

# 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	3
1 IN THE UNITED STATES DISTRICT COURT	1 A P P E A R A N C E S
2 NORTHERN DISTRICT OF ILLINOIS	2 ON BEHALF OF CERTAIN PLAINTIFFS:
3 EASTERN DIVISION	3 THERESA KLEINHAUS, ESQUIRE
4 IN RE: )	4 SCOTT R. RAUSCHER, ESQUIRE
5 WATTS COORDINATED CASES ) Master Docket	5 LOEVY & LOEVY
6 ) Case No. 19-cv-01717	6 311 North Aberdeen Street
7 Videotaped Deposition of:	7 3rd Floor
8 MANUEL LEANO	8 Chicago, Illinois 60607
9 Chicago, Illinois	9 (312) 243-5900
10 Thursday, September 26, 2019	10
11 11:28 a.m.	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	16 Chicago, Illinois 60604
17 Job No.: 262544	17 (312) 427-3200
18 Pages: 1 - 215	18
19 Reported by: Kimberly Winkler Christopher, CSR	19
20	20
21	21
22	22
23	23
24	24
2	4
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)

5	7
<p>1 A P P E A R A N C E S (Continued)</p> <p>2 ON BEHALF OF DEFENDANT RONALD WATTS:</p> <p>3 AHMED A. KOSOKO, ESQUIRE</p> <p>4 JOHNSON &amp; BELL LTD.</p> <p>5 33 West Monroe Street</p> <p>6 Suite 2700</p> <p>7 Chicago, Illinois 60603</p> <p>8 (312) 372-0770</p> <p>9</p> <p>10 ON BEHALF OF DEFENDANTS CITY OF CHICAGO, PHILIP</p> <p>11 CLINE, DEBRA KIRBY, KAREN ROWAN, JOSE LOPEZ,</p> <p>12 JEROME A. FLUDER, MIKE RYLE, EDWARD W. GRIFFIN,</p> <p>13 and JERROLD BOSAK:</p> <p>14 PAUL A. MICHALIK, ESQUIRE</p> <p>15 REITER BURNS LLP</p> <p>16 311 South Wacker Drive</p> <p>17 Suite 5200</p> <p>18 Chicago, Illinois 60606</p> <p>19 (312) 982-0090</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>	<p>1 C O N T E N T S</p> <p>2 EXAMINATION OF MANUEL LEANO PAGE</p> <p>3 By Mr. Rauscher 9, 206, 212</p> <p>4 By Mr. Flaxman 194, 210</p> <p>5 By Mr. Kosoko 199</p> <p>6 By Mr. Zecchin 205, 212</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11 E X H I B I T S PAGE</p> <p>12 LEANO EXHIBIT</p> <p>13 Exhibit 1 (Vice Case Report) 109</p> <p>14 Exhibit 2 (Original Case Incident Report) 156</p> <p>15 Exhibit 3 (Arrest Report) 185</p> <p>16 Exhibit 4 (Arrest Report) 187</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>
6	8
<p>1 A P P E A R A N C E S (Continued)</p> <p>2 ON BEHALF OF DEFENDANTS MICHAEL SPAARGAREN and</p> <p>3 MATTHEW CADMAN:</p> <p>4 MICHAEL J. SCHALKA, ESQUIRE</p> <p>5 LEINENWEBER BARONI &amp; DAFFADA LLC</p> <p>6 120 North LaSalle Street</p> <p>7 Suite 2000</p> <p>8 Chicago, Illinois 60602</p> <p>9 (312) 663-3003</p> <p>10</p> <p>11 ALSO PRESENT:</p> <p>12 MR. RICK KOSBERG, Videographer</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>	<p>1 P R O C E E D I N G S</p> <p>2 THE VIDEOGRAPHER: This is the video</p> <p>3 deposition of Manuel Leano taken by Loevy &amp; Loevy in</p> <p>4 the matter of the Watts coordinated pretrial</p> <p>5 proceedings, Master Docket Case No. 19-cv-01717,</p> <p>6 held at Loevy &amp; Loevy, 311 North Aberdeen Street,</p> <p>7 Chicago, Illinois. Today is September 26th, 2019.</p> <p>8 The time is 11:28.</p> <p>9 The court reporter is Kim Christopher of</p> <p>10 Planet Depos. The videographer is Rick Kosberg.</p> <p>11 Counsel can now introduce themselves and the court</p> <p>12 reporter is free to administer the oath.</p> <p>13 MR. RAUSCHER: Scott Rauscher on behalf of</p> <p>14 all the -- all the plaintiffs represented by Loevy &amp;</p> <p>15 Loevy in the Watts coordinated cases.</p> <p>16 MS. KLEINHAUS: Theresa Kleinhaus on behalf</p> <p>17 of the Loevy &amp; Loevy plaintiffs.</p> <p>18 MR. FLAXMAN: Joel Flaxman on behalf of the</p> <p>19 Flaxman plaintiffs.</p> <p>20 MR. SCHALKA: Michael Schalka on behalf of</p> <p>21 defendants Spaargaren and Cadman.</p> <p>22 MR. PALLES: Eric Palles on behalf of</p> <p>23 defendant Mohammed.</p> <p>24 MR. KOSOKO: Ahmed Kosoko on behalf of</p>

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3 (9 to 12)

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

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4 (13 to 16)

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

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5 (17 to 20)

17	<p>1 Q Okay. Do you consider being moved to</p> <p>2 administrative duty discipline?</p> <p>3 <b>A Do I believe?</b></p> <p>4 Q Yes.</p> <p>5 <b>A Yes.</b></p> <p>6 Q Why do you believe that you've been</p> <p>7 disciplined?</p> <p>8 <b>A Why do I believe I've been disciplined?</b></p> <p>9 Q Yes.</p> <p>10 <b>A Because -- I can't say, but it has to do</b></p> <p>11 <b>something with all these cases being exonerated.</b></p> <p>12 Q When you were told that you got placed on</p> <p>13 administrative duty, did you talk to Nichols or</p> <p>14 Gonzalez?</p> <p>15 <b>A Did I talk to -- I believe they were present</b></p> <p>16 <b>when we were told we were being placed into</b></p> <p>17 <b>administrative duty.</b></p> <p>18 Q Do you think it's more likely that all three</p> <p>19 of you were told at the same time?</p> <p>20 <b>A We were probably told at the same time, but</b></p> <p>21 <b>we probably spoke to the commander individually at</b></p> <p>22 <b>some point.</b></p> <p>23 Q On the same day or --</p> <p>24 <b>A At the same -- at that day.</b></p>	19
18	<p>1 <b>or not.</b></p> <p>2 Q You know it's unfair on your part?</p> <p>3 <b>A Yes.</b></p> <p>4 Q Why is it unfair that you've been placed on</p> <p>5 administrative duty?</p> <p>6 <b>A Well, I used to be an officer that's on the</b></p> <p>7 <b>street and now all of a sudden I'm on administrative</b></p> <p>8 <b>duty entering blue cards that document that the</b></p> <p>9 <b>officers -- traffic stop when a citation is not</b></p> <p>10 <b>given. I don't believe that's a police -- as an</b></p> <p>11 <b>officer, I don't believe that's a police duty that I</b></p> <p>12 <b>should be doing.</b></p> <p>13 Q So it sounds like you don't like the job of</p> <p>14 administrative duty. Is that fair?</p> <p>15 <b>A I would rather be on the street, if that's</b></p> <p>16 <b>what you're asking me to.</b></p> <p>17 Q Well, I think -- that's one question is</p> <p>18 whether you enjoy the job responsibilities of being</p> <p>19 on administrative duty.</p> <p>20 <b>A No, I don't enjoy being on administrative</b></p> <p>21 <b>duty.</b></p> <p>22 Q And a separate question is you said you</p> <p>23 don't believe it was fair to -- for you to be placed</p> <p>24 on administrative duty, right?</p>	20

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6 (21 to 24)

21	<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>	23
22	<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>	24

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7 (25 to 28)

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

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8 (29 to 32)

