

# Exhibit 6



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# Transcript of Manuel Leano

**Date:** September 26, 2019  
**Case:** Watts Coordinated Cases

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Transcript of Manuel Leano  
Conducted on September 26, 2019

1 (1 to 4)

1	IN THE UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION	1	A P P E A R A N C E S
2		2	ON BEHALF OF CERTAIN PLAINTIFFS:
3	IN RE: )	3	TERESA KLEINHAUS, ESQUIRE
4	WATTS COORDINATED CASES ) Master Docket	4	SCOTT R. RAUSCHER, ESQUIRE
	) Case No. 19-cv-01717	5	LOEVY & LOEVY
5	)	6	311 North Aberdeen Street
6		7	3rd Floor
7	Videotaped Deposition of:	8	Chicago, Illinois 60607
8	MANUEL LEANO	9	(312) 243-5900
9	Chicago, Illinois		
	Thursday, September 26, 2019		
	11:28 a.m.		
10		10	
11		11	ON BEHALF OF CERTAIN PLAINTIFFS:
12		12	JOEL A. FLAXMAN, ESQUIRE
13		13	KENNETH N. FLAXMAN, P.C.
14		14	200 South Michigan Avenue
15		15	Suite 201
16	Job No.: 262544	16	Chicago, Illinois 60604
17	Pages: 1 - 215	17	(312) 427-3200
	Reported by: Kimberly Winkler Christopher, CSR	18	
19		19	
20		20	
21		21	
22		22	
23		23	
24		24	
		2	
1	Videotaped Deposition of MANUEL LEANO, at	1	A P P E A R A N C E S (Continued)
2	the location of:	2	ON BEHALF OF DEFENDANTS ALVIN JONES, ROBERT
3		3	GONZALEZ, MIGUEL CABRALES, DOUGLAS NICHOLS, JR.,
4	LOEVY & LOEVY	4	MANUEL S. LEANO, BRIAN BOLTON, KENNETH YOUNG,
5	311 North Aberdeen Street	5	JR., DAVID SOLTIS, ELSWORTH J. SMITH, JR., JOHN
6	3rd Floor	6	RODRIGUEZ, GEROME SUMMERS, JR., CALVIN RIDGELL,
7	Chicago, Illinois 60606	7	JR., LAMONICA LEWIS, REBECCA BOGARD, FRANKIE
8	(312) 2432-5900	8	LANE, and KATHERINE MOSES-HUGHES, DARRYL EDWARDS:
9		9	ANTHONY E. ZECCHIN, ESQUIRE
10		10	HALE & MONICO, LLC
11		11	53 West Jackson Boulevard
12		12	Suite 337
13	Pursuant to notice, before Kimberly Winkler	13	Chicago, Illinois 60604
14	Christopher, a Certified Shorthand Reporter in and	14	(312) 870-6933
15	for the State of Illinois.	15	
16		16	ON BEHALF OF DEFENDANT KALLATT MOHAMMED:
17		17	ERIC S. PALLES, ESQUIRE
18		18	RAVITZ & PALLES, P.C.
19		19	203 North LaSalle Street
20		20	Suite 2100
21		21	Chicago, Illinois 60601
22		22	(312) 558-1689
23		23	
24		24	

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2 (5 to 8)

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8	Suite 2700	6 By Mr. Zecchin 205, 212
9	Chicago, Illinois 60603	7
10	(312) 372-0770	8
11		9
12	ON BEHALF OF DEFENDANTS CITY OF CHICAGO, PHILIP	10
13	CLINE, DEBRA KIRBY, KAREN ROWAN, JOSE LOPEZ,	11 LEANO EXHIBIT EXHIBITS PAGE
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17	REITER BURNS LLP	15 Exhibit 4 (Arrest Report) 187
18	311 South Wacker Drive	16
19	Suite 5200	17
20	Chicago, Illinois 60606	18
21	(312) 982-0090	19
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23		21
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		23
		24
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2	APPEA RANCES (Continued)	PROCEEDINGS
3	ON BEHALF OF DEFENDANTS MICHAEL SPAARGAREN and	THE VIDEOGRAPHER: This is the video
4	MATTHEW CADMAN:	deposition of Manuel Leano taken by Loevy & Loevy in
5	MICHAEL J. SCHALKA, ESQUIRE	the matter of the Watts coordinated pretrial
6	LEINENWEBER BARONI & DAFFADA LLC	proceedings, Master Docket Case No. 19-cv-01717,
7	120 North LaSalle Street	held at Loevy & Loevy, 311 North Aberdeen Street,
8	Suite 2000	Chicago, Illinois. Today is September 26th, 2019.
9	Chicago, Illinois 60602	The time is 11:28.
10	(312) 663-3003	The court reporter is Kim Christopher of
11	ALSO PRESENT:	10 Planet Depos. The videographer is Rick Kosberg.
12	MR. RICK KOSBERG, Videographer	11 Counsel can now introduce themselves and the court
13		12 reporter is free to administer the oath.
14		MR. RAUSCHER: Scott Rauscher on behalf of
15		14 all the -- all the plaintiffs represented by Loevy &
16		15 Loevy in the Watts coordinated cases.
17		MS. KLEINHAUS: Theresa Kleinhaus on behalf
18		17 of the Loevy & Loevy plaintiffs.
19		MR. FLAXMAN: Joel Flaxman on behalf of the
20		19 Flaxman plaintiffs.
21		MR. SCHALKA: Michael Schalka on behalf of
22		21 defendants Spaargaren and Cadman.
23		MR. PALLE: Eric Palles on behalf of
24		23 defendant Mohammed.
		MR. KOSOKO: Ahmed Kosoko on behalf of

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3 (9 to 12)

	9		11
1	Ronald Watts.	1	<b>second was also involved shooting.</b>
2	MR. MICHALIK: Paul Michalik on behalf of	2	Q Were they police shootings?
3	defendant City of Chicago and certain municipal	3	<b>A Yes, police involved shooting.</b>
4	official defendants.	4	Q Do you know the names of the plaintiffs in
5	MR. ZECCHIN: Anthony Zecchin on behalf of	5	those cases?
6	Officer Leano and the individual defendants	6	<b>A The officers you mean?</b>
7	represented by the Hale & Monico law firm.	7	Q No. The persons suing.
8	THE COURT REPORTER: Please raise your right	8	<b>A The persons suing? The first one was -- if</b>
9	hand.	9	<b>I'm not mistaken, is Christian Green; and the second</b>
10	(Witness sworn.)	10	<b>10 would be Ronald Johnson, I believe.</b>
11	MANUEL LEANO,	11	Q Were you a defendant in those cases?
12	having been duly sworn, testified as follows:	12	<b>A In the beginning, yes.</b>
13	DIRECT EXAMINATION BY COUNSEL FOR CERTAIN PLAINTIFFS	13	Q And then you were voluntarily dismissed?
14	BY MR. RAUSCHER:	14	<b>A I believe so.</b>
15	Q Mr. Leano, you understand you are a	15	Q Do you know how the cases were resolved?
16	defendant in a number of case -- individual cases in	16	<b>A The first one went to trial and the second</b>
17	the Watts coordinated cases?	17	<b>17 one I believe is still ongoing.</b>
18	<b>A Yes.</b>	18	Q Do you know the result of the trial in the
19	Q And today we are going to ask questions	19	Green case?
20	specifically about four cases. And just for the	20	<b>A I believe they found in favor of the</b>
21	record, I'm going read the case captions and numbers	21	<b>21 plaintiff.</b>
22	into the record.	22	Q But by the time of trial you were not a
23	So we have Anthony McDaniels -- and I'm just	23	defendant anymore?
24	going to list the plaintiffs and case numbers.	24	<b>A No.</b>
	10		12
1	Anthony McDaniels, Case No. 18-cv-5126; Christopher	1	Q No, you were not?
2	Scott, 18-cv-5128; Taurus Smith, 18-cv-5130; and	2	<b>A I was not.</b>
3	Lionel White, Senior, Case No. 17-cv-2877.	3	Q Were you the -- one of the officers who had
4	Do you understand that you are here to	4	been accused of shooting people in those cases?
5	answer questions about those cases?	5	<b>A No, I wasn't.</b>
6	<b>A Yes.</b>	6	Q Are you currently a Chicago police officer?
7	Q And it sounds like we have some construction	7	<b>A Yes, I am.</b>
8	going on upstairs so let me know if you ever can't	8	Q What's your current role with the police
9	hear one of my questions, okay?	9	department?
10	<b>A Yes.</b>	10	<b>A Administrative.</b>
11	Q And then also let me know if I ask a	11	Q How long have you been in an administrative
12	question and you don't understand it, okay?	12	role?
13	<b>A Okay.</b>	13	<b>A Since last -- November of 2017, I believe.</b>
14	Q And if you don't do that, I'm going to	14	Q How long have you been with the department?
15	assume that you did understand the question.	15	<b>A A little over 18 years.</b>
16	<b>A Okay.</b>	16	Q Was your move to an administrative role
17	Q How many times have you been deposed in the	17	voluntary?
18	past?	18	MR. ZECCHIN: Objection to form. You can
19	<b>A I would say at least two.</b>	19	answer.
20	Q Does that mean you have a specific	20	<b>A I don't believe so.</b>
21	recollection of being deposed twice?	21	Q Why do you not believe your move to an
22	<b>A Yes.</b>	22	administrative role in November of 2017 was
23	Q Tell me about those cases, please.	23	voluntary?
24	<b>A One was -- involved a shooting and the</b>	24	<b>A Could you repeat that?</b>

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4 (13 to 16)

	13		15
1	Q Sure. You said you don't believe that your	1	<b>A No, I didn't get a response.</b>
2	move to an administrative role was voluntary?	2	Q All right. Let's back up a step.
3	<b>A It wasn't voluntary.</b>	3	When you were -- when Ms. King told you that
4	Q Okay. And how did it come about that you	4	you were being moved to administrative duty, did you
5	got moved to an administrative role?	5	ask her why?
6	<b>A Well, I was a street officer and all of a</b>	6	<b>A Yes, I believe I did.</b>
7	<b>sudden I was informed I was going to be placed into</b>	7	Q And did she give you any sort of response?
8	<b>administrative duties.</b>	8	<b>A I don't believe she did.</b>
9	Q Who told you you were getting moved to	9	Q How long was your conversation with Ms. King
10	10 administrative duties?	10	10 when she told you you were getting moved to
11	<b>A I believe the commander at the time in the</b>	11	11 administrative duty?
12	<b>2nd District.</b>	12	<b>A Maybe 5, 10 minutes.</b>
13	Q And who was the commander at the time in the	13	Q Is -- and so what -- you think that all she
14	14 2nd District?	14	14 said in that 5 to 10 minutes was you're getting
15	<b>A I believe it's Crystal King.</b>	15	15 moved to administrative duty?
16	Q Crystal King?	16	<b>A I believe so, yes.</b>
17	<b>A Yes, sir.</b>	17	Q Did she say it in multiple different ways?
18	Q And what did Crystal King tell you about why	18	<b>A She said we were being taken off the street</b>
19	19 you were getting moved to an administrative role?	19	<b>and placed into administrative duties. The context</b>
20	<b>A I don't recall what was said except we were</b>	20	<b>20 of the conversation, that's all I can remember.</b>
21	<b>being reassigned to administrative duties.</b>	21	Q Do you remember where you were when you had
22	Q Who is the "we"?	22	22 this conversation?
23	<b>A Myself, Officer Nichols, and I believe</b>	23	<b>A I believe we were in a tac office and then</b>
24	<b>Officer Gonzalez.</b>	24	<b>we were called into her office.</b>
	14		16
1	Q And was that one conversation with the three	1	Q And I think you've already said you don't
2	2 of you and Crystal King?	2	remember if you were individually called in or
3	<b>A I don't recall whether it was individual or</b>	3	3 called in together; is that right?
4	<b>all at once.</b>	4	<b>A That is correct.</b>
5	Q Was it an in-person conversation?	5	Q Is desk duty another name for administrative
6	<b>A Yes.</b>	6	6 duty?
7	Q Is it Ms. King, Crystal King?	7	<b>A You could say so.</b>
8	<b>A I couldn't tell you if it was Ms. King or</b>	8	Q Is it referred to as desk -- is
9	<b>Mrs. King.</b>	9	9 administrative duty referred to as desk duty at
10	Q All right. Do you remember anything else	10	10 the --
11	11 that -- we'll say Ms. King for today -- Ms. King	11	<b>A Well, administrative duty is basically</b>
12	12 told you about why you were getting moved to	12	<b>12 you're not on the street.</b>
13	13 administrative duty?	13	Q You're at a desk?
14	<b>A No.</b>	14	<b>A At a desk or somewhere in the station.</b>
15	Q So she just said you're getting moved to	15	Q And what have you specifically been doing
16	16 administrative duty with no context?	16	16 since November of 2017?
17	<b>A Yes.</b>	17	<b>A I've been entering what is called blue</b>
18	Q Did you have any questions about that?	18	<b>18 cards, which is basically officers documenting their</b>
19	<b>A I -- I might have asked why, but I wasn't</b>	19	<b>19 traffic stop where a citation is not given.</b>
20	<b>told at that moment why.</b>	20	Q Do you consider being placed on desk duty --
21	Q You think you asked her why but didn't get a	21	21 well, let me back up.
22	22 response?	22	Is it -- do you refer to what you're on as
23	<b>A No.</b>	23	23 desk duty?
24	Q No, you don't think --	24	<b>A Administrative.</b>

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5 (17 to 20)

	17		19
1 Q Okay. Do you consider being moved to 2 administrative duty discipline?		1 Q You know it's unfair on your part?	
3 A Do I believe?		3 A Yes.	
4 Q Yes.		4 Q Why is it unfair that you've been placed on 5 administrative duty?	
5 A Yes.		6 A Well, I used to be an officer that's on the 7 street and now all of a sudden I'm on administrative 8 duty entering blue cards that document that the 9 officers -- traffic stop when a citation is not 10 given. I don't believe that's a police -- as an 11 officer, I don't believe that's a police duty that I 12 should be doing.	
6 Q Why do you believe that you've been 7 disciplined?		13 Q So it sounds like you don't like the job of 14 administrative duty. Is that fair?	
8 A Why do I believe I've been disciplined?		15 A I would rather be on the street, if that's 16 what you're asking me to.	
9 Q Yes.		17 Q Well, I think -- that's one question is 18 whether you enjoy the job responsibilities of being 19 on administrative duty.	
10 A Because -- I can't say, but it has to do 11 something with all these cases being exonerated.		20 A No, I don't enjoy being on administrative 21 duty.	
12 Q When you were told that you got placed on 13 administrative duty, did you talk to Nichols or 14 Gonzalez?		22 Q And a separate question is you said you 23 don't believe it was fair to -- for you to be placed 24 on administrative duty, right?	
15 A Did I talk to -- I believe they were present 16 when we were told we were being placed into 17 administrative duty.		20 A Yes.	
18 Q Do you think it's more likely that all three 19 of you were told at the same time?		21 Q And tell me why it wasn't fair for the 22 Chicago Police Department to put you on 23 administrative duty?	
20 A We were probably told at the same time, but 21 we probably spoke to the commander individually at 22 some point.		24 A Because I believe I didn't do anything wrong 25 to be placed on administrative duties.	
23 Q On the same day or --		21 Q Do you still carry a gun?	
24 A At the same -- at that day.	18	22 A Yes, sir.	
1 Q And when you were all told at the same time, 2 did anybody else respond?		23 Q Are you -- do you still have the power to 24 arrest people?	
3 A I'm pretty sure they had, but I can't 4 remember what that response would be.		25 A Yes, sir.	
5 Q Have you -- since then have you talked to 6 them about the fact that you're on administrative 7 duty?		21 Q Have you been stripped of any of your police 22 powers?	
8 A As to what context?		24 A No, I haven't.	
9 Q At all.		25 Q Do you still get paid the same amount that 21 you were getting paid in November 2017?	
10 A I mean, we -- Officer Nichols and I, we 11 still work together in the same office as an 12 administrative officer.		21 A For the most part, yes.	
13 Q Have you ever talked -- have you ever talked 14 to either of them about whether you -- whether they 15 think that it's fair that they're on administrative 16 duty?		22 Q So you haven't gotten any pay deducted or 23 gotten lower pay or --	
17 A I have -- I mean, I know it's not -- it's 18 not fair on my part being on administrative duty. I 19 don't know if they have mentioned it to me that they 20 feel that it's unfair on them also, but I know it's 21 unfair on mine.		24 A My regular pay is still the same.	
22 Q You said you don't know if they've mentioned 23 to you?		25 Q Okay. How long have you been a police 21 officer?	
24 A No, I don't recall whether they mentioned it		23 A A little over 18 years.	
		24 Q When you were placed on administrative duty,	

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6 (21 to 24)

<p>1 were you given any paperwork to sign?</p> <p>2 <b>A I don't believe so.</b></p> <p>3 Q Were you moved into a different unit when</p> <p>4 you got placed on administrative duty?</p> <p>5 <b>A No, I wasn't.</b></p> <p>6 Q What unit are you currently in?</p> <p>7 <b>A Still the 2nd District assigned to 264 team.</b></p> <p>8 Q Assigned to what?</p> <p>9 <b>A 264 team.</b></p> <p>10 Q Are you assigned to a different team than</p> <p>11 you used to be assigned to?</p> <p>12 <b>A I was previously assigned to that unit.</b></p> <p>13 Q Were you previously assigned to the 264</p> <p>14 team?</p> <p>15 <b>A Yes. I was assigned to 264 and remain in</b></p> <p>16 <b>264.</b></p> <p>17 Q But you're just doing different things; is</p> <p>18 that right?</p> <p>19 <b>A Just in administrative portion of it.</b></p> <p>20 Q What shift do you currently work?</p> <p>21 <b>A 1700 to 0200.</b></p> <p>22 Q So the same shift you were working before?</p> <p>23 <b>A Before we used to rotate nights and days.</b></p> <p>24 <b>So nights would be 1700 to 0200. Days would be</b></p> <p>22</p> <p>1 either 0900 to -- it was 6:00 p.m., 1800 or 10:00</p> <p>2 a.m. to 1900.</p> <p>3 Q So now you're working nights?</p> <p>4 <b>A Yeah, strictly nights.</b></p> <p>5 Q And was that a choice by you?</p> <p>6 <b>A Yes, it was.</b></p> <p>7 Q Do you remember the year you started with</p> <p>8 the Chicago Police Department?</p> <p>9 <b>A Excuse me?</b></p> <p>10 Q Do you remember what year you started with</p> <p>11 the Chicago Police Department?</p> <p>12 <b>A I started March -- March 26th, 2001.</b></p> <p>13 Q Walk me through your various roles with the</p> <p>14 police department, if you can put times around them</p> <p>15 if they've changed over the years.</p> <p>16 <b>A March 26th, 2001, I was at the academy. I</b></p> <p>17 <b>believe I hit the street November of 2001. I worked</b></p> <p>18 <b>first watch, midnights, from 2- -- November 2001</b></p> <p>19 <b>until November of 2004. That's when I came to tac</b></p> <p>20 <b>team/housing team, 264 team, and remained on that</b></p> <p>21 <b>team until the present day as being in</b></p> <p>22 <b>administrative duties.</b></p> <p>23 Q So from '04 to November -- so basically is</p> <p>24 it November of 2004?</p>	<p>21</p> <p>1 <b>A November 2004.</b></p> <p>2 Q Until November of 2017 you were on the tac</p> <p>3 team in the 2nd District on the street?</p> <p>4 <b>A Yes.</b></p> <p>5 Q Okay. And then since then you've been on</p> <p>6 the tac team in the 2nd District but just in an</p> <p>7 administrative role?</p> <p>8 <b>A That would be correct.</b></p> <p>9 Q What has your title been?</p> <p>10 <b>A My title?</b></p> <p>11 Q What is your title?</p> <p>12 <b>A Police officer.</b></p> <p>13 Q Has that always been your title?</p> <p>14 <b>A Yes.</b></p> <p>15 Q Did your responsibilities change from '04 to</p> <p>16 November 2017?</p> <p>17 <b>A Did my responsibilities change --</b></p> <p>18 Q So setting apart the administrative duty,</p> <p>19 there was a 13-year period or so when you were on</p> <p>20 the street as a member of the tac team, correct?</p> <p>21 <b>A Yes.</b></p> <p>22 Q And did your responsibilities as a member of</p> <p>23 the tac team change over the years?</p> <p>24 <b>A No.</b></p> <p>24</p> <p>1 Q What were your main responsibilities as a</p> <p>2 member of the tac team in the 2nd District from '04</p> <p>3 to 2017?</p> <p>4 <b>A Our main responsibilities, any housing</b></p> <p>5 <b>project in the 2nd District.</b></p> <p>6 Q What do you mean when you say your</p> <p>7 responsibilities are the housing projects?</p> <p>8 <b>A Any housing projects -- we patrol any</b></p> <p>9 <b>housing project that's located in the 2nd District.</b></p> <p>10 Q And from November 26, 2004, to November 2017</p> <p>11 what were the housing projects located in the 2nd</p> <p>12 District?</p> <p>13 <b>A There's Ida B. Wells; there's a Washington</b></p> <p>14 <b>Park Homes; there's small scattered places; and</b></p> <p>15 <b>there's also Stateway.</b></p> <p>16 Q And did you patrol all three of those -- or</p> <p>17 would you say three of them are like the main</p> <p>18 housing projects in the 2nd District during that</p> <p>19 time period?</p> <p>20 <b>A I would say the main ones are Ida B. Wells</b></p> <p>21 <b>and Stateways.</b></p> <p>22 Q Did you patrol both Ida B. Wells and</p> <p>23 Stateways?</p> <p>24 <b>A Yes.</b></p>
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7 (25 to 28)

	25		27
1	Q And were there different time periods when	1	night and day?
2	you patrolled them or was it one day at Ida B. Wells	2	<b>A Yes.</b>
3	and maybe the next day at Stateways?	3	Q How frequently did your shifts rotate?
4	<b>A It varies. Whichever we have more</b>	4	<b>A Every period, which is basically every</b>
5	<b>complaints, we would focus on that housing projects.</b>	5	<b>month.</b>
6	Q How frequently would it vary where you went?	6	Q Were the eight officers led by Sergeant
7	<b>A I mean, it all depends. We try to patrol</b>	7	Watts -- did you all work together every day?
8	<b>all the housing projects in the 2nd District during</b>	8	<b>A Did we work together every day?</b>
9	<b>the day at some point.</b>	9	Q Yes.
10	Q So it could be one day you're at both Ida B.	10	<b>A I don't believe we do -- we worked together</b>
11	Wells and Stateways?	11	<b>every day, no.</b>
12	<b>A Yes.</b>	12	Q Did you work together -- did you work with
13	Q And when you're out patrolling the housing	13	other people also during that time period?
14	projects -- when you were out patrolling the housing	14	<b>A Did I work with other people? If my partner</b>
15	projects in the 2nd District, what were you doing	15	<b>is off that day, I probably worked with a different</b>
16	specifically?	16	<b>officer that day.</b>
17	<b>A Looking for any criminal activities, whether</b>	17	Q Would it be a different officer who's on the
18	<b>it be drugs, guns, gang activities, battery,</b>	18	18 tac team?
19	<b>robberies.</b>	19	<b>A On my -- on our tac team.</b>
20	Q What were the most common types of crimes in	20	Q So I should rephrase the question.
21	Ida B. Wells and Stateways from November of 2004 to	21	Did you all work -- did the eight officers
22	November 2 of 2017?	22	and Sergeant Watts all work together on the days
23	<b>A I mean, I state whether most obvious crime</b>	23	23 when they were working?
24	<b>would be narcotics.</b>	24	<b>A I don't understand the question you're</b>
	26		28
1	Q You said the most obvious crime --	1	<b>asking me.</b>
2	<b>A Yeah.</b>	2	Q So -- you were all on a team, the eight
3	Q (Continuing) -- would be narcotics?	3	officers led by Sergeant Watts?
4	<b>A Narcotics, yes.</b>	4	<b>A Yes.</b>
5	Q How many members of the tac team were there	5	Q And did other officers go out patrolling
6	from, let's say, November of 2004 to 2- -- to the	6	6 with your tac team?
7	end of 2008?	7	<b>A I don't understand what you mean by other</b>
8	<b>A Could you repeat that question?</b>	8	<b>officer.</b>
9	Q Do you know how many members of the tac team	9	Q Other officers who are not members of your
10	there were from November of 2004 until the end of	10	10 tac team.
11	2008?	11	<b>A They patrol -- it doesn't restrict them of</b>
12	<b>A Are you speaking of our tac team?</b>	12	<b>patrolling any of the housing projects. They're</b>
13	Q Your tac team.	13	<b>Chicago police officers.</b>
14	<b>A It consist of eight officer and one</b>	14	Q Who was your partner from 2004 to 2008,
15	<b>sergeant.</b>	15	15 partner or partners?
16	Q Who were those officers during the 2004 to	16	<b>A My regular partner would be Officer Douglas</b>
17	2008 time frame?	17	<b>Nichols.</b>
18	<b>A That would be Ronald Watts. And if I'm not</b>	18	Q Did your shifts rotate with him? Did you
19	<b>mistaken, it would be Kenny Young, Officer Jones,</b>	19	19 and him rotate together?
20	<b>Elsworth Smith, Cynthia Torres I believe, myself,</b>	20	<b>A Yes, we did.</b>
21	<b>Officer Douglas Nichols, Brian Bolton, and Robert</b>	21	Q What did it mean for your job to be a member
22	<b>Gonzalez, if I'm not mistaken.</b>	22	22 of -- can I call it the Watts team? Will you
23	Q And from 2004 -- from November of 2004	23	23 understand what I'm talking about?
24	24 through the end of 2008, did your shifts rotate	24	<b>A If you want to refer as the Watts team, but</b>

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8 (29 to 32)

1	I refer to it as 264 team.	29	1	the tac office.	31
2	Q 264 team?		2	Q How many arrests do you think you	
3	A Yes.		3	participated in as a member of the 2nd District tac	
4	Q Did you call it the 264 team at the time?		4	team?	
5	A Yes.		5	A I can't even guess to tell you.	
6	Q Okay. What did it mean for your day to day		6	Q Was it in the thousands?	
7	to be a member of the 64 team?		7	A I -- I can't answer whether it's in the	
8	MR. ZECCHIN: Objection to form. You can		8	thousand or in the hundreds.	
9	answer if you understand the question.		9	Q Can you say it's more than 500?	
10	A It's kind of vague, what question -- what		10	A I believe possibly more than 500.	
11	you're asking me.		11	Q Do you think it's more than a thousand?	
12	Q Well, can you just describe what a typical		12	A It could be.	
13	day would look like as a member of the 264 team for		13	Q Do you think it's more than 2,000?	
14	you?		14	A Possible, but I don't it.	
15	A We would patrol the entire 2nd District, but		15	Q So somewhere between 500 and 2,000 most	
16	mostly the housing, and try to arrest people		16	likely?	
17	committing crimes.		17	MR. ZECCHIN: Objection, form. You can	
18	Q How would the day start as a member of the		18	answer.	
19	264 team?		19	A I guess.	
20	A We would have a roll call in the 2nd		20	Q Is between 500 and 2,000 your best estimate	
21	District.		21	of how many arrests you participated in as a member	
22	Q And who would lead the roll call?		22	of the 2nd District tactical team?	
23	A The sergeant of 264 team would be Ronald		23	A If I would have to guess, maybe.	
24	Watts.	30	24	Q Do you have a specific recollection of many	32
1	Q What topics were covered at the roll calls		1	of those arrests?	
2	led by Ronald Watts?		2	A A few or a couple.	
3	A What happened the night before or the		3	Q When you say "A few or a couple," you mean	
4	previous day or any complaints that's been received		4	two to three?	
5	that day or the night before and what we need to		5	A Two or three maybe, yes.	
6	focus on that day.		6	Q And I know we have specific cases to cover	
7	Q How long did roll calls led by Ronald Watts		7	today, but can you just give me a list of the two to	
8	last?		8	three cases -- two to three arrests that you	
9	A It varies. Sometimes ten minutes, sometimes		9	specifically remember?	
10	half an hour.		10	A That I can't recall at this moment.	
11	Q And then what's the next thing you as an		11	Q So you don't -- you don't remember the names	
12	officer would do after roll call finished?		12	of the two to three arrests you remember?	
13	A We'd get our gears together and then we		13	A No.	
14	would hit the street.		14	Q What do you remember about them?	
15	Q Would someone tell you where you should be		15	A Well, the two shootings and McDaniels. I	
16	going?		16	remember McDaniels.	
17	A If there's a special problem that was -- we		17	Q So those are the three things that you	
18	needed to address that day, yes. If not, we're free		18	remember --	
19	to roam the 2nd District or any housing project in		19	A Yes.	
20	the 2nd District.		20	Q (Continuing) -- from your 13 years on the	
21	Q If there was a special problem that you were		21	tac team?	
22	supposed to be concentrating on, who would tell you		22	A I mean, nothing sticks out at this moment.	
23	where you should be going?		23	There may be something that could refresh my memory,	
24	A Either our sergeant or any other sergeant in		24	but at this moment I don't know what that might be.	

