

Exhibit 8



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Transcript of Douglas Nichols

Date: December 19, 2019

Case: Watts Coordinated Cases

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Transcript of Douglas Nichols
Conducted on December 19, 2019

1 (1 to 4)

1	1 UNITED STATES DISTRICT COURT 2 NORTHERN DISTRICT OF ILLINOIS 3 EASTERN DIVISION 4 5 - - - - - x 6 WATTS COORDINATED CASES. : Master Docket 7 : Case No. 19-cv-01717 8 - - - - - x 9 10 11 12 Videotaped Deposition of 13 DOUGLAS NICHOLS, VOLUME I 14 Chicago, Illinois 15 Thursday, December 19, 2019 16 10:12 a.m. 17 18 19 20 21 22 Job No.: 273007 23 Pages: 1 - 194 24 Reported by: Joanne E. Ely, CSR, RPR	3
2	1 A P P E A R A N C E S 2 ON BEHALF OF CERTAIN PLAINTIFFS: 3 THERESA KLEINHAUS, ESQUIRE 4 LOEVY & LOEVY 5 311 North Aberdeen Street 6 Third Floor 7 Chicago, Illinois 60607 8 312.243.5900 9 10 ON BEHALF OF CERTAIN PLAINTIFFS: 11 JOEL FLAXMAN, ESQUIRE 12 200 South Michigan Avenue 13 Suite 201 14 Chicago, Illinois 60604 15 312-427-3200 16 17 18 19 20 21 22 23 24	4
2	1 Videotaped deposition of DOUGLAS NICHOLS, 2 Volume I, held at the location of: 3 4 5 LOEVY & LOEVY 6 311 North Aberdeen Street 7 Third Floor 8 Chicago, Illinois 60607 9 312.243.5902 10 11 12 Pursuant to notice, before Joanne E. Ely, 13 a Certified Shorthand Reporter, and a Notary 14 Public in and for the State of Illinois. 15 16 17 18 19 20 21 22 23 24	4
2	1 A P P E A R A N C E S C O N T I N U E D 2 ON BEHALF OF THE DEFENDANT CITY OF CHICAGO AND 3 VARIOUS POLICE DEPARTMENT SUPERVISORS: 4 DANIEL M. NOLAND, ESQUIRE 5 REITER BURNS LLP 6 311 South Wacker Drive 7 Suite 5200 8 Chicago, Illinois 60606 9 312.982.0090 10 11 ON BEHALF OF THE DEFENDANT WATTS: 12 AHMED A. KOSOKO, ESQUIRE 13 JOHNSON & BELL, LTD. 14 33 West Monroe Street 15 Suite 2700 16 Chicago, Illinois 60603 17 312.372.0770 18 19 20 21 22 23 24	4

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2 (5 to 8)

