p> <p>4 Q Was anyone with you?</p> <p>5 A That I don't remember.</p> <p>6 Q Where were Watts and Spaargaren?</p> <p>7 A In a closed room to the -- in a closed 8 room that is next to the roll call room.</p> <p>9 Q Is there a name for that room?</p> <p>10 A No.</p> <p>11 Q Okay. It's not a sergeant's office or 12 anyone's office?</p> <p>13 A No.</p> <p>14 Q How did Spaargaren believing he was being 15 treated differently based on his race relate to 16 the fact that he had a side business?</p> <p>17 A I believe Mike Spaargaren felt that 18 because of his race that other officers were able 19 to take time to do whatever they wanted and it was 20 no big deal, the black officers, and then because 21 of his race, he felt that he was being looked at 22 differently because of his race and having to take 23 time due. Meaning the black officers got 24 preferential treatment and never got any flack</p>
<p>1 that it was due to his race, that he wasn't 2 treated the same as the black officers.</p> <p>3 Q Were there black officers who -- sorry, 4 there's some feedback.</p> <p>5 A Yeah, there's feedback; I'm sorry.</p> <p>6 Q Were there black officers who had to take 7 time away from CPD for another business?</p> <p>8 A Not at that time.</p> <p>9 Q Okay. Do you know why Officer Spaargaren 10 believed he was being treated differently based 11 on race?</p> <p>12 A Do I know why he felt that way? I don't 13 know why he felt that way.</p> <p>14 Q You said you overheard a closed door 15 screaming match between Watts and Spaargaren?</p> <p>16 A Yes, they were screaming at each other.</p> <p>17 Q And what was Watts screaming at Spaargaren?</p> <p>18 A If I recall, it was, "You're done."</p> <p>19 Q Okay. And was this on one occasion that 20 you overheard this screaming argument?</p> <p>21 A Yeah, that was one occasion.</p> <p>22 Q Okay. And do you recall approximately 23 when that was?</p> <p>24 A I don't recall that.</p>	<p>146</p> <p>1 from that and he is. That's what I believed.</p> <p>2 Q Okay. And do you know where he transferred 3 to after he was on the Watts tactical team or what 4 his next assignment was?</p> <p>5 A I believe he was put on the -- a third 6 watch uniform team, and then I believe he took a 7 leave of absence from there.</p> <p>8 Q And do you know why he took a leave of 9 absence?</p> <p>10 A Yes. He became very successful at his 11 business of home inspection, so he was -- he 12 became so busy that he had to take a leave of 13 absence from the Chicago Police Department.</p> <p>14 Q Did he tell you that?</p> <p>15 A He never told me that, but he told me he 16 was very busy and he was taking a leave of absence.</p> <p>17 Q Did his leaving the Watts tactical team 18 have anything to do with why you were no longer 19 friends with him?</p> <p>20 A No. We were still friends.</p> <p>21 Q Okay. And were you still friends with him 22 during his leave of absence?</p> <p>23 A Yeah, he actually did a couple home 24 inspections for, I believe it was my father and my</p>