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9 (33 to 36)

	33		35
1	Q Has your memory about McDaniels been	1	<b>A Could be.</b>
2	refreshed or do you have an independent	2	Q Do you think you chased more than 200 people
3	recollection?	3	as a member of the 2nd District tactical team?
4	<b>A No, I have an independent recollection of</b>	4	<b>A Possible.</b>
5	<b>McDaniels.</b>	5	Q Do you think you chased more than 300 people
6	Q Is there some particular reason you think --	6	as a member of the 2nd District tactical team?
7	let me rephrase that.	7	<b>A Possible.</b>
8	Is there a particular reason that you can	8	Q Do you think you chased more than 400
9	think of why you remember Anthony McDaniels' arrest	9	people?
10	but no other ones other than two shootings?	10	<b>A Like I said, again, possible.</b>
11	MR. ZECCHIN: Objection to form. You can	11	Q But as you sit here today, you don't
12	answer.	12	remember any of those up to 500 chases other than
13	<b>A Well, McDaniels is a gun arrest. I don't</b>	13	13 McDaniels?
14	<b>make -- I haven't made too many arrests -- gun</b>	14	<b>A Well, out of those chase, nothing really</b>
15	<b>arrests. And it's kind of particular. There was an</b>	15	<b>sticks out in my mind.</b>
16	<b>actual chase that happened, a car chase and a foot</b>	16	Q So do you remember any of the 500 or so
17	<b>chase. So it sticks -- something that sticks out in</b>	17	17 chases?
18	<b>my memory.</b>	18	MR. ZECCHIN: Objection to form. You can
19	Q Got it. You didn't have to chase a lot of	19	answer.
20	people over the years?	20	<b>A No.</b>
21	<b>A Chase, but nothing that sticks out like</b>	21	Q Did you ever patrol with Ronald Watts?
22	<b>McDaniels sticks out.</b>	22	<b>A I'm pretty sure I have.</b>
23	Q How many foot chases do you think you	23	Q Do you know how many times you went out on
24	participated in on your 13 years on the tac team in	24	24 patrol with Ronald Watts?
	34		36
1	the 2nd District?	1	<b>A That I can't recall.</b>
2	<b>A I couldn't -- I couldn't tell you.</b>	2	Q And you said you remembered McDaniels and
3	Q What's your best estimate of how many foot	3	then the two shootings.
4	chases you participated in on the 2nd District tac	4	Are those the two shootings that you talked
5	team?	5	about at the beginning?
6	<b>A I can't even guess.</b>	6	<b>A Yes.</b>
7	Q Is it because it's too many to guess?	7	Q Okay. How many gun arrests have you been
8	<b>A I wouldn't say too many, but I don't want to</b>	8	involved in as a police officer?
9	<b>give you the wrong amount or number.</b>	9	<b>A I can't -- I can't guess how many.</b>
10	Q Was it more than five?	10	Q Is it more than a hundred?
11	<b>A Yes.</b>	11	<b>A Probably.</b>
12	Q Did you have to chase more than 10 people in	12	Q Do you think it's more than 500?
13	13 years?	13	<b>A Possible, but I doubt it.</b>
14	<b>A Probably.</b>	14	Q Somewhere between 100 and 500 gun arrests?
15	Q Do you think you've had to chase more than	15	<b>A Possible.</b>
16	50 people in your 13 years on the tac team?	16	Q And all of those as a member of the 2nd
17	<b>A Possible.</b>	17	District tactical team?
18	Q Do you think you chased more than a hundred	18	<b>A Yes.</b>
19	people in 13 years on the tac team?	19	Q And when I've been asking questions about
20	<b>A Possible.</b>	20	20 the 2nd District tactical team, have you understood
21	Q Do you think you chased more than 500 people	21	21 those to be about your time on the 264 team?
22	in 13 years on the tac team?	22	<b>A Yes.</b>
23	<b>A I doubt it.</b>	23	Q Other than McDaniels, which gun arrests do
24	Q Somewhere between 100 and 500?	24	24 you remember?

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10 (37 to 40)

	37		39
1 <b>A Actually nothing sticks out in my mind at</b>		1 <b>A Officer Nichols, I believe.</b>	
2 <b>this moment.</b>		2   Q And who was Watts with anybody?	
3   Q Did members of the 264 team socialize		3 <b>A I don't believe -- I believe he was by</b>	
4   together?		4 <b>himself.</b>	
5        MR. ZECCHIN: Objection to the word		5   Q Was he already off of the force by the time?	
6   "socialize."		6 <b>A Excuse me?</b>	
7 <b>A I don't understand what you mean by</b>		7   Q Was he already off the force when you saw	
8   "socialize."		8   him?	
9   Q Did you spend time together outside of work		9 <b>A Yes.</b>	
10 with any of the members of the 264 team?		10   Q Where did you -- where did you bump into	
11 <b>A A police department involved function, yes.</b>		11   him?	
12   Q I'm sorry. Say that again.		12 <b>A I believe a restaurant. I can't recall the</b>	
13 <b>A Police department involved functions, yes.</b>		13 <b>restaurant. Somewhere on the South Side.</b>	
14   Q If there was police department sponsored		14   Q Did you say anything to him?	
15 events basically?		15 <b>A Hi, how you doing. That's about it.</b>	
16 <b>A For the most part, yes.</b>		16   Q And what did he say in response to you?	
17   Q Would you go get drinks together?		17 <b>A He didn't say much. He said he was doing</b>	
18 <b>A Would we go get drinks together? I'm pretty</b>		18 <b>all right. I believe that was his response.</b>	
19 <b>sure it happens once or twice, but more than that I</b>		19   Q How long was Nichols your partner?	
20 <b>don't recall.</b>		20 <b>A Nichols was my partner from November '04 --</b>	
21   Q Were you friends with any of the members of		21 <b>he took maybe a six-month break, went back to the</b>	
22 the 264 team outside of work?		22 <b>watch for six months and then came back and became</b>	
23 <b>A I mean, I consider them friends, but we</b>		23 <b>my partner again. So from 2004 until now except</b>	
24 <b>rarely hang out afterwards.</b>		24 <b>that six months when he went back to the watch.</b>	
	38		40
1   Q And has that always been the case?		1   Q He went back to the watch?	
2 <b>A Yes.</b>		2 <b>A Yes.</b>	
3   Q Which members of the 264 team do you		3   Q What does that mean?	
4 consider to be personal friends?		4 <b>A He went back to the watch. He was no longer</b>	
5 <b>A I consider everyone on the 264 team my</b>		5 <b>on the tac team.</b>	
6 <b>personal friends.</b>		6   Q What does it mean to be on the watch?	
7   Q Including Ronald Watts?		7 <b>A You work in a marked vehicle, respond to</b>	
8 <b>A Yes.</b>		8 <b>radio calls.</b>	
9   Q Was Kallatt Mohammed on the 264 team?		9   Q Do you know why he went back to the watch	
10 <b>A Yes, he was.</b>		10 for six months?	
11   Q Is he a friend of yours?		11 <b>A I didn't ask him.</b>	
12 <b>A I consider him a friend, yes.</b>		12   Q But do you know why he went back to the	
13   Q When was the last time you talked to Ronald		13 watch?	
14 Watts?		14 <b>A No, I didn't.</b>	
15 <b>A Last time I talked to him or bump into him?</b>		15   Q Did anybody tell you why?	
16   Q Either or both.		16 <b>A No.</b>	
17 <b>A I think the last time I bumped into him was</b>		17   Q Did you -- do you have any information as to	
18 <b>after he got arrested.</b>		18 why he went to the watch?	
19   Q Did you talk to him then?		19 <b>A I don't recall -- I don't recall why he went</b>	
20 <b>A We -- we were eating lunch. He just</b>		20 <b>to the watch.</b>	
21 <b>happened to walk in when we were eating lunch. Not</b>		21   Q Do you know -- can you tell me again what	
22 <b>much was said. We just -- he ordered his food,</b>		22 time period it was that he went to the watch?	
23 <b>ate -- and we ate.</b>		23 <b>A That I couldn't tell you, the time period he</b>	
24   Q Who were you with?		24 <b>went back to the watch.</b>	

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11 (41 to 44)

<p>1     Q And were you curious as to why he wasn't 2 your partner anymore?</p> <p>3     <b>A He said he was going on the watch and I left 4 it at that.</b></p> <p>5     Q Why didn't you ask him any follow-up 6 questions?</p> <p>7     <b>A I didn't believe I needed to. If that's 8 what he wanted to do, I guess that's what was best 9 for him at that moment.</b></p> <p>10    Q And then when he came back, did you talk 11 about why he had left then?</p> <p>12    <b>A No.</b></p> <p>13    Q Who was your partner while Nichols was on 14 the watch?</p> <p>15    <b>A I believe Mark -- I'm probably going to 16 butcher his last name. Kowetski (phonetic) or 17 something like that. Probably I even said it wrong. 18 Mark something.</b></p> <p>19    Q When you were on the 264 team, were you 20 patrolling in unmarked vehicles?</p> <p>21    <b>A That would be correct, yes.</b></p> <p>22    Q And did you wear uniforms?</p> <p>23    <b>A Wear plain clothes with a vest over it, a 24 bulletproof vest.</b></p>	<p>41</p> <p>1     Q And did you talk with other members of the 2 264 team on your cell phones about work?</p> <p>3     <b>A It could be work or it could be something 4 else.</b></p> <p>5     Q How frequently would you call each other on 6 your cell phones to talk about the things that were 7 happening in the 2nd District?</p> <p>8     <b>A I don't understand what you mean how often.</b></p> <p>9     Q So how frequent -- like every day would you 10 call people on their cell phones to talk about 11 things that happened on the job?</p> <p>12    <b>A You mean after work would I call them and 13 say --</b></p> <p>14    Q No, no. Did -- well, okay. Let me back up.</p> <p>15    Did you use your cell phone during a shift 16 to talk about things that were happening on the 17 shift?</p> <p>18    <b>A I doubt it.</b></p> <p>19    Q You don't remember doing that?</p> <p>20    <b>A No, I don't believe I used my phones about 21 what was going on that day.</b></p> <p>22    Q Sorry. Say that again.</p> <p>23    <b>A I don't believe I used my phone to call 24 another officer to discuss what was going on that</b></p>
<p>42</p> <p>1     Q Did you get to know a lot of the residents 2 in Ida B. Wells over the years as a member of the 3 264 team?</p> <p>4     <b>A I don't understand what you mean "get to 5 know." I mean, I say hi to people that says hi to 6 me.</b></p> <p>7     Q Did you begin to recognize certain people?</p> <p>8     <b>A Yeah. Certain people I recognized, yes.</b></p> <p>9     Q And did people recognize you as a police 10 officer?</p> <p>11    <b>A Yes.</b></p> <p>12    Q You weren't undercover?</p> <p>13    MR. ZECCHIN: Objection to form.</p> <p>14    <b>A I don't understand what you mean "under 15 cover."</b></p> <p>16    Q Well, was it -- it wasn't any sort of secret 17 that you were a police officer even though you 18 weren't wearing a uniform. Is that fair?</p> <p>19    <b>A Yes, that's fair.</b></p> <p>20    Q Did you have cell phone numbers of other 21 members of the 264 team?</p> <p>22    <b>A I believe I did, yes.</b></p> <p>23    Q And did you all talk on your cell phones?</p> <p>24    <b>A Yes.</b></p>	<p>42</p> <p>1     <b>day.</b></p> <p>2     Q Do you know whether the Cook County State's 3 Attorney's Office will call you as a witness in 4 criminal cases?</p> <p>5     <b>A Could you repeat that?</b></p> <p>6     Q Do you know whether the Cook County State's 7 Attorney's Office will currently use you as a 8 witness in criminal cases?</p> <p>9     <b>A From what I have seen in the news and in the 10 Internet, no, they're not willing to call us for any 11 cases.</b></p> <p>12    Q And I just mean you specifically.</p> <p>13    <b>A Me? No, they're not willing to call me in 14 any cases.</b></p> <p>15    Q Has anybody told you other than a news 16 report?</p> <p>17    <b>A I found out as -- like everyone else, when 18 it came out on the news media that I was no longer 19 going to be called on any testimony regarding Cook 20 County.</b></p> <p>21    Q And did you ever get a memo or anything like 22 that?</p> <p>23    <b>A No, I did not.</b></p> <p>24    Q Other than being placed on administrative</p>

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12 (45 to 48)

1 duty, have you ever been disciplined as a Chicago  
2 police officer?

3 **A I don't believe I have.**

4 Q You would know if you had, right?

5 **A Yes, that would be correct.**

6 Q What's your best estimate of how many people  
7 the 264 team arrested during your 13 years on the  
8 street with that team?

9 MR. ZECCHIN: Objection to foundation from  
10 this witness. You can answer if you know.

11 **A I don't -- I don't recall. I can't even  
12 give you a guess.**

13 Q It's in the thousands, though, right?

14 **A Probably, yes.**

15 Q You mentioned a few types of the most common  
16 crimes from your time on the 2nd District tactical  
17 team, on Team 264. You didn't talk about  
18 trespassing.

19 Did you ever arrest people for trespassing  
20 frequently?

21 **A Did I arrest people -- yes.**

22 Q What was the standard that you used to  
23 decide whether someone should be arrested for  
24 trespassing?

46  
1 **A I would give them a verbal warning, stating,  
2 If you don't live in the area and you're not  
3 visiting anyone -- there's signs posted all over the  
4 building no criminal trespass, no loitering. And if  
5 you return, then I'll lock you up; but I give you a  
6 verbal warning first.**

7 Q So you'd only arrest people for trespassing  
8 if you had specifically seen them on a different day  
9 trespassing and giving them warning?

10 MR. ZECCHIN: Objection. Misstates his  
11 answer.

12 **A I usually give them a verbal warning that  
13 day. Whether I saw them last night, I would give  
14 them a verbal warning that day because he could be  
15 visiting someone that day. So I would give him a  
16 verbal warning. If you're not here visiting anyone  
17 and you don't live here, there's a sign posted no  
18 loitering, no trespassing. And when they come back  
19 after I give them that verbal warning, then I lock  
20 them up for criminal trespass.**

21 Q All right. Maybe you can help me understand  
22 more about the verbal warnings.

23 You said -- so you could give someone a  
24 verbal warning, let's say, last night. Let's

47  
1 pretend it's today. Let's say last night you saw  
2 someone and gave them a verbal warning. You see  
3 them the next day. You would give them another  
4 verbal warning?

5 **A Yeah, it's a different day. Last night he  
6 could have just been hanging out not visiting  
7 anyone. The following day he could be there --  
8 legitimately there to see someone. So I would do  
9 the same thing. I'm like, Are you here to visit  
10 anyone? I know you don't live there. And if you're  
11 not here to visit anyone, if you don't live here,  
12 I'm giving you a warning to leave the area otherwise  
13 you'll be locked up for trespass.**

14 Q And so then it would only be if someone came  
15 back the same day after that warning?

16 **A Yes.**

17 Q That you would arrest them for trespassing?

18 **A Yes.**

19 Q How would you know that the second time that  
20 day they weren't there to visit somebody?

21 **A I would ask them. If they said, I'm  
22 visiting so and so, you verify whether that's true  
23 or not.**

24 Q Did it frequently happen that you'd tell

48  
1 somebody, You can't be here unless you're visiting.  
2 If you come back, you're going to get arrested.  
3 Then they would come back and they would admit to  
4 you they weren't visiting anybody?

5 **A Could you repeat that?**

6 Q Yeah, sure. Did it happen frequently where  
7 you would give somebody a warning along the lines  
8 of, You can't be here unless you're visiting  
9 somebody or you live here and then they would come  
10 back that very same day and admit to you that they  
11 weren't visiting anybody?

12 **A If they admit to me they weren't visiting  
13 someone?**

14 Q Did that happen a lot?

15 **A I'm not going to say it never happened, but  
16 I don't recall the incident that actually happened  
17 that way that you spoke of.**

18 Q Is there another way you could have arrested  
19 someone for trespassing?

20 **A I don't understand that question. What do  
21 you mean another way?**

22 Q Well, I guess you said you don't remember it  
23 happening a lot the way that I described the  
24 sequence, right?

Transcript of Manuel Leano  
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13 (49 to 52)

1    A That -- that the individual come up to me  
2 and say, I was actually lying; I wasn't here to  
3 visit? Is that what you're trying to say?  
4    Q No. What I'm asking you is you said, as I  
5 understand it -- and tell me if I am  
6 misunderstanding -- you said you arrest people for  
7 trespassing only when you've already given them a  
8 verbal warning that very same day that they can't be  
9 in the place and then they come back that same day.  
10   A Okay.  
11   Q Is that right?  
12   A Yes.  
13   Q And you only know the second time that  
14 they're not there to see someone legitimately if you  
15 ask them, correct?  
16   A If I ask them? I would have verified that  
17 from the first encounter. So next time I see them I  
18 know they weren't there to see anyone because I  
19 already gave them a verbal warning to leave.  
20   Q How do you know that the next time that they  
21 weren't there to see someone?  
22   A I probably verified it again if they give me  
23 a different person or a different location that they  
24 were going to.

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1    A Probably pick an area where I could see the  
2 subject, whatever the subject was selling drugs,  
3 where I can't be seen and see the narcotics  
4 transaction.  
5    Q When you say you probably did it that way,  
6 did you do it that way?  
7    A Most likely I would do it that way.  
8    Q But you don't have no specific memory right  
9 now of ever conducting surveillance as a member of  
10 the Watts team?  
11   A Nothing comes to mind at this moment.  
12   Q And you can't say for certain one way or the  
13 other whether you actually conducted surveillance as  
14 a member of the Watts team?  
15   A I'm pretty sure I have, but I just don't  
16 recall of those at this moment.  
17   Q So you know you did it. You just don't  
18 remember any specific times; is that right?  
19   A That would be correct.  
20   Q And do you know any specific methods that  
21 you used?  
22   A It varies on the situation.  
23   Q Well, tell me about -- I'm not asking you to  
24 generally describe how someone might conduct

51

1    Q And then you would just make your best  
2 estimate?  
3    A No. I would verify -- let's say, I spoke to  
4 a subject the first time that say, I'm here to go  
5 visit someone in 201 named Smith. I go up there.  
6 Does anyone Smith lives in this apartment. They say  
7 no. Then I give him that warning to leave. The  
8 second time, I told you already. I told you to  
9 leave and then he gives me another excuse. Well, I  
10 actually got the apartment wrong. I wanted to go  
11 301. And I know myself 301 is a vacant apartment,  
12 so then I lock him up.  
13   Q Okay. Did you participate in surveillance  
14 operations as a member of the 264 team?  
15   A Surveillance? Pretty sure I have, but I  
16 don't recall any of those at this time.  
17   Q Was -- were -- well, what types of  
18 surveillance did you participate in as a member of  
19 the Watts team?  
20   A Probably narcotics.  
21   Q Probably narcotics you said?  
22   A Most likely narcotics.  
23   Q Do you remember how you conducted  
24 surveillance as a member of the Watts team?

50

1 surveillance. I want to just know what do you  
2 remember about how you conducted surveillance as a  
3 member of the Watts team?  
4    A I mean, it varies. I could -- we could just  
5 sit in a squad car far enough where they can't see  
6 us but we could still see them. Or we could  
7 actually get out of the car, you know, find a place  
8 where we can't be seen but we could see them. It  
9 all depends on the situation.  
10   Q Are there any other methods other than the  
11 two you just described?  
12   A I mean, if we had a covert car, we might use  
13 a covert car, which is just a car with regular  
14 plates on it.  
15   Q What's --  
16   A It's a regular -- it's a covert -- we call  
17 it a covert car.  
18   Q Covert scar?  
19   A Yeah. But it's basically a regular car with  
20 regular plates in it. Instead of having a municipal  
21 plate, it would have regular plates.  
22   Q Was it sometimes your role to transport  
23 people to the police station who had already been  
24 arrested by other officers?

52

Transcript of Manuel Leano  
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14 (53 to 56)

1 <b>A It happens, yes.</b>	53   1 <b>Q And what about Al Jones?</b>
2 <b>Q How frequently did that happen as a member</b>	2 <b>A Probably the same, at our civil law firm.</b>
3 <b>of the Watts team?</b>	3 <b>Q You just said hi also?</b>
4 <b>A I can't say. If there's no beat cars</b>	4 <b>A Yes. For the most part, yes.</b>
5 <b>available at that moment, we might transfer them</b>	5 <b>Q And what about Smith?</b>
6 <b>ourselves.</b>	6 <b>A Smith, probably a week ago said hi because</b>
7 <b>Q Was that a weekly occurrence?</b>	7 <b>he works the radio in the 2nd District.</b>
8 <b>A Again, it varies.</b>	8 <b>Q He's also on administrative duty?</b>
9 <b>Q Sometimes every week, sometimes not?</b>	9 <b>A I believe so, yes.</b>
10 <b>A It could be every week or it could happen</b>	10 <b>Q You said Cynthia Torres?</b>
11 <b>once a month, once every two months. It just varies</b>	11 <b>A Yes.</b>
12 <b>on how busy the district that day where there's no</b>	12 <b>Q And when was the last time you talked to</b>
13 <b>available squad car to transport for us.</b>	13 <b>Cynthia Torres?</b>
14 <b>Q Did any of the -- do you remember anybody</b>	14 <b>A Couldn't remember. Maybe months or even a</b>
15 <b>ever telling you when you were transporting them to</b>	15 <b>year.</b>
16 <b>the police station that they had been framed or they</b>	16 <b>Q Okay. And what did you talk with her about?</b>
17 <b>weren't guilty?</b>	17 <b>A She works the desk so probably said hi.</b>
18 <b>A They had been framed? I don't believe so.</b>	18 <b>Q Do you still talk to Nichols every day?</b>
19 <b>Q Or that they weren't guilty?</b>	19 <b>A We work together in the same room, yes.</b>
20 <b>A That they were guilty?</b>	20 <b>Q And when was the last time you talked to</b>
21 <b>Q Were not.</b>	21 <b>Bolton?</b>
22 <b>A I don't believe so.</b>	22 <b>A Probably at one of our fantasy leagues</b>
23 <b>Q What about that they were guilty. Did</b>	23 <b>together.</b>
24 <b>anybody ever tell you they were guilty?</b>	24 <b>Q Are you still in that -- is it football -- a</b>
54	55
1 <b>A That would be actually good if they would</b>	1 <b>fantasy football league?</b>
2 <b>tell us they were guilty.</b>	2 <b>A Yes, that would be correct.</b>
3 <b>Q Yeah. But did anyone do it?</b>	3 <b>Q Are you still on a league with him?</b>
4 <b>A I don't believe so.</b>	4 <b>A Yes.</b>
5 <b>Q That would be highly unusual?</b>	5 <b>Q What's his team name?</b>
6 <b>A I would say so.</b>	6 <b>A I can't remember his team name.</b>
7 <b>Q Which members of the Watts team do you still</b>	7 <b>Q What's your team name?</b>
8 <b>work with?</b>	8 <b>A My team name? On that one, My Butkus -- My</b>
9 <b>MR. MICHALIK: I'm just going to object to</b>	9 <b>Ditka and Our Butkus.</b>
10 <b>the -- I think he said before that -- he called it</b>	10 <b>Q Who else is in that fantasy football league?</b>
11 <b>the 264 team, not the Watts team.</b>	11 <b>A That one -- that league would be Officer</b>
12 <b>A I mean, I still work with Officer Nichols.</b>	12 <b>Bolton, Gonzalez, and other officer that I can't</b>
13 <b>If you call that working administratively, yes, that</b>	13 <b>remember their names.</b>
14 <b>would be Officer Nichols.</b>	14 <b>I remember some of them. Do you want me to</b>
15 <b>Q Anyone else?</b>	15 <b>mention them?</b>
16 <b>A That's about it.</b>	16 <b>Q Yeah.</b>
17 <b>Q When was the last time you talked to Kenny</b>	17 <b>A Lieutenant Jones, Sergeant Cologne, Ryan</b>
18 <b>Young?</b>	18 <b>Goldie, Derrick Cross. I know I'm forgetting</b>
19 <b>A Probably months.</b>	19 <b>something. Sergeant Stevens, a retired officer</b>
20 <b>Q And what did you talk with him about when</b>	20 <b>Marvin Jones. I know I'm forgetting something</b>
21 <b>you last talked?</b>	21 <b>because it's a 12-man league. I'm probably</b>
22 <b>A Probably that was at our civil lawyer's</b>	22 <b>forgetting an officer.</b>
23 <b>building. Probably just said hi. I can't remember</b>	23 <b>Q When you said Lieutenant Jones, who are you</b>
24 <b>when that was.</b>	24 <b>talking about?</b>