5	7
1 A P P E A R A N C E S C O N T I N U E D 2 ON BEHALF OF THE DEFENDANT MOHAMMED: 3 ERIC PALLES, ESQUIRE 4 RAVITZ & PALLES, PC 5 203 North LaSalle Street 6 Suite 2100 7 Chicago, Illinois 60601 8 312.558.1689 9 10 ON BEHALF OF THE DEFENDANT OFFICERS: 11 WILLIAM E. BAZAREK, ESQUIRE 12 HALE & MONICO 13 53 West Jackson Street 14 Suite 337 15 Chicago, Illinois 60604 16 312.870.6902 17 18 ALSO PRESENT: 19 RICK KOSBERG, Videographer 20 21 22 23 24	1 E X H I B I T S C O N I N U E D 2 3 NICHOLS DEPOSITION EXHIBITS PAGE 4 Exhibit 11 Affidavit of Christopher Scott 114 5 Exhibit 12 Photo of Jamell Sanders 123 6 Exhibit 13 Jamell Sanders Arrest Report 124 7 Exhibit 14 Jamell Sanders Vice Case 125 8 Report 9 Exhibit 15 Affidavit of Jamell Sanders 126 10 Exhibit 16 Photo of Cleon Glover 128 11 Exhibit 17 Cleon Glover Arrest Report 128 12 Exhibit 18 Cleon Glover Vice Case Report 135 13 Exhibit 19 Cleon Glover Original Case 135 14 Incident Report 15 Exhibit 20 Cleon Glover Inventory Report 136 16 Exhibit 21 Affidavit of Cleon Glover 137 17 Exhibit 22 Photo of Brian Hunt 141 18 Exhibit 23 Brian Hunt Arrest Report 141 19 Exhibit 24 Brian Hunt Vice Case Report 142 20 Exhibit 25 Affidavit of Brian Hunt 142 21 Exhibit 26 Willie Martin Complaint 145 22 Exhibit 27 Willie Martin Arrest Report 150 23 Exhibit 28 Willie Martin and Coleathen 151 24 Jefferson Vice Case Report
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1 C O N T E N T S 2 3 EXAMINATION OF DOUGLAS NICHOLS PAGE 4 By Ms. Kleinhaus 10 5 6 E X H I B I T S 7 (Attached to transcript.) 8 9 NICHOLS DEPOSITION EXHIBITS PAGE 10 Exhibit 1 4/4/18, Letter, Magats to 15 11 Valente 12 Exhibit 2 Photo of Andre McNairy 98 13 Exhibit 3 Andre McNairy Trial Transcript 99 14 Exhibit 4 Andre McNairy Arrest Report 100 15 Exhibit 5 Andre McNairy Original Case 103 16 Incident Report 17 Exhibit 6 Andre McNairy Inventory Report 104 18 Exhibit 7 Affidavit of Andre McNairy 105 19 Exhibit 8 Photo of Christopher Scott 110 20 Exhibit 9 Christopher Scott Arrest 111 21 Report 22 Exhibit 10 Christopher Scott Vice Case 114 23 Report 24	1 E X H I B I T S C O N I N U E D 2 3 NICHOLS DEPOSITION EXHIBITS PAGE 4 Exhibit 29 eTrack Chain of Custody 154 5 Exhibit 30 Photo of James Moore 160 6 Exhibit 31 James Moore Arrest Report 161 7 Exhibit 32 Affidavit of James Moore 165 8 Exhibit 33 Photo of Lionel White, Jr., 168 9 Exhibit 34 Lionel White, Jr., Arrest 169 10 Report 11 Exhibit 35 Affidavit of Lionel White, Jr. 173 12 Exhibit 36 Photos of Frank Saunders 174 13 Exhibit 37 Frank Saunders Arrest Report 175 14 Exhibit 38 Affidavit of George Almond 186 15 Exhibit 39 Deandre Bell Vice Case Report 190 16 Exhibit 40 Affidavit of Deandre Bell 190 17 18 19 20 21 22 23 24