29	<p>1 <b>I refer to it as 264 team.</b></p> <p>2 Q 264 team?</p> <p>3 <b>A Yes.</b></p> <p>4 Q Did you call it the 264 team at the time?</p> <p>5 <b>A Yes.</b></p> <p>6 Q Okay. What did it mean for your day to day</p> <p>7 to be a member of the 64 team?</p> <p>8 MR. ZECCHIN: Objection to form. You can</p> <p>9 answer if you understand the question.</p> <p>10 <b>A It's kind of vague, what question -- what</b></p> <p>11 <b>you're asking me.</b></p> <p>12 Q Well, can you just describe what a typical</p> <p>13 day would look like as a member of the 264 team for</p> <p>14 you?</p> <p>15 <b>A We would patrol the entire 2nd District, but</b></p> <p>16 <b>mostly the housing, and try to arrest people</b></p> <p>17 <b>committing crimes.</b></p> <p>18 Q How would the day start as a member of the</p> <p>19 264 team?</p> <p>20 <b>A We would have a roll call in the 2nd</b></p> <p>21 <b>District.</b></p> <p>22 Q And who would lead the roll call?</p> <p>23 <b>A The sergeant of 264 team would be Ronald</b></p> <p>24 <b>Watts.</b></p>	31
30	<p>1 of those arrests?</p> <p>2 <b>A A few or a couple.</b></p> <p>3 Q When you say "A few or a couple," you mean</p> <p>4 two to three?</p> <p>5 <b>A Two or three maybe, yes.</b></p> <p>6 Q And I know we have specific cases to cover</p> <p>7 today, but can you just give me a list of the two to</p> <p>8 three cases -- two to three arrests that you</p> <p>9 specifically remember?</p> <p>10 <b>A That I can't recall at this moment.</b></p> <p>11 Q So you don't -- you don't remember the names</p> <p>12 of the two to three arrests you remember?</p> <p>13 <b>A No.</b></p> <p>14 Q What do you remember about them?</p> <p>15 <b>A Well, the two shootings and McDaniels. I</b></p> <p>16 <b>remember McDaniels.</b></p> <p>17 Q So those are the three things that you</p> <p>18 remember --</p> <p>19 <b>A Yes.</b></p> <p>20 Q (Continuing) -- from your 13 years on the</p> <p>21 tac team?</p> <p>22 <b>A I mean, nothing sticks out at this moment.</b></p> <p>23 <b>There may be something that could refresh my memory,</b></p> <p>24 <b>but at this moment I don't know what that might be.</b></p>	32

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9 (33 to 36)

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

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10 (37 to 40)

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

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11 (41 to 44)

41	<p>1 Q And were you curious as to why he wasn't</p> <p>2 your partner anymore?</p> <p>3 <b>A He said he was going on the watch and I left</b></p> <p>4 <b>it at that.</b></p> <p>5 Q Why didn't you ask him any follow-up</p> <p>6 questions?</p> <p>7 <b>A I didn't believe I needed to. If that's</b></p> <p>8 <b>what he wanted to do, I guess that's what was best</b></p> <p>9 <b>for him at that moment.</b></p> <p>10 Q And then when he came back, did you talk</p> <p>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</p> <p>14 the watch?</p> <p>15 <b>A I believe Mark -- I'm probably going to</b></p> <p>16 <b>butcher his last name. Kowetski (phonetic) or</b></p> <p>17 <b>something like that. Probably I even said it wrong.</b></p> <p>18 <b>Mark something.</b></p> <p>19 Q When you were on the 264 team, were you</p> <p>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</b></p> <p>24 <b>bulletproof vest.</b></p>	43	<p>1 Q And did you talk with other members of the</p> <p>2 264 team on your cell phones about work?</p> <p>3 <b>A It could be work or it could be something</b></p> <p>4 <b>else.</b></p> <p>5 Q How frequently would you call each other on</p> <p>6 your cell phones to talk about the things that were</p> <p>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</p> <p>10 call people on their cell phones to talk about</p> <p>11 things that happened on the job?</p> <p>12 <b>A You mean after work would I call them and</b></p> <p>13 <b>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</p> <p>16 to talk about things that were happening on the</p> <p>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</b></p> <p>21 <b>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</b></p> <p>24 <b>another officer to discuss what was going on that</b></p>
42	<p>1 Q Did you get to know a lot of the residents</p> <p>2 in Ida B. Wells over the years as a member of the</p> <p>3 264 team?</p> <p>4 <b>A I don't understand what you mean "get to</b></p> <p>5 <b>know." I mean, I say hi to people that says hi to</b></p> <p>6 <b>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</p> <p>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</b></p> <p>15 <b>cover."</b></p> <p>16 Q Well, was it -- it wasn't any sort of secret</p> <p>17 that you were a police officer even though you</p> <p>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</p> <p>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>	44	<p>1 <b>day.</b></p> <p>2 Q Do you know whether the Cook County State's</p> <p>3 Attorney's Office will call you as a witness in</p> <p>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</p> <p>7 Attorney's Office will currently use you as a</p> <p>8 witness in criminal cases?</p> <p>9 <b>A From what I have seen in the news and in the</b></p> <p>10 <b>Internet, no, they're not willing to call us for any</b></p> <p>11 <b>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</b></p> <p>14 <b>any cases.</b></p> <p>15 Q Has anybody told you other than a news</p> <p>16 report?</p> <p>17 <b>A I found out as -- like everyone else, when</b></p> <p>18 <b>it came out on the news media that I was no longer</b></p> <p>19 <b>going to be called on any testimony regarding Cook</b></p> <p>20 <b>County.</b></p> <p>21 Q And did you ever get a memo or anything like</p> <p>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)

45	<p>1 duty, have you ever been disciplined as a Chicago</p> <p>2 police officer?</p> <p>3 <b>A I don't believe I have.</b></p> <p>4 Q You would know if you had, right?</p> <p>5 <b>A Yes, that would be correct.</b></p> <p>6 Q What's your best estimate of how many people</p> <p>7 the 264 team arrested during your 13 years on the</p> <p>8 street with that team?</p> <p>9 MR. ZECCHIN: Objection to foundation from</p> <p>10 this witness. You can answer if you know.</p> <p>11 <b>A I don't -- I don't recall. I can't even</b></p> <p>12 <b>give you a guess.</b></p> <p>13 Q It's in the thousands, though, right?</p> <p>14 <b>A Probably, yes.</b></p> <p>15 Q You mentioned a few types of the most common</p> <p>16 crimes from your time on the 2nd District tactical</p> <p>17 team, on Team 264. You didn't talk about</p> <p>18 trespassing.</p> <p>19 Did you ever arrest people for trespassing</p> <p>20 frequently?</p> <p>21 <b>A Did I arrest people -- yes.</b></p> <p>22 Q What was the standard that you used to</p> <p>23 decide whether someone should be arrested for</p> <p>24 trespassing?</p>	47	<p>1 pretend it's today. Let's say last night you saw</p> <p>2 someone and gave them a verbal warning. You see</p> <p>3 them the next day. You would give them another</p> <p>4 verbal warning?</p> <p>5 <b>A Yeah, it's a different day. Last night he</b></p> <p>6 <b>could have just been hanging out not visiting</b></p> <p>7 <b>anyone. The following day he could be there --</b></p> <p>8 <b>legitimately there to see someone. So I would do</b></p> <p>9 <b>the same thing. I'm like, Are you here to visit</b></p> <p>10 <b>anyone? I know you don't live there. And if you're</b></p> <p>11 <b>not here to visit anyone, if you don't live here,</b></p> <p>12 <b>I'm giving you a warning to leave the area otherwise</b></p> <p>13 <b>you'll be locked up for trespass.</b></p> <p>14 Q And so then it would only be if someone came</p> <p>15 back the same day after that warning?</p> <p>16 <b>A Yes.</b></p> <p>17 Q That you would arrest them for trespassing?</p> <p>18 <b>A Yes.</b></p> <p>19 Q How would you know that the second time that</p> <p>20 day they weren't there to visit somebody?</p> <p>21 <b>A I would ask them. If they said, I'm</b></p> <p>22 <b>visiting so and so, you verify whether that's true</b></p> <p>23 <b>or not.</b></p> <p>24 Q Did it frequently happen that you'd tell</p>
46	<p>1 <b>A I would give them a verbal warning, stating,</b></p> <p>2 <b>If you don't live in the area and you're not</b></p> <p>3 <b>visiting anyone -- there's signs posted all over the</b></p> <p>4 <b>building no criminal trespass, no loitering. And if</b></p> <p>5 <b>you return, then I'll lock you up; but I give you a</b></p> <p>6 <b>verbal warning first.</b></p> <p>7 Q So you'd only arrest people for trespassing</p> <p>8 if you had specifically seen them on a different day</p> <p>9 trespassing and giving them warning?</p> <p>10 MR. ZECCHIN: Objection. Misstates his</p> <p>11 answer.</p> <p>12 <b>A I usually give them a verbal warning that</b></p> <p>13 <b>day. Whether I saw them last night, I would give</b></p> <p>14 <b>them a verbal warning that day because he could be</b></p> <p>15 <b>visiting someone that day. So I would give him a</b></p> <p>16 <b>verbal warning. If you're not here visiting anyone</b></p> <p>17 <b>and you don't live here, there's a sign posted no</b></p> <p>18 <b>loitering, no trespassing. And when they come back</b></p> <p>19 <b>after I give them that verbal warning, then I lock</b></p> <p>20 <b>them up for criminal trespass.</b></p> <p>21 Q All right. Maybe you can help me understand</p> <p>22 more about the verbal warnings.</p> <p>23 You said -- so you could give someone a</p> <p>24 verbal warning, let's say, last night. Let's</p>	48	<p>1 somebody, You can't be here unless you're visiting.</p> <p>2 If you come back, you're going to get arrested.</p> <p>3 Then they would come back and they would admit to</p> <p>4 you they weren't visiting anybody?</p> <p>5 <b>A Could you repeat that?</b></p> <p>6 Q Yeah, sure. Did it happen frequently where</p> <p>7 you would give somebody a warning along the lines</p> <p>8 of, You can't be here unless you're visiting</p> <p>9 somebody or you live here and then they would come</p> <p>10 back that very same day and admit to you that they</p> <p>11 weren't visiting anybody?</p> <p>12 <b>A If they admit to me they weren't visiting</b></p> <p>13 <b>someone?</b></p> <p>14 Q Did that happen a lot?</p> <p>15 <b>A I'm not going to say it never happened, but</b></p> <p>16 <b>I don't recall the incident that actually happened</b></p> <p>17 <b>that way that you spoke of.</b></p> <p>18 Q Is there another way you could have arrested</p> <p>19 someone for trespassing?</p> <p>20 <b>A I don't understand that question. What do</b></p> <p>21 <b>you mean another way?</b></p> <p>22 Q Well, I guess you said you don't remember it</p> <p>23 happening a lot the way that I described the</p> <p>24 sequence, right?</p>