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15 (57 to 60)

	57		59
1	<b>A A different Jones.</b>	1	<b>A No.</b>
2	Q Okay. What's Gonzalez's team name?	2	Q Did you ever suspect that Kallatt Mohammed
3	<b>A I believe Los Chingones.</b>	3	was corrupt?
4	Q And when's the last time you talked to	4	<b>A No.</b>
5	Officer Gonzalez?	5	Q Have you ever suspected that any Chicago
6	<b>A Probably last month because he rotates, so</b>	6	police officers were corrupt that you worked with?
7	<b>sometimes we work the same shifts.</b>	7	<b>A No.</b>
8	Q Have you ever talked to anybody other than	8	Q Do you -- are you familiar with the term
9	your lawyers about the allegations made against you	9	"code of silence"?
10	10 in the civil cases?	10	<b>A Other than what I heard in the media and</b>
11	<b>A No.</b>	11	<b>from the former mayor, no.</b>
12	Q Have you ever talked to anyone other than	12	Q Do you have an understanding of what a code
13	your lawyers about your being moved to	13	13 of silence is?
14	14 administrative duty?	14	<b>A From what the media and former mayor, yes.</b>
15	<b>A No.</b>	15	Q What's your understanding of what a code of
16	Q Has anyone ever come talk to you -- any	16	16 silence means?
17	17 other defendants in these cases ever come to you and	17	<b>A According to the media, it's another officer</b>
18	18 said anything about the cases or about whether they	18	<b>don't turn an officer over.</b>
19	19 think it's fair or they did anything wrong?	19	Q And do you know whether there is a code of
20	<b>A No.</b>	20	20 silence in the Chicago Police Department?
21	Q Do you still have Watts' phone number?	21	<b>A I don't believe so.</b>
22	<b>A I don't believe I -- I don't have.</b>	22	Q You -- you've never seen any other officers
23	Q You think you do not have it anymore?	23	23 engage in wrongdoing, though, right?
24	<b>A I don't believe -- I don't have his number</b>	24	<b>A No, I haven't.</b>
	58		60
1	<b>anymore.</b>	1	Q And you've never heard of any other officers
2	Q What about Kallatt Mohammed?	2	2 engage in wrongdoing?
3	<b>A The same. I don't think I have -- I don't</b>	3	<b>A No, I haven't.</b>
4	<b>have his number anymore.</b>	4	Q No civilians have ever complained to you
5	Q I'm sorry if I'm repeating this, but when's	5	5 about officer wrongdoing?
6	the last time you talked to Mohammed?	6	<b>A Any civilians? I don't recall.</b>
7	<b>A The last time I bumped into him or talked to</b>	7	Q You don't recall one way or the other?
8	<b>him, probably after he got out of jail.</b>	8	<b>A No.</b>
9	Q How long after?	9	Q If you would have known that a different
10	<b>A That I couldn't tell you how long after he</b>	10	10 member of your team was extorting civilians, you
11	<b>got out of jail.</b>	11	11 would have said something about it?
12	Q Do you know where you were?	12	<b>A I would have probably brought it up to --</b>
13	<b>A We were just patrolling the 2nd District.</b>	13	<b>not probably. I would have brought it to one of the</b>
14	<b>And I guess he was driving and we just happened to</b>	14	<b>supervisors.</b>
15	<b>see him on the street.</b>	15	Q Which supervisors would you have brought it
16	Q Did you stop and talk to him?	16	16 to?
17	<b>A Yeah. Said hi, how he was doing, to that</b>	17	<b>A If the suspect was on our team, then I would</b>
18	<b>extent.</b>	18	<b>have brought it up to a different supervisor. If he</b>
19	Q And what did he say to you?	19	<b>was on another team, then I would have told my</b>
20	<b>A He said he was fine.</b>	20	<b>sergeant.</b>
21	Q Was it you and Nichols?	21	Q Did you work with Lamonica Lewis?
22	<b>A I believe -- yes.</b>	22	<b>A I'm for sure I have.</b>
23	Q Did you ever suspect that Ronald Watts was	23	Q Do you know if she was a member of the 264
24	24 corrupt?	24	24 team?

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16 (61 to 64)

	61		63
1	<b>A Yes, she was.</b>	1	<b>A I don't believe I have.</b>
2	Q And was she on the 264 team when you were on	2	Q Which members of the Watts 264 team that
3	the team?	3	you're aware of played the role of a pretend drug
4	<b>A At some point, yes.</b>	4	dealer?
5	Q Do you remember what years she was on the	5	<b>A That would be the African American officer.</b>
6	team?	6	Q Which ones specifically?
7	<b>A She got on the team after us. The year, I</b>	7	<b>A It varies. It could be Al Jones, Officer</b>
8	<b>couldn't tell you what year she joined our team.</b>	8	<b>Smith, Officer Lamonica, Officer Kallatt Mohammed.</b>
9	Q Do you remember when Mohammed became part of	9	<b>Am I missing anyone? That would be the officer that</b>
10	10 the team?	10	<b>would pretend to be the drug dealers.</b>
11	<b>A Mohammed was there when I got there.</b>	11	Q Would Watts ever do it?
12	Q Was there when you got there?	12	<b>A I'm pretty sure he had.</b>
13	<b>A Yes, in 2- -- in 2004.</b>	13	Q You're pretty sure he has?
14	Q Did Watts and Mohammed often go do things on	14	<b>A Yes.</b>
15	15 their own out of view of you or other officers?	15	Q How do reverse stings work in an area -- how
16	<b>A Could you repeat that?</b>	16	were they successful?
17	Q Sure. Were Watts and Mohammed often doing	17	<b>A Could you repeat that?</b>
18	18 things outside of your view?	18	Q The 264 team was a pretty big presence in
19	<b>A I don't understand what you mean outside my</b>	19	Ida B. Wells, correct?
20	<b>view.</b>	20	<b>A Okay.</b>
21	Q Well, if you would go with a group on the	21	Q I'm asking. Is that -- do you agree with
22	22 264 team to arrest people --	22	22 that?
23	<b>A Again, I don't understand the question</b>	23	<b>A Yeah. We're known in Ida B. Wells, yes.</b>
24	<b>you're asking me right now.</b>	24	Q How was it that you were able to
	62		64
1	Q All right. Well, did you ever go out with	1	1 successfully run reverse stings?
2	multiple people on the 264 team to go do	2	2 MR. ZECCHIN: Objection, form and
3	surveillance or run operations?	3	3 foundation. You can answer.
4	<b>A I mean, it depends on the situation. If the</b>	4	<b>A Well, the African American officer would</b>
5	<b>situation dictate that it needs more than two</b>	5	<b>pretend to be the drug dealers. And there would be</b>
6	<b>officers to do a surveillance, yes. But if it just</b>	6	<b>normal residents still hanging outside or in the</b>
7	<b>need me and my partner, me and my partner will do</b>	7	<b>lobby.</b>
8	<b>the surveillance. It all depends on the situation.</b>	8	Q So residents would help out?
9	Q Did you participate in reverse stings?	9	<b>A Not help out, but we wouldn't kick them out</b>
10	<b>A Yes.</b>	10	<b>10 while we're doing it.</b>
11	Q Tell me what a reverse sting is.	11	Q And then people would approach the
12	<b>A A reverse sting is where our focus is on the</b>	12	12 officer --
13	<b>buyer, not the seller.</b>	13	<b>A Yes.</b>
14	Q A reverse sting that focuses on the buyer?	14	Q (Continuing) -- to try and buy drugs?
15	<b>A Yes.</b>	15	<b>A Yes.</b>
16	Q And how does a -- what is a -- how does a	16	Q And did residents or anyone -- well, did
17	17 reverse sting work?	17	17 residents or other civilians warn people of reverse
18	<b>A A reverse sting? Officers would pretend to</b>	18	18 stings?
19	<b>be a drug dealer where the buyer would approach him</b>	19	<b>A I'm pretty sure they have. I'm pretty sure</b>
20	<b>and ask him for certain type of narcotics. And then</b>	20	<b>there's people that warn saying we're in the</b>
21	<b>21 they would be arrested for attempted -- attempted</b>	21	<b>21 building. I'm pretty sure that happens often.</b>
22	<b>22 purchase of narcotics.</b>	22	Q How frequently did the Watts 264 team run
23	Q Did you ever play the role of a pretend drug	23	23 reverse stings?
24	24 dealer in a reverse sting?	24	<b>A It all depends. If we got too much</b>

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17 (65 to 68)

	65		67
1 <b>complaint of too many drug activities at certain</b>		1 dealer, you say that they were outside the building	
2 <b>location, we might do one every week. Or if not we</b>		2 or inside?	
3 <b>might do once a month or once every other month. It</b>		3 <b>A Some of them is outside. Some of them might</b>	
4 <b>all depends on the situation.</b>		4 <b>be hanging out in the lobby, but they could be seen</b>	
5 Q Did you have a target for how many people		5 <b>from the outside. The public from the outside could</b>	
6 you wanted to arrest on a reverse sting?		6 <b>see them.</b>	
7 <b>A We usually try not to have a target, but we</b>		7 Q And then -- so then the public could	
8 <b>usually try to give it enough time to -- or for a</b>		8 presumably see them walking someone else away to	
9 <b>sting to work.</b>		9 you, right?	
10 Q And what's a --		10 MR. ZECCHIN: Objection, form and foundation	
11 <b>A We try to give it at least an hour, an hour</b>		11 from this witness.	
12 <b>and a half, two hours.</b>		12 <b>A What are you trying -- I can't -- I don't</b>	
13 Q How -- and do you have an estimate of how		13 <b>understand your question.</b>	
14 many people you typically would arrest in an hour		14 Q Yes. Well, if they could be seen from the	
15 and a half, 2-hour reverse sting?		15 outside and then they arrested somebody and brought	
16 <b>A Could you repeat that?</b>		16 them over to you, the public could see that also,	
17 Q Do you have any estimate of how many people		17 right?	
18 would typically be arrested during an hour and a		18 <b>A No.</b>	
19 half or 2-hour reverse sting?		19 MR. ZECCHIN: The same objection to	
20 <b>A I would say probably on average anywhere</b>		20 foundation, what somebody else could see.	
21 <b>from 10 to 15 maybe.</b>		21 <b>A They would walk them to us where -- where</b>	
22 Q What was your role specifically on reverse		22 <b>we're at where the subject can't see us.</b>	
23 stings?		23 Q Where the subject -- right. You can't be	
24 <b>A My role would most likely be</b>		24 seen, right?	
	66		68
1 <b>enforcement/processing team.</b>		1 <b>A Yes.</b>	
2 Q What is the enforcement/processing team?		2 Q But the officer could be seen from the	
3 <b>A That's where we would be somewhere inside</b>		3 outside walking the person away, right?	
4 <b>the lobby where the officer would bring the subject</b>		4 <b>A Okay, yes. That's possible yes.</b>	
5 <b>that attempted to buy narcotics, where we would</b>		5 Q How do they walk them to you? Do they just	
6 <b>assist in placing that subject into custody.</b>		6 voluntarily?	
7 Q Tell me how it would work? Like what are		7 <b>A Most of the time they're walking side by</b>	
8 the logistics like? Someone comes in, they go talk		8 <b>side, and then the minute they see us they know</b>	
9 to an officer and they try to buy drugs.		9 <b>they're being arrested.</b>	
10 Where are you standing then and how do you		10 Q And so they don't know they were arrested	
11 get alerted?		11 until they see you?	
12 <b>A We would be somewhere inside the building</b>		12 <b>A Yes. You see an Asian guy, a white guy in</b>	
13 <b>where we can't be seen from the outside. Now, if</b>		13 <b>the lobby and they're being walked by and then, you</b>	
14 <b>you're asking me how it happened outside, I can't</b>		14 <b>know, they know they're being arrested. That's when</b>	
15 <b>tell you that. I'm not one of the officer. But</b>		15 <b>we assist them in placing them into custody.</b>	
16 <b>usually the officer pretending to be drug dealers</b>		16 Q When you're doing reverse stings -- I mean	
17 <b>would walk that individual to us and then we would</b>		17 you, not just the team. When you are working on	
18 <b>assist in placing that subject into custody. And</b>		18 reverse stings and you're in enforcement and	
19 <b>then the officer would inform us what he bought, how</b>		19 processing role, can you see the transaction	
20 <b>much money he tendered. And then from then I would</b>		20 happening?	
21 <b>write down the time he was arrested, the person's</b>		21 <b>A No.</b>	
22 <b>name, what he attempted to purchase, and the amount</b>		22 Q Is the only officer who can see the	
23 <b>of money he tendered that officer.</b>		23 transaction the one who's being the pretend drug	
24 Q And so the officer who was the pretend drug		24 dealer?	

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18 (69 to 72)

	69		71
1	<b>A</b> I believe so, yes.	1	<b>say -- probably would have to guess -- 6 by 12</b>
2	Q And do reverse sting, the way they work is	2	<b>maybe.</b>
3	each time someone tries to buy drugs, a pretend drug	3	Q And you write what they tried to buy, how
4	dealer officer will walk them over to you or another	4	much they tendered on that bag?
5	member of the enforcement team?	5	<b>A Yes.</b>
6	<b>A That would be correct, yes.</b>	6	Q And you write what time they were arrested
7	Q And then on the ones where you're working,	7	on that bag?
8	you will write down at that time when they were	8	<b>A Yes.</b>
9	arrested?	9	Q And --
10	<b>A Yes.</b>	10	<b>A I try to do it anyway.</b>
11	Q And what do you write that down on?	11	Q You tried to or --
12	<b>A Usually we have a bag, a packet for each</b>	12	<b>A No. I do it anyway when that individual is</b>
13	<b>individual; the time he was arrested, his name, what</b>	13	<b>handed to me.</b>
14	<b>he tried to purchase, the amount of money he</b>	14	Q And then do you know -- what do you do with
15	<b>tendered.</b>	15	15 the bags?
16	Q And where do you get that information from?	16	<b>A I keep it with me until we go back to the</b>
17	<b>A From -- well, the officer will give -- will</b>	17	<b>station.</b>
18	<b>inform us what he tried to purchase and how much</b>	18	Q Were you -- would you bring people back one
19	<b>money he tendered, and we would ask that individual</b>	19	by one or you wait until the reverse sting's over?
20	<b>what his name is.</b>	20	<b>A We usually wait until the operation is done</b>
21	Q And when you say "the officer," you mean the	21	<b>and then the wagon would come transport all the</b>
22	officer who was the pretend drug dealer?	22	<b>individuals.</b>
23	<b>A That would be correct, yes.</b>	23	Q And when you get back to the station, what
24	Q So you have no way to verify whether that is	24	24 do you do with the bags?
	70		72
1	true other than the officer telling you that. Is	1	<b>A Keep it with me and then put it with the</b>
2	that fair?	2	<b>individual's packet.</b>
3	<b>A I have no reason to doubt that officer that</b>	3	Q When you say put it with the packet, what do
4	<b>it isn't true.</b>	4	you mean by that?
5	Q Well, that's a different question.	5	<b>A We usually do a packet with his background</b>
6	You have no reason to verify that the	6	<b>check, name check, make sure he doesn't have a</b>
7	officer's information is accurate other than the	7	<b>warrant, the case report, the complaints, and the</b>
8	officer?	8	<b>inventory copies.</b>
9	<b>A That would be correct, yes.</b>	9	Q If you were the person who filled out the
10	Q You said you have a packet for each	10	10 prisoner property bag, would you also be the one who
11	individual who's arrested?	11	11 writes the reports back at the station?
12	<b>A It's a bag.</b>	12	<b>A Not necessarily.</b>
13	Q A bag?	13	Q How do you decide who should be writing the
14	<b>A Basically a bag --</b>	14	14 reports on reverse stings?
15	Q And what --	15	<b>A For the most part it would be the processing</b>
16	<b>A (Continuing) -- where --</b>	16	<b>team/enforcement.</b>
17	Q No. Go ahead.	17	Q Is processing team different than
18	<b>A We would write their name, like I stated</b>	18	18 enforcement?
19	<b>earlier, what time he got arrested, what he</b>	19	<b>A It could be, but sometimes it goes hand in</b>
20	<b>attempted to purchase, how much money he tendered.</b>	20	<b>hand, enforcement/processing team.</b>
21	Q What is -- what kind of bag? I mean,	21	Q All right. Well, let's try to break it down
22	literally a bag?	22	22 then.
23	<b>A It's a clear -- it's a property -- prisoner</b>	23	What does the enforcement team do?
24	<b>property bag. It's a clear plastic bag. I would</b>	24	<b>A Enforcement team is assisting and placing</b>

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19 (73 to 76)

<p style="text-align: right;">73</p> <p>1 the subject in custody when the officer brings them 2 back to us. 3 Q And then what is the processing team? 4 A Processing team is completing the arrest 5 packet for that individual. 6 Q And so does the arrest packet include both 7 the property bag that you do on scene and the 8 reports that you do back at the station? 9 A Well, the property bag is just our reference 10 so we know who's who, what money he tendered and 11 what he tried to purchase. 12 Q And do you put the money in the property 13 bag? 14 A No. We put it in a -- we inventory it and 15 we put it in a different bag that's strictly for 16 money. 17 Q You do that at the scene? 18 A On the -- in the station. 19 Q What do you do with the money until you get 20 back to the station? 21 A Keep it in the bag me. 22 Q In the property bag? 23 A Yes. 24 Q And so when you are filling out reports as a</p>	<p style="text-align: right;">75</p> <p>1 Q He plays the lottery? 2 A Yes. 3 Q How do you know he plays the lottery? 4 A He's got -- he's got lotto tickets with him. 5 Q Back in the day? 6 A I'm pretty sure, yes. 7 Q But you're not in touch with him now, right? 8 A No. 9 Q Did you receive any training as a police 10 officer on how to complete reports? 11 A In the academy and also in the field. 12 Q Tell me about your training in the academy 13 on completing police reports. 14 A I don't understand what you mean, tell you. 15 Q What was your training? 16 A We were -- probably in class on how to 17 prepare a case report, arrest report and that stuff. 18 Q Do you remember what you learned about how 19 to prepare reports in the academy? 20 A 18 years ago, I can't recall how we were 21 taught in the academy. 22 Q And you said you had some additional 23 training in report writing? 24 A Yes.</p>
<p style="text-align: right;">74</p> <p>1 member of the processing team of a reverse sting, 2 you're doing so based on what another officer has 3 reported to you as happening? 4 A That would be correct, yes. 5 Q Who gives you -- for reverse stings who 6 would be the person to give you an assignment? 7 A Well, for the most part it would be the 8 sergeant, but it's pretty obvious our role would be 9 strictly enforcement/processing team. 10 Q Because no one would believe that you're a 11 drug dealer? 12 A That would be correct. 13 Q Did you ever -- other than fantasy football, 14 did you do any gambling with the members of the 264 15 Watts team? 16 A Gambling, I don't believe so. 17 Q Did you ever go to a casino with anyone on 18 the Watts 264 team? 19 A Casino, any on Watts -- I don't recall 20 having gone to a casino with any Watts team or 264 21 team. 22 Q Do you know if Watts liked to gamble? 23 A I can't tell you whether he likes to gamble. 24 I know he plays the lottery.</p>	<p style="text-align: right;">76</p> <p>1 Q And tell me when you had additional 2 report -- 3 A When I was a PPO, I would be riding with an 4 FTO. 5 Q What's a PPO; what's an FTO? 6 A PTO is probationary police officer. FTO is 7 field training officer. 8 Q You'd receive training from field 9 training -- 10 A Yes. 11 Q (Continuing) -- officers? 12 A Yes. 13 Q When did that happen? 14 A Right -- right after we -- I got out of the 15 academy and got assigned to the 2nd District. 16 Q How long were you a probationary officer? 17 A I don't remember whether the probationary 18 was a year or a year and a half. I believe we was a 19 year when I was -- when I came out of the academy. 20 Q And did you spend that whole year with the 21 field training officer? 22 A The first believe three months you had a 23 field training officer, and then after that you get 24 assigned to a regular POs.</p>

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20 (77 to 80)

<p>1 Q What do you recall learning about preparing 2 police reports from the field training officers?</p> <p>3 <b>A For the most part we get a job. Let's say a 4 battery. He would assist me in how to properly fill 5 out a battery case report.</b></p> <p>6 Q And how would they assist you on how to 7 properly fill it out?</p> <p>8 <b>A They would help us, say first you've got to 9 get an RD. Make sure you get the UCR code, get all 10 the information, the victims, and self-explanatory; 11 fill out the case report.</b></p> <p>12 Q What's an RD?</p> <p>13 <b>A An RD is a unique number that's attached to 14 an incident.</b></p> <p>15 Q How do you get an RD number?</p> <p>16 <b>A You -- either by dispatch or -- now we're 17 able to put it in the computer when we're preparing 18 a case report.</b></p> <p>19 Q It just generates automatically?</p> <p>20 <b>A Yes. You put in the right UCR code and it 21 generates an RD for you.</b></p> <p>22 Q You said UCR?</p> <p>23 <b>A Yes.</b></p> <p>24 Q What does that stand for?</p>	77	<p>1 <b>A What's the reason? I don't understand what 2 you mean by "the reason."</b></p> <p>3 Q Well, why do you -- why does it matter if 4 you're accurate when completing police reports?</p> <p>5 <b>A Why does it matter why -- if you're accurate 6 in a police report?</b></p> <p>7 Q Yeah.</p> <p>8 <b>A You want to be as close to as accurate as to 9 what happened at that moment. You want to put it 10 down as accurate as you can.</b></p> <p>11 Q Right. But why do you want to have an 12 accurate police report? What's the reason for that?</p> <p>13 <b>A I don't understand the question, what you 14 mean by "What's the reason for that."</b></p> <p>15 Q You're a police officer. You've been one 16 for 18 years.</p> <p>17 <b>A Yes.</b></p> <p>18 Q You've completed thousands of reports?</p> <p>19 <b>A Yes.</b></p> <p>20 Q Have you ever thought about why it matters 21 that you write complete, accurate reports?</p> <p>22 <b>A I don't know -- I'm kind of confused on your 23 question.</b></p> <p>24 Q Well, what's the point of a police report?</p>	79
<p>1 <b>A It's a -- UCR is a classification for types 2 of crimes; battery, burglary, handgun, that type.</b></p> <p>3 Q And you said an RD number is generated in 4 the computer. What system do you use?</p> <p>5 <b>A We use Era I believe right now.</b></p> <p>6 Q Era?</p> <p>7 <b>A Yes.</b></p> <p>8 Q How long have you used the Era system?</p> <p>9 <b>A I couldn't tell you when it started, but -- 10 I can't give the date when Era started.</b></p> <p>11 Q You agree that it's important to have 12 complete and accurate police reports?</p> <p>13 <b>A Yes.</b></p> <p>14 Q Why is it important to have complete and 15 accurate police reports?</p> <p>16 <b>A You want to be as accurate as possible as to 17 what happened or occurred that moment.</b></p> <p>18 Q And why do you want to be as accurate as 19 possible as to what occurred at that moment?</p> <p>20 <b>A Why do I want to be as accurate? You 21 want -- you want to put as much facts and accurate 22 to an incident as accurate as you can.</b></p> <p>23 Q What's the reason for wanting to be accurate 24 in police reports or reasons?</p>	78	<p>1 <b>A To document an incident as accurate as you 2 can.</b></p> <p>3 Q And are they used for things?</p> <p>4 <b>A For trial, for criminal proceedings.</b></p> <p>5 Q Okay. How are they used in criminal 6 proceedings in your experience with 18 years on the 7 force?</p> <p>8 <b>A How they're used in criminal proceedings?</b></p> <p>9 Q Yes.</p> <p>10 <b>A To pros --</b></p> <p>11 MR. KOSOKO: I'm going to object to the way 12 the question is phrased.</p> <p>13 MR. MICHALIK: I'm going to object to form.</p> <p>14 MR. PALLS: And I'm going to object to lack 15 of foundation.</p> <p>16 Q Do you have experience testifying in court 17 during your 18 years as a police officer?</p> <p>18 <b>A Yes.</b></p> <p>19 Q Did you use reports in connection with that 20 testimony sometimes?</p> <p>21 <b>A Yes.</b></p> <p>22 Q Based on your substantial experience as a 23 police officer, do you have an understanding of how 24 police reports are used in criminal proceedings?</p>	80

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21 (81 to 84)