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9	P R O C E E D I N G S THE VIDEOGRAPHER: This is the video deposition of Douglas Nichols taken by Loevy & Loevy in the matter of the Watts coordinated pretrial proceedings, Master Docket 19-cv-01717 held at Loevy & Loevy, 311 Aberdeen Street, Chicago, Illinois. Today is December 19th, 2019. The time is 10:10. The court reporter is Joanne Ely of Planet Depos. The videographer is Rick Kosberg. Counsel can now introduce themselves, and the court reporter is free to administer the oath. MS. KLEINHAUS: Theresa Kleinhaus for the Loevy Plaintiffs. MR. FLAXMAN: Joel Flaxman for various plaintiffs. MR. PALLES: Eric Palles for Kallatt Mohammed. MR. KOSOKO: Ahmed Kosoko on behalf of Ronald Watts. MR. NOLAND: Daniel Noland for the City and supervisory defendants. MR. BAZAREK: William E. Bazarek for Defendant Nichols as well as the other officers	11
10	represented by Hale and Monico. THE WITNESS: Douglas E. Nichols, Jr., Chicago Police Department. THE REPORTER: Would you raise your right hand, please. (Witness sworn.) DOUGLAS NICHOLS, having been duly sworn, testified as follows: EXAMINATION BY COUNSEL FOR CERTAIN PLAINTIFFS BY MS. KLEINHAUS: Q Good morning, Officer Nichols. A Good morning. Q I introduced myself before we were on the record. My name is Tess Kleinhaus. I represent a number of the plaintiffs in these coordinated proceedings. What did you do to prepare for today's deposition? A I met with my lawyers, and I went over some documents. Q What documents did you go over? A Vice case report, arrest report, general offense case reports, and that's basically it. Q Have you reviewed the complaints that have	12
	been filed in the lawsuits against you? A No. Not really, no. Q You've been deposed before; right? A I have. Q Okay. Just to remind you of how it works, I'll do my best not to talk over you; and if you can do your best not to talk over me, that makes it easier for the court reporter; is that fair? A That's fair. Q If you answer one of my questions, I'll assume that you understood the question; is that fair? A That's fair. Q If I ask a bad question, you need to tell me, and I'll rephrase it. Okay? A Yes. Q Are you on any medication or do you have any medical conditions that would prevent you from providing accurate testimony today? A No, I'm not. Q Are you currently employed by the Chicago Police Department? A Yes, I am. Q Okay. How long have you been employed by	
	the Chicago Police Department? A I got hired by the Chicago Police Department 24 February of 2003. Q And what do you currently do for CPD? A I'm currently assigned to the 2nd District, Chicago Police Department. Q What do you do at the 2nd District? A I do admin work right now, currently, in the Chicago Police Department, 2nd District. Q Okay. And what does that admin consist of? A The admin consists of inside duties, which consist of TSS cards. I enter TSS cards. I entered -- well, I put up a board, what we call "caboodle," and it was crimes that were happening in the 2nd District. I put a peg where that was going -- that was happening, and I printed up a little summary of what it was, with the RD number, the date, any offenders, anything like that, and I put it on the board in the tac office. Q Okay. What is a TSS card? A A TSS card is a traffic stop. Q So you're doing data entry of the	

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4 (13 to 16)