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13 (49 to 52)

49	<p>1 <b>A That -- that the individual come up to me</b>  2 <b>and say, I was actually lying; I wasn't here to</b>  3 <b>visit? Is that what you're trying to say?</b>  4 <b>Q No. What I'm asking you is you said, as I</b>  5 <b>understand it -- and tell me if I am</b>  6 <b>misunderstanding -- you said you arrest people for</b>  7 <b>trespassing only when you've already given them a</b>  8 <b>verbal warning that very same day that they can't be</b>  9 <b>in the place and then they come back that same day.</b>  10 <b>A Okay.</b>  11 <b>Q Is that right?</b>  12 <b>A Yes.</b>  13 <b>Q And you only know the second time that</b>  14 <b>they're not there to see someone legitimately if you</b>  15 <b>ask them, correct?</b>  16 <b>A If I ask them? I would have verified that</b>  17 <b>from the first encounter. So next time I see them I</b>  18 <b>know they weren't there to see anyone because I</b>  19 <b>already gave them a verbal warning to leave.</b>  20 <b>Q How do you know that the next time that they</b>  21 <b>weren't there to see someone?</b>  22 <b>A I probably verified it again if they give me</b>  23 <b>a different person or a different location that they</b>  24 <b>were going to.</b></p>	51	<p>1 <b>A Probably pick an area where I could see the</b>  2 <b>subject, whatever the subject was selling drugs,</b>  3 <b>where I can't be seen and see the narcotics</b>  4 <b>transaction.</b>  5 <b>Q When you say you probably did it that way,</b>  6 <b>did you do it that way?</b>  7 <b>A Most likely I would do it that way.</b>  8 <b>Q But you don't have no specific memory right</b>  9 <b>now of ever conducting surveillance as a member of</b>  10 <b>the Watts team?</b>  11 <b>A Nothing comes to mind at this moment.</b>  12 <b>Q And you can't say for certain one way or the</b>  13 <b>other whether you actually conducted surveillance as</b>  14 <b>a member of the Watts team?</b>  15 <b>A I'm pretty sure I have, but I just don't</b>  16 <b>recall of those at this moment.</b>  17 <b>Q So you know you did it. You just don't</b>  18 <b>remember any specific times; is that right?</b>  19 <b>A That would be correct.</b>  20 <b>Q And do you know any specific methods that</b>  21 <b>you used?</b>  22 <b>A It varies on the situation.</b>  23 <b>Q Well, tell me about -- I'm not asking you to</b>  24 <b>generally describe how someone might conduct</b></p>
50	<p>1 <b>Q And then you would just make your best</b>  2 <b>estimate?</b>  3 <b>A No. I would verify -- let's say, I spoke to</b>  4 <b>a subject the first time that say, I'm here to go</b>  5 <b>visit someone in 201 named Smith. I go up there.</b>  6 <b>Does anyone Smith lives in this apartment. They say</b>  7 <b>no. Then I give him that warning to leave. The</b>  8 <b>second time, I told you already. I told you to</b>  9 <b>leave and then he gives me another excuse. Well, I</b>  10 <b>actually got the apartment wrong. I wanted to go</b>  11 <b>301. And I know myself 301 is a vacant apartment,</b>  12 <b>so then I lock him up.</b>  13 <b>Q Okay. Did you participate in surveillance</b>  14 <b>operations as a member of the 264 team?</b>  15 <b>A Surveillance? Pretty sure I have, but I</b>  16 <b>don't recall any of those at this time.</b>  17 <b>Q Was -- were -- well, what types of</b>  18 <b>surveillance did you participate in as a member of</b>  19 <b>the Watts team?</b>  20 <b>A Probably narcotics.</b>  21 <b>Q Probably narcotics you said?</b>  22 <b>A Most likely narcotics.</b>  23 <b>Q Do you remember how you conducted</b>  24 <b>surveillance as a member of the Watts team?</b></p>	52	<p>1 <b>surveillance. I want to just know what do you</b>  2 <b>remember about how you conducted surveillance as a</b>  3 <b>member of the Watts team?</b>  4 <b>A I mean, it varies. I could -- we could just</b>  5 <b>sit in a squad car far enough where they can't see</b>  6 <b>us but we could still see them. Or we could</b>  7 <b>actually get out of the car, you know, find a place</b>  8 <b>where we can't be seen but we could see them. It</b>  9 <b>all depends on the situation.</b>  10 <b>Q Are there any other methods other than the</b>  11 <b>two you just described?</b>  12 <b>A I mean, if we had a covert car, we might use</b>  13 <b>a covert car, which is just a car with regular</b>  14 <b>plates on it.</b>  15 <b>Q What's --</b>  16 <b>A It's a regular -- it's a covert -- we call</b>  17 <b>it a covert car.</b>  18 <b>Q Covert scar?</b>  19 <b>A Yeah. But it's basically a regular car with</b>  20 <b>regular plates in it. Instead of having a municipal</b>  21 <b>plate, it would have regular plates.</b>  22 <b>Q Was it sometimes your role to transport</b>  23 <b>people to the police station who had already been</b>  24 <b>arrested by other officers?</b></p>



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14 (53 to 56)