	81		83
1 <b>A Yes.</b>		1 <b>A I mean, it would -- it might help my --</b>	
2    Q Okay. How are police reports used in		2 <b>refresh my memory by looking back on my case report.</b>	
3    criminal proceedings?		3    Q You have no other source of information	
4    MR. ZECCHIN: Objection, asked and answered.		4    other than what's in your police reports, do you?	
5    You can answer again.		5    MR. KOSOKO: Objection, form of the	
6 <b>A How is a police report used in a criminal</b>		6    question.	
7 <b>proceeding? Police reports are used to prosecute an</b>		7    MR. MICHALIK: Join.	
8 <b>individual where the facts are stated in a case</b>		8 <b>A I guess.</b>	
9 <b>report as accurate as you can.</b>		9    Q So if your reports aren't accurate, then	
10   Q So the reports need to be accurate so that		10   your testimony can't be accurate?	
11   prosecutors have accurate information, right?		11 <b>A That would be correct.</b>	
12 <b>A Yes.</b>		12   MR. KOSOKO: Objection, form of the	
13   Q And if prosecutors don't have accurate		13   question.	
14   information, how do they make reasoned decisions on		14   MR. PALLE: Lack of foundation.	
15   whether to prosecute people?		15   MR. MICHALIK: Join.	
16   MR. ZECCHIN: Objection, foundation from		16   Q You said that your -- Nichols was your	
17   this witness as to what a prosecutor does.		17   partner?	
18   MR. KOSOKO: Join.		18 <b>A Yes.</b>	
19   Q You can still answer.		19   Q From 2004 to 2008 who -- can you tell me the	
20 <b>A I don't understand the question.</b>		20   other partners on the Watts 264 team?	
21   Q Would you refer to your police reports		21 <b>A Like I stated earlier, most likely it would</b>	
22   before you would testify?		22 <b>be Kenny Young, Alvin Jones.</b>	
23 <b>A Yes.</b>		23   Q So I'm sorry. Let me clarify the question.	
24   Q Why would you refer to your police reports		24   I'm sorry to interrupt. But who was partnered with	
	82		84
1   before you would testify?		1 <b>who?</b>	
2 <b>A To refresh my memory on what happened at</b>		2 <b>A Okay. The partner would be most likely --</b>	
3 <b>that -- at that moment.</b>		3 <b>264 Adam would be Officer Young, Officer Jones. 264</b>	
4   Q Because you're so busy and you do so many		4 <b>Boy would be Officer Gonzalez, Officer Bolton. 264</b>	
5   things, you can't remember everything you do, right?		5 <b>Charlie would be myself and Officer Douglas Nichols.</b>	
6 <b>A Because you want to be refreshed to make</b>		6 <b>264 David would most likely be Officer Smith and</b>	
7 <b>sure that what you put down was accurate and help</b>		7 <b>Officer Cynthia Torres.</b>	
8 <b>your memory when you're testifying in criminal</b>		8   Q When you were saying "most likely" there, is	
9 <b>proceeding.</b>		9   that because it would depend on if people were	
10   Q And as we sit here today, we've asked you		10   working on a given day or because you don't remember	
11   about -- you've told me you have a specific		11   exactly or some other reason?	
12   recollection of 3 of the potentially 2,000 arrests		12 <b>A You gave me a period from 2004 to 2007. I</b>	
13   you made in your team -- your time on the Watts		13 <b>don't remember when Officer Torres left --</b>	
14   team, right?		14   Q Okay.	
15 <b>A Yes.</b>		15 <b>A (Continuing) -- so...</b>	
16   MR. ZECCHIN: Object to form. You misstated		16   Q Do you remember who replaced Officer Torres?	
17   the number he said, but you can answer the question.		17 <b>A That I couldn't remember. I don't know</b>	
18 <b>A Yes.</b>		18 <b>whether it was Officer Cabrales or Officer Lamonica</b>	
19   Q So the only way that you can even talk about		19 <b>Lewis.</b>	
20   what happened in other ones is to look at your		20   Q Lewis. And that's Coco?	
21   police reports, right?		21 <b>A Yes, that would be correct.</b>	
22   MR. KOSOKO: Objection, form of the		22   Q Whoever replaced Torres, would they become	
23   question.		23   Smith's partner? Is that what happened?	
24   MR. MICHALIK: Join.		24 <b>A If Torres would have left, yes.</b>	

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22 (85 to 88)

85	
86	
87	

1 Q Yeah. And I'm not trying to get you to  
2 answer a question you don't know about timing. But  
3 I just mean whenever Torres left, was the person --  
4 **A The person that got replaced would have been**  
5 **working with Officer Smith.**  
6 Q Okay.  
7 MR. RAUSCHER: Is it okay if we take a quick  
8 break?  
9 MR. ZECCHIN: Sure.  
10 THE VIDEOGRAPHER: Off the record, 1:50  
11 (sic).  
12 (A recess was taken from 12:50 p.m. to 1:02  
13 p.m.)  
14 THE VIDEOGRAPHER: Back on the record, 1:03.  
15 Q We were talking about partners among the  
16 Watts 264 team before the break. And I asked you to  
17 identify who was on the team from the 2004 to 2008  
18 period.  
19 Can you tell me other members of the team  
20 over the year -- over the years who you haven't  
21 mentioned yet?  
22 **A Over the years? The only person that I**  
23 **could think of that I haven't mentioned is Dorian**  
24 **Smith.**

1 Q And about how long was Dorian Smith on the  
2 Watts 264 team?  
3 **A That I couldn't remember. I know he came in**  
4 **towards the tail end of it.**  
5 Q Did you ever ask to get taken off of the  
6 Watts 264 team?  
7 **A No.**  
8 Q Did you ever ask to get transferred out of  
9 the 2nd District?  
10 **A No.**  
11 Q Did you ever seek a promotion?  
12 **A Did I ever seek promotion? Yes.**  
13 Q When did you seek promotions?  
14 **A When I took the sergeant exam twice.**  
15 Q And what was the result of you taking the  
16 sergeant exam?  
17 **A I didn't do too well.**  
18 Q When did you take the sergeant exam?  
19 **A I think the first one -- I'm not exact on**  
20 **the date. It might have been 2005. And the last**  
21 **one was whenever the last sergeant exam was.**  
22 Q And you've described your day-to-day  
23 responsibilities when you were an active street  
24 police officer.

1 Can you describe Watts's responsibilities on  
2 a day-to-day basis?  
3 **A Basically to supervise the eight officers.**  
4 Q And was he out on the street with you?  
5 **A With us or --**  
6 Q With -- not just with you, with the team.  
7 **A For the most part, yes.**  
8 Q Almost every day?  
9 **A I couldn't say every day, but for the most**  
10 **part, yes.**  
11 Q Typically he would be on the street with the  
12 team?  
13 **A Yes.**  
14 Q And what would he be doing?  
15 **A That I couldn't answer.**  
16 Q Did you see him?  
17 **A At some point during the day, yes.**  
18 Q And when you saw him during the day, what  
19 would he typically be doing?  
20 MR. ZECCHIN: Objection to form of the  
21 question.  
22 **A Most of the time he would log us saying he**  
23 **saw us here, saw us at a location.**  
24 Q Would he participate in arrests?

1 **A Would he participate in an arrest? I'm**  
2 **pretty sure there's certain time he would be on the**  
3 **scene.**  
4 Q What do you mean there you're pretty sure  
5 there are certain times he'd be on the scene?  
6 **A If we're making an arrest, he might drive up**  
7 **on the scene to make sure we're all right or to see**  
8 **what -- what we had.**  
9 Q Did he ever arrest people when you were a  
10 member of the 264 Watts team?  
11 **A Did he arrest people by himself or along**  
12 **with other officers?**  
13 Q Along with -- either by himself or along  
14 with others.  
15 **A For sure he has assisted. Like I said, when**  
16 **we make arrests, sometimes he's on the scene.**  
17 Q How frequently would he be on the scene?  
18 **A How frequent? I can't give you a guess on**  
19 **that one.**  
20 Q Would it be every week?  
21 **A Maybe.**  
22 Q Do you think he was on the scene of arrests  
23 every week?  
24 **A On whose arrests?**

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23 (89 to 92)

	89		91
1	Q Just generally when he was the sergeant of	1	Q Did you -- would it be -- did you frequently
2	the 264 team, was he on the scene of arrests every	2	see him on the scene of arrests?
3	week?	3	<b>A I mean, if someone made an arrest and I</b>
4	<b>A I can't speak whether he would be on the</b>	4	<b>happened to stop by and I see him, then I see Watts</b>
5	<b>scene of the other vehicle. I'm not, you know, in</b>	5	<b>on the scene of an arrest; but other than that, I</b>
6	<b>that vehicle.</b>	6	<b>can't answer that.</b>
7	Q I'm not asking if he was at every arrest.	7	Q Did you -- you can't answer if you saw him
8	But do you have any understanding of whether he was	8	frequently at the scene of arrests?
9	on the scene of arrests, period, every week when he	9	<b>A I'm confused by your question. Like I said,</b>
10	11 was the sergeant?	10	<b>I'm not on those vehicles. So if they made an</b>
11	MR. KOSOKO: I'm going to object to just the	11	<b>arrest somewhere else and I'm somewhere else, how am</b>
12	form of the question.	12	<b>I supposed to know if Officer Watts -- I mean,</b>
13	MR. ZECCHIN: I'm going to join.	13	<b>Sergeant Watts then was on that arrest? I can't</b>
14	<b>A I don't understand your questioning.</b>	14	<b>answer that.</b>
15	Q Do you know one way or the other whether	15	Q Yeah. Let me try to help you.
16	Sergeant Watts was on the scene of arrests every	16	What is -- what are you finding confusing
17	week while he was the sergeant of the tac team?	17	about my question?
18	MR. KOSOKO: I'm going to object to the form	18	<b>A You're asking me if Watts was on an arrest</b>
19	again.	19	<b>on a weekly basis. I don't understand that</b>
20	<b>A Again, I mean, whose arrests? There's four</b>	20	<b>question.</b>
21	<b>different cars on a team.</b>	21	Q You don't understand it or you don't know
22	Q Any -- any arrests at all.	22	the answer?
23	<b>A Well, I can't speak for those other three</b>	23	<b>A I don't understand it.</b>
24	<b>cars, whether he was on the scene while they were</b>	24	Q Do you have an understanding of what it
	90		92
1	<b>making an arrest.</b>	1	means to be at the scene of an arrest?
2	Q So my question is do you know one way or the	2	<b>A Yes.</b>
3	other whether Watts was on the scene of at least	3	Q Okay. What is your understanding of what it
4	some arrests on a weekly basis when he was the	4	means to be at the scene of an arrest?
5	sergeant of the tac team?	5	<b>A You're present when someone was arrested.</b>
6	<b>A I mean, I can't answer that. Probably, but</b>	6	Q What do you not understand about the
7	<b>I can't answer that -- I'm not on those vehicles.</b>	7	question of whether Watts was at the scene of
8	Q Did you see him on a weekly basis at the	8	arrests on a weekly basis?
9	scene of arrests?	9	<b>A I'm asking whose arrests are you talking</b>
10	<b>A On my arrests?</b>	10	<b>about?</b>
11	Q Did you see him on anyone's arrests?	11	Q Any arrests.
12	<b>A Again, I can't speak for those other</b>	12	<b>A Again, if I wasn't there, I can't speak of</b>
13	<b>officers. We're not -- we're not always together.</b>	13	<b>whether Watts was there on the scene of an arrest.</b>
14	Q Let me try again.	14	Q So you do understand what the question
15	<b>A Okay.</b>	15	means, right?
16	Q Because I'm asking did you see him, you see	16	<b>A Yes.</b>
17	him physically? Did you see Ronald Watts on the	17	Q Okay. But you just are saying you don't
18	scene of arrests every week while he was the	18	know if he was at every arrest that you didn't see?
19	sergeant?	19	<b>A That would be correct.</b>
20	<b>A Every week?</b>	20	Q I'm not asking you about arrests you didn't
21	Q Yes.	21	see.
22	<b>A I don't know if I see him every week on the</b>	22	What I want to know is do you know one way
23	<b>scene of an arrest. I can't -- I don't know every</b>	23	or the other whether Ronald Watts would go --
24	<b>week.</b>	24	whether he was at the scene of arrests on a weekly

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24 (93 to 96)

<p>1 basis when he was the sergeant of the tac team that 2 you worked on?</p> <p>3 MR. KOSOKO: I'm going to object based on 4 form of the question. I understand where you're 5 trying to go, but I think there's a fundamental 6 misunderstanding of what goes on at the scene.</p> <p>7 MR. ZECCHIN: I'm going to join.</p> <p>8 <b>A I mean, pretty sure most -- most, not all of 9 them, he would be on the scene of an arrest, yes.</b></p> <p>10 Q And what would his role typically be at the 11 scene of an arrest?</p> <p>12 MR. ZECCHIN: Objection to the form --</p> <p>13 MR. KOSOKO: Object to foundation.</p> <p>14 MR. ZECCHIN: (Continuing) -- as to arrests 15 he's not present for.</p> <p>16 MR. KOSOKO: And I object to foundation as 17 to a sergeant's role.</p> <p>18 <b>A What would his role would be? He's a 19 supervisor. Supervise.</b></p> <p>20 Q And did you see Watts supervising arrest 21 scenes over the years?</p> <p>22 MR. KOSOKO: Again, I'm going to object 23 based upon foundation as to the supervisor's role 24 and what the supervisors do.</p>	<p>93</p> <p>1 Q In your many years of working under Ronald 2 Watts' supervision, did you gain some understanding 3 of what his responsibilities were at the scene of an 4 arrest?</p> <p>5 MR. ZECCHIN: Objection to the formation, 6 asked.</p> <p>7 <b>A I mean, it bears on the situation.</b></p> <p>8 Q Okay, great. So tell me the different 9 various things that he was responsible for doing at 10 the scene of an arrest based on your experience 11 working with him.</p> <p>12 MR. MICHALIK: Object to form and 13 foundation.</p> <p>14 MR. ZECCHIN: Join.</p> <p>15 MR. MICHALIK: That's not a question.</p> <p>16 MR. KOSOKO: Join.</p> <p>17 THE WITNESS: I mean, like I said, just his 18 presence alone, make sure his officer are safe. 19 That's one thing. He hears us on a job somewhere, 20 he might drop by, make sure his officer are all 21 right.</p> <p>22 Q And how would he -- in your experience from 23 what you observed, how would he make sure that 24 officers were safe at the scene of arrests?</p>
<p>1 <b>A I mean, what do you mean by supervise? He 2 could just be there as he's present supervising. He 3 wouldn't have to say anything. He could just be 4 present at the scene supervise. Just his presence 5 alone is supervise, make sure everything went well.</b></p> <p>6 Q Okay. So one role of a supervisor would 7 just be to be there and make sure everything went 8 well, right?</p> <p>9 <b>A Or that went all right.</b></p> <p>10 MR. KOSOKO: I just fundamentally object as 11 to his foundation as to what the supervisor's 12 duties, roles, and responsibilities are.</p> <p>13 Q How many years did you work with Ronald 14 Watts as your supervisor?</p> <p>15 <b>A From 2004 until the time he got arrested.</b></p> <p>16 Q How many years was that?</p> <p>17 <b>A 2004, I forgot the year he got arrested. 18 You would have to tell me.</b></p> <p>19 Q More than ten years? No, sorry.</p> <p>20 <b>A I mean, I could do the math if you tell 21 me -- I don't know the year he got arrested.</b></p> <p>22 Q You worked with him for many years. Is that 23 fair?</p> <p>24 <b>A Okay. That's fair.</b></p>	<p>94</p> <p>1 <b>A I mean, he --</b></p> <p>2 MR. KOSOKO: Object as to form as to what -- 3 what my client knew and did.</p> <p>4 <b>A I mean, he could just act as a guard officer 5 while we're doing our investigation.</b></p> <p>6 Q And what does a guard officer do?</p> <p>7 <b>A You make sure the officers safe while 8 they're doing what they're doing.</b></p> <p>9 Q And how does a guard officer make sure that 10 people are safe?</p> <p>11 <b>A Your responsibility is to be aware of your 12 surroundings, make -- keeping your officers safe, 13 make sure no one walks up behind them while they're 14 doing their investigation.</b></p> <p>15 Q Did you ever see Ronald Watts arrest anybody 16 himself?</p> <p>17 <b>A I don't recall.</b></p> <p>18 Q You don't recall one way or the other?</p> <p>19 <b>A No.</b></p> <p>20 Q Did you ever see your partner, Nichols, 21 arrest anybody?</p> <p>22 <b>A Yes.</b></p> <p>23 Q Did you ever tell a civilian how they can 24 file a complaint against any officers?</p>

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25 (97 to 100)

97  
 1 **A Did I ever tell?**  
 2 Q Yeah.  
 3 **A If an -- if an individual come up to me**  
 4 **saying they have a complaint against an officer, I**  
 5 **usually refer them to OPS at the time. I always**  
 6 **tell them, You can call OPS if you have a complaint**  
 7 **on any officer.**  
 8 Q And what type of complaints did you get from  
 9 civilians over the years?  
 10 **A I don't recall the complaint. They would**  
 11 **just say, How do I file a complaint on an officer?**  
 12 **I would state, Call OPS.**  
 13 Q Did you tell them how to get in touch with  
 14 OPS?  
 15 **A Yes.**  
 16 Q Did you give them a phone number or --  
 17 **A Yes. I would look in my book. Or if I**  
 18 **don't have my book at that time, I would advise them**  
 19 **to call 311 and ask for OPS's number.**  
 20 Q Do you remember any specific officers people  
 21 wanted to complain about?  
 22 **A No.**  
 23 Q Do you remember anyone ever coming up to you  
 24 and saying Watts did anything wrong?

99  
 1 **and Mohammed got locked up.**  
 2 Q When did you have that conversation or those  
 3 conversations with Nichols?  
 4 **A Probably the day the news broke out or right**  
 5 **after.**  
 6 Q How many times do you think you've talked to  
 7 Nichols about the Watts and Mohammed criminal  
 8 proceedings?  
 9 **A Probably just a couple of times after --**  
 10 **immediately after they got arrested.**  
 11 Q What did you say to him, what did he say to  
 12 you?  
 13 **A I just said, Did you know what -- probably**  
 14 **to the extent, Did you know what Watts and Mohammed**  
 15 **got locked up for according to the news media, to**  
 16 **that extent.**  
 17 Q And what did he say to you?  
 18 **A He probably stated he read -- he also read**  
 19 **the media or what was in the news.**  
 20 Q And did you have any -- did either of you  
 21 express any surprise, disbelief?  
 22 **A I mean, we were shocked that they got**  
 23 **arrested; but other than that, no.**  
 24 Q Why were you shocked that they got arrested?

98  
 1 **A No.**  
 2 Q How many people over the years do you think  
 3 you gave OPS's telephone number to?  
 4 **A That I couldn't tell you.**  
 5 Q More than a hundred?  
 6 **A I doubt it.**  
 7 Q More than 50?  
 8 **A Maybe.**  
 9 Q How did you learn that Mohammed and Watts  
 10 had been charged with crimes?  
 11 **A How did I learn? On the news.**  
 12 Q Do you have any source of information about  
 13 what they were charged or convicted of other than  
 14 the news?  
 15 **A No, just the news.**  
 16 Q Did you ever talk about it with current or  
 17 former members of the 264 Watts team?  
 18 **A Other than what was on the news, no.**  
 19 Q But you've talked to them about what was on  
 20 the news?  
 21 **A Yeah, about what they were locked up for.**  
 22 Q Who did you talk to about that?  
 23 **A Probably discussed it with my partner that,**  
 24 **Did you read on the paper -- on the news that Watts**

100  
 1 MR. KOSOKO: I'm going to object as to form  
 2 of the question.  
 3 **A That they just got arrested.**  
 4 Q Why were you shocked that they had been  
 5 arrested?  
 6 **A I had no reason to believe that they would**  
 7 **be arrested.**  
 8 Q Why was Nichols shocked? Did he tell you?  
 9 **A I didn't -- did I say he was shocked? I**  
 10 **don't believe I stated he was shocked.**  
 11 Q I thought you said, We were shocked.  
 12 **A Okay. I might have spoken -- I was shocked.**  
 13 Q You don't know how Nichols --  
 14 **A No, I don't know how Nichols felt.**  
 15 Q He didn't say to you, I'm shocked that they  
 16 got arrested --  
 17 **A No --**  
 18 Q (Continuing) -- or anything like that?  
 19 **A (Continuing) -- I don't believe he did.**  
 20 Q How long was this conversation with you and  
 21 Nichols about Watts and Mohammed?  
 22 **A About a couple minutes, not more than that.**  
 23 Q Was it at the police station?  
 24 **A I couldn't remember if it was the police**

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26 (101 to 104)

1 <b>station. Most likely probably, yes, the police</b> 2 <b>station.</b> 3   Q We had talked about report writing, and a 4   lot of it was in connection with reverse stings. 5   How do you decide who writes a report after 6   an arrest outside of the reverse sting context? 7   A <b>Usually the arresting officer or the person</b> 8 <b>that actually observed the crime would do the</b> 9 <b>paperwork, but there are certain instances where</b> 10 <b>that doesn't happen.</b> 11   Q What are the incidents when that doesn't 12   happen? 13   A <b>That they don't write --</b> 14   Q So -- well, let's back up. 15   Who's the -- when you say "arresting 16   officer," who is the arresting officer? 17   A <b>The person that observed the crime being</b> 18 <b>committed.</b> 19   Q So there is -- when you said the arresting 20   officer or the person who writes or who observed the 21   crime being committed, is that the same person? 22   A <b>What was that?</b> 23   Q The arresting officer, that means that's the 24   person who witnessed the crime being observed?	101 1 <b>not.</b> 2   Q And what would be the incidents where maybe 3   the arresting officer wouldn't have observed the 4   transaction? 5   A <b>The arresting officer wouldn't be the person</b> 6 <b>that observed the transaction. Well, let's say I'm</b> 7 <b>the surveillance officer. I observed a transaction.</b> 8 <b>Then I arrested the person. I'm relying on the</b> 9 <b>surveillance officer information of what happened.</b> 10   Q So let me just understand. Who are you in 11   this scenario you just gave? 12   A <b>Let's say I'm an enforcement officer and</b> 13 <b>there's a surveillance officer. Let's say so and so</b> 14 <b>individual did a transaction and I placed that</b> 15 <b>subject in custody and I end up being the arresting</b> 16 <b>officer. That's the incident I didn't observe what</b> 17 <b>happened, but I'm relying on the information from</b> 18 <b>the officer that actually witnessed the incident.</b> 19   Q Understood. And then who -- should all that 20   information be written in the report so that someone 21   could look at it and know who saw what? 22   A <b>Yes.</b> 23   Q I'm going to shift gears a little bit again. 24   We talked about the members of the team over the	103 104
102 1   A <b>For the most part, yes, but it doesn't</b> 2 <b>really -- it doesn't -- there are certain incident</b> 3 <b>where that doesn't happen.</b> 4   Q Where the arresting officer doesn't observe 5   it? 6   A <b>Yes.</b> 7   Q And is it like -- is a reverse sting an 8   example of that? 9   A <b>Yes; yes.</b> 10   Q What are some other examples of when the 11   arresting officer would not be someone who observed 12   the incident? 13   A <b>Well, I could give you an example. Let's</b> 14 <b>say there's a person shot. I didn't witness that,</b> 15 <b>but I'm relying on information I received from the</b> 16 <b>citizen or other officer. I might be the arresting</b> 17 <b>officer, but I didn't witness that incident. So</b> 18 <b>certain situation like that.</b> 19   Q And when -- so let's take a drug 20   transaction. 21   Does the -- would the arresting officer 22   typically be someone who observed the transaction? 23   A <b>The arresting officer would be the --</b> 24 <b>typically, yes, but there's incident where maybe</b>	102 1 <b>years.</b> 2   Did any of them have nicknames that you're 3   aware of, including you? 4   A <b>Do any of them nicknames? I know some of</b> 5 <b>the resident would call me Chinaman. But as to the</b> 6 <b>other officer, I can't remember what nicknames they</b> 7 <b>have.</b> 8   Q Other than we talked about Lewis. We know 9   some people referred to her as Coco; is that right? 10   A <b>I believe so.</b> 11   Q And anyone else you can think of? 12   A <b>Sometimes they would refer to my partner as</b> 13 <b>Big Country. Robert Gonzalez, I'm not positive.</b> 14 <b>Make Gonzo. And Brian Bolton, some of them would</b> 15 <b>refer to him as Blue Eyes; but that's about it.</b> 16   Q Do you know Shannon Spalding? 17   A <b>Other than what I hear in the media, no.</b> 18   Q You never met her? 19   A <b>Never met her.</b> 20   Q What about Echeverria? 21   A <b>The same thing.</b> 22   Q Never met him? 23   A <b>Never met him.</b> 24   Q So never worked with either of them?	104

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27 (105 to 108)

	105		107
1 <b>A No.</b>		1 <b>vice or case report. I don't recall whether it was</b>	
2    Q Were you ever interviewed by Internal		2 <b>vice or case report.</b>	
3    Affairs about Watts or Mohammed?		3    Q Did any of the documents you looked at to	
4 <b>A I don't believe so.</b>		4    prepare for your deposition refresh your	
5    Q Are you aware of any internal investigation		5    recollection?	
6    into Watts or Mohammed while they were officers?		6 <b>A Refresh my recollection? No.</b>	
7 <b>A No.</b>		7    Q How long -- well, did you do anything other	
8    Q And were you ever made aware while Watts and		8    than look at documents to prepare for your	
9    Mohammed were still on the force of any		9    deposition?	
10 investigation involving either of them?		10 <b>A No.</b>	
11 <b>A No.</b>		11   Q Did you meet with your attorney?	
12   Q After they were arrested, did anyone from		12 <b>A Yes, I met with --</b>	
13 the City or COPA or IPRA come talk to you about		13   Q I don't want to know what you talked about	
14 Watts or Mohammed before these cases were filed?		14 with him --	
15 <b>A No.</b>		15 <b>A Yes.</b>	
16   Q You've talked to COPA, correct?		16   Q (Continuing) -- but I do want to know if you	
17 <b>A Yes.</b>		17 met with him.	
18   Q Other than COPA, has anyone from the City		18 <b>A Yes, I met with my civil attorneys.</b>	
19 talked to you about Watts or Mohammed?		19   Q How -- when did you meet with your	
20 <b>A No.</b>		20 attorneys?	
21   Q And Internal Affairs, no one from the CPD,		21 <b>A To prepare for this?</b>	
22 anything like that?		22   Q Yeah.	
23 <b>A No.</b>		23 <b>A Last three days, I believe.</b>	
24   Q Do you have any reason to believe that Watts		24   Q All three days?	
	106		108
1 and Mohammed are not guilty?		1 <b>A Yes, I believe so.</b>	
2 <b>A Do I have reason to believe they're not</b>		2    Q How long did each meeting last?	
3 <b>guilty?</b>		3 <b>A Probably from -- any time between 10:00 to</b>	
4    MR. ZECCHIN: Objection, foundation. You		4 <b>2:00 or 3:00.</b>	
5 can answer if you know.		5    Q And who was at the meetings?	
6 <b>A I can't answer that.</b>		6 <b>A Counsel, Tony.</b>	
7    Q You don't know one way or the other?		7    Q Okay. Is that it?	
8 <b>A No.</b>		8 <b>A And some other ones who might drop in, like</b>	
9    Q Tell me what you did to prepare for your		9 <b>Allyson, Bill, and Brian; but for the most part just</b>	
10 deposition today?		10 <b>Tony.</b>	
11 <b>A Looked at a couple of paperwork, case</b>		11   Q All from Mr. Hale's office?	
12 <b>reports.</b>		12 <b>A That would be correct.</b>	
13   Q What case reports paperwork did you look at?		13   Q When was the last time you saw -- so you saw	
14 <b>A What do you mean?</b>		14 a bunch of -- well, I shouldn't say "a bunch."	
15   Q What case reports or paperwork did you look		15   Q You saw some reports over the last few days	
16 at to prepare for your deposition?		16 to prepare for your deposition, right?	
17 <b>A Case report for McDaniels, maybe looked at</b>		17 <b>A Yes.</b>	
18 <b>Lionel White, Scott, Martin -- I mean, not Martin,</b>		18   Q Before that when was the last time you	
19 <b>Smith. I'm sorry.</b>		19 looked at any of those reports?	
20   Q Taurus Smith?		20 <b>A Before that, probably a couple of months.</b>	
21 <b>A Is that her name? Okay, Taurus Smith.</b>		21   Q And was that -- it was something else in	
22   Q Do you remember specifically which reports		22 connection with this case?	
23 you looked at?		23 <b>A I don't remember if it's in connection with</b>	
24 <b>A Probably Arrest Report, whether -- if it's</b>		24 <b>this case; but at the same law firm, Hale's law</b>	