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<p>149</p> <p>1 aunt and also a rental property that myself and my</p> <p>2 father bought together.</p> <p>3 Q And eventually, did he come back to the</p> <p>4 police department from that leave of absence?</p> <p>5 A I believe so, yes.</p> <p>6 Q And were you friends with him once he came</p> <p>7 back from the leave of absence?</p> <p>8 A No.</p> <p>9 Q And why not?</p> <p>10 A He just went to a different -- a different</p> <p>11 district, and we never talked anymore.</p> <p>12 Q Did you observe any differences in how</p> <p>13 black officers and nonblack officers were treated</p> <p>14 on the Watts tactical team?</p> <p>15 A I wasn't treated any -- I don't believe I</p> <p>16 was treated any different than the black officers.</p> <p>17 Q Were you satisfied with the work that</p> <p>18 Officer Spaargaren did for you on the home</p> <p>19 inspections on your father, and your aunt, and</p> <p>20 your rental property?</p> <p>21 A Yeah. Yes.</p> <p>22 Q Do you know who Martez Wise is?</p> <p>23 A No.</p> <p>24 Q Do you recall the arrest of Martez Wise on</p>	<p>151</p> <p>1 Q Okay. In this incident narrative it refers</p> <p>2 to A/Os. Do you see that part?</p> <p>3 A Yes.</p> <p>4 Q And that refers to arresting officers;</p> <p>5 correct?</p> <p>6 A Yes.</p> <p>7 Q And that would refer to you and Officer</p> <p>8 Nichols as the first and second arresting officer?</p> <p>9 A Yes.</p> <p>10 QOkay. And according to this narrative,</p> <p>11 Mr. Wise spit out a bag of drugs from his mouth</p> <p>12 during a conversation with -- during a field</p> <p>13 interview with you and Officer Nichols; correct?</p> <p>14 A Yes.</p> <p>15 Q And then he spit out an additional</p> <p>16 13 baggies of drugs?</p> <p>17 A 13 not in bags.</p> <p>18 Q Does any of that ring a bell? Do you have</p> <p>19 any recollection of seeing someone spit out 14 bags</p> <p>20 of drugs?</p> <p>21 A No.</p> <p>22 Q Okay. Do you recognize the person depicted</p> <p>23 on the last page of this incident -- I'm sorry --</p> <p>24 exhibit?</p>
<p>150</p> <p>1 November 22nd, 2006?</p> <p>2 A No.</p> <p>3 (Bolton Deposition Exhibit 12 marked for</p> <p>4 identification and attached to the transcript.)</p> <p>5 Q Okay. Take a look, please, at what's been</p> <p>6 marked as Exhibit 12.</p> <p>7 MR. BAZAREK: Hey, Tess, I know you</p> <p>8 directed the deponent to Exhibit 12, but I also</p> <p>9 know the Wise affidavit is in Exhibit 13.</p> <p>10 MS. KLEINHAUS: Yeah. Right now we're</p> <p>11 just working with Exhibit 12.</p> <p>12 MR. BAZAREK: Okay.</p> <p>13 A Okay.</p> <p>14 Q Okay. Having reviewed Exhibit 12, did</p> <p>15 that refresh your recollection about the arrest of</p> <p>16 Martez Wise on November 22nd of 2006?</p> <p>17 A No.</p> <p>18 Q Okay. You are listed as the first</p> <p>19 arresting officer on this arrest report; correct?</p> <p>20 A Yes.</p> <p>21 Q As the first arresting officer, you would</p> <p>22 have written the incident narrative section of the</p> <p>23 report; right?</p> <p>24 A Most likely, yes.</p>	<p>152</p> <p>1 A No.</p> <p>2 Q Okay. You can put that exhibit to the side.</p> <p>3 A Okay.</p> <p>4 Q Do you know who Deon Willis is?</p> <p>5 A No.</p> <p>6 Q Do you recall an arrest of Deon Willis and</p> <p>7 Martez Wise on August 7th, 2008?</p> <p>8 A No.</p> <p>9 (Bolton Deposition Exhibit 13 marked for</p> <p>10 identification and attached to the transcript.)</p> <p>11 Q Okay. Take a look, please, at what's been</p> <p>12 marked as Exhibit 13.</p> <p>13 A Okay.</p> <p>14 Q Okay. Having reviewed what's been marked</p> <p>15 as Exhibit 13, did it refresh your recollection at</p> <p>16 all about the arrest of Deon Willis and Martez Wise</p> <p>17 on okay -- I'm sorry -- on August 7th, 2008?</p> <p>18 A No.</p> <p>19 Q Do you know of anything that would refresh</p> <p>20 your recollection?</p> <p>21 A Not at this time.</p> <p>22 Q Okay. Did you review the arrest report of</p> <p>23 Hassan Potts which is included in that exhibit? I</p> <p>24 believe it's the last portion of that exhibit.</p>

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1 A Yes.

2 Q Okay. Do you recall the arrest of
3 Mr. Potts on August 7th of 2008?

4 A No.

5 MS. KLEINHAUS: Those are all the
6 questions that I have for you today, sir, and I
7 believe we'll all be back again on Thursday.

8 THE WITNESS: Okay.

9 MS. KLEINHAUS: We can go off the record.

10 Thanks everybody.

11 (Off the record at 4:56 p.m. CST.)

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1 CERTIFICATE OF COURT REPORTER - NOTARY PUBLIC

2

3 I, Paula M. Quetsch, Certified Shorthand
4 Reporter No. 084-003733, CSR, RPR, and a Notary
5 Public in and for the County of Kane, State of
6 Illinois, the officer before whom the foregoing
7 deposition was taken, do hereby certify that the
8 foregoing transcript is a true and correct record
9 of the testimony given; that said testimony was
10 taken by me stenographically and thereafter reduced
11 to typewriting under my direction; that reading and
12 signing was requested; and that I am neither
13 counsel for, related to, nor employed by any of
14 the parties to this case and have no interest,
15 financial or otherwise, in its outcome.16 IN WITNESS WHEREOF, I have hereunto set my
17 hand and affixed my notarial seal this 30th day of
18 November, 2020.

19 My commission expires: October 16, 2021

20

21

22 
23 Notary Public in and for the
24 State of Illinois

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