13 1 information from the traffic stop? 2 A That's correct. 3 Q How long have you had an admin role at the 4 2nd District? 5 A Since November of 2017. 6 Q Would you refer to that role as desk duty? 7 MR. BAZAREK: I would object to the form 8 of the question, vague, and ambiguous. 9 Q Would you also -- I'm sorry. Just go 10 ahead and answer. 11 A I don't know what desk duty is. I'm 12 admin. I know I'm admin. 13 Q Okay. You've never heard your current 14 situation described as desk duty? 15 A Not me personally, no. 16 Q Okay. Do you know why you were 17 transferred to an admin role? 18 MR. KOSOKO: Objection; form of the 19 question, calls for speculation, vague, and 20 ambiguous. 21 Q Okay. And unless your -- 22 MR. BAZAREK: Join. 23 Q Excuse me. Unless your attorney tells you 24 not to answer, you still can answer despite the	15 1 A No, I don't. 2 Q Are you aware that it relates to the 3 willingness of the state's attorney's office to 4 call you as a witness? 5 MR. BAZAREK: I'd object to the form of 6 that question. 7 A Could you repeat that question? 8 Q Sure. 9 MS. KLEINHAUS: Can you read it back. 10 (Pending question read.) 11 MR. BAZAREK: Also a further objection, 12 vague, ambiguous, compound. I don't understand 13 it. 14 A I'm not sure. I don't know. 15 (Nichols Deposition Exhibit 1 marked for 16 identification and attached to the transcript.) 17 Q Okay. Let me show you what we'll mark as 18 Exhibit 1. Take a second to review it, and I'll 19 ask you some questions about it. 20 A Okay. 21 Q Okay. Have you seen this letter before? 22 A This is the first time I'm seeing this 23 letter. 24 Q Okay. Look with me, please, to the last
14 1 objection. Okay? 2 A Okay. 3 Q Go ahead. 4 A My understanding is because of these 5 lawsuits that we're sitting here today for. 6 Q Who told you that you would be placed in 7 an administrative role? 8 A My commander at the time and the captain 9 at the time. 10 Q Who was your commander at the time? 11 A Crystal King Smith. 12 Q And how did she tell you that you were 13 going to be put in an administrative role? 14 A If I recall, I don't remember 100 percent 15 what she exactly said, but she said I was going to 16 be inside. 17 Q Okay. Did she tell you why? 18 A I don't recall. 19 Q Did you ask why? 20 A No. 21 Q Other than knowing it's related to the 22 lawsuits we're here for today, do you have any 23 other information about why you were put in an 24 admin role?	16 1 sentence in this letter. It says, "Please be 2 advised that the state's attorney's office has 3 concluded it will no longer call Officer Nichols 4 as witness in any pending or future matter" hand- 5 -- excuse me -- "handled by the state's attorney's 6 office due to concerns about his credibility and 7 alleged involvement in the misconduct of Sergeant 8 Watts." 9 Do you see that? 10 A I do. 11 Q Prior to seeing this letter, had you been 12 informed that the state's attorney's office would 13 no longer call you as a witness? 14 A I just saw on the news the original 15 letter, the news, and that was it, but my name was 16 not on that letter. That's when I first saw the 17 letter. But this particular letter, this is the 18 first I'm seeing this letter. 19 Q But did anyone from the Chicago Police 20 Department tell you that the state's attorney's 21 office would not call you as a witness? 22 A No. 23 Q Okay. Did anyone from the Chicago Police 24 Department tell you that there were concerns about

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17 1 your credibility as a witness? 2 A No one in the Chicago Police Department 3 said anything about my credibility. 4 Q Okay. You can put that exhibit to the 5 side. 6 You said your captain also talked to you 7 about being placed in an administrative role. 8 Who was that? 9 A His name is Mark Moore. 10 Q How do you spell his last name, please? 11 A I'm not 100 percent sure, but I think it's 12 M-o-o-r-e, if I'm not mistaken. 13 Q Okay. And what did Captain Moore tell you 14 about your transfer into an administrative role? 15 A Just basically we were going into 16 administrative duties. 17 Q Did he tell you why? 18 A I don't recall. 19 Q Did you ask why? 20 A I don't believe I did, no. 21 Q Why didn't you want to know the reason? 22 MR. NOLAND: Object to the form of the 23 question, foundation. 24 MR. BAZAREK: Join.	19 1 or up until today with Officer Leano about why the 2 two of you were placed on administrative duty? 3 A Briefly. 4 Q What did that conversation consist of? 5 A About these lawsuits and we think it's 6 unfair of why we're in this situation. 7 Q Did anybody tell you -- I'm sorry -- 8 strike that, please. 9 Did anyone from the Chicago Police 10 Department tell you that you were placed on 11 administrative duty because of these lawsuits? 12 A I don't recall. 13 Q How did you learn that administrative 14 duty -- your administrative duty was connected to 15 these lawsuits? 16 A Well, I found out by the letter, this 17 letter when I met with my attorneys. That's how I 18 found out that I was not on this list, on the 19 so-called list. 20 Q Okay. 21 MR. BAZAREK: Don't discuss any 22 conversations with your counsel. 23 Q Do you know how long you'll be on 24 administrative duty?
18 1 MR. KOSOKO: Join. 2 MR. PALLES: Join. 3 A I don't know. I don't know what -- my 4 conversation with him, like I stated before. 5 BY MS. KLEINHAUS: 6 Q Okay. Was this a conversation you had 7 with Captain Moore in person? 8 A Could you repeat that question? 9 Q Did you talk with Captain Moore about your 10 transfer to an administrative role in person? 11 A Yes. It was myself, Captain Moore, and 12 Crystal King Smith in person. 13 Q Okay. Was anyone else present for that 14 meeting? 15 A Yes. 16 Q Who else? 17 A My partner at the time, Officer Leano. 18 Q Anyone else? 19 A No. Not that I recall, no. 20 Q Did Officer Leano ask why you were being 21 transferred to administrative duty? 22 MR. NOLAND: Objection; foundation. 23 A I don't recall. 24 Q Did you have any conversation either then	20 1 MR. BAZAREK: Object to the form of the 2 question, speculation. 3 BY MS. KLEINHAUS: 4 Q Go ahead. 5 A I have no idea. 6 Q Do you consider being placed on 7 administrative duty a punishment? 8 MR. NOLAND: Object to the form of the 9 question, foundation. 10 MR. BAZAREK: Join. 11 A Absolutely, 100 percent I feel it's a 12 punishment. 13 Q And have you ever asked anyone at the 14 Chicago Police Department what you're being 15 punished for? 16 A No. 17 Q Prior to being placed on administrative 18 duty at the 2nd District, what were you doing? 19 A When I first got hired by the Chicago 20 Police Department, I went to the academy. After 21 the academy, I went to the 15th District. I did 22 my probation there; and then right before my 23 probation, I got sent to the 2nd District. 24 When I got to the 2nd District, I was