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28 (109 to 112)

	109		111
<b>1 firm.</b>		1 time period?	
2 Q Before these cases were filed, do you know		2 <b>A No.</b>	
3 the last time you looked at any of those reports, if		3 Q Did you ever work with members of Watts's	
4 ever?		4 team during that time period?	
<b>5 A I don't recall the last time I looked at</b>		<b>5 A No.</b>	
<b>6 those reports.</b>		6 Q Are you familiar with Vice Case Reports	
7 MR. RAUSCHER: I'm just going to go grab --		7 generally?	
8 it's in here.		<b>8 A Yes.</b>	
9 MR. ZECCHIN: Oh, sure.		9 Q Did you complete a number of Vice -- have	
10 (Brief pause.)		10 you completed a number of Vice Case Reports over the	
11 Q I'm going to mark Exhibit 1, which is a		11 years?	
12 document Bates-stamped CITY-BG-52330 through 31.		<b>12 A Yes.</b>	
13 Hand that to you.		13 Q Row 18 on there has a few choices.	
14 (Leano Exhibit No. 1 was marked for		<b>14 A Row 18.</b>	
15 identification and is attached to the transcript.)		15 Q You see they're numbered at the top. It's	
16 Q And this is on the Smith case.		16 got a check mark for Witnessed and a bunch of	
17 Have you seen this document before?		17 officer names in there?	
<b>18 A Yes.</b>		<b>18 A Yes.</b>	
19 Q Is this one of the documents you looked at		19 Q Do you have any understanding of what	
20 to prepare for your deposition today?		20 that -- when Witnessed is checked there, what that's	
<b>21 A Yes.</b>		21 supposed to indicate in a Vice Case Report?	
22 Q Tell me what this document is.		<b>22 A I mean, from my understanding, Witnessed</b>	
<b>23 A It is a Vice Case Report.</b>		<b>23 means he witnessed something. As to what, I</b>	
24 Q And what's it a Vice Case Report of?		<b>24 couldn't tell you.</b>	
	110		112
<b>1 A vice Case Report is usually done on</b>		1 Q And what are the things someone might	
<b>2 narcotics.</b>		2 witness that would warrant being included in a -- as	
3 Q And Taurus Smith is one of the offenders		3 a witness in a Vice Case Report?	
4 listed here, the second window?		<b>4 A I mean, if you're in an assisting unit, you</b>	
<b>5 A Yes.</b>		<b>5 might have witnessed the subject being arrested, the</b>	
6 Q Do you know whether you were involved in Mr.		<b>6 narcotics being recovered. As to what you</b>	
7 Smith's arrest?		<b>7 witnessed, I couldn't tell you from this document.</b>	
<b>8 A I don't believe I was.</b>		8 Q And I'm not asking specifically if you --	
9 Q And tell me why you don't think you were		<b>9 A I understand.</b>	
10 involved?		10 Q You're saying you can't remember this one.	
<b>11 A I was never assigned to the Unit 715.</b>		11 But it could be narcotics being recovered. What	
12 Q And that's the unit that arrested him?		12 else could it be?	
<b>13 A Yes.</b>		<b>13 A There are numerous things.</b>	
14 Q And how do you know that?		14 Q What other numerous things?	
<b>15 A I wasn't on the team on April 3rd, 2004.</b>		<b>15 A Witness the subject being transport to 2nd</b>	
16 Q Because you started November '04?		<b>16 District.</b>	
<b>17 A Yes.</b>		17 Q What else?	
18 Q Where were you in April of 2004?		<b>18 A Observing -- witnessing someone for going</b>	
<b>19 A I was assigned to midnight, first watch.</b>		<b>19 custodial search or actually witnessing the crime</b>	
20 Q And were you assigned to midnight, first		<b>20 being committed.</b>	
21 watch the whole month of April 2004?		21 Q So one would be witnessed -- let me just	
<b>22 A I was assigned to midnight, first watch, 2nd</b>		22 make sure I get the list right. Witnessed the crime	
<b>23 District November of '01 until November of '04.</b>		23 being committed?	
24 Q Did you ever work other shifts during that		<b>24 A Yes.</b>	

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29 (113 to 116)

	113		115
1	Q Witness the transport of the offender?	1	<b>goes, Oh, okay, I read it anyways. It's good. Just</b>
2	<b>A Yes.</b>	2	<b>sign it on my behalf.</b>
3	Q Witness a search?	3	Q That would be the only time you'd sign for
4	<b>A Yes.</b>	4	someone else?
5	Q Anything else?	5	<b>A Or something chaotic. You know what I mean?</b>
6	<b>A Witness narcotics being recovered.</b>	6	<b>Something -- a lot of stuff going on. He already</b>
7	Q And is that different than witnessing the	7	<b>read it, I read it, and the last thing is he forgot</b>
8	crime?	8	<b>to sign it so he might give me permission to sign on</b>
9	<b>A Well, you -- if you observe a hand-to-hand</b>	9	<b>his behalf.</b>
10	<b>transaction, you might not have witnessed that but</b>	10	Q But you would only sign on his behalf if you
11	<b>11 you might witness the recovery portion of it.</b>	11	had specific permission to sign that particular
12	Q So you may find -- someone may find drugs	12	report after he had reviewed it?
13	somewhere else? You may see that, but --	13	<b>A Yes.</b>
14	<b>A Yes. Or while he's in custody, you might</b>	14	Q And did you ever know of others signing your
15	<b>witness an officer recovering another narcotics</b>	15	name on reports?
16	<b>somewhere on the -- on his person.</b>	16	<b>A Not that I'm aware of except my partner, but</b>
17	Q Is there anywhere on this form, these	17	<b>I would have to give him -- I would have gave him</b>
18	reports, or elsewhere that you know of where you're	18	<b>permission, the same.</b>
19	supposed to detail who saw what?	19	Q And that would only be after you reviewed
20	<b>A On the narrative.</b>	20	20 the report?
21	Q And so the narrative should say who saw the	21	<b>A Yes.</b>
22	transport, who saw the arrest?	22	Q Do you know Taurus Smith?
23	<b>A The narrative should -- would hopefully say</b>	23	<b>A Taurus Smith?</b>
24	<b>24 who did who or what officer is involved in it.</b>	24	Q Taurus Smith. Do you know who that is?
	114		116
1	Q Was it your practice to say which officers	1	<b>A No, I don't. I don't recall who that is.</b>
2	did what in the narrative?	2	Q All right. You can put this to the side or
3	<b>A For the most part I would try to put in the</b>	3	just try to keep them stacked.
4	<b>narrative what each officer did or done.</b>	4	You listed Anthony McDaniels earlier as one
5	Q And so to do that would you have to go talk	5	of the few cases you have an independent
6	to other officers before you completed reports?	6	recollection of?
7	<b>A If I wasn't present as to what happened,</b>	7	<b>A Yes.</b>
8	<b>yes, I would talk to them. But if I was there and</b>	8	Q Tell me every fact that you remember related
9	<b>observed what he did, I may still talk to them but</b>	9	to Mr. McDaniels' arrest.
10	<b>10 not necessarily.</b>	10	<b>A I know he ran out of 5613 holding his side</b>
11	Q Did you ever sign other officers' names on	11	<b>11 yelling, Go, go, go and jumped into a vehicle. The</b>
12	12 your reports?	12	<b>12 color or make of that vehicle I can't recall at this</b>
13	<b>13 about it.</b>	13	<b>13 moment.</b>
14	<b>A Other officer's name? I might have signed</b>	14	<b>That vehicle then went eastbound on 56th</b>
15	<b>14 my partner's name for the most part, but that's</b>	15	<b>15 where we followed it where the vehicle failed to</b>
16	<b>16 stop at a stop sign on 56th and King. Around 58 and</b>	16	<b>17 King we activated the lights. He refused to stop.</b>
17	<b>17 he went maybe one block south and then immediately</b>	18	<b>18 He went maybe one block south and then immediately</b>
18	<b>18 West, I believe -- that's either 59th or 60th. And</b>	19	<b>19 West, I believe -- that's either 59th or 60th. And</b>
19	<b>19 then he made another right into the alley, west</b>	20	<b>20 then he made another right into the alley, west</b>
20	<b>20 alley of King Drive. Maybe a block, not a block --</b>	21	<b>21 or half a block the car slowed down. He jumped out.</b>
21	<b>21 I chased him. He fell. A gun ejected and fell to</b>	22	<b>22 the floor. I recovered that and maybe 30 feet away</b>
22	<b>22</b>	23	
23	<b>23</b>	24	
24	<b>24 told you to read it. You forgot to sign it. He</b>		

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30 (117 to 120)

117	119
1 <b>in a vacant lot he was apprehended by my partner,</b>	1 Q Who was driving day?
2 <b>Officer Nichols.</b>	2 <b>A Officer Nichols.</b>
3 Q How long did that whole thing you just	3 Q You remember that?
4 described take?	4 A Yes.
5 <b>A Probably a minute or two at the most.</b>	5 Q Which direction was your car facing?
6 Q Including the driving?	6 A <b>Not a hundred percent positive. I believe</b>
7 A Yes.	7 <b>it was facing eastbound.</b>
8 Q So from running out of the building until	8 Q And what direction did -- was Mr. McDaniels
9 he's under arrest from Nichols -- well, let me ask,	9 running when he came out of the building?
10 did Nichols arrest him?	10 A Yes.
11 A Yes.	11 Q Which direction?
12 Q So from running out of the building until	12 A <b>Was he running?</b>
13 Nichols arrested him took 1 to 2 minutes?	13 Q Yeah.
14 A Yes.	14 A <b>Came out of the house going northwest.</b>
15 Q When did this happen?	15 Q So away from your car?
16 A <b>The date, I can't tell you exactly. I would</b>	16 A <b>No. We were on the opposite side of the</b>
17 <b>have to look at a document to tell you that.</b>	17 <b>street on the corner.</b>
18 Q What about the year?	18 Q Was he running towards your car or away from
19 A <b>That I couldn't tell you the year either.</b>	19 it?
20 Q What was the weather like that day?	20 A <b>Towards our car.</b>
21 A <b>The weather like? I couldn't tell you the</b>	21 Q How far away was your car from the building?
22 <b>weather.</b>	22 A <b>Whatever size the street is plus the</b>
23 Q Was it night or day?	23 <b>sidewalk, at an angle, so I don't know. Maybe 50,</b>
24 A <b>I believe it might have been day.</b>	24 <b>60 feet.</b>
118	120
1 Q Why do you think it might have been day?	1 Q Did you know Mr. McDaniels?
2 A <b>I just believe it was days. No other</b>	2 A <b>Prior to this, no.</b>
3 <b>reason. I believe it was days.</b>	3 Q How fast was he running when he came out of
4 Q Was the sun out?	4 the building?
5 A <b>I couldn't -- I can't answer that.</b>	5 MR. ZECCHIN: Object to the form.
6 Q How many people were around when he ran out	6 A <b>It wasn't a sprint, but it wasn't a -- maybe</b>
7 of the building yelling, Go, go, go?	7 <b>a light jog.</b>
8 A <b>I believe it was just him that came -- that</b>	8 Q What was he wearing?
9 <b>came out of the building saying, Go, go, go.</b>	9 A <b>That I can't recall what was he wearing.</b>
10 Q No one else was standing around?	10 Q What were you wearing?
11 A <b>No, I don't believe so.</b>	11 A <b>Plain clothes.</b>
12 Q Who were you with?	12 Q Like what clothes?
13 A <b>My partner.</b>	13 A <b>I can't tell you what clothes I was wearing.</b>
14 Q Where were you?	14 Q What clothes was your partner wearing?
15 A <b>We were parked on the corner.</b>	15 A <b>I can't tell you that either.</b>
16 Q Windows rolled up or down?	16 Q Why were you parked where you were parked?
17 A <b>Might have been down.</b>	17 A <b>Excuse me?</b>
18 Q Might have been or they were?	18 Q Why were you parked in the location where
19 A <b>I like to have the window down when I</b>	19 you parked?
20 <b>patrol.</b>	20 A <b>That's a high narcotics area.</b>
21 Q Typically they were down?	21 Q A lot of traffic -- a lot of foot traffic?
22 A <b>Yes, on my side anyway.</b>	22 A <b>Usually, yes.</b>
23 Q And were you driving or Nichols driving?	23 Q But at that time there wasn't?
24 A <b>For the most part my partner drives.</b>	24 A <b>The moment he came out of the building, no,</b>

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31 (121 to 124)

	121		123
<b>1</b> <b>there wasn't.</b>		1	MR. ZECCHIN: Objection, asked and answered.
2 Q Before he had come out of the building was		2	You can answer again.
3 there other foot traffic?		3	<b>A I couldn't tell you if there was people in</b>
<b>4</b> <b>A I don't recall.</b>		4	<b>the vehicle, but I know there was other vehicles in</b>
5 Q So you saw him walk in the building?		5	<b>the block.</b>
<b>6</b> <b>A No, he did not.</b>		6	Q Do you know how many other vehicles were on
7 Q You didn't see him go in?		7	the block?
<b>8</b> <b>A No.</b>		8	<b>A Like I stated, I couldn't tell you how many</b>
9 Q Taurus was on or -- I'm sorry. The car was		9	<b>vehicles on the block.</b>
10 on or it wasn't on when he got out of it? Let me		10	Q And I'm sorry. You may have already
11 rephrase.		11	answered this, but do you remember what kind of car
12 The car that he got into, was that on or not		12	12 it was?
13 on when he came out of the building?		13	<b>A Like I stated earlier, I can't recall what</b>
<b>14</b> <b>A I don't recall if it was on or off.</b>		14	<b>kind of car it was.</b>
15 Q Was it parked?		15	Q The other person -- how many other people
<b>16</b> <b>A Yes.</b>		16	16 were in the car?
17 Q And were there people in it?		17	<b>A I believe just a driver.</b>
<b>18</b> <b>A There was a driver in it.</b>		18	Q And what's the driver's name?
19 Q When did you first notice there was a driver		19	<b>A That I couldn't tell you.</b>
20 in that car?		20	Q What did the driver look like?
<b>21</b> <b>A When he jumped in the passenger side of the</b>		21	<b>A That I couldn't tell you.</b>
<b>22</b> <b>vehicle.</b>		22	Q What did the -- who talked to the driver?
23 Q How many other cars were there parked near		23	Which officers talked to the driver?
24 you?		24	<b>A No one.</b>
	122		124
<b>1</b> <b>A I couldn't tell you that.</b>		1	Q What did Mr. McDaniels say the driver's name
2 Q How far away was the car from -- was the car		2	2 was?
3 that Mr. McDaniels got into from your car?		3	<b>A He didn't.</b>
<b>4</b> <b>A Like I said -- stated earlier, the</b>		4	Q Did you ask him?
<b>5</b> <b>building's probably, what, 50 to 60. So the car, I</b>		5	<b>A I don't recall whether I did or not.</b>
<b>6</b> <b>would put it probably 40 feet away from us.</b>		6	Q Did anybody ask him?
7 Q And you don't remember how many other -- was		7	<b>A I don't recall.</b>
8 it on the street?		8	MR. ZECCHIN: Objection, foundation. You
<b>9</b> <b>A Yes.</b>		9	can answer.
10 Q You don't remember how many other cars were		10	Q So you recovered a gun and Nichols arrested
11 on the street?		11	Mr. McDaniels?
<b>12</b> <b>A No, I don't.</b>		12	<b>A Yes. Placed him in custody, that's correct.</b>
13 Q That was part of your job, making sure that		13	Q And then the driver took the car away? What
14 you knew your surroundings and you were aware of		14	14 happened with the driver?
15 your surroundings?		15	<b>A When he jumped out of the car --</b>
16 MR. MICHALIK: Object to the form of the		16	Q I'm sorry. When who jumped out of the car?
17 question.		17	<b>A Anthony McDaniels. When he jumped out of</b>
18 MR. ZECCHIN: Join.		18	<b>the car, the car proceeded to go northbound on the</b>
19 MR. KOSOKO: Join.		19	<b>alley.</b>
<b>20</b> <b>A Yes, I'm supposed to be aware of my</b>		20	Q The car got away?
<b>21</b> <b>surroundings, but I don't count every vehicle on the</b>		21	<b>A Yes.</b>
<b>22</b> <b>block.</b>		22	Q Whose car was it?
23 Q You don't know if there were any other		23	<b>A I couldn't tell you that.</b>
24 vehicles on the block with people in them?		24	Q Did you call this in on the radio?

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32 (125 to 128)

	125		127
1	<b>A Yes, I did.</b>	1	<b>that is a dope house, no.</b>
2	Q You, yourself, not your partner?	2	Q Do you think he committed a drug crime?
3	<b>A Yes, I did.</b>	3	<b>A I can't speak for Mr. McDaniels.</b>
4	Q What did you call in?	4	Q Did you find any drugs on him?
5	<b>A Most likely we're behind a car going</b>	5	<b>A No, I did not.</b>
6	<b>southbound on King that refused to stop and gave</b>	6	Q Did you search him for drugs?
7	<b>a -- gave a description. And then as he -- as</b>	7	<b>A I did a custodial search in the station,</b>
8	<b>Mr. McDaniels bailed out of the car, probably gave</b>	8	<b>yes.</b>
9	<b>his description, holding his side. And then when he</b>	9	Q Did Nichols find any drugs on him?
10	<b>fell, when I recovered the gun, I probably stated</b>	10	<b>A I don't believe he did.</b>
11	<b>11 gun recovered.</b>	11	Q Do you know if the car was ever recovered --
12	Q You said a car going southbound you would	12	<b>A Yes.</b>
13	have called in?	13	Q (Continuing) -- by the police?
14	<b>A What was that? Initially when we activated</b>	14	It was?
15	<b>15 our lights, yes, he was going southbound on King.</b>	15	<b>A Yes.</b>
16	Q Okay. Was it unusual for someone -- in your	16	Q How did that come about?
17	experience was it unusual to see someone jog out of	17	<b>A I believe 264 David -- that would be Officer</b>
18	18 a building yelling, Go, go, go?	18	<b>Mohammed, Lamonica, and Smith -- stating they</b>
19	<b>A Is it unusual? Yes.</b>	19	<b>19 recovered a vehicle west alley around -- I might be</b>
20	Q Did you ever ask him why he was yelling, Go,	20	<b>20 getting the address off -- 57 and King, 5720 King</b>
21	go, go?	21	<b>21 unoccupied.</b>
22	<b>A No, I did not.</b>	22	Q Was that near where you arrested -- or where
23	Q Who was he yelling it to?	23	Mr. McDaniels was arrested?
24	MR. ZECCHIN: Objection, foundation from	24	<b>A Yes.</b>
	126		128
1	this witness.	1	Q How close was it to where he was arrested?
2	<b>A I assume the driver.</b>	2	<b>A Probably less than a block.</b>
3	Q Can you think of any reasons why he would	3	Q How do you know that they're the ones who
4	have needed to yell for the driver to start going	4	recovered the vehicle?
5	from outside of the car?	5	<b>A I believe they went on the air.</b>
6	<b>A Could you repeat that?</b>	6	Q They went on the air and --
7	Q Yeah. So can you think of any reasons	7	<b>A Yes.</b>
8	when -- why Mr. McDaniels would have needed to yell,	8	Q (Continuing) -- said that?
9	Go, go, go while he was jogging to the car?	9	So what happened next after you recovered
10	MR. KOSOKO: Objection. Calls for a	10	the gun and Nichols arrested Mr. McDaniels?
11	speculative response.	11	<b>A He was transported to the 2nd District.</b>
12	MR. PALLE: Object to the form.	12	Q Who transported him to the 2nd District?
13	MR. ZECCHIN: Object to the form.	13	<b>A I believe Beat 214, Officer Carlos, I</b>
14	<b>A Do you want me to answer?</b>	14	<b>14 believe.</b>
15	Q Yes.	15	Q And what did you and Nichols do next?
16	<b>A Maybe he just committed a crime.</b>	16	<b>A Again, we probably relocated to 2nd District</b>
17	Q What crime did he --	17	<b>17 to process the arrest.</b>
18	<b>A That I couldn't tell you.</b>	18	Q What did you do to process the arrest?
19	MR. ZECCHIN: Objection. Foundation, form.	19	<b>A Sat at a computer, generated an Arrest</b>
20	MR. KOSOKO: It calls for a speculative	20	<b>20 Report, and probably -- I don't know if we were</b>
21	response.	21	<b>21 automated then. Probably a general case report at</b>
22	Q So any other reasons you can think of why he	22	<b>22 that time.</b>
23	would have jogged to the car yelling, Go, go, go?	23	Q Do you remember how much later after the
24	<b>A Other than maybe committing a crime because</b>	24	arrest the car was recovered?

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33 (129 to 132)

	129		131
1 <b>A Excuse me?</b>		1    MR. MICHALIK: Object to the form of the	
2    Q Do you remember how much after the arrest --		2 question.	
3 like how long elapsed between the arrest and when		3 <b>A The majority of the time.</b>	
4 the car was recovered?		4    Q What do you mean "The majority of the time"?	
5 <b>A After McDaniels Daniel was placed in custody</b>		5 <b>A Majority of the time that we would relocate</b>	
6 <b>by Officer Nichols? I would say a minute or two.</b>		6 <b>the vehicle to the second district.</b>	
7    Q So Mohammed, Lewis, and Smith got that car		7    Q So the majority of time people were arrested	
8 within a minute or two after McDaniels was arrested?		8 with cars, an officer would drive it back to the	
9 <b>A Yes.</b>		9 station?	
10   Q And what did they do with it?		10 <b>A Yes.</b>	
11 <b>A I believe they drove it back to the 2nd</b>		11   Q How often did you do that personally?	
12 <b>District.</b>		12 <b>A How often would we do that?</b>	
13   Q Who drove it back to the 2nd District?		13   Q No. You personally.	
14 <b>A One of those officers on 264 David.</b>		14 <b>A If we have the keys to the vehicle, most</b>	
15   Q Did any of them ever tell you?		15 likely we would drive that vehicle to the 2nd	
16 <b>A No. All they stated was they drove the</b>		16 District.	
17 <b>vehicle to the 2nd District.</b>		17   Q What's your best estimate of how many times	
18   Q And did you put in your report that someone		18 you drove a civilian car back to the 2nd District to	
19 drove the vehicle back?		19 be towed?	
20 <b>A Yes.</b>		20 <b>A You want me to give you a percentage or --</b>	
21   Q Who did you write down drove the vehicle		21   Q No. A number -- just a number.	
22 back?		22 <b>A Probably, if I would have to give you a</b>	
23 <b>A 264 David relocated the vehicle to the 2nd</b>		23 <b>number, 8 out of 10 we would do it.</b>	
24 <b>District.</b>		24   Q How many times total did you personally do	
	130		132
1    Q Why did one of the officers drive		1   that?	
2 Mr. McDaniels -- well, why did not Mr. McDaniels --		2 <b>A That I can't tell you.</b>	
3 why did one of the officers drive that car back to		3   Q More than a hundred?	
4 the station?		4 <b>A Again, probably. But it would just be a</b>	
5 <b>A It's just easier to have the vehicle towed</b>		5 <b>guess.</b>	
6 <b>in the 2nd District where you don't have to have an</b>		6   Q More than 500?	
7 <b>officer sitting in that vehicle while waiting for</b>		7 <b>A I doubt it, but anything is possible.</b>	
8 <b>the tow truck.</b>		8   Q Was Mr. McDaniels car -- was the car that	
9   Q Were there any policies -- CPD policies at		9 McDaniels was in -- was that searched?	
10 the time about officers driving cars of civilians?		10 <b>A I'm pretty sure it was.</b>	
11 <b>A Relocating -- relocating to the 2nd District</b>		11   Q And who searched it?	
12 <b>for towing? No.</b>		12 <b>A We probably searched it, other officers</b>	
13   Q How frequently did it happen that officers		13 <b>searched it, make sure there was no other</b>	
14 in your unit drove civilian cars to the police		14 <b>contrabands in the vehicle.</b>	
15 station to get them towed?		15   Q What do you remember about it? Do you	
16   MR. MICHALIK: I'm sorry. Can you repeat		16 remember you searching it?	
17 that question?		17 <b>A I don't remember whether it was myself or</b>	
18   MR. RAUSCHER: Yeah.		18 <b>Officer Nichols that searched it.</b>	
19   Q How --		19   Q So you don't know if it was you, Nichols, or	
20   MR. MICHALIK: I may object to the form of		20 somebody else; but you assume somebody searched it?	
21 that.		21 <b>A Yes.</b>	
22   Q How frequently did it happen in your		22   Q And why do you assume that someone searched	
23 experience in your unit that officers would drive		23 that vehicle?	
24 civilian cars back to the station to be towed?		24 <b>A Before -- it's a policy you search the</b>	

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34 (133 to 136)

	133		135
1 <b>vehicle to make sure there's no contraband before</b>		1 <b>Q</b> (Continuing) -- how they got the keys?	
2 <b>it's being towed.</b>		2 <b>A</b> <b>No, couldn't tell you.</b>	
3 Q So someone searched it at the scene where it		3 Q You talked to McDaniels that day?	
4 was left?		4 <b>A</b> <b>Yes.</b>	
5 <b>A Most likely, yes, it was searched at the</b>		5 Q And where did -- when did you talk to him?	
6 <b>scene and searched again in the 2nd District.</b>		6 <b>A Most likely in the 2nd District.</b>	
7 Q And was that something written in a report?		7 Q What do you remember?	
8 <b>A That the vehicle was searched? I don't</b>		8 <b>A I believe -- I don't remember if it was</b>	
9 <b>think so.</b>		9 <b>myself or Officer Nichols read him his rights and</b>	
10 Q Why would that not have been written down in		10 <b>asked him why he has the gun.</b>	
11 a report?		11 Q So you don't actually remember whether you	
12 <b>A It's just a common practice that all</b>		12 talked to McDaniels or Nichols did at the station?	
13 <b>vehicles to be towed are searched for any</b>		13 <b>A No, I don't.</b>	
14 <b>contrabands or illegal -- any contrabands in the</b>		14 Q So you don't remember him saying anything to	
15 <b>vehicle.</b>		15 you then either?	
16 Q And you don't write down that you did it and		16 <b>A I would -- I would have been present when he</b>	
17 didn't find any contraband?		17 <b>was Mirandized and the questions being asked.</b>	
18 <b>A I don't believe I -- if we would have found</b>		18 Q But you don't remember him saying anything?	
19 <b>something, we would have wrote that we found</b>		19 <b>A Yes, I remember him saying --</b>	
20 <b>something in the vehicle. But most likely if there</b>		20 Q You don't remember --	
21 <b>was nothing found, we didn't write anything down.</b>		21 <b>A I just don't know if it was me that asked</b>	
22 Q You don't think it was important before you		22 <b>the question or Officer Nichols did.</b>	
23 just drove someone's car to write down that there		23 Q But you remember the response?	
24 was no contraband in it?		24 <b>A Yes.</b>	
	134		136
1 <b>A To write down there's no contraband?</b>		1 Q Okay. What do you remember McDaniels saying	
2 MR. ZECCHIN: Object to the form.		2 to you and Officer Nichols?	
3 <b>A If there's nothing found, there's no need to</b>		3 <b>A This is not verbatim, but I believe he said,</b>	
4 <b>write down there was no contraband found.</b>		4 <b>I bought the gun on the street for protection.</b>	
5 Q Why would you not -- why would it not be		5 Q Anything else?	
6 important to write down that you searched and didn't		6 <b>A That's it.</b>	
7 find any contraband?		7 Q You had already read him his rights or	
8 <b>A What would be the purpose of it?</b>		8 someone had read him his rights?	
9 Q So there's no purpose you can think of?		9 <b>A Yes.</b>	
10 <b>A If there's no narcotics or contrabands, why</b>		10 Q Was it common that people would answer	
11 <b>would I need to put down no narcotics or contraband</b>		11 questions about why they had contraband after you	
12 <b>found in the vehicle?</b>		12 read them their rights?	
13 Q Well, to have a complete report.		13 <b>A Some would. There's some people that would</b>	
14 MR. ZECCHIN: Form. Is that a question?		14 <b>ask. Some wouldn't.</b>	
15 MR. RAUSCHER: That's a question.		15 Q Was it more frequently people refused to	
16 <b>A I mean, it's not relevant. There was</b>		16 answer or answered?	
17 <b>nothing relevant to the case that was found in the</b>		17 <b>A I would say half and half.</b>	
18 <b>vehicle.</b>		18 Q Were you surprised when McDaniels told you	
19 Q Where did the keys come from?		19 he bought the gun on the street for protection?	
20 <b>A Where did the keys come from?</b>		20 <b>A No.</b>	
21 Q Yeah.		21 Q Did you ask him why he needed it or why he	
22 <b>A Couldn't tell you.</b>		22 thought he needed protection?	
23 Q You don't know --		23 <b>A No, I did not.</b>	
24 <b>A No.</b>		24 Q Why not?	