53	<p>1 <b>A It happens, yes.</b></p> <p>2 Q How frequently did that happen as a member</p> <p>3 of the Watts team?</p> <p>4 <b>A I can't say. If there's no beat cars</b></p> <p>5 <b>available at that moment, we might transfer them</b></p> <p>6 <b>ourselves.</b></p> <p>7 Q Was that a weekly occurrence?</p> <p>8 <b>A Again, it varies.</b></p> <p>9 Q Sometimes every week, sometimes not?</p> <p>10 <b>A It could be every week or it could happen</b></p> <p>11 <b>once a month, once every two months. It just varies</b></p> <p>12 <b>on how busy the district that day where there's no</b></p> <p>13 <b>available squad car to transport for us.</b></p> <p>14 Q Did any of the -- do you remember anybody</p> <p>15 ever telling you when you were transporting them to</p> <p>16 the police station that they had been framed or they</p> <p>17 weren't guilty?</p> <p>18 <b>A They had been framed? I don't believe so.</b></p> <p>19 Q Or that they weren't guilty?</p> <p>20 <b>A That they were guilty?</b></p> <p>21 Q Were not.</p> <p>22 <b>A I don't believe so.</b></p> <p>23 Q What about that they were guilty. Did</p> <p>24 anybody ever tell you they were guilty?</p>	55
54	<p>1 <b>A That would be actually good if they would</b></p> <p>2 <b>tell us they were guilty.</b></p> <p>3 Q Yeah. But did anyone do it?</p> <p>4 <b>A I don't believe so.</b></p> <p>5 Q That would be highly unusual?</p> <p>6 <b>A I would say so.</b></p> <p>7 Q Which members of the Watts team do you still</p> <p>8 work with?</p> <p>9 MR. MICHALIK: I'm just going to object to</p> <p>10 the -- I think he said before that -- he called it</p> <p>11 the 264 team, not the Watts team.</p> <p>12 <b>A I mean, I still work with Officer Nichols.</b></p> <p>13 <b>If you call that working administratively, yes, that</b></p> <p>14 <b>would be Officer Nichols.</b></p> <p>15 Q Anyone else?</p> <p>16 <b>A That's about it.</b></p> <p>17 Q When was the last time you talked to Kenny</p> <p>18 Young?</p> <p>19 <b>A Probably months.</b></p> <p>20 Q And what did you talk with him about when</p> <p>21 you last talked?</p> <p>22 <b>A Probably that was at our civil lawyer's</b></p> <p>23 <b>building. Probably just said hi. I can't remember</b></p> <p>24 <b>when that was.</b></p>	56

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15 (57 to 60)

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

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16 (61 to 64)

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

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17 (65 to 68)

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

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18 (69 to 72)

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



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19 (73 to 76)

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

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20 (77 to 80)

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



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21 (81 to 84)

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

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22 (85 to 88)

85	<p>1 Q Yeah. And I'm not trying to get you to</p> <p>2 answer a question you don't know about timing. But</p> <p>3 I just mean whenever Torres left, was the person --</p> <p>4 <b>A The person that got replaced would have been</b></p> <p>5 <b>working with Officer Smith.</b></p> <p>6 Q Okay.</p> <p>7 MR. RAUSCHER: Is it okay if we take a quick</p> <p>8 break?</p> <p>9 MR. ZECCHIN: Sure.</p> <p>10 THE VIDEOGRAPHER: Off the record, 1:50</p> <p>11 (sic).</p> <p>12 (A recess was taken from 12:50 p.m. to 1:02</p> <p>13 p.m.)</p> <p>14 THE VIDEOGRAPHER: Back on the record, 1:03.</p> <p>15 Q We were talking about partners among the</p> <p>16 Watts 264 team before the break. And I asked you to</p> <p>17 identify who was on the team from the 2004 to 2008</p> <p>18 period.</p> <p>19 Can you tell me other members of the team</p> <p>20 over the year -- over the years who you haven't</p> <p>21 mentioned yet?</p> <p>22 <b>A Over the years? The only person that I</b></p> <p>23 <b>could think of that I haven't mentioned is Dorian</b></p> <p>24 <b>Smith.</b></p>	87
86	<p>1 Q And about how long was Dorian Smith on the</p> <p>2 Watts 264 team?</p> <p>3 <b>A That I couldn't remember. I know he came in</b></p> <p>4 <b>towards the tail end of it.</b></p> <p>5 Q Did you ever ask to get taken off of the</p> <p>6 Watts 264 team?</p> <p>7 <b>A No.</b></p> <p>8 Q Did you ever ask to get transferred out of</p> <p>9 the 2nd District?</p> <p>10 <b>A No.</b></p> <p>11 Q Did you ever seek a promotion?</p> <p>12 <b>A Did I ever seek promotion? Yes.</b></p> <p>13 Q When did you seek promotions?</p> <p>14 <b>A When I took the sergeant exam twice.</b></p> <p>15 Q And what was the result of you taking the</p> <p>16 sergeant exam?</p> <p>17 <b>A I didn't do too well.</b></p> <p>18 Q When did you take the sergeant exam?</p> <p>19 <b>A I think the first one -- I'm not exact on</b></p> <p>20 <b>the date. It might have been 2005. And the last</b></p> <p>21 <b>one was whenever the last sergeant exam was.</b></p> <p>22 Q And you've described your day-to-day</p> <p>23 responsibilities when you were an active street</p> <p>24 police officer.</p>	88
	<p>1 Can you describe Watts's responsibilities on</p> <p>2 a day-to-day basis?</p> <p>3 <b>A Basically to supervise the eight officers.</b></p> <p>4 Q And was he out on the street with you?</p> <p>5 <b>A With us or --</b></p> <p>6 Q With -- not just with you, with the team.</p> <p>7 <b>A For the most part, yes.</b></p> <p>8 Q Almost every day?</p> <p>9 <b>A I couldn't say every day, but for the most</b></p> <p>10 <b>part, yes.</b></p> <p>11 Q Typically he would be on the street with the</p> <p>12 team?</p> <p>13 <b>A Yes.</b></p> <p>14 Q And what would he be doing?</p> <p>15 <b>A That I couldn't answer.</b></p> <p>16 Q Did you see him?</p> <p>17 <b>A At some point during the day, yes.</b></p> <p>18 Q And when you saw him during the day, what</p> <p>19 would he typically be doing?</p> <p>20 MR. ZECCHIN: Objection to form of the</p> <p>21 question.</p> <p>22 <b>A Most of the time he would log us saying he</b></p> <p>23 <b>saw us here, saw us at a location.</b></p> <p>24 Q Would he participate in arrests?</p>	

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23 (89 to 92)

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

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24 (93 to 96)

93	<p>1 basis when he was the sergeant of the tac team that</p> <p>2 you worked on?</p> <p>3 MR. KOSOKO: I'm going to object based on</p> <p>4 form of the question. I understand where you're</p> <p>5 trying to go, but I think there's a fundamental</p> <p>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</b></p> <p>9 <b>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</p> <p>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</p> <p>15 he's not present for.</p> <p>16 MR. KOSOKO: And I object to foundation as</p> <p>17 to a sergeant's role.</p> <p>18 <b>A What would his role would be? He's a</b></p> <p>19 <b>supervisor. Supervise.</b></p> <p>20 Q And did you see Watts supervising arrest</p> <p>21 scenes over the years?</p> <p>22 MR. KOSOKO: Again, I'm going to object</p> <p>23 based upon foundation as to the supervisor's role</p> <p>24 and what the supervisors do.</p>	95	<p>1 Q In your many years of working under Ronald</p> <p>2 Watts' supervision, did you gain some understanding</p> <p>3 of what his responsibilities were at the scene of an</p> <p>4 arrest?</p> <p>5 MR. ZECCHIN: Objection to the formation,</p> <p>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</p> <p>9 various things that he was responsible for doing at</p> <p>10 the scene of an arrest based on your experience</p> <p>11 working with him.</p> <p>12 MR. MICHALIK: Object to form and</p> <p>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</p> <p>18 presence alone, make sure his officer are safe.</p> <p>19 That's one thing. He hears us on a job somewhere,</p> <p>20 he might drop by, make sure his officer are all</p> <p>21 right.</p> <p>22 Q And how would he -- in your experience from</p> <p>23 what you observed, how would he make sure that</p> <p>24 officers were safe at the scene of arrests?</p>
94	<p>1 <b>A I mean, what do you mean by supervise? He</b></p> <p>2 <b>could just be there as he's present supervising. He</b></p> <p>3 <b>wouldn't have to say anything. He could just be</b></p> <p>4 <b>present at the scene supervise. Just his presence</b></p> <p>5 <b>alone is supervise, make sure everything went well.</b></p> <p>6 Q Okay. So one role of a supervisor would</p> <p>7 just be to be there and make sure everything went</p> <p>8 well, right?</p> <p>9 <b>A Or that went all right.</b></p> <p>10 MR. KOSOKO: I just fundamentally object as</p> <p>11 to his foundation as to what the supervisor's</p> <p>12 duties, roles, and responsibilities are.</p> <p>13 Q How many years did you work with Ronald</p> <p>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.</b></p> <p>18 <b>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</b></p> <p>21 <b>me -- I don't know the year he got arrested.</b></p> <p>22 Q You worked with him for many years. Is that</p> <p>23 fair?</p> <p>24 <b>A Okay. That's fair.</b></p>	96	<p>1 <b>A I mean, he --</b></p> <p>2 MR. KOSOKO: Object as to form as to what --</p> <p>3 what my client knew and did.</p> <p>4 <b>A I mean, he could just act as a guard officer</b></p> <p>5 <b>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</b></p> <p>8 <b>they're doing what they're doing.</b></p> <p>9 Q And how does a guard officer make sure that</p> <p>10 people are safe?</p> <p>11 <b>A Your responsibility is to be aware of your</b></p> <p>12 <b>surroundings, make -- keeping your officers safe,</b></p> <p>13 <b>make sure no one walks up behind them while they're</b></p> <p>14 <b>doing their investigation.</b></p> <p>15 Q Did you ever see Ronald Watts arrest anybody</p> <p>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,</p> <p>21 arrest anybody?</p> <p>22 <b>A Yes.</b></p> <p>23 Q Did you ever tell a civilian how they can</p> <p>24 file a complaint against any officers?</p>