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6 (21 to 24)

21	1 working midnights; and after I was working 2 midnights as a beat patrol officer, I went to the 3 tactical division, tactical, slash, housing in 4 November of 2004. 5 Q And you've been assigned to the 2nd 6 District ever since? 7 A Yes. 8 Q What was the approximate time frame that 9 you were in the academy? 10 A If I had to guess 24 February of '03, and 11 I'm not sure when I graduated. I think it was 12 August of '03, if I'm not mistaken. I could be 13 wrong on that. 14 Q How long were you assigned to the 15th 15 District? 16 A I'm guessing again, I'm not 100 percent 17 sure, but I did my probation there. So probably 18 around six months, if I had to guess. I'm 19 guessing. 20 Q When you left the 15th District to go to 21 the 2nd District, was that the result of a bidding 22 process? 23 A To the best of my knowledge, when I got 24 sent to the 2nd District -- you get assigned to a	23	1 reports? 2 A I believe so, yes. 3 Q Okay. What did that consist of? 4 MR. NOLAND: Objection; overly broad. 5 MR. BAZAREK: Join. 6 MR. KOSOKO: Join. 7 A To the best of my knowledge, to fill in 8 the blanks, to write the narratives stating the 9 facts and what occurred to it, and filling out 10 each box that was pertinent to the case. 11 Q When you were taught to write up the 12 narratives, were you trained to include 13 information about which officer performed which 14 tasks in the arrest? 15 MR. KOSOKO: Objection; form of the 16 question, vague. 17 MR. BAZAREK: Join. 18 A I don't recall. I don't remember. 19 Q Were you taught at the academy, as part of 20 your training on writing police reports, about 21 which officer should write up the narrative 22 portion of the report? 23 A Not that I'm aware of, no. 24 Q Were you given any training about who
22	1 district after your -- right before the end of 2 your probation, and you get assigned to a 3 district, and I happened to get assigned to the 4 2nd District. 5 Q Okay. So that was not something that you 6 had any ability to select or rank that you wanted 7 to go to the 2nd District? 8 A Not at all because at the time I was 9 living up north, and I didn't want to go to the 10 2nd District because it was quite a distance. 11 Q How long did you work midnights in the 2nd 12 District as a beat officer? 13 A If I'm not mistaken, I think I got to the 14 2nd District around June or July of '04, if I'm 15 not mistaken; and so probably a couple of months 16 before I went to tac in November of '04. 17 Q Okay. Was going to the tac team something 18 that you requested? 19 A No, it wasn't. 20 Q Do you know why you were placed on the 21 tactical team? 22 A No, I don't. I don't know why. 23 Q When you were at the academy, did you 24 receive some training on how to write police	24	1 should be listed as the first arresting officer 2 and the second arresting officer? 3 A As of which time? In the academy or -- 4 Q At any point. 5 A No. To the best of my knowledge, whoever 6 is in box 1 is the one who is reporting the 7 offense. 8 Q Does that mean the person that's listed in 9 Box 1 writes the narrative portion of the report? 10 MR. BAZAREK: Object to the form of the 11 question. 12 MR. KOSOKO: Join. 13 A Typically, yes. To the best of my 14 knowledge, the person in Box 1 would typically 15 write the narrative to the case report -- or the 16 case report. 17 Q When you were working midnights in the 2nd 18 District before you became part of the tac team, 19 was report writing part of your responsibilities? 20 A Yes. 21 Q And would supervisors review the reports 22 that you wrote? 23 A Yeah. Supervisors would review the 24 reports. That's correct.