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35 (137 to 140)

	137		139
1	<b>A I just didn't ask him that.</b>	1	<b>A I don't believe, no.</b>
2	Q Have you read Mr. McDaniels' affidavit	2	Q What?
3	describing the events?	3	<b>A I don't believe so, no.</b>
4	<b>A I believe I did.</b>	4	Q Do you remember them telling you that they
5	Q And is there anything in that that you	5	relocated it to the 2nd District?
6	remember you agree with?	6	<b>A They would have had to tell me because I put</b>
7	<b>A Do I agree with? I don't agree to any of</b>	7	<b>it down in my report for 264 David, car was</b>
8	<b>it.</b>	8	<b>relocated to the 2nd District.</b>
9	Q So you don't agree that his conviction	9	Q You only -- you know that they told you it
10	should have been vacated?	10	10 was relocated to the 2nd District. You don't
11	<b>A No. His conviction should never have been</b>	11	11 actually know if it happened; is that fair?
12	<b>vacated.</b>	12	<b>A If you're asking me if I went in the parking</b>
13	Q Why do you think his conviction should not	13	<b>13 lot and physically looked at the car, no.</b>
14	have been vacated?	14	Q I'm just going to shift gears for one
15	<b>A Why? Because everything that happened</b>	15	15 second. I should have asked you this earlier. But
16	<b>16 happened the way it happened and his conviction</b>	16	16 for Taurus Smith, you don't have an opinion about
17	<b>17 shouldn't have been vacated. He committed a crime</b>	17	17 whether his conviction should have been vacated?
18	<b>18 and we arrested him lawfully, truthfully; and</b>	18	<b>A Taurus Smith?</b>
19	<b>19 there's no reason for his case to be vacated.</b>	19	Q Yeah.
20	Q Was his car towed from the 2nd District?	20	<b>A Like I said, I wasn't --</b>
21	<b>A I believe so, yes.</b>	21	MR. ZECCHIN: I'm going to object to any
22	Q Why do you believe that to be the case?	22	22 questions about Taurus Smith. He wasn't involved in
23	<b>A Because it was relocated to the 2nd District</b>	23	23 an arrest. But go ahead. You can answer the
24	<b>24 so it would have been picked up from the 2nd</b>	24	24 question.
	138		140
1	<b>District.</b>	1	<b>A Like I said, I don't know anything about</b>
2	Q Did you call in for the tow?	2	<b>2 that case. I wasn't involved in that arrest so I</b>
3	<b>A I don't know if I did or some other officer</b>	3	<b>3 can't speak either or.</b>
4	<b>did.</b>	4	Q What kind of gun did you recover from Mr.
5	Q Did you see the car at the 2nd District?	5	McDaniels?
6	<b>A Did I see the car at the 2nd District? I</b>	6	<b>A I believe it was a Glock 9 millimeter.</b>
7	<b>7 can't -- I can't recall whether I did or not.</b>	7	Q Why do you believe it was a 9 millimeter?
8	Q Did you see a tow come pick it up?	8	<b>A Why do I believe? I mean, I would have to</b>
9	<b>A I don't believe I did.</b>	9	<b>9 look at my case report to verify it, but I believe</b>
10	Q So you don't know one way or the other	10	<b>10 it was a Glock 9 millimeter.</b>
11	whether it was towed from the 2nd District?	11	Q So you don't have an independent
12	<b>A No, but I was informed by an officer that it</b>	12	12 recollection of what kind of gun it was?
13	<b>13 was relocated to 2nd District.</b>	13	<b>A No.</b>
14	Q Who told you that?	14	Q And do you remember what it looked like?
15	<b>A Most like 264 David.</b>	15	<b>A Blue steel.</b>
16	Q Mohammed, Lewis --	16	Q Blue steel?
17	<b>A One of the two -- one of those officers in</b>	17	<b>A Blue steel is basically a black gun.</b>
18	<b>18 that car.</b>	18	Q How big was it?
19	Q It was most likely them or it was them?	19	<b>A How big was it? I'm bad with -- what would</b>
20	<b>A One of those three officers on 264 David</b>	20	<b>20 you consider this? Maybe 6, 7 inches.</b>
21	<b>21 would have informed me that the car was located to</b>	21	Q Do you remember that -- do you remember what
22	<b>22 the 2nd District.</b>	22	22 it looked like?
23	Q And did one of them tell you it was towed	23	<b>A Yeah. It's a Glock.</b>
24	24 from the 2nd District?	24	Q Did the gun fall or did he throw it?

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36 (141 to 144)

141	143
<p>1   <b>A It fell.</b></p> <p>2   Q What did -- describe how you saw it. Did</p> <p>3   you see it fall?</p> <p>4   <b>A As he fell, the cuff -- as he fell, the gun</b></p> <p>5   <b>fell.</b></p> <p>6   Q Where did it fall from?</p> <p>7   <b>A From his waistband.</b></p> <p>8   Q When he was leaving the building, when he</p> <p>9   was jogging out of the building when you first saw</p> <p>10 him, did you think he had a gun?</p> <p>11   <b>A He was holding his side.</b></p> <p>12   Q But did you think he had a gun?</p> <p>13   <b>A Most likely, yes, by the way he was holding</b></p> <p>14 <b>his side, yes.</b></p> <p>15   Q Did you call in and say, We think we're</p> <p>16 following someone who's fleeing with a gun?</p> <p>17   <b>A No, I did not.</b></p> <p>18   Q Why would you not have included that</p> <p>19 information?</p> <p>20   <b>A Because I didn't have verification that it</b></p> <p>21 <b>was a gun. I was -- I'm just thinking he might have</b></p> <p>22 <b>a gun the way he was holding his side.</b></p> <p>23   Q So you wouldn't call something in on the</p> <p>24 radio if you suspected he had a gun until you saw</p>	<p>1   first -- when he did that, you thought he was</p> <p>2   holding a gun?</p> <p>3   <b>A No. I suspect he might be.</b></p> <p>4   Q Did you think he likely was -- had a gun?</p> <p>5   MR. MICHALIK: Object to the form of the</p> <p>6 question.</p> <p>7   MR. ZECCHIN: Join.</p> <p>8   MR. MICHALIK: Argumentative.</p> <p>9   <b>A Most likely he might, but I'm not sure</b></p> <p>10 <b>because I didn't have visible indication that he has</b></p> <p>11 <b>a gun.</b></p> <p>12   Q Would you have wanted other officers to know</p> <p>13 if he had a gun if they came across him?</p> <p>14   <b>A When they came across him? When he got out</b></p> <p>15 <b>of the car, that's when I said he was still -- he</b></p> <p>16 <b>was holding his side. Or while he's in the car I</b></p> <p>17 <b>didn't give that -- I didn't give that information</b></p> <p>18 <b>out.</b></p> <p>19   Q So why did you give it out when he got out</p> <p>20 of the car?</p> <p>21   <b>A Because he was still holding his side when</b></p> <p>22 <b>he got out of the car.</b></p> <p>23   Q Did you see the gun then?</p> <p>24   <b>A Yes.</b></p>
142	144
<p>1   it?</p> <p>2   <b>A Yes, I would say he was holding his side. I</b></p> <p>3 <b>wouldn't say he had a gun when I eventually wouldn't</b></p> <p>4 <b>see a gun.</b></p> <p>5   Q You wouldn't even say, I think he might have</p> <p>6 a gun?</p> <p>7   <b>A No. I would say he was holding his side.</b></p> <p>8   Q So you would have called in and said,</p> <p>9 Someone is fleeing southbound and they were holding</p> <p>10 their side when they got in the car?</p> <p>11   <b>A When he got out of the car, I believe that's</b></p> <p>12 <b>when I said he was holding his -- holding his side.</b></p> <p>13   Q When he got out of the car?</p> <p>14   <b>A Yes.</b></p> <p>15   Q What about when he got into the car the</p> <p>16 first time?</p> <p>17   <b>A No, I didn't call that -- we didn't call</b></p> <p>18 <b>that -- I didn't call out the car chase until we</b></p> <p>19 <b>activated our lights on 58th Street.</b></p> <p>20   Q But by that time you had already seen him</p> <p>21 leave a building jogging and holding his side,</p> <p>22 right?</p> <p>23   <b>A Yes.</b></p> <p>24   Q And that's the time I was asking about, the</p>	<p>1   Q You saw the gun right when he got out of the</p> <p>2 car?</p> <p>3   <b>A No, not right away.</b></p> <p>4   Q Okay. So then why did you call it in?</p> <p>5   <b>A Why did I call it in?</b></p> <p>6   Q Did you call in the gun -- did you call in</p> <p>7 that he was holding his side before you saw a gun or</p> <p>8 after?</p> <p>9   <b>A Before I saw the gun, I stated he jumped out</b></p> <p>10 <b>of the car holding his side. And then when I</b></p> <p>11 <b>visually saw the butt of the gun, I think I stated</b></p> <p>12 <b>he has a gun.</b></p> <p>13   Q So why did you call in that he was holding</p> <p>14 his side when he got out of the car but not when he</p> <p>15 got in the car?</p> <p>16   <b>A I didn't call that out when he got in the</b></p> <p>17 <b>car.</b></p> <p>18   Q Did you call in -- did you first call in</p> <p>19 this call -- did you first call this in over the</p> <p>20 radio after Mr. McDaniels was out of his car?</p> <p>21   <b>A Repeat that.</b></p> <p>22   Q Did you first call in this event after</p> <p>23 Mr. McDaniels was out of his car?</p> <p>24   <b>A No. I called in this while he was going</b></p>

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37 (145 to 148)

145  
1 **southbound on King on 58th Street when we activated  
2 the lights.**

3 Q And at that time why didn't you mention that  
4 he had been holding his side when he was jogging out  
5 of the building before the car --

6 **A Well, I don't know if he still had the gun  
7 on him. He might have just left it in the car. So  
8 when he got out of the car still holding his sides,  
9 that's when I went over the air, Subject jumped out  
10 of the car holding his side. And then when I had  
11 visible indication that he does have a gun, that's  
12 when I probably stated, Subject has a gun.**

13 Q I thought you just said you called in that  
14 he was holding his side before he had a gun?

15 **A Yes, when he got out of the car.**

16 Q What do you mean -- but when you said he  
17 might have left it in the car, what do you mean by  
18 that?

19 **A Well, weren't you asking me why didn't I  
20 call that he was holding his side while he was in  
21 the car? While he's in the car, I don't know where  
22 the gun is.**

23 Q Why would that matter?

24 **A Okay. Like I said, I had no visible**

147  
1 Q That was -- but before he got in the car,  
2 you saw him holding his side, right?

3 **A Correct.**

4 Q You thought that he might have a gun?

5 **A Yes.**

6 Q And then you called it in while he was still  
7 in the car?

8 **A Correct.**

9 Q Why did you not say then he was holding his  
10 side when he jumped in his car?

11 **A Couldn't tell you why I didn't say it.**

12 Q Why did you say it when he got out of the  
13 car?

14 **A Why did I say it?**

15 Q Yeah.

16 **A I'm giving a description letting other  
17 officer responding he might -- might have a gun.**

18 Q Did other officers respond?

19 **A I believe so.**

20 Q Which other officers responded?

21 **A That I couldn't tell you.**

22 Q Did Nichols see the gun at the scene?

23 **A Did Nichols see the gun? After he was  
24 placed in custody, I probably showed him.**

146  
1 **indication that he had a gun. He was just holding  
2 his side. So I'm not going to tell the officer, So  
3 and so we're chasing has a gun when I don't have  
4 visible indication a hundred percent that he has a  
5 gun.**

6 Q What was different about the -- well, let me  
7 try to rephrase that.

8 Why did you say that he was holding his side  
9 when he got out of the car but not describe that  
10 event when you called it in before he got out of the  
11 car?

12 There were two times when he was holding his  
13 side, right?

14 **A Yes.**

15 Q Once before he got in the car and once  
16 after, right?

17 **A I didn't get on the radio when he was coming  
18 out of the car. I got on the radio when we  
19 activated our lights at 58th Street.**

20 Q And where was that in this chain?

21 **A What do you mean where was that?**

22 Q What was he doing?

23 **A I don't know what he was doing. He was in  
24 the car.**

148  
1 Q But you don't remember?

2 **A No.**

3 Q How long were you talking to Mr. McDaniels  
4 at the station? You and -- I'm sorry. Let me  
5 rephrase.

6 How long were you and Nichols talking to  
7 Mr. McDaniels at the station?

8 **A Probably a minute or two. How long it takes  
9 for us to read him his rights and how long for him  
10 to answer that he bought the gun on the street for  
11 protection.**

12 Q So just straightaway he told you?

13 **A Yes.**

14 Q Do you remember that it was a minute or two  
15 or are you just --

16 **A I'm approximating it.**

17 Q Did Nichols ask how many -- did Nichols ask  
18 him who was driving the car?

19 **A I don't -- I don't believe so.**

20 Q Did the person driving the car commit a  
21 crime?

22 **A Yes.**

23 Q What crime did that person commitment?

24 **A Failing to stop at a stop sign.**

Transcript of Manuel Leano  
Conducted on September 26, 2019

38 (149 to 152)

1     Q Have you ticketed or arrested people over 2 the years for failing to stop at a stop sign?  3 <b>A If they don't have a license, they're 4 suspended otherwise it would just be a citation.</b>  5     Q Is there some sort of crime fleeing from the 6 police?  7 <b>A Fleeing from the police? Yes.</b> 8     Q And had the driver committed that crime?  9 <b>A If he would have been apprehended, most 10 likely he would have been charged with that citation 11 and fleeing the police.</b>  12    Q So he -- in your opinion the driver did 13 illegally flee from the police?  14 <b>A Yes.</b>  15    Q Is it common in your -- well, have you had 16 other instances of people trying to flee from the 17 police?  18 <b>A Yes.</b>  19    Q And is it common in your experience that if 20 one person of multiple people is caught fleeing from 21 the police you don't even ask who the other person 22 is?  23 <b>A Would we ask? We might ask, but they don't 24 usually -- for the most part they won't give you the</b>	149  1 <b>most part we would just give a description, a 2 physical description of who was driving the car.</b> 3     Q But I'm not asking how people answer. I'm 4 asking are there any other reasons other than you 5 just forgot to ask why you wouldn't have asked who 6 was driving the car?  7 <b>A I mean, most of the time we probably would 8 ask, but I don't know why we didn't ask in this 9 incident or I didn't ask in that incident.</b>  10    Q So there's no other reasons you can think of 11 other than just forgetting?  12 <b>A Yes.</b> 13    Q Yes, you're agreeing you can't think of --  14 <b>A Yes, I'm agreeing with you.</b>  15    Q If Mr. McDaniels was willing to openly tell 16 you why he had a gun, do you think he would have 17 fallen in the category of people who wouldn't have 18 told you who the driver was or who would have?  19    MR. ZECCHIN: Objection, form and foundation 20 from this witness.  21 <b>A I can't tell you whether he would or not. I 22 can't get in McDaniels' mind.</b>  23    Q Did you testify in criminal proceedings 24 brought against Mr. McDaniels?	151  1 <b>152</b>  1 <b>A Yes, I did.</b> 2     Q How many times? 3 <b>A I don't remember if this went to the Grand 4 Jury. So if he went to the Grand Jury, I probably 5 testified at Grand Jury and at his trial.</b> 6     Q You remember testifying at his trial? 7 <b>A Yes.</b> 8     Q How did you prepare to testify at his trial? 9 <b>A Look at the documents.</b> 10    Q Which documents did you look at? 11 <b>A The Arrest Report, probably the general case 12 report.</b> 13    Q Do you know who else testified at his trial? 14 <b>A That I can't recall who else testified at 15 his trial.</b> 16    Q Did you talk to anybody else in preparation 17 for your testimony? 18 <b>A In preparation for this?</b> 19    Q No, no. In preparation for your testimony 20 at Mr. McDaniels' -- did you talk to anyone else 21 before you testified at Mr. McDaniels' criminal 22 trial?  23 <b>A The State's Attorneys.</b> 24    Q Do you remember which State's Attorneys you
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39 (153 to 156)

	153		155
1	talked to?	1	McDaniels' trial?
2	<b>A No, I don't.</b>	2	<b>A The case.</b>
3	Q Do you remember how long you talked to them?	3	Q Anything specifically?
4	<b>A That I can't tell you.</b>	4	<b>A Of what happened, the facts of the case.</b>
5	Q Did you talk to Mohammed?	5	Q Did you cover the car being towed with the
6	<b>A Did I talk to Mohammed? If he was in the</b>	6	State's Attorney?
7	<b>courtroom, probably yes.</b>	7	<b>A Did we cover? I'm pretty sure we did.</b>
8	Q Did you talk to him about your testimony?	8	Q Do you remember talking about that with the
9	<b>A Did I talk to him? I talked to the State's</b>	9	State's Attorney or you just think you would have
10	<b>Attorney about my testimony.</b>	10	10 because it's a part of the story?
11	Q Right.	11	<b>A I don't have no independent recollection</b>
12	<b>A I don't know if I talked to Mohammed about</b>	12	<b>whether we talked about the case report with the</b>
13	<b>my testimony.</b>	13	<b>State's Attorney, but most likely we would have.</b>
14	Q Is it possible that you talked to Mohammed	14	Q Do you have any independent recollection of
15	about what your testimony was going to be before he	15	15 your conversation with the State's Attorney about
16	testified?	16	16 the McDaniels case?
17	<b>A He might have been in the room while I was</b>	17	<b>A Independent recollection, no.</b>
18	<b>talking to the State's Attorney, but. . .</b>	18	Q You're just going based on typical practice?
19	Q So if Mohammed was in the room when you were	19	<b>A Yes.</b>
20	preparing with the State's Attorney, then he would	20	Q After you recovered the -- when you
21	have known about -- then you would have talked to	21	21 recovered the gun, did you see any other civilians
22	him about your testimony, but otherwise you wouldn't	22	22 around?
23	have independently just talked to him?	23	<b>A I don't believe I did.</b>
24	<b>A I probably wouldn't talk to him about my</b>	24	Q Did people gather around at all after
	154		156
1	<b>testimony because I would have probably been talking</b>	1	Mr. McDaniels was arrested?
2	<b>to the State's Attorney.</b>	2	<b>A I don't believe so.</b>
3	Q Did you talk to anybody else other than the	3	MR. RAUSCHER: Let me grab the McDaniels
4	State's Attorney about what you were going to be	4	reports. Anybody need a short break while I get
5	testifying about --	5	5 this or do you want to just hang out?
6	<b>A No.</b>	6	MR. PALLE: No, that's fine.
7	Q (Continuing) -- Nichols, anybody?	7	MR. RAUSCHER: All right. We're going to
8	<b>A No.</b>	8	8 mark -- we're going to mark as Exhibit 2 a report,
9	Q Do you know how many criminal trials you've	9	9 Bates-stamped DO-JOINT 5777 through 5779.
10	testified in over the years?	10	10 (Leano Exhibit No. 2 was marked for
11	<b>A I can't give you a number.</b>	11	11 identification and is attached to the transcript.)
12	Q A best estimate.	12	12 Q Just let me know when you've had a chance to
13	<b>A Probably a hundred or less.</b>	13	13 read through it.
14	Q What's the process you typically go through	14	<b>A Okay.</b>
15	15 to prepare for testimony in criminal cases?	15	(Witness examining document.)
16	<b>A I would review the document -- the Arrest</b>	16	Q Have you seen this document before?
17	<b>Report, whether the vice or case.</b>	17	<b>A Yes.</b>
18	Q Is that it?	18	Q Is this one of the documents you looked at
19	<b>A Yes.</b>	19	19 to prepare for your deposition today?
20	Q And then would you also talk to the State's	20	<b>A Yes.</b>
21	Attorney?	21	Q Did you create this document?
22	<b>A Yes.</b>	22	<b>A Yes, I did.</b>
23	Q Do you remember what you talked to the	23	Q And tell us what the document is?
24	State's Attorney about before you testified in	24	<b>A It is Original Case Incident Report.</b>

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Conducted on September 26, 2019

40 (157 to 160)

	157		159
1	Q	What is an Original Case Incident Report?	
2	<b>A</b>	<b>It's a general case report.</b>	
3	Q	And what's the purpose of creating an	
4		Original Case Incident Report?	
5	<b>A</b>	<b>To document a crime incident that happened.</b>	
6	Q	And what's the crime incident that you were	
7		documenting in this Original Case Incident Report?	
8	<b>A</b>	<b>Weapon violation, unlawful handgun.</b>	
9	Q	This is Anthony McDaniels' arrest that we've	
10		been talking about?	
11	<b>A</b>	<b>Yes.</b>	
12	Q	When did you create this report in relation	
13		to the events?	
14	<b>A</b>	<b>Probably right after we got back in the 2nd</b>	
15		<b>District.</b>	
16	Q	Why do you think it was probably right after	
17		you got back?	
18	<b>A</b>	<b>As soon as we relocated to 2nd District, got</b>	
19		<b>situated is when most likely I started this case</b>	
20		<b>report.</b>	
21	Q	You see toward the end you have -- we're on	
22		Page DO-JOINT 5779, Page 3 of 3.	
23	<b>A</b>	<b>Okay.</b>	
24	Q	There's a -- it looks like a quote, I think.	
	158		
1		It says -- well, let's -- there's a sentence that	
2		says, "R/Os read subject rights from F.O.P. book at	
3		1428 hours. Subject then stated 'I bought the gun	
4		on the street for protection and I wanted to get the	
5		gun out of my car'."	
6		Do you see that?	
7	<b>A</b>	<b>Yes.</b>	
8	Q	Is that a verbatim quote of something	
9		Mr. McDaniels told you and Mr. Nichols?	
10	<b>A</b>	<b>Yes, that would be verbatim.</b>	
11	Q	And did you ask him why he wanted to get the	
12		gun out of his car?	
13	<b>A</b>	<b>No, I did not.</b>	
14	Q	Did you have any opinion as to why he might	
15		have wanted to get the gun out of his car?	
16		MR. RAUSCHER: Objection. Foundation, form.	
17	<b>A</b>	<b>I can't tell you why he said he wanted it</b>	
18		<b>out of his car.</b>	
19	Q	Why did you not ask him why he wanted to get	
20		it out of his car?	
21	<b>A</b>	<b>I can't recall why.</b>	
22	Q	Do you know if a gun was in his car -- well,	
23		do you know if the Taurus was his car?	
24	<b>A</b>	<b>At that moment, no; but if I look at this,</b>	
	160		
1		<b>before I talked to him?</b>	
2	Q	Before you read him his rights or after.	
3		Before his rights were read to him or after.	
4	<b>A</b>	<b>That I couldn't tell you whether it was</b>	
5		<b>before or after that.</b>	
6	Q	The report lists a number of people in	
7		different roles.	
8		Do you see that?	
9	<b>A</b>	<b>Yes.</b>	
10	Q	So it's got the first arresting officer.	
11		That's you, right?	
12	<b>A</b>	<b>Yes.</b>	
13	Q	And star number 4303?	
14	<b>A</b>	<b>Yes.</b>	
15	Q	Has that always been your star number?	
16	<b>A</b>	<b>Yes.</b>	
17	Q	It's still your star number?	
18	<b>A</b>	<b>Yes.</b>	
19	Q	What is first -- well, let me ask you this	
20		first: Do you as the person who created this	
21		report -- did you get to decide who got listed in	
22		what category here?	
23	<b>A</b>	<b>Do I decide?</b>	
24	Q	Yeah.	