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25 (97 to 100)

97	<p>1 <b>A Did I ever tell?</b></p> <p>2 Q Yeah.</p> <p>3 <b>A If an -- if an individual come up to me</b></p> <p>4 <b>saying they have a complaint against an officer, I</b></p> <p>5 <b>usually refer them to OPS at the time. I always</b></p> <p>6 <b>tell them, You can call OPS if you have a complaint</b></p> <p>7 <b>on any officer.</b></p> <p>8 Q And what type of complaints did you get from</p> <p>9 civilians over the years?</p> <p>10 <b>A I don't recall the complaint. They would</b></p> <p>11 <b>just say, How do I file a complaint on an officer?</b></p> <p>12 <b>I would state, Call OPS.</b></p> <p>13 Q Did you tell them how to get in touch with</p> <p>14 OPS?</p> <p>15 <b>A Yes.</b></p> <p>16 Q Did you give them a phone number or --</p> <p>17 <b>A Yes. I would look in my book. Or if I</b></p> <p>18 <b>don't have my book at that time, I would advise them</b></p> <p>19 <b>to call 311 and ask for OPS's number.</b></p> <p>20 Q Do you remember any specific officers people</p> <p>21 wanted to complain about?</p> <p>22 <b>A No.</b></p> <p>23 Q Do you remember anyone ever coming up to you</p> <p>24 and saying Watts did anything wrong?</p>	99	<p>1 <b>and Mohammed got locked up.</b></p> <p>2 Q When did you have that conversation or those</p> <p>3 conversations with Nichols?</p> <p>4 <b>A Probably the day the news broke out or right</b></p> <p>5 <b>after.</b></p> <p>6 Q How many times do you think you've talked to</p> <p>7 Nichols about the Watts and Mohammed criminal</p> <p>8 proceedings?</p> <p>9 <b>A Probably just a couple of times after --</b></p> <p>10 <b>immediately after they got arrested.</b></p> <p>11 Q What did you say to him, what did he say to</p> <p>12 you?</p> <p>13 <b>A I just said, Did you know what -- probably</b></p> <p>14 <b>to the extent, Did you know what Watts and Mohammed</b></p> <p>15 <b>got locked up for according to the news media, to</b></p> <p>16 <b>that extent.</b></p> <p>17 Q And what did he say to you?</p> <p>18 <b>A He probably stated he read -- he also read</b></p> <p>19 <b>the media or what was in the news.</b></p> <p>20 Q And did you have any -- did either of you</p> <p>21 express any surprise, disbelief?</p> <p>22 <b>A I mean, we were shocked that they got</b></p> <p>23 <b>arrested; but other than that, no.</b></p> <p>24 Q Why were you shocked that they got arrested?</p>
98	<p>1 <b>A No.</b></p> <p>2 Q How many people over the years do you think</p> <p>3 you gave OPS's telephone number to?</p> <p>4 <b>A That I couldn't tell you.</b></p> <p>5 Q More than a hundred?</p> <p>6 <b>A I doubt it.</b></p> <p>7 Q More than 50?</p> <p>8 <b>A Maybe.</b></p> <p>9 Q How did you learn that Mohammed and Watts</p> <p>10 had been charged with crimes?</p> <p>11 <b>A How did I learn? On the news.</b></p> <p>12 Q Do you have any source of information about</p> <p>13 what they were charged or convicted of other than</p> <p>14 the news?</p> <p>15 <b>A No, just the news.</b></p> <p>16 Q Did you ever talk about it with current or</p> <p>17 former members of the 264 Watts team?</p> <p>18 <b>A Other than what was on the news, no.</b></p> <p>19 Q But you've talked to them about what was on</p> <p>20 the news?</p> <p>21 <b>A Yeah, about what they were locked up for.</b></p> <p>22 Q Who did you talk to about that?</p> <p>23 <b>A Probably discussed it with my partner that,</b></p> <p>24 <b>Did you read on the paper -- on the news that Watts</b></p>	100	<p>1 MR. KOSOKO: I'm going to object as to form</p> <p>2 of the question.</p> <p>3 <b>A That they just got arrested.</b></p> <p>4 Q Why were you shocked that they had been</p> <p>5 arrested?</p> <p>6 <b>A I had no reason to believe that they would</b></p> <p>7 <b>be arrested.</b></p> <p>8 Q Why was Nichols shocked? Did he tell you?</p> <p>9 <b>A I didn't -- did I say he was shocked? I</b></p> <p>10 <b>don't believe I stated he was shocked.</b></p> <p>11 Q I thought you said, We were shocked.</p> <p>12 <b>A Okay. I might have spoken -- I was shocked.</b></p> <p>13 Q You don't know how Nichols --</p> <p>14 <b>A No, I don't know how Nichols felt.</b></p> <p>15 Q He didn't say to you, I'm shocked that they</p> <p>16 got arrested --</p> <p>17 <b>A No --</b></p> <p>18 Q (Continuing) -- or anything like that?</p> <p>19 <b>A (Continuing) -- I don't believe he did.</b></p> <p>20 Q How long was this conversation with you and</p> <p>21 Nichols about Watts and Mohammed?</p> <p>22 <b>A About a couple minutes, not more than that.</b></p> <p>23 Q Was it at the police station?</p> <p>24 <b>A I couldn't remember if it was the police</b></p>



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26 (101 to 104)

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

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27 (105 to 108)

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



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28 (109 to 112)

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

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29 (113 to 116)

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

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30 (117 to 120)

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

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31 (121 to 124)

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

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32 (125 to 128)

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



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33 (129 to 132)

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

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34 (133 to 136)

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



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35 (137 to 140)

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

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36 (141 to 144)

141	<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>	143	<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	<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>	144	<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)