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7 (25 to 28)

25	1 Q Do you feel that you had adequate training 2 on report writing at the academy? 3 A I don't remember the class on reporting, 4 so I couldn't answer that question. 5 Q Did anyone at the 2nd District ever tell 6 you there was anything deficient or wrong with the 7 way you were writing up reports? 8 A No. 9 Q And you were trained that the reports 10 would be used as part of criminal proceedings; 11 right? 12 MR. KOSOKO: I'm going to object to the 13 form of the question, calls for speculation, 14 ambiguous. 15 MR. BAZAREK: Join. 16 A Yes. I would expect my reports to be in 17 the court proceedings. 18 Q When you joined the tactical team at the 19 2nd District, who was your supervisor? 20 A When I got assigned to the tactical team, 21 my supervisor was Ronald Watts. 22 Q Did Sergeant Watts ever give you any 23 training or instruction on report writing? 24 A No, he did not.	27	1 MR. KOSOKO: Join. 2 MR. BAZAREK: Join. 3 A I went to court a lot, yes. 4 BY MS. KLEINHAUS: 5 Q When you needed to go to court as part of 6 your job, what would you do to prepare to testify? 7 MR. NOLAND: Objection; incomplete 8 hypothetical. 9 MR. BAZAREK: Join. 10 MR. KOSOKO: Join. 11 A When I went to court, I would talk to the 12 state's attorneys, and I would review my reports, 13 any reports that were pertinent to the case. 14 Q When you would meet with the state's 15 attorney, would other police officers typically be 16 present for that preparation session with the 17 prosecutor? 18 MR. BAZAREK: Object to the form, 19 foundation. I'll just make a standing objection 20 on this whole line of questioning. I don't know 21 if I want to interfere with every question that 22 you ask. So that's my objection. 23 A It's on -- yes. 24 Q Were you provided any training during the
26	1 Q At any point during your career with the 2 Chicago Police Department, did you receive 3 training on how to testify in court? 4 MR. NOLAND: Object to the form. 5 MR. KOSOKO: Join. 6 A I don't know if we had a class in the 7 academy. I don't remember if we had, like, a mock 8 trial, like how to; but not how to testify, no, if 9 that's what you're -- I don't understand what you 10 mean, how to testify. 11 BY MS. KLEINHAUS: 12 Q Did you receive any training related to 13 testimony in court? 14 A Like I said before, we might have in the 15 academy of how it's like to testify in court but 16 not how to testify. 17 Q How many times have you testified in 18 court? 19 A Many, a lot. 20 Q Okay. Dozens? 21 A I don't know the number, a lot. 22 Q That was a routine part of your job before 23 you were put on administrative duty; right? 24 MR. NOLAND: Object to the form, routine.	28	1 course of your career with the Chicago Police 2 Department, before you were placed in the 3 administrative role, on how to gather information 4 about narcotic sales? 5 MR. KOSOKO: I'm going to object to the 6 form of the question, vague, ambiguous. 7 A Could you repeat that question, ma'am. 8 Q Sure. In the course of your career with 9 the Chicago Police Department before you were 10 placed in an administrative role, were you given 11 any training about how to find out information or 12 investigate narcotic sales? 13 A I don't believe so, no. 14 Q When you were assigned to the 2nd District 15 on patrol on the midnight shift, did you know 16 Sergeant Watts? 17 A I did not. I did not know who Sergeant 18 Watts was. 19 Q When did you first come to know Sergeant 20 Watts? 21 A The first time I met Sergeant Watts was 22 the first day that I was working in the tactical 23 unit when I -- my first day in tactical. 24 Q What was the difference in terms of your