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41 (161 to 164)

	161		163
1 <b>A I mean, I would be the first arresting</b>		1    question I don't want to know generally how you	
2 <b>officer and then my partner would be the second</b>		2 would decide that. I just want to know in this case	
3 <b>arresting officer and everyone else would be</b>		3 who decided who would be in Box 1?	
4 <b>assisting.</b>		4 <b>A Most likely I did.</b>	
5    Q But you're the one who -- the report writer		5    Q And why did you decide that you would go in	
6 in this case, you, you're the one who makes the		6 Box 1?	
7 decision about whose names go on here?		7 <b>A Why did I decide? Probably just told my</b>	
8 <b>A Not necessarily.</b>		8 <b>partner, I'm taking this one; I'll be in Box 1.</b>	
9    Q Okay. Did you in this case?		9    Q And why would you have been in Box 1 as	
10 <b>A Yes.</b>		10 opposed to Nichols in this case?	
11   Q Okay. Who else -- in other situations who		11   MR. ZECCHIN: Objection, asked and answered.	
12 else other than the person writing the report would		12 You can answer it again.	
13 decide which person goes into which category or		13   Q Well, is there a reason or is it just	
14 who's listed on a report?		14 random?	
15 <b>A If I was the one that observed the crime, I</b>		15 <b>A I mean, we usually decide -- we both</b>	
16 <b>might say I'll be Box 1 and whoever is writing the</b>		16 <b>observed a crime being committed. Do you want to be</b>	
17 <b>report, you guys can go in Box 2.</b>		17 <b>in Box 1 or do you want to be in Box 2, and this day</b>	
18   Q And what's Box 1, Box 2?		18 <b>I decided to be in Box 1.</b>	
19 <b>A Just --</b>		19   Q And Box 1 is the person who's likely going	
20   Q You're talking about the different layout of		20 to testify?	
21 reports?		21 <b>A Most likely, but there's other ways, like in</b>	
22 <b>A No. In this case report, Box 1 is just</b>		22 <b>the narrative where you observe something, you might</b>	
23 <b>reporting officer who is preparing the case report.</b>		23 <b>be also called to testify. For the most part the</b>	
24   Q Okay. Why were you the first arresting		24 <b>State's Attorney usually subpoena the first</b>	
	162		164
1    officer?		1 <b>arresting officer.</b>	
2 <b>A Why was I the first arresting officer?</b>		2    Q Did you -- when you both observed a crime,	
3    Q Yes. What does that mean?		3 did you try to trade off to keep it even who would	
4 <b>A I'm the one that arrest him and most likely</b>		4 be in Box 1?	
5 <b>I'm the one that will be testifying in a court</b>		5 <b>A No. It's -- we don't try to keep it even.</b>	
6 <b>proceedings.</b>		6 <b>It just depends on that day. Like, All right, I'm</b>	
7    Q How were you the one who arrested him? What		7 <b>taking this one. You might take the next two or you</b>	
8 did you do to be the one who arrested him?		8 <b>might take the next one. So there's no random</b>	
9 <b>A What did I do?</b>		9 <b>reason. I just decided to take the first arresting</b>	
10   Q Yeah.		10 <b>officer in this case.</b>	
11 <b>A What do you mean what did I do?</b>		11   Q But you're not trying to testify more than	
12   Q I thought Nichols arrested him?		12 Nichols as a general matter?	
13 <b>A Placed him in custody, yes.</b>		13 <b>A No, no.</b>	
14   Q So why are you the one who arrested him?		14   Q So can you tell me what specifically it is	
15 That's what I'm trying to understand.		15 supposed to indicate when it says first arresting	
16 <b>A We both arrested him. I just happened to be</b>		16 officer and how it -- if anything is different than	
17 <b>in Box 1. He could have gone in Box 1 if he wanted</b>		17 second arresting officer?	
18 <b>to, but I just happened to go in Box 1.</b>		18 <b>A First arresting officer is usually the</b>	
19   Q Who decided that you should go in Box 1?		19 <b>officer that would be testifying in a criminal</b>	
20 <b>A Who decided? I mean, we both observed a</b>		20 <b>proceeding. Second arresting officer could also</b>	
21 <b>crime being committed. If he wanted to go in Box 1,</b>		21 <b>testify in a -- in the criminal proceeding, just</b>	
22 <b>he could have gone in Box 1; but we made a decision</b>		22 <b>depending on what he observed or what he saw. I</b>	
23 <b>I would be in Box 1.</b>		23 <b>mean, I could be the first arresting officer. I</b>	
24   Q Yeah. So I'm not trying -- for this		24 <b>might not observe as much as the second arresting</b>	

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42 (165 to 168)

<p>1 <b>officer. I just decide I'm taking the -- I'll be</b>  2 <b>the first arresting officer.</b></p> <p>3 Q Are you aware of any CPD rules or guidelines  4 in place to decide who should be listed as first  5 versus second arresting officer?</p> <p>6 <b>A Not that I'm aware as long as you indicate</b>  7 <b>the facts truthfully and accurately as possible in a</b>  8 <b>case report.</b></p> <p>9 Q Why is Nichols listed as assisting arresting  10 officer and the second arresting officer?</p> <p>11 <b>A Might just be a typo.</b></p> <p>12 Q And it's with different beats?</p> <p>13 <b>A Might just be a typo on my part.</b></p> <p>14 Q Is there any reason you can think of other  15 than a typo?</p> <p>16 <b>A No, just -- it's just a typo on my part.</b></p> <p>17 Q Do you think that means there should be an  18 additional officer listed as an assisting arresting  19 officer?</p> <p>20 <b>A I might just click -- put his star number by</b>  21 <b>accident and then would delete it.</b></p> <p>22 Q When you fill out this form, are you -- do  23 you have to manually type in the beat?</p> <p>24 <b>A Yes.</b></p>	<p>165</p> <p>1 <b>A That could also be fair.</b></p> <p>2 Q What are you trying to capture when you  3 write down assisting arresting officers on a report?</p> <p>4 <b>A Person that assisted you in your lawful duty</b>  5 <b>as an officer.</b></p> <p>6 Q And that can range from just having  7 responded to the call and being at the scene to  8 what?</p> <p>9 <b>A Helping with paperworks, helping with</b>  10 <b>searches, various ways.</b></p> <p>11 Q If Bolton would have had a substantive role  12 in the response, it would have been listed in the  13 narrative; is that right?</p> <p>14 <b>A Yes.</b></p> <p>15 Q It says in here Beat 264A located the  16 vehicle -- I'm paraphrasing. I'm not quoting. But  17 located the vehicle at 57 South King in the west  18 alley unoccupied.</p> <p>19 <b>A Yes.</b></p> <p>20 Q And then it says that beat relocated the  21 vehicle to the 2nd District?</p> <p>22 <b>A Yes.</b></p> <p>23 Q Do you know who provided you with that  24 information?</p>	<p>166</p> <p>1 Q So you have to assign -- so when you write  2 Bolton, Beat 264B, you're actually writing 264B?</p> <p>3 <b>A Typing it, yes.</b></p> <p>4 Q And that's not a drop-down or anything?</p> <p>5 <b>A There is. You can type it or there's a</b>  6 <b>drop-down.</b></p> <p>7 Q But it's not like it autopopulates, like you  8 put in a name and it --</p> <p>9 <b>A No.</b></p> <p>10 Q What was Brian Bolton's role in the arrest  11 of Mr. McDaniels?</p> <p>12 <b>A I couldn't tell you. Might have been</b>  13 <b>arrived on the scene, but I couldn't tell you what</b>  14 <b>his role was.</b></p> <p>15 Q What is the point of writing him down as an  16 assisting arresting officer?</p> <p>17 <b>A What is the point?</b></p> <p>18 Q Yeah.</p> <p>19 <b>A If he showed up at my call, whether he did</b>  20 <b>minimal, he could be an assisting unit. Whether</b>  21 <b>it's just standing there or making sure everything</b>  22 <b>is okay, he could be an assisting unit.</b></p> <p>23 Q Or he might not have had any role. Is that  24 fair?</p>	<p>167</p> <p>1 <b>A One of the officers on Beat 264A. I might</b>  2 <b>have spoken earlier that I said 264 David, but that</b>  3 <b>beat that day was actually 264 Adam.</b></p> <p>4 Q But you're talking about the same people you  5 mentioned earlier, right?</p> <p>6 <b>A Smith, Coco, and Mohammed.</b></p> <p>7 Q And the only way that you know that it was  8 someone from that beat who told you that they had  9 found a car unoccupied and brought it back to the  10 station is because you wrote down Beat 264A in this  11 report?</p> <p>12 <b>A Well, the car being located at 5720, that</b>  13 <b>was broadcast over the air. Being relocated to the</b>  14 <b>2nd District, I would have had to receive that</b>  15 <b>information from one of those three officers.</b></p> <p>16 Q And you remember sitting here today, you  17 have an independent recollection of hearing that the  18 car had been located at 5720?</p> <p>19 <b>A Yes.</b></p> <p>20 Q But you don't remember who said it?</p> <p>21 <b>A No, I don't.</b></p> <p>22 Q Were you only on certain channels over the  23 radio?</p> <p>24 <b>A It would be the 2nd District broadband,</b></p>
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43 (169 to 172)

<p>1 <b>whatever the 2nd District frequency would be.</b></p> <p>2 Q But you don't remember what that is at this</p> <p>3 time?</p> <p>4 <b>A It would be Zone 5.</b></p> <p>5 Q Zone 5?</p> <p>6 <b>A Yes.</b></p> <p>7 Q At the time it was Zone 5?</p> <p>8 <b>A I think it's still Zone 5.</b></p> <p>9 Q Okay. Why didn't you write in the report</p> <p>10 who specifically relocated the vehicle to the 2nd</p> <p>11 District?</p> <p>12 <b>A Put in the beat. I thought it was</b></p> <p>13 <b>sufficient enough. When it came to court, the</b></p> <p>14 <b>State's Attorney could have actually asked what</b></p> <p>15 <b>individual actually located the car. But I thought</b></p> <p>16 <b>it was sufficient just putting the beat number that</b></p> <p>17 <b>one of them -- Beat 264 Adam relocated the car to</b></p> <p>18 <b>the 2nd District.</b></p> <p>19 Q You didn't think there was a reason to just</p> <p>20 identify which officer it was?</p> <p>21 <b>A I didn't feel it was necessary at that time.</b></p> <p>22 Q And do you know why you didn't think it was</p> <p>23 necessary at the time?</p> <p>24 <b>A Because I already put down what beat</b></p>	<p>169</p> <p>1 <b>A It would have been indicated somewhere.</b></p> <p>2 Q You've got in here that seven -- there were</p> <p>3 seven live rounds and one in the chamber?</p> <p>4 <b>A Yes.</b></p> <p>5 Q And how did you know that?</p> <p>6 <b>A How did I know that? I recovered the gun.</b></p> <p>7 Q And then what did you do with the gun when</p> <p>8 you recovered it?</p> <p>9 <b>A I deemed it safe.</b></p> <p>10 Q What did you do to deem it safe?</p> <p>11 <b>A I would eject the slide back so the</b></p> <p>12 <b>ammunition would eject out. Then I would make a</b></p> <p>13 <b>physical -- visual and physical inspection of the</b></p> <p>14 <b>gun, making sure there's no other live rounds in the</b></p> <p>15 <b>gun.</b></p> <p>16 Q What did you do with the gun and the</p> <p>17 ammunition after you completed that process of</p> <p>18 making sure it was safe?</p> <p>19 <b>A Kept it on my person.</b></p> <p>20 Q Until when?</p> <p>21 <b>A Until we got to the 2nd District.</b></p> <p>22 Q When you kept it on your person, how did</p> <p>23 you -- did you have an evidence bag? What --</p> <p>24 <b>A I probably kept it in one of my pockets if I</b></p>
<p>170</p> <p>1 <b>transported. I don't know who was driving so I</b></p> <p>2 <b>don't know who transported, but I know it was Beat</b></p> <p>3 <b>264 Adam.</b></p> <p>4 Q How fast was the Taurus moving when</p> <p>5 Mr. McDaniels got out?</p> <p>6 <b>A The Taurus was moving?</b></p> <p>7 Q It was moving, right?</p> <p>8 <b>A It was in motion, but I wouldn't -- maybe if</b></p> <p>9 <b>I would have to guess, 3 miles, 2 miles an hour.</b></p> <p>10 Q Just barely rolling?</p> <p>11 <b>A Yes.</b></p> <p>12 Q How far away was your car from the Taurus</p> <p>13 when Mr. McDaniels jumped out?</p> <p>14 <b>A Maybe a car length, two at the most.</b></p> <p>15 Q And then how long did it take you and</p> <p>16 Nichols to catch up with him?</p> <p>17 <b>A To catch up with who?</b></p> <p>18 Q With Mr. McDaniels once he got out.</p> <p>19 <b>A Probably seconds or a minute.</b></p> <p>20 Q Did he resist arrest at all?</p> <p>21 <b>A Did he resist? I wasn't there when he was</b></p> <p>22 <b>placed in custody. I don't believe so, no.</b></p> <p>23 Q If he would have resisted, it would have</p> <p>24 been --</p>	<p>172</p> <p>1 <b>was wearing cargo pants. I'm not sure what kind of</b></p> <p>2 <b>pants I was wearing.</b></p> <p>3 Q And do you -- do you remember what you did</p> <p>4 with them when you got back to the station?</p> <p>5 <b>A Probably -- I don't know if I did</b></p> <p>6 <b>inventories. But if I did inventories, I would</b></p> <p>7 <b>probably generated a unique inventory number with</b></p> <p>8 <b>all the classification of the gun, serial number and</b></p> <p>9 <b>all that. If not, if I didn't do the inventories, I</b></p> <p>10 <b>probably would have handed that weapon to the person</b></p> <p>11 <b>generating that inventory number.</b></p> <p>12 Q And then where would -- physically where</p> <p>13 would the gun go?</p> <p>14 <b>A Where would the gun go?</b></p> <p>15 Q Yeah.</p> <p>16 <b>A After we're done with inventory, it would be</b></p> <p>17 <b>placed in a gun -- in a gun safe in the front desk</b></p> <p>18 <b>until it's picked up by ERPS.</b></p> <p>19 Q To an evidence --</p> <p>20 <b>A Evidence technician, yes.</b></p> <p>21 Q And do you have any independent recollection</p> <p>22 of doing any of those things you've just described</p> <p>23 with this --</p> <p>24 <b>A Like I said --</b></p>

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44 (173 to 176)

	173		175
1    Q (Continuing) -- particular gun other than 2 making it safe?		1    comparing, seeing if it was the same serial number 2 or anything like that?	
3 <b>A Like I said, I don't know if I'm the one 4 that inventoried the gun or someone else.</b>		3 <b>A Do I remember independently, no, but most 4 likely that's what would have been done.</b>	
5    Q And I should ask you this: Do you have an 6 independent recollection of making sure the gun was 7 same? Do you know you did that?		5    Q That's what commonly you would be asked to 6 do?	
8 <b>A Yes.</b>		7 <b>A Yes.</b>	
9    Q You remember doing that?		8    Q Do you have any estimate of how many gun 9 cases you've testified in?	
10 <b>A Yes.</b>		10 <b>A Testified in? I can't tell you that.</b>	
11   Q And you did that at the scene?		11   Q Do you have an estimate as to how many 12 arrests you were involved in that Mohammed was 13 involved in in some way?	
12 <b>A I do that with all the guns.</b>		14 <b>A That I can't tell you.</b>	
13   Q But do you remember doing it with this gun?		15   Q Do you think it's in the hundreds?	
14 <b>A Yes.</b>		16 <b>A Possible.</b>	
15   Q Or do you just know you do it with all the 16 guns?		17   Q Likely? Is it likely in the hundreds?	
17 <b>A No. I remember doing it with this gun.</b>		18 <b>A Possible, yes.</b>	
18   Q How long did that process take you?		19   Q Can you move it past the possible category 20 or no?	
19 <b>A The process?</b>		21 <b>A Probably a hundred, yes.</b>	
20   Q Just making sure the gun was safe.		22   Q Do you see Edgar Carlos is also listed as an 23 assisting arresting officer?	
21 <b>A Seconds or less than a minute.</b>		24 <b>A Yes.</b>	
22   Q Did you ever see the gun again after you 23 brought it back to the station?			176
24 <b>A At trial, yes.</b>			
	174		
1    Q Not in between that?		1    Q Do you know Mr. Carlos?	
2 <b>A No.</b>		2 <b>A Yes.</b>	
3    Q How do you know if it was the same gun at 4 trial?		3    Q Was he ever a member of the Watts 264 team?	
5 <b>A The same serial number, same make.</b>		4 <b>A He was never a member of the 264 team.</b>	
6    Q You looked at the serial number?		5    Q Do you know what his role was in assisting 6 the McDaniels arrest?	
7 <b>A The inventory numbers.</b>		7 <b>A I believe he was the transport officer.</b>	
8    Q And were you asked to do all those things, 9 look at all those things?		8    Q Do you have an independent memory of that?	
10 <b>A What was that?</b>		9 <b>A Independent memory of it? No.</b>	
11   Q You would compare the serial number and that 12 sort of thing?		10   Q Why do you think he was the transport 11 officer?	
13 <b>A It would be the unique inventory number 14 attached to that gun.</b>		12 <b>A Why -- I don't know if I indicated on my 13 report or not, but I believe he was the transport 14 officer.</b>	
15   Q Okay. So I just want to know what you 16 remember.		15   Q Is that just a role he frequently had?	
17   Do you remember looking at serial numbers, 18 doing comparisons?		16 <b>A No. Usually he was still in a beat car. So 17 if he was on scene, most likely we would have asked 18 him to transport for us.</b>	
19 <b>A When?</b>		19   MR. RAUSCHER: Take another quick --	
20   Q At the trial, any time -- so the only time 21 you saw the gun was the day when you are testifying 22 you recovered it and then at trial; is that right?		20   MR. ZECCHIN: Sure.	
23 <b>A Yes.</b>		21   THE VIDEOGRAPHER: Off the record, 2:40.	
24   Q And do you remember doing any like		22   (A recess was taken from 2:40 p.m. to 2:57 23 p.m.)	
		24   THE VIDEOGRAPHER: Back on the record, 2:57.	

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45 (177 to 180)

1    Q Do you remember how many people you arrested 2 on November 21st, 2008?  3 <b>A No, I don't.</b>  4    Q Do you know if you arrested anyone other 5 than Mr. McDaniels?  6 <b>A I don't recall if we did or not.</b>  7    Q You don't recall either way?  8 <b>A No.</b>  9    Q Do you remember what kind of car you were 10 driving that day?  11 <b>A Most likely would have been a Crown Vic.</b> 12   Q But you don't remember specifically?  13 <b>A I don't have no independent recollection</b>  14 <b>whether it was a Crown Vic, but most likely it would</b> <b>15 be.</b>  16   Q Why do you think it was most likely a Crown 17 Vic?  18 <b>A That was the car we drove at that time.</b> 19   Q What color was it?  20 <b>A Most likely it would have been gray.</b> 21   Q Did it have automatic windows or locks?  22 <b>A I believe so.</b> 23   Q Both, both automatic windows and locks?  24 <b>A Yes.</b>	177  1 <b>A Probably one of the State's Attorney.</b> 2    Q Do you have any explanation as to why the 3 tow truck driver is giving testimony that conflicts 4 with your version of events?  5 <b>A I can't --</b> 6        MR. ZECCHIN: Objection, form and 7 foundation.  8 <b>A I can't answer that question.</b> 9    Q So you don't know?  10 <b>A I don't know.</b> 11   Q Have you ever spoken to the tow truck 12 driver?  13 <b>A No.</b> 14   Q And have you ever talked with anybody other 15 than the State's Attorney about the car being towed?  16 <b>A No.</b> 17   Q Do you know whether anyone else on the Watts 18 264 team had any interactions with McDaniels --  19 <b>A That I can't --</b> 20   Q (Continuing) -- the day of his arrest, 21 November 21st, 2008?  22 <b>A Could you repeat that?</b> 23   Q Yeah. I was going slow. I'll try again, 24 so. . .
1    Q Do you know if your partner, Nichols, knew 2 Mr. McDaniels?  3 <b>A I don't recall.</b> 4    Q You don't know --  5 <b>A I don't know if he knows Mr. McDaniels.</b> 6    Q Do you know if Mohammed knew Mr. McDaniels?  7 <b>A That I don't know either.</b> 8    Q Were you pressed for time for any reason 9 when you were back at the station after 10 Mr. McDaniels had been arrested?  11 <b>A I don't believe so.</b> 12   Q You had plenty of time to ask him whatever 13 you wanted to?  14 <b>A Yes.</b> 15   Q Did you hear a tow truck driver testify 16 during Mr. McDaniels trial?  17 <b>A I believe he did.</b> 18   Q Did you hear his testimony?  19 <b>A No.</b> 20   Q Do you know his testimony conflicts with the 21 idea that the car was towed from the 2nd District?  22 <b>A I believe, yes, it did conflict with 2nd</b> <b>23 District.</b>  24   Q And who told you that it conflicts with --	178  1    Do you know whether anyone else on the Watts 2 264 team had any interaction with Mr. McDaniels on 3 November 21st, 2008, other than the events that 4 you've described today?  5 <b>A I don't recall.</b> 6    Q You don't know?  7 <b>A I don't know.</b> 8    Q Do you know whether anyone on the Watts 264 9 team had any interactions with Mr. McDaniels on any 10 other day ever?  11 <b>A I don't know.</b> 12   Q You never asked anybody?  13 <b>A No.</b> 14   Q I'm going to shift gears again and ask you 15 about Christopher Scott.  16 <b>A Okay.</b> 17   Q Do you know who Christopher Scott is?  18 <b>A No, I don't.</b> 19   Q Do you have any recollection of being 20 involved in arresting Mr. Scott?  21 <b>A No, I don't.</b> 22   Q Are you aware, though, that you're a 23 defendant in a lawsuit he's brought?  24 <b>A Yes.</b>

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46 (181 to 184)

	181		183
1	Q Do you have any basis one way or the other	1	officers?
2	to determine whether the allegations in the lawsuit	2	MR. ZECCHIN: Objection. That's not what he
3	are correct?	3	testified to. If you're going to ask a different
4	<b>A Could you repeat that?</b>	4	question, that's fine.
5	Q Yeah. Do you know whether what Mr. Scott is	5	<b>A At that incident, yes.</b>
6	alleging happened actually happened?	6	Q But after that incident you have no reason
7	<b>A No, it didn't happen the way he's alleging.</b>	7	to think they might have done that or something
8	Q And how do you know that if you don't have	8	similar ever a different time?
9	any memory of arresting him?	9	<b>A I have never witnessed any officer commit</b>
10	<b>A I have no reason to doubt any of the</b>	10	<b>any unlawful act in my presence or otherwise.</b>
11	<b>officers of their lawful duty in that arrest.</b>	11	Q Have you read the complaints -- any of the
12	Q You still think Mohammed and Watts didn't do	12	complaints that list you as a defendant?
13	anything wrong?	13	<b>A Any of the complaints, some of them, yes.</b>
14	<b>A At that --</b>	14	Q Have you read the parts where the federal
15	MR. ZECCHIN: Objection, argumentative.	15	government accused Watts and Mohammed of abusing
16	<b>A At that moment I have no reason to doubt any</b>	16	their power repeatedly?
17	<b>officer, their credibility or their lawful duty in</b>	17	<b>A I don't know if I ever read that one.</b>
18	<b>that incident.</b>	18	Q So if the federal government did make that
19	Q So even now that you know that Watts and	19	accusation, do you have any reason to believe it's
20	Mohammed have been convicted and they abused their	20	wrong?
21	power, you don't doubt their actions?	21	MR. KOSOKO: Objection. Calls for a
22	<b>A Like I stated --</b>	22	speculative response.
23	MR. KOSOKO: I'm going to -- I'm going to	23	<b>A I can't answer it.</b>
24	object to the form of the question.	24	Q Because you don't think you read that part
	182		184
1	<b>A Like I stated, I have no reason to doubt</b>	1	of the complaint?
2	<b>those officers at that time.</b>	2	<b>A I mean, I never witnessed any wrongful act</b>
3	Q Do you agree that Watts and Mohammed abused	3	<b>by any officer in my presence.</b>
4	their power as police officers?	4	Q And if the federal government had accused
5	<b>A Could you repeat that?</b>	5	them of that, it still wouldn't give you any pause
6	Q Do you agree -- let me rephrase it.	6	as to their actions that you didn't observe?
7	Did Officer Watts and Officer Mohammed abuse	7	<b>A There was other officers involved in most of</b>
8	their power as police officers?	8	<b>those arrests.</b>
9	MR. ZECCHIN: Objection; form, foundation.	9	Q What does that mean?
10	<b>A Abused their power on what incident?</b>	10	<b>A So I have no reason to doubt those other</b>
11	Q Generally. Did they abuse their power as	11	<b>officers and their lawful duty as a police officer</b>
12	police officers ever?	12	<b>in that incident.</b>
13	<b>A Ever other than what I heard in the news? I</b>	13	Q Because they haven't been convicted yet?
14	<b>have no other knowledge of them abusing their police</b>	14	MR. ZECCHIN: I'm going to object as --
15	<b>power.</b>	15	Q I didn't mean that to assume.
16	Q From what you heard on the news, do you	16	Is that because they haven't -- there are no
17	agree that they did abuse their police power?	17	other officers who have been convicted?
18	<b>A According to the news, they were locked up</b>	18	<b>A Not just that. I have never witnessed any</b>
19	<b>for taking funds from a government agency.</b>	19	<b>officer do any wrongful thing in my presence.</b>
20	Q Is that an abuse of power?	20	Q Did you review any reports relating to
21	<b>A At that --</b>	21	Christopher Scott's arrest before --
22	MR. KOSOKO: Object to the form.	22	<b>A Yes.</b>
23	<b>A At that moment, yes. That incident, yes.</b>	23	Q (Continuing) -- your deposition?
24	Q So, yes, they abused their power as police	24	Did the reports refresh your recollection at

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47 (185 to 188)