<p style="text-align: right;">145</p> <p>1 southbound on King on 58th Street when we activated</p> <p>2 the lights.</p> <p>3 Q And at that time why didn't you mention that</p> <p>4 he had been holding his side when he was jogging out</p> <p>5 of the building before the car --</p> <p>6 A Well, I don't know if he still had the gun</p> <p>7 on him. He might have just left it in the car. So</p> <p>8 when he got out of the car still holding his sides,</p> <p>9 that's when I went over the air, Subject jumped out</p> <p>10 of the car holding his side. And then when I had</p> <p>11 visible indication that he does have a gun, that's</p> <p>12 when I probably stated, Subject has a gun.</p> <p>13 Q I thought you just said you called in that</p> <p>14 he was holding his side before he had a gun?</p> <p>15 A Yes, when he got out of the car.</p> <p>16 Q What do you mean -- but when you said he</p> <p>17 might have left it in the car, what do you mean by</p> <p>18 that?</p> <p>19 A Well, weren't you asking me why didn't I</p> <p>20 call that he was holding his side while he was in</p> <p>21 the car? While he's in the car, I don't know where</p> <p>22 the gun is.</p> <p>23 Q Why would that matter?</p> <p>24 A Okay. Like I said, I had no visible</p>	<p style="text-align: right;">147</p> <p>1 Q That was -- but before he got in the car,</p> <p>2 you saw him holding his side, right?</p> <p>3 A Correct.</p> <p>4 Q You thought that he might have a gun?</p> <p>5 A Yes.</p> <p>6 Q And then you called it in while he was still</p> <p>7 in the car?</p> <p>8 A Correct.</p> <p>9 Q Why did you not say then he was holding his</p> <p>10 side when he jumped in his car?</p> <p>11 A Couldn't tell you why I didn't say it.</p> <p>12 Q Why did you say it when he got out of the</p> <p>13 car?</p> <p>14 A Why did I say it?</p> <p>15 Q Yeah.</p> <p>16 A I'm giving a description letting other</p> <p>17 officer responding he might -- might have a gun.</p> <p>18 Q Did other officers respond?</p> <p>19 A I believe so.</p> <p>20 Q Which other officers responded?</p> <p>21 A That I couldn't tell you.</p> <p>22 Q Did Nichols see the gun at the scene?</p> <p>23 A Did Nichols see the gun? After he was</p> <p>24 placed in custody, I probably showed him.</p>
<p style="text-align: right;">146</p> <p>1 indication that he had a gun. He was just holding</p> <p>2 his side. So I'm not going to tell the officer, So</p> <p>3 and so we're chasing has a gun when I don't have</p> <p>4 visible indication a hundred percent that he has a</p> <p>5 gun.</p> <p>6 Q What was different about the -- well, let me</p> <p>7 try to rephrase that.</p> <p>8 Why did you say that he was holding his side</p> <p>9 when he got out of the car but not describe that</p> <p>10 event when you called it in before he got out of the</p> <p>11 car?</p> <p>12 There were two times when he was holding his</p> <p>13 side, right?</p> <p>14 A Yes.</p> <p>15 Q Once before he got in the car and once</p> <p>16 after, right?</p> <p>17 A I didn't get on the radio when he was coming</p> <p>18 out of the car. I got on the radio when we</p> <p>19 activated our lights at 58th Street.</p> <p>20 Q And where was that in this chain?</p> <p>21 A What do you mean where was that?</p> <p>22 Q What was he doing?</p> <p>23 A I don't know what he was doing. He was in</p> <p>24 the car.</p>	<p style="text-align: right;">148</p> <p>1 Q But you don't remember?</p> <p>2 A No.</p> <p>3 Q How long were you talking to Mr. McDaniels</p> <p>4 at the station? You and -- I'm sorry. Let me</p> <p>5 rephrase.</p> <p>6 How long were you and Nichols talking to</p> <p>7 Mr. McDaniels at the station?</p> <p>8 A Probably a minute or two. How long it takes</p> <p>9 for us to read him his rights and how long for him</p> <p>10 to answer that he bought the gun on the street for</p> <p>11 protection.</p> <p>12 Q So just straightaway he told you?</p> <p>13 A Yes.</p> <p>14 Q Do you remember that it was a minute or two</p> <p>15 or are you just --</p> <p>16 A I'm approximating it.</p> <p>17 Q Did Nichols ask how many -- did Nichols ask</p> <p>18 him who was driving the car?</p> <p>19 A I don't -- I don't believe so.</p> <p>20 Q Did the person driving the car commit a</p> <p>21 crime?</p> <p>22 A Yes.</p> <p>23 Q What crime did that person commitment?</p> <p>24 A Failing to stop at a stop sign.</p>

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38 (149 to 152)

<p style="text-align: right;">149</p> <p>1 Q Have you ticketed or arrested people over</p> <p>2 the years for failing to stop at a stop sign?</p> <p>3 <b>A If they don't have a license, they're</b></p> <p>4 <b>suspended otherwise it would just be a citation.</b></p> <p>5 Q Is there some sort of crime fleeing from the</p> <p>6 police?</p> <p>7 <b>A Fleeing from the police? Yes.</b></p> <p>8 Q And had the driver committed that crime?</p> <p>9 <b>A If he would have been apprehended, most</b></p> <p>10 <b>likely he would have been charged with that citation</b></p> <p>11 <b>and fleeing the police.</b></p> <p>12 Q So he -- in your opinion the driver did</p> <p>13 illegally flee from the police?</p> <p>14 <b>A Yes.</b></p> <p>15 Q Is it common in your -- well, have you had</p> <p>16 other instances of people trying to flee from the</p> <p>17 police?</p> <p>18 <b>A Yes.</b></p> <p>19 Q And is it common in your experience that if</p> <p>20 one person of multiple people is caught fleeing from</p> <p>21 the police you don't even ask who the other person</p> <p>22 is?</p> <p>23 <b>A Would we ask? We might ask, but they don't</b></p> <p>24 <b>usually -- for the most part they won't give you the</b></p>	<p style="text-align: right;">151</p> <p>1 <b>most part we would just give a description, a</b></p> <p>2 <b>physical description of who was driving the car.</b></p> <p>3 Q But I'm not asking how people answer. I'm</p> <p>4 asking are there any other reasons other than you</p> <p>5 just forgot to ask why you wouldn't have asked who</p> <p>6 was driving the car?</p> <p>7 <b>A I mean, most of the time we probably would</b></p> <p>8 <b>ask, but I don't know why we didn't ask in this</b></p> <p>9 <b>incident or I didn't ask in that incident.</b></p> <p>10 Q So there's no other reasons you can think of</p> <p>11 other than just forgetting?</p> <p>12 <b>A Yes.</b></p> <p>13 Q Yes, you're agreeing you can't think of --</p> <p>14 <b>A Yes, I'm agreeing with you.</b></p> <p>15 Q If Mr. McDaniels was willing to openly tell</p> <p>16 you why he had a gun, do you think he would have</p> <p>17 fallen in the category of people who wouldn't have</p> <p>18 told you who the driver was or who would have?</p> <p>19 MR. ZECCHIN: Objection, form and foundation</p> <p>20 from this witness.</p> <p>21 <b>A I can't tell you whether he would or not. I</b></p> <p>22 <b>can't get in McDaniels' mind.</b></p> <p>23 Q Did you testify in criminal proceedings</p> <p>24 brought against Mr. McDaniels?</p>
<p style="text-align: right;">150</p> <p>1 <b>driver's name or the person's name.</b></p> <p>2 Q But you ask?</p> <p>3 <b>A I don't -- like I said, I don't know if we</b></p> <p>4 <b>did or not.</b></p> <p>5 Q But typically you would ask?</p> <p>6 <b>A You would.</b></p> <p>7 Q It would be pretty unusual to not even ask</p> <p>8 who was with you, right?</p> <p>9 <b>A It would.</b></p> <p>10 Q Of course you would ask, right?</p> <p>11 MR. ZECCHIN: Objection, argumentative.</p> <p>12 Q All right. You don't have to answer that.</p> <p>13 Are there any reasons you can think of why</p> <p>14 you wouldn't have asked or why Nichols wouldn't have</p> <p>15 asked who was driving the car that fled from the</p> <p>16 police?</p> <p>17 <b>A I don't recall why. We might have just</b></p> <p>18 <b>forgot to ask who was in the vehicle, who was</b></p> <p>19 <b>driving the vehicle.</b></p> <p>20 Q Other than forgetting to ask, are there any</p> <p>21 other reasons you can think of why no one would have</p> <p>22 asked who was driving the vehicle?</p> <p>23 <b>A I mean, for the most part they wouldn't tell</b></p> <p>24 <b>you who was driving the vehicle anyway. So for the</b></p>	<p style="text-align: right;">152</p> <p>1 <b>A Yes, I did.</b></p> <p>2 Q How many times?</p> <p>3 <b>A I don't remember if this went to the Grand</b></p> <p>4 <b>Jury. So if he went to the Grand Jury, I probably</b></p> <p>5 <b>testified at Grand Jury and at his trial.</b></p> <p>6 Q You remember testifying at his trial?</p> <p>7 <b>A Yes.</b></p> <p>8 Q How did you prepare to testify at his trial?</p> <p>9 <b>A Look at the documents.</b></p> <p>10 Q Which documents did you look at?</p> <p>11 <b>A The Arrest Report, probably the general case</b></p> <p>12 <b>report.</b></p> <p>13 Q Do you know who else testified at his trial?</p> <p>14 <b>A That I can't recall who else testified at</b></p> <p>15 <b>his trial.</b></p> <p>16 Q Did you talk to anybody else in preparation</p> <p>17 for your testimony?</p> <p>18 <b>A In preparation for this?</b></p> <p>19 Q No, no. In preparation for your testimony</p> <p>20 at Mr. McDaniels' -- did you talk to anyone else</p> <p>21 before you testified at Mr. McDaniels' criminal</p> <p>22 trial?</p> <p>23 <b>A The State's Attorneys.</b></p> <p>24 Q Do you remember which State's Attorneys you</p>

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39 (153 to 156)

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



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40 (157 to 160)