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8 (29 to 32)

29	1 job duties when you were assigned to patrol in the 2 2nd District on midnights versus when you were on 3 the tactical team? 4 A For the most part when you're in that 5 tactical unit, you're in plainclothes. For the 6 most part, you don't answer any calls that are not 7 urgent calls. You don't answer like domestic 8 calls or anything like that, criminal trespass -- 9 or you could answer criminal trespass calls. 10 The main difference, when you're working a 11 beat car, you're in a uniform in a marked squad 12 car. 13 Q When you were part of the tactical team at 14 the 2nd District, how would your duties for each 15 shift be assigned? 16 A Typical in my duties when I first got 17 assigned was the same thing. I was assigned to 18 the 264 housing, slash, tactical team. 19 Q And what would you do on a particular -- 20 on a -- excuse me -- in a typical shift on that 21 team, how would you know what your duties were for 22 that shift? 23 A My typical duties were basically the same 24 thing every day. On some circumstances, we would	31	1 team was senior to you in terms of experience? 2 MR. BAZAREK: I will just object to the 3 form of the question. It's a bit vague, and 4 ambiguous. 5 A I don't understand what you mean by 6 experience. 7 BY MS. KLEINHAUS: 8 Q Were there people on that team who had 9 more experience as a police officer than you did? 10 A If you're talking about experience as a 11 police officer, I was the baby on the team. I had 12 the least amount of time on the team at the time. 13 Q Who joined the team next after you? 14 A I don't know. I don't understand the 15 question. 16 Q Did other people join the team after you 17 joined the team? 18 A We had other people join the 264 team, if 19 that's what you're -- I still don't understand the 20 complete question. 21 Q Okay. What about it is confusing? 22 A What do you mean joining, or when did they 23 join? 24 Q People were added to the team after you
30	1 have roll call. Our sergeant would lead that roll 2 call or any other supervisor would lead the roll 3 call. 4 During the roll call, they would tell us 5 our shift that day, like if we were doing anything 6 in particular; or they might even tell us what was 7 happening in the district of recent shootings, 8 burglaries, robberies, et cetera, anything 9 pertinent that we should know that was happening 10 inside the district. 11 Q Who was part of the tactical team when you 12 joined it? 13 A When I first joined it was -- my 14 supervisor was Ron Watts. Then there was Officer 15 Young, Officer Jones, Bolton, Gonzalez, myself, 16 Leano, Smith, and I believe Torres when I first -- 17 I got assigned to the 2nd District tactical. 18 Q Torres, is that T-o-r-r-e-s? 19 A I'm not 100 per- -- I don't know. 20 Q Okay. What's Torres's first name? 21 A I believe it's Cynthia, and it might be 22 Tornes. I'm not 100 percent sure what -- it's 23 Torres or Tornes. 24 Q Okay. Other than Ron Watts, who on that	32	1 were already on it; right? 2 A Yes. 3 Q Okay. Who was the next person who was 4 added to the team? 5 A I don't know. 6 Q Who was your partner when you were first 7 assigned to the tactical team? 8 A My -- I got assigned to Officer Leano. 9 That was my partner. 10 Q Okay. Did he remain your partner 11 throughout the time that you were on the tactical 12 team? 13 A Yes. And then I went back to the patrol 14 for a couple months; and then when I went back to 15 the tactical team, he was my partner. 16 Q When did you go back to patrol for a 17 couple months? 18 A I believe it was sometime in 2008. 19 Q And why did you go back to patrol in 2008? 20 A To the best of my knowledge of why I did 21 go back to patrol, because I didn't follow the 22 chain of command. 23 Q Was it a form of discipline that you were 24 put back in patrol?