	185		187
1 all?		1 <b>A Not really.</b>	
2 <b>A No.</b>		2 Q Do you know who he is at all?	
3 MR. RAUSCHER: Let's mark this as Exhibit 3.		3 <b>A No.</b>	
4 This is Bates-stamped CITY-BG-32187 to 188 -- no, to		4 Q Do you know if you were involved in his	
5 190.		5 arrest or any arrest any time arresting him?	
6 MR. ZECCHIN: Could you read those again,		6 <b>A Maybe, but I'm not a hundred percent sure.</b>	
7 Scott?		7 Q Why do you say "maybe"?	
8 MR. RAUSCHER: Yeah, sure. It's		8 <b>A I might have looked at a document stating I</b>	
9 CITY-BG-32187 to 190.		9 <b>was assisting on it.</b>	
10 (Leano Exhibit No. 3 was marked for		10 Q No independent -- you don't have any --	
11 identification and is attached to the transcript.)		11 <b>A No.</b>	
12 Q Have you seen this document before?		12 Q (Continuing) -- independent recollection of	
13 <b>A Yes.</b>		13 being involved in any arrest of Lionel White,	
14 Q Tell me what this document is.		14 Senior?	
15 <b>A It's an Arrest Report.</b>		15 <b>A No.</b>	
16 Q And do you have any independent knowledge as		16 MR. RAUSCHER: I'm going to mark Exhibit 4,	
17 to whether what's alleged in this report is true?		17 a document that's BAKER GLENN 4144 through 4150.	
18 <b>A Independent, no.</b>		18 (Leano Exhibit No. 4 was marked for	
19 Q Do you have any knowledge that isn't -- any		19 identification and is attached to the transcript.)	
20 knowledge as to whether it's true?		20 (Witness examining document.)	
21 <b>A Do I have what?</b>		21 MR. PALLE: Those of us following the	
22 Q Any knowledge at all as to whether what's		22 Lionel White matter.	
23 alleged in this report is true?		23 MR. RAUSCHER: Yes.	
24 <b>A That is true independent, no.</b>		24 MS. KLEINHAUS: All of us are following the	
	186		188
1 Q You just assume it is accurate because one		1 line.	
2 of your fellow officers wrote it; is that right?		2 MR. RAUSCHER: I'm not sure.	
3 <b>A Yes.</b>		3 MR. PALLE: They told me I've got to stay	
4 Q But you've never talked to anybody about		4 awake.	
5 Christopher Scott's arrest?		5 Q Have you had a chance to review that?	
6 <b>A No.</b>		6 <b>A Yes.</b>	
7 Q Do you remember being at the scene of his		7 Q Is this or some of this at least documents	
8 arrest?		8 you reviewed in preparation for your deposition	
9 <b>A I don't believe I was at this arrest.</b>		9 today?	
10 Q Why do you think you weren't at this arrest?		10 <b>A Yes.</b>	
11 <b>A I believe I was on furlough at this time.</b>		11 Q And you see your name is listed on what's	
12 Q How long were you on furlough for?		12 BAKER GLENN 4147?	
13 <b>A Depends on the year and the amount of time I</b>		13 <b>A Uh-huh, yes.</b>	
14 <b>have on the job.</b>		14 Q And it lists you as a witness?	
15 Q When you say "furlough," are you talking		15 <b>A Yes.</b>	
16 about a vacation?		16 Q Did you witness anything relating to	
17 <b>A A vacation.</b>		17 Mr. White's arrest?	
18 Q Why do you think you were on vacation for		18 <b>A Witnessed something; but as to what, I don't</b>	
19 this particular arrest?		19 recall at this time.	
20 <b>A I recall looking at A&amp;As indicating I was on</b>		20 Q You don't -- you don't really know if you	
21 <b>furlough on this date.</b>		21 witnessed anything, right?	
22 Q Do you know who Lionel White, Senior is?		22 <b>A No, I witnessed something; but to the</b>	
23 <b>A Do I know who he is?</b>		23 <b>capacity of what I witnessed, I don't recall what</b>	
24 Q Yeah.		24 <b>that is.</b>	

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48 (189 to 192)

	189		191
1 Q	How do you know that you witnessed	1 Q	Do you remember him ever coming to you and
2 something?		2 saying, I just had to punch somebody to subdue them	3 in connection with an arrest or anything like that?
3 A	<b>It's checked I witnessed so I must have</b>	4 A	<b>No, I don't believe so.</b>
4 witnessed something.		5 Q	Did looking at any of these documents
5 Q	Or the report's wrong?	6 refresh	your recollection as to whether you were
6 A	<b>Possible, but I doubt it.</b>	7 involved	in the arrest of Lionel White?
7 Q	Do you know who -- who created this report?	8 A	<b>My involvement, no.</b>
8 A	<b>I'm just assuming here since reporting</b>	9 Q	Or as to whether you were involved at all?
9 officer is Officer Jones, it would be Officer Jones.		10 A	<b>It has me listing as assisting. So in some</b>
10 Q	Did you ever talk to Officer Jones about his	11 capacity	<b>I assisted the officer in their lawful</b>
11 report?		12 duties.	
12 A	<b>Did I ever talk to Officer Jones about his</b>	13 Q	But that doesn't mean you actually assisted
13 report?		14 with --	
14 Q	This report.	15 A	<b>With the physical arrest?</b>
15 A	<b>This report? No.</b>	16 Q	Yeah. Or that you saw anything that he did
16 Q	Do you remember anything you did on this	17 or was alleged to have done?	
17 day?		18 A	<b>Right.</b>
18 A	<b>No, I don't.</b>	19 Q	It could mean you just got there and you
19 Q	Do you remember Officer Jones getting into	20 were making sure the scene was -- the officers were	
20 fights with anybody when he was an officer?		21 safe, right?	
21 A	<b>Getting in fights?</b>	22 A	<b>Yes.</b>
22 Q	Yeah.	23 Q	Or you were just there. You had responded
23 A	<b>Probably --</b>	24 to the call and you were there?	
24 MR. KOSOKO: I'm going to object to the --			
	190		192
1 I'm going to object to the way it was phrased.		1 A	<b>Yes.</b>
2 A	<b>I probably observe him in a struggle trying</b>	2 Q	Is there anything you can think of at all
3 to arrest someone, but I wouldn't call that a fight.		3 that would refresh your recollection as to whether	
4 Q	Did you ever observe him getting punched by	4 you actively participated in Mr. White's arrest?	
5 a civilian he was trying to arrest?		5 A	<b>I mean, there's -- might be some, but at</b>
6 A	<b>I don't recall if I have or not.</b>	6 this moment I don't know what that something is.	
7 Q	You don't know one way or the other?	7 Q	Yeah, you can't think of anything?
8 A	<b>No.</b>	8 A	<b>No.</b>
9 Q	No, you don't know?	9 Q	And did you try to -- did you try to think
10 A	<b>No, I don't know.</b>	10 of ways to refresh your recollection before the	
11 Q	Did you ever observe him punching anybody?	11 deposition?	
12 A	<b>I don't recall.</b>	12 A	<b>I mean, I tried. But there might be a way;</b>
13 MR. ZECCHIN: Objection to form. You mean		13 but as I say, at this moment I don't know what that	
14 in this instance or ever?		14 might be.	
15 MR. RAUSCHER: I actually mean ever.		15 Q	Is that the same for Christopher Scott?
16 Q	Do you remember him punching anybody ever?	16 A	<b>Christopher Scott, I believe I was on</b>
17 A	<b>I don't believe so.</b>	17 furlough at that time.	
18 Q	You don't think you've ever seen him punch	18 Q	And then Mr. McDaniels, other than things
19 anybody?		19 you say you have an independent recollection of, is	
20 A	<b>No.</b>	20 there anything you can think of that would refresh	
21 Q	Do you ever remember him coming and telling	21 your recollection as to the other events?	
22 you, Hey, someone just punched me in the face when I		22 A	<b>Could you repeat that question?</b>
23 tried to arrest them or something like that?		23 Q	Yeah. So you said you have an independent
24 A	<b>I don't believe so.</b>	24 recollection of certain things relating to	

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49 (193 to 196)

1    Mr. McDaniels' arrest. 2 <b>A Yes.</b> 3    Q And then there's certain things you don't 4    remember exactly? 5 <b>A Yes.</b> 6    Q Is there anything that would refresh your 7    recollection as to those events that you can think 8    of? 9 <b>A There might be; but like I stated earlier, I</b> 10 <b>don't know what that stuff might be.</b> 11    MR. RAUSCHER: You know, let us take another 12 quick break. And we should -- I want to talk -- 13 maybe we can talk about the best way to move forward 14 with cases. 15    MR. ZECCHIN: Sure. 16    MR. RAUSCHER: Just real quick. 17    MR. ZECCHIN: Yeah. 18    THE VIDEOGRAPHER: Off the record, 3:15. 19    (A recess was taken from 3:15 p.m. to 3:21 20 p.m.) 21    THE VIDEOGRAPHER: Back on the record, 3:21. 22    MR. RAUSCHER: I'm actually -- I think I'm 23 through with my questions. I think Joel has a 24 couple questions so I'm going to pass to him.	193 1    MR. RAUSCHER: You guys are up. 2    MR. PALLE: No questions for me. 3    MR. KOSOKO: Watts has a couple questions. 4    CROSS-EXAMINATION BY COUNSEL FOR DEFENDANT RONALD WATTS 5    BY MR. KOSOKO: 6    Q Officer Leano, have you ever been -- 7    THE VIDEOGRAPHER: Pass the mic, please. 8    (Discussion off the record.) 9    Q You wouldn't have been listed in any 10 reports, whether it be a Vice Case Report or Arrest 11 Report, unless you were either a surveillance 12 officer, an enforcement officer, or a processing 13 officer; is that correct? 14    MR. FLAXMAN: Objection, foundation. 15 <b>A Could you repeat that, sir?</b> 16    Q You wouldn't have been listed in either any 17 Vice Reports or Arrest Reports if you either 18 didn't -- didn't work as a surveillance officer in 19 the incident, an enforcement officer, or helped in 20 some formal way of the processing? 21    MR. FLAXMAN: Objection, foundation. 22 <b>A Unless I was an assisting officer in some</b> 23 <b>capacity.</b> 24    Q Now, back in 2008 do you remember if there	195 196
1    CROSS-EXAMINATION BY COUNSEL FOR CERTAIN PLAINTIFFS 2    BY MR. FLAXMAN: 3    Q Sir, do people call you Manny? 4 <b>A Sometimes.</b> 5    Q And another thing that Mr. Rauscher asked 6    you about were nicknames for some of the officers on 7    your team. 8    Do you remember that? 9 <b>A Yes.</b> 10    Q Do you remember hearing Officer Mohammed 11 ever called Smoke? 12 <b>A Smoke? No.</b> 13    Q And do you ever remember hearing Officer 14 Jones called AJ? 15 <b>A No.</b> 16    Q AJ are his initials, though, right? 17 <b>A I thought you said EJ.</b> 18    Q Oh, I'm sorry. Let me ask it again. 19    Have you ever heard Officer Jones referred 20 to as AJ? 21 <b>A AJ? Maybe.</b> 22    MR. FLAXMAN: Okay. Those are all my 23 questions. Thank you. 24 <b>A I thought you said EJ.</b>	1    was any gang warfare between any gangs in the 2nd 2    District? 3 <b>A No, I don't.</b> 4    Q Now, you've been on the force for 18 years; 5    is that correct? 6 <b>A Yes.</b> 7    Q Has any -- has any State's Attorney ever 8    used your report in lieu of your live testimony? 9 <b>A No.</b> 10    Q Okay. So what is the -- the purpose of your 11 report is to assist you in recollecting the 12 incident; is that correct? 13    MR. RAUSCHER: Object to form. 14 <b>A Yes.</b> 15    Q Okay. Now, what is the Felony Review Unit, 16 Officer Leano? 17 <b>A It's part of the State's Attorney. You call</b> 18 <b>to get an approval for a felony.</b> 19    Q Okay. Now, the Felony Review Unit doesn't 20 require approval on all felonies; is that correct? 21 <b>A Yes.</b> 22    Q Okay. So drug charges you don't need to 23 call -- small drug charges you don't need to call 24 Felony Review; is that correct?	

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50 (197 to 200)

	197	199
1	MR. RAUSCHER: Object to form.	1 case in?
2	<b>A All drug charges, if it's felony, you don't need to call for a felony.</b>	<b>2 A I believe we just called the case in.</b>
3		3 Q Okay. And when you call the case in, what
4	Q So an officer can initiate a complaint and	4 is it -- what happens?
5	charge an individual without contacting the Cook	
6	County State's Attorney's Office?	<b>5 A We tell them what happened. We give them --</b>
7	<b>A For a drug felony, no.</b>	<b>6 we give them his background check --</b>
8	Q What about gun cases. Can you ever charge a	7 Q Okay.
9	felony gun case without contacting the Cook County	<b>8 A (Continuing) -- and they make the</b>
10	State's Attorney's Office?	<b>9 determination on that.</b>
11	<b>A No.</b>	10 Q Okay. So they verify the facts of the
12	Q Okay. So the Cook County State's Attorney's	11 incident as you relay to them?
13	Office has a vetting system, is that correct, upon	<b>12 A Yes.</b>
14	which --	13 MR. RAUSCHER: Object to the form and
15	MR. FLAXMAN: Objection, foundation.	14 foundation.
16	Q Are you aware of --	15 Q And including the criminal history of the
17	MR. RAUSCHER: And form.	16 assailant?
18	MR. KOSOKO: Huh? And form?	<b>17 A That would be correct.</b>
19	Q Are you aware that the Cook County State's	18 Q Okay. And the State's Attorney's office
20	Attorney's Office has a vetting system for all	19 decides whether or not to charge or not?
21	felony gun cases?	<b>20 A Correct.</b>
22	MR. RAUSCHER: Object to form. I think	21 Q Okay. Now, in regards to Mr. McDaniels'
23	that -- and I will explain. I think there are legal	22 case, which occurred in November of 2008, did
24	questions which I don't think are proper.	23 Mr. McDaniels file a complaint with either OPS or if
		24 it was called IPRA then on you based on this arrest?
	198	200
1	Q Explain to us the felony review process.	<b>1 A I don't believe so.</b>
2	<b>A I know we would have to call Felony Review</b>	2 Q Okay. Did you, yourself -- eventually
3	<b>to get a felony approval on a weapon.</b>	3 McDaniels was charged with armed habitual criminal;
4	Q On a weapon charge?	4 is that correct?
5	<b>A Yes.</b>	<b>5 A Correct.</b>
6	Q On a felony weapon charge?	6 Q Okay. When you called the case in to Felony
7	<b>A Yes.</b>	7 Review, did you call it in as armed habitual or just
8	Q Okay. Could you on your own charge an	8 UUW?
9	individual without contacting the Cook County	<b>9 A UUW.</b>
10	State's Attorney's Office Felony Review Unit?	10 Q Okay. So the State's Attorney's office
11	<b>A No.</b>	11 determined that Mr. McDaniels should be indicted for
12	Q Okay. Going back to Mr. McDaniels' arrest,	12 armed habitual?
13	did you call Felony Review?	<b>13 A That would be --</b>
14	<b>A Yes.</b>	14 MR. FLAXMAN: Objection, foundation.
15	Q Explain to all of us what's the difference	<b>15 A That would be correct.</b>
16	between a phone case and a personal case in Felony	16 Q Now, after Mr. McDaniels was indicted for
17	Review?	17 armed habitual criminal, at some point you remember
18	<b>A Could you repeat that?</b>	18 testifying in the matter; is that correct?
19	Q What is the difference between a phone case	<b>19 A Correct.</b>
20	and a personal case in Felony Review?	20 Q Okay. Do you remember if you testified in
21	<b>A What do you -- I don't understand what you</b>	21 the motion to quash the arrest?
22	<b>mean by a phone case.</b>	<b>22 A I don't recall whether I did or not.</b>
23	Q Did a State's Attorney come out to 51st and	23 Q Do you recall if -- and at some point you
24	Wentworth to speak to you or did you just call the	24 testified at his criminal trial; is that correct?

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51 (201 to 204)

	201		203
1	<b>A Yes.</b>	1	<b>case report might tell me whether he was on duty.</b>
2	Q And that was a bench trial?	2	Q The Original Case Incident Report?
3	<b>A Yes.</b>	3	<b>A Yes, whether he approved it or not.</b>
4	Q Was that a bench trial or jury trial?	4	MR. RAUSCHER: Do you want to say what Bates
5	<b>A Bench.</b>	5	number that is?
6	Q And the judge found him guilty?	6	MR. KOSOKO: Yeah. That's just your Exhibit
7	<b>A Correct.</b>	7	No. 2. That's just Exhibit No. 2.
8	Q Okay. After that testimony, did the Cook	8	Q Handing you Exhibit No. 2.
9	County State's Attorney's Office ever subpoena you	9	<b>A I don't recall whether he was on duty or</b>
10	again to testify regarding the arrest of Anthony	10	<b>not.</b>
11	McDaniels?	11	Q Did Sergeant Watts approve your report?
12	<b>A No.</b>	12	<b>A No.</b>
13	Q Okay. But he was exonerated anyways?	13	Q I'll take that back. Now, in order to
14	<b>A Yes.</b>	14	charge Mr. McDaniels with a UUW or to seek approval
15	Q So nothing changed from the date you called	15	of charging him with a UUW, you needed to verify his
16	the Felony Review Unit up until Mr. McDaniels had	16	criminal history, correct?
17	been arrested?	17	<b>A Correct.</b>
18	MR. RAUSCHER: Object to form.	18	Q Okay. So when you called -- when you called
19	MR. FLAXMAN: Objection, foundation.	19	the matter in, you were able to determine that he,
20	MR. RAUSCHER: And form.	20	in fact, was a felon?
21	<b>A Correct.</b>	21	<b>A Correct.</b>
22	Q Now, we can surmise that the reason	22	Q Okay. And in order for Mr. McDaniels to be
23	Mr. McDaniels was indicted was because my client	23	charged with armed habitual, he would have been
24	back in 2012 had pled guilty to theft of government	24	previously convicted of multiple gun charges; is
	202		204
1	funds; is that correct?	1	that correct?
2	<b>A Yes.</b>	2	<b>A I don't know how the State's Attorney</b>
3	MR. FLAXMAN: Objection to form.	3	<b>determined charging him with armed habitual.</b>
4	MR. KOSOKO: Huh?	4	Q Are you aware that Mr. McDaniels has been to
5	MR. FLAXMAN: You said, We can surmise that	5	prison for murder?
6	McDaniels was indicted because your client --	6	<b>A Yes.</b>
7	Q Why do you think Mr. McDaniels was	7	Q Okay. And, again, you've never been asked
8	exonerated?	8	to testify regarding this arrest since his bench
9	<b>A Why do I think?</b>	9	trial. The State's Attorney's office hasn't
10	Q Yeah.	10	subpoenaed you to testify?
11	<b>A Based on Officer -- formerly Officer</b>	11	<b>A No.</b>
12	<b>Mohammed and Sergeant Watts being convicted of a</b>	12	Q You don't -- do you recall ever testifying
13	<b>crime, federal crime.</b>	13	at a third stage evidentiary hearing post conviction
14	Q Was Sergeant Watts on duty the date you	14	petition?
15	arrested Mr. McDaniels?	15	<b>A No.</b>
16	<b>A I don't -- I don't recall, but I would have</b>	16	Q Okay. So as it stands now, no one has asked
17	<b>to look at the Arrest Report whether he is or not.</b>	17	you -- nothing has changed as far as what you've put
18	Q Okay. I'll give you an opportunity to --	18	forward in regard to why Mr. McDaniels was charged
19	let's go back to -- is there anything that would	19	with the gun charge that date?
20	help you refresh your recollection?	20	<b>A No.</b>
21	<b>A Probably the case report or the Arrest</b>	21	Q Okay. Do you think it was safe for the Cook
22	<b>Report.</b>	22	County State's Attorney's Office to exonerate an
23	Q Okay. So we can look at Exhibit No. 2.	23	armed habitual criminal without asking you any
24	<b>A Do you have a case report on there? The</b>	24	further questions?

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52 (205 to 208)

	205		207
1	<b>A Could you repeat that question?</b>	1	Would you agree that for the prosecutors to
2	Q Do you think -- do you think it's safe for	2	make an informed decision, you have to give them
3	the 2nd District that the Cook County State's	3	accurate information?
4	Attorney's Office exonerated a known murderer and	4	<b>A Correct.</b>
5	armed habitual criminal without asking you any	5	Q So if you lied to the officers, then they
6	additional questions?	6	obviously couldn't make an informed decision about
7	<b>A No, it's not safe for the City of Chicago.</b>	7	whether to file charges?
8	MR. KOSOKO: No further questions.	8	MR. MICHALIK: Object to the form.
9	MR. MICHALIK: I have no questions.	9	<b>A Could you repeat that?</b>
10	MR. ZECCHIN: I just have a few.	10	Q If you --
11	CROSS-EXAMINATION BY COUNSEL FOR CERTAIN DEFENDANTS	11	MR. MICHALIK: Did you mean attorneys?
12	BY MR. ZECCHIN:	12	MR. RAUSCHER: I'm sorry.
13	Q Officer Leano, you were asked questions	13	MR. MICHALIK: You said officers. Did you
14	about Lionel White, Senior and the arrest that was	14	mean attorneys?
15	made by Officer -- Sergeant Jones, at the time	15	MR. RAUSCHER: I didn't mean to interrupt.
16	Officer Jones, correct?	16	Yeah, thanks.
17	<b>A Yes.</b>	17	Q If a police officer lies to a prosecutor and
18	Q Did you see anything -- any interaction	18	says certain events happened in a way that they
19	between Mr. White and Officer Jones?	19	didn't, the prosecutor can't make an informed
20	<b>A No, I did not.</b>	20	decision about whether to press charges, correct?
21	Q Did you see any physical contact between	21	<b>A If an officer lied?</b>
22	Officer Jones and Mr. White?	22	Q Yes.
23	<b>A No, I did not.</b>	23	<b>A That would be correct.</b>
24	Q Did you see anything involving the narcotics	24	Q Tell me what you remember about the reverse
	206		208
1	that Mr. White was ultimately charged with in	1	sting the morning of when Lionel White, Junior --
2	relation to Mr. Jones?	2	I'm sorry -- when Lionel White, Senior was arrested.
3	<b>A No, I did not.</b>	3	<b>A Tell you about the reverse sting?</b>
4	Q And that day do you recall there being a	4	Q Yeah. Tell me what you remember about that
5	reverse sting being held in the lobby of that	5	particular reverse sting.
6	building?	6	<b>A We were -- I was probably part of the</b>
7	<b>A I believe so.</b>	7	<b>enforcement processing team.</b>
8	Q And was that separate and apart from the	8	Q I'm sorry. Don't -- and I don't mean to cut
9	arrest of Mr. White?	9	you off, but I don't want to know what you probably
10	<b>A I believe so.</b>	10	think you would have done. I want to know what you
11	Q And was your involvement limited to that	11	remember.
12	reverse sting and not involving the arrest of Mr.	12	<b>A I don't -- I don't have no independent</b>
13	White?	13	<b>recollection of that.</b>
14	<b>A Correct.</b>	14	Q Of the reverse sting at all?
15	Q But did the arrest take place of Mr. White	15	<b>A Yes.</b>
16	at approximately the same time the reverse sting was	16	Q How do you know you were involved in a
17	taking place?	17	reverse sting?
18	<b>A Yes.</b>	18	<b>A We -- I know we did one and I'm -- I tested</b>
19	MR. ZECCHIN: I don't think I have any other	19	<b>a couple of the -- of the offenders that was</b>
20	questions.	20	<b>arrested for attempted PCS.</b>
21	REDIRECT EXAMINATION BY COUNSEL FOR CERTAIN PLAINTIFFS	21	Q So you looked at some other documents?
22	BY MR. RAUSCHER:	22	<b>A Yes.</b>
23	Q You talked a little bit about the felony	23	Q And do you remember which documents you
24	review process.	24	looked at in particular?

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53 (209 to 212)

<p>1     <b>A That would be probably the vice and the case</b>  2     <b>report -- I mean, the Arrest Report.</b>  3     Q For what?  4     <b>A For individuals that was locked up that day</b>  5     <b>for attempted PCS.</b>  6     Q And do you know who those individuals were?  7     <b>A No, I don't, not offhand.</b>  8     Q How long ago did you look at those  9     documents?  10    <b>A Probably the time last week when we prepare</b>  11   <b>this deposition.</b>  12    Q You mean the last few days?  13    <b>A Yes.</b>  14    Q And did those documents refresh your  15    recollection or are you just saying, I looked at  16    documents and they said there was a reverse sting?  17    <b>A I mean, they didn't refresh my recollection;</b>  18   <b>but according to the document, a reverse sting was</b>  19   <b>conducted.</b>  20    Q And does the reverse sting say any -- do any  21    of those documents say anything about Lionel White,  22    Senior?  23    <b>A No, it doesn't.</b>  24    Q And how do you know that they -- that they</p>	<p>209</p>	<p>1     <b>A I mean, at that time they were locking up</b>  2     <b>Mr. White, they were probably not involved with that</b>  3     <b>reverse sting.</b>  4     Q And the question I asked you was the  5     officers involved in White's arrest. The Arrest  6     Report lists Officer Jones and Officer Smith as the  7     arresting -- as the arresting officers.  8     Do you remember that?  9     <b>A Yes.</b>  10    Q And it's your testimony that at some point  11    during the day those officers were involved in the  12    reverse sting?  13    <b>A Yes.</b>  14    Q And the Vice Case Report that you looked at,  15    which is also part of Exhibit 4, lists certain other  16    officers, including yourself. And that's the report  17    for Mr. White.  18    Do you remember looking at that?  19    <b>A Yes.</b>  20    Q Are the -- all the officers listed on this  21    Vice Case Report related to Mr. White's arrest also  22    officers who were involved in the reverse sting on  23    that same day?  24    <b>A Yes.</b></p>	<p>211</p>
<p>1     mean you didn't have anything to do with Lionel  2     White, Senior's arrest?  3     <b>A Because I would have been focused on the</b>  4     <b>reverse sting part of the operation.</b>  5     Q How do you know that?  6     <b>A Because I would have been part -- like I</b>  7     <b>stated earlier, I would have been part of the</b>  8     <b>processing or enforcement team.</b>  9     Q But with no independent recollection of what  10    you did that day, how do you know that you were more  11    involved with the reverse sting than with Lionel  12    White, Senior's arrest?  13    <b>A How do I know that?</b>  14    Q Yeah.  15    <b>A Off of my head, off of my memory, I can't</b>  16   <b>answer it.</b>  17    MR. RAUSCHER: I don't have anything else.  18    RECROSS-EXAMINATION BY COUNSEL FOR CERTAIN PLAINTIFFS  19    BY MR. FLAXMAN:  20    Q Were the officers arresting Mr. White  21    involved in the reverse sting?  22    <b>A At some point, yes.</b>  23    Q But then at some other point they arrested  24    Mr. White?</p>	<p>210</p>	<p>1     MR. RAUSCHER: I'm sorry. I said I was  2     done, but I have just a couple more related to that.  3         FURTHER RECROSS-EXAMINATION  4         BY COUNSEL FOR CERTAIN PLAINTIFFS  5     BY MR. RAUSCHER:  6     Q Who played what role in the reverse sting  7     that day?  8     <b>A Like I stated earlier, most likely the</b>  9     <b>African American officers would be the pretend drug</b>  10    <b>dealers.</b>  11    Q So who would have been that -- who would  12    that have been that day?  13    <b>A It would have been Officer Smith, Officer</b>  14    <b>Mohammed, Officer Jones. And then Officer Leano,</b>  15    <b>Bolton, Gonzalez and I would have been the</b>  16    <b>enforcement processing team.</b>  17    MR. RAUSCHER: Okay. I don't have any more  18    questions.  19    MR. ZECCHIN: Just two quick ones.  20    RECROSS-EXAMINATION BY COUNSEL FOR CERTAIN DEFENDANTS  21    BY MR. ZECCHIN:  22    Q Your name's not listed anywhere on this  23    Arrest Report for Mr. Lionel White; is that correct?  24    The Arrest Report I'm speaking --</p>	<p>212</p>



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