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

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41 (161 to 164)

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

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42 (165 to 168)

<p style="text-align: right;">165</p> <p><b>1 officer. I just decide I'm taking the -- I'll be</b></p> <p><b>2 the first arresting officer.</b></p> <p>3 Q Are you aware of any CPD rules or guidelines</p> <p>4 in place to decide who should be listed as first</p> <p>5 versus second arresting officer?</p> <p><b>6 A Not that I'm aware as long as you indicate</b></p> <p><b>7 the facts truthfully and accurately as possible in a</b></p> <p><b>8 case report.</b></p> <p>9 Q Why is Nichols listed as assisting arresting</p> <p>10 officer and the second arresting officer?</p> <p><b>11 A Might just be a typo.</b></p> <p>12 Q And it's with different beats?</p> <p><b>13 A Might just be a typo on my part.</b></p> <p>14 Q Is there any reason you can think of other</p> <p>15 than a typo?</p> <p><b>16 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</p> <p>18 additional officer listed as an assisting arresting</p> <p>19 officer?</p> <p><b>20 A I might just click -- put his star number by</b></p> <p><b>21 accident and then would delete it.</b></p> <p>22 Q When you fill out this form, are you -- do</p> <p>23 you have to manually type in the beat?</p> <p><b>24 A Yes.</b></p>	<p style="text-align: right;">167</p> <p><b>1 A That could also be fair.</b></p> <p>2 Q What are you trying to capture when you</p> <p>3 write down assisting arresting officers on a report?</p> <p><b>4 A Person that assisted you in your lawful duty</b></p> <p><b>5 as an officer.</b></p> <p>6 Q And that can range from just having</p> <p>7 responded to the call and being at the scene to</p> <p>8 what?</p> <p><b>9 A Helping with paperworks, helping with</b></p> <p><b>10 searches, various ways.</b></p> <p>11 Q If Bolton would have had a substantive role</p> <p>12 in the response, it would have been listed in the</p> <p>13 narrative; is that right?</p> <p><b>14 A Yes.</b></p> <p>15 Q It says in here Beat 264A located the</p> <p>16 vehicle -- I'm paraphrasing. I'm not quoting. But</p> <p>17 located the vehicle at 57 South King in the west</p> <p>18 alley unoccupied.</p> <p><b>19 A Yes.</b></p> <p>20 Q And then it says that beat relocated the</p> <p>21 vehicle to the 2nd District?</p> <p><b>22 A Yes.</b></p> <p>23 Q Do you know who provided you with that</p> <p>24 information?</p>
<p style="text-align: right;">166</p> <p>1 Q So you have to assign -- so when you write</p> <p>2 Bolton, Beat 264B, you're actually writing 264B?</p> <p><b>3 A Typing it, yes.</b></p> <p>4 Q And that's not a drop-down or anything?</p> <p><b>5 A There is. You can type it or there's a</b></p> <p><b>6 drop-down.</b></p> <p>7 Q But it's not like it autopopulates, like you</p> <p>8 put in a name and it --</p> <p><b>9 A No.</b></p> <p>10 Q What was Brian Bolton's role in the arrest</p> <p>11 of Mr. McDaniels?</p> <p><b>12 A I couldn't tell you. Might have been</b></p> <p><b>13 arrived on the scene, but I couldn't tell you what</b></p> <p><b>14 his role was.</b></p> <p>15 Q What is the point of writing him down as an</p> <p>16 assisting arresting officer?</p> <p><b>17 A What is the point?</b></p> <p>18 Q Yeah.</p> <p><b>19 A If he showed up at my call, whether he did</b></p> <p><b>20 minimal, he could be an assisting unit. Whether</b></p> <p><b>21 it's just standing there or making sure everything</b></p> <p><b>22 is okay, he could be an assisting unit.</b></p> <p>23 Q Or he might not have had any role. Is that</p> <p>24 fair?</p>	<p style="text-align: right;">168</p> <p><b>1 A One of the officers on Beat 264A. I might</b></p> <p><b>2 have spoken earlier that I said 264 David, but that</b></p> <p><b>3 beat that day was actually 264 Adam.</b></p> <p>4 Q But you're talking about the same people you</p> <p>5 mentioned earlier, right?</p> <p><b>6 A Smith, Coco, and Mohammed.</b></p> <p>7 Q And the only way that you know that it was</p> <p>8 someone from that beat who told you that they had</p> <p>9 found a car unoccupied and brought it back to the</p> <p>10 station is because you wrote down Beat 264A in this</p> <p>11 report?</p> <p><b>12 A Well, the car being located at 5720, that</b></p> <p><b>13 was broadcast over the air. Being relocated to the</b></p> <p><b>14 2nd District, I would have had to receive that</b></p> <p><b>15 information from one of those three officers.</b></p> <p>16 Q And you remember sitting here today, you</p> <p>17 have an independent recollection of hearing that the</p> <p>18 car had been located at 5720?</p> <p><b>19 A Yes.</b></p> <p>20 Q But you don't remember who said it?</p> <p><b>21 A No, I don't.</b></p> <p>22 Q Were you only on certain channels over the</p> <p>23 radio?</p> <p><b>24 A It would be the 2nd District broadband,</b></p>

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<p style="text-align: right;">169</p> <p>1 whatever the 2nd District frequency would be.</p> <p>2 Q But you don't remember what that is at this</p> <p>3 time?</p> <p>4 A It would be Zone 5.</p> <p>5 Q Zone 5?</p> <p>6 A Yes.</p> <p>7 Q At the time it was Zone 5?</p> <p>8 A I think it's still Zone 5.</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 A Put in the beat. I thought it was</p> <p>13 sufficient enough. When it came to court, the</p> <p>14 State's Attorney could have actually asked what</p> <p>15 individual actually located the car. But I thought</p> <p>16 it was sufficient just putting the beat number that</p> <p>17 one of them -- Beat 264 Adam relocated the car to</p> <p>18 the 2nd District.</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 A I didn't felt it was necessary at that time.</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 A Because I already put down what beat</p>	<p style="text-align: right;">171</p> <p>1 A It would have been indicated somewhere.</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 A Yes.</p> <p>5 Q And how did you know that?</p> <p>6 A How did I know that? I recovered the gun.</p> <p>7 Q And then what did you do with the gun when</p> <p>8 you recovered it?</p> <p>9 A I deemed it safe.</p> <p>10 Q What did you do to deem it safe?</p> <p>11 A I would eject the slide back so the</p> <p>12 ammunition would eject out. Then I would make a</p> <p>13 physical -- visual and physical inspection of the</p> <p>14 gun, making sure there's no other live rounds in the</p> <p>15 gun.</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 A Kept it on my person.</p> <p>20 Q Until when?</p> <p>21 A Until we got to the 2nd District.</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 A I probably kept it in one of my pockets if I</p>
<p style="text-align: right;">170</p> <p>1 transported. I don't know who was driving so I</p> <p>2 don't know who transported, but I know it was Beat</p> <p>3 264 Adam.</p> <p>4 Q How fast was the Taurus moving when</p> <p>5 Mr. McDaniels got out?</p> <p>6 A The Taurus was moving?</p> <p>7 Q It was moving, right?</p> <p>8 A It was in motion, but I wouldn't -- maybe if</p> <p>9 I would have to guess, 3 miles, 2 miles an hour.</p> <p>10 Q Just barely rolling?</p> <p>11 A Yes.</p> <p>12 Q How far away was your car from the Taurus</p> <p>13 when Mr. McDaniels jumped out?</p> <p>14 A Maybe a car length, two at the most.</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 A To catch up with who?</p> <p>18 Q With Mr. McDaniels once he got out.</p> <p>19 A Probably seconds or a minute.</p> <p>20 Q Did he resist arrest at all?</p> <p>21 A Did he resist? I wasn't there when he was</p> <p>22 placed in custody. I don't believe so, no.</p> <p>23 Q If he would have resisted, it would have</p> <p>24 been --</p>	<p style="text-align: right;">172</p> <p>1 was wearing cargo pants. I'm not sure what kind of</p> <p>2 pants I was wearing.</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 A Probably -- I don't know if I did</p> <p>6 inventories. But if I did inventories, I would</p> <p>7 probably generated a unique inventory number with</p> <p>8 all the classification of the gun, serial number and</p> <p>9 all that. If not, if I didn't do the inventories, I</p> <p>10 probably would have handed that weapon to the person</p> <p>11 generating that inventory number.</p> <p>12 Q And then where would -- physically where</p> <p>13 would the gun go?</p> <p>14 A Where would the gun go?</p> <p>15 Q Yeah.</p> <p>16 A After we're done with inventory, it would be</p> <p>17 placed in a gun -- in a gun safe in the front desk</p> <p>18 until it's picked up by ERPS.</p> <p>19 Q To an evidence --</p> <p>20 A Evidence technician, yes.</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 A Like I said --</p>