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9 (33 to 36)

33	1 A I really don't know. The reason that I 2 think I went back to patrol, I had a trip booked 3 and I had my airlines booked and everything. I 4 went to my tactical lieutenant at the time, and I 5 asked -- well, before that -- strike that. Before 6 that I tried to put in time, and I got denied. 7 So I went to my tactical lieutenant, asked 8 him if I could get the time granted. 9 He said, No. 10 And I said, Okay. I'll talk to the 11 district commander at the time. 12 And he said, Don't worry about it. She is 13 on my side. She is already aware of the 14 situation. You're just going to waste your time. 15 So I didn't know what to do. So I went to 16 the first deputy at the time, spoke to him, and my 17 time was granted. To the best of my knowledge, I 18 thought that I got replaced and went back to 19 patrol because I didn't follow the chain of 20 command. 21 Q Okay. When you say you didn't follow the 22 chain of command, you mean because you skipped 23 talking to the commander? 24 A That's correct.	35	1 Sergeant Jones was, and I don't recall who the 2 other sergeants were at the time. 3 Q And that's Sergeant Jones -- that's not Al 4 Jones; right? 5 A No. 6 Q What's the first name of that Sergeant 7 Jones that you're referring to? 8 A Donald Jones. 9 Q How long were you reassigned to patrol 10 in 2008? 11 A If I had to guess, maybe six months or 12 less, I would think. I'm guessing. 13 Q Did you want to return to the tactical 14 team? 15 A I did. 16 Q And why was that? 17 A Because I liked the hours. I liked what I 18 was doing back there. I felt comfortable with my 19 partner, working with my partner, and I liked what 20 I was doing. I thought I was a good officer and I 21 liked -- I really liked what I was doing. 22 Q What did you like about it? 23 A I liked making a difference out there. I 24 liked talking to citizens. I liked interacting
34	1 Q Who was the lieutenant that you spoke 2 with? 3 A That was Lieutenant Anthony Carothers. 4 Q And who was the commander that he said was 5 already aware and on his side? 6 A That was Commander Genessa Lewis. 7 Q And who was the first deputy that you 8 spoke with? 9 A I believe that was Joe Patterson. 10 Q How did you find out that you were being 11 moved back to patrol? 12 A It was a to/from printed up in the CO 13 book, and I believe my sergeant at the time 14 informed me that I was going back to patrol. 15 Q Was that Sergeant Watts? 16 A No. I don't believe Sergeant Watts was 17 there at the time. 18 Q Who told -- which supervisor told you? 19 A I do not know which supervisor it was. It 20 was one of the supervisors that were in the 21 tactical unit at the time. 22 Q Who were the other supervisors in the 23 tactical unit at the time? 24 A I don't remember all of them. I know	36	1 with people. If a person was doing something 2 wrong, I would enforce the law, and I would arrest 3 that person. 4 Q And how was that -- how was it different 5 on the patrol side in terms of what you were doing 6 or your interactions with citizens? 7 A Basically, no different interactions with 8 citizens. 9 Q How did you get switched back into the 10 tactical team? 11 A I talked to the commander at the time, met 12 with her, explained the situation. We talked, and 13 then she reassigned me back to the tactical unit. 14 Q Was that Commander Lewis? 15 A Yes, it was. 16 Q Did she tell you that you had been moved 17 to patrol because you skipped a portion of the 18 chain of command? 19 A I don't recall. I don't know. 20 Q When you were assigned to the tactical 21 team, what areas of the 2nd District were you 22 assigned to? 23 A Could you repeat that question, ma'am