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44 (173 to 176)

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



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45 (177 to 180)

177	<p>1 Q Do you remember how many people you arrested</p> <p>2 on November 21st, 2008?</p> <p>3 <b>A No, I don't.</b></p> <p>4 Q Do you know if you arrested anyone other</p> <p>5 than Mr. McDaniels?</p> <p>6 <b>A I don't recall if we did or not.</b></p> <p>7 Q You don't recall either way?</p> <p>8 <b>A No.</b></p> <p>9 Q Do you remember what kind of car you were</p> <p>10 driving that day?</p> <p>11 <b>A Most likely would have been a Crown Vic.</b></p> <p>12 Q But you don't remember specifically?</p> <p>13 <b>A I don't have no independent recollection</b></p> <p>14 <b>whether it was a Crown Vic, but most likely it would</b></p> <p>15 <b>be.</b></p> <p>16 Q Why do you think it was most likely a Crown</p> <p>17 Vic?</p> <p>18 <b>A That was the car we drove at that time.</b></p> <p>19 Q What color was it?</p> <p>20 <b>A Most likely it would have been gray.</b></p> <p>21 Q Did it have automatic windows or locks?</p> <p>22 <b>A I believe so.</b></p> <p>23 Q Both, both automatic windows and locks?</p> <p>24 <b>A Yes.</b></p>	179	<p>1 <b>A Probably one of the State's Attorney.</b></p> <p>2 Q Do you have any explanation as to why the</p> <p>3 tow truck driver is giving testimony that conflicts</p> <p>4 with your version of events?</p> <p>5 <b>A I can't --</b></p> <p>6 MR. ZECCHIN: Objection, form and</p> <p>7 foundation.</p> <p>8 <b>A I can't answer that question.</b></p> <p>9 Q So you don't know?</p> <p>10 <b>A I don't know.</b></p> <p>11 Q Have you ever spoken to the tow truck</p> <p>12 driver?</p> <p>13 <b>A No.</b></p> <p>14 Q And have you ever talked with anybody other</p> <p>15 than the State's Attorney about the car being towed?</p> <p>16 <b>A No.</b></p> <p>17 Q Do you know whether anyone else on the Watts</p> <p>18 264 team had any interactions with McDaniels --</p> <p>19 <b>A That I can't --</b></p> <p>20 Q (Continuing) -- the day of his arrest,</p> <p>21 November 21st, 2008?</p> <p>22 <b>A Could you repeat that?</b></p> <p>23 Q Yeah. I was going slow. I'll try again,</p> <p>24 so. . .</p>
178	<p>1 Q Do you know if your partner, Nichols, knew</p> <p>2 Mr. McDaniels?</p> <p>3 <b>A I don't recall.</b></p> <p>4 Q You don't know --</p> <p>5 <b>A I don't know if he knows Mr. McDaniels.</b></p> <p>6 Q Do you know if Mohammed knew Mr. McDaniels?</p> <p>7 <b>A That I don't know either.</b></p> <p>8 Q Were you pressed for time for any reason</p> <p>9 when you were back at the station after</p> <p>10 Mr. McDaniels had been arrested?</p> <p>11 <b>A I don't believe so.</b></p> <p>12 Q You had plenty of time to ask him whatever</p> <p>13 you wanted to?</p> <p>14 <b>A Yes.</b></p> <p>15 Q Did you hear a tow truck driver testify</p> <p>16 during Mr. McDaniels trial?</p> <p>17 <b>A I believe he did.</b></p> <p>18 Q Did you hear his testimony?</p> <p>19 <b>A No.</b></p> <p>20 Q Do you know his testimony conflicts with the</p> <p>21 idea that the car was towed from the 2nd District?</p> <p>22 <b>A I believe, yes, it did conflict with 2nd</b></p> <p>23 <b>District.</b></p> <p>24 Q And who told you that it conflicts with --</p>	180	<p>1 Do you know whether anyone else on the Watts</p> <p>2 264 team had any interaction with Mr. McDaniels on</p> <p>3 November 21st, 2008, other than the events that</p> <p>4 you've described today?</p> <p>5 <b>A I don't recall.</b></p> <p>6 Q You don't know?</p> <p>7 <b>A I don't know.</b></p> <p>8 Q Do you know whether anyone on the Watts 264</p> <p>9 team had any interactions with Mr. McDaniels on any</p> <p>10 other day ever?</p> <p>11 <b>A I don't know.</b></p> <p>12 Q You never asked anybody?</p> <p>13 <b>A No.</b></p> <p>14 Q I'm going to shift gears again and ask you</p> <p>15 about Christopher Scott.</p> <p>16 <b>A Okay.</b></p> <p>17 Q Do you know who Christopher Scott is?</p> <p>18 <b>A No, I don't.</b></p> <p>19 Q Do you have any recollection of being</p> <p>20 involved in arresting Mr. Scott?</p> <p>21 <b>A No, I don't.</b></p> <p>22 Q Are you aware, though, that you're a</p> <p>23 defendant in a lawsuit he's brought?</p> <p>24 <b>A Yes.</b></p>

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46 (181 to 184)

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

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47 (185 to 188)

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

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48 (189 to 192)

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

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49 (193 to 196)

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



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50 (197 to 200)

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

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51 (201 to 204)

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

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52 (205 to 208)

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

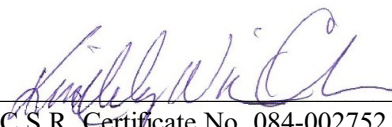
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53 (209 to 212)

<p style="text-align: right;">209</p> <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>for 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 style="text-align: right;">211</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 style="text-align: right;">210</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 style="text-align: right;">212</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>

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<p style="text-align: right;">213</p> <p>1     <b>A The Arrest report?</b></p> <p>2     MR. RAUSCHER: Object to form.</p> <p>3     <b>A No.</b></p> <p>4     Q And you didn't write the Vice Case Report in</p> <p>5 this case either, did you?</p> <p>6     <b>A No, I did not.</b></p> <p>7     MR. ZECCHIN: No other questions.</p> <p>8     MR. RAUSCHER: I think we're done.</p> <p>9     THE VIDEOGRAPHER: This concludes the</p> <p>10 deposition. Time, 3:39.</p> <p>11    MR. ZECCHIN: I'm going to reserve, please.</p> <p>12    (Off the record at 3:39 p.m.)</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>	<p style="text-align: right;">215</p> <p>1     CERTIFICATE OF SHORTHAND REPORTER</p> <p>2</p> <p>3     I, Kimberly R. Christopher, the officer</p> <p>4 before whom the foregoing proceedings were taken, do</p> <p>5 certify that the foregoing transcript is a true and</p> <p>6 correct record of the proceedings, that said</p> <p>7 proceedings were taken by me stenographically and</p> <p>8 thereafter reduced to typewriting under my</p> <p>9 supervision, and that I am neither counsel for,</p> <p>10 related to, nor employed by any of the parties to</p> <p>11 this case and have no interest, financial or</p> <p>12 otherwise, in its outcome.</p> <p>13    IN WITNESS WHEREOF, I have hereunto set my</p> <p>14 hand this 10th day of October 2019.</p> <p>15</p> <p>16</p> <p>17 </p> <p>18 _____</p> <p>19 C.S.R. Certificate No. 084-002752</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>
<p style="text-align: right;">214</p> <p>1     ACKNOWLEDGMENT OF DEPONENT</p> <p>2</p> <p>3</p> <p>4     I, MANUEL LEANO, do hereby acknowledge that</p> <p>5 I have read and examined the foregoing testimony,</p> <p>6 and the same is a true, correct, and complete</p> <p>7 transcription of the testimony given by me and any</p> <p>8 corrections appear on the attached errata sheet</p> <p>9 signed by me.</p> <p>10</p> <p>11</p> <p>12</p> <p>13 _____</p> <p>14 (DATE)                      (SIGNATURE)</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>	<p>1</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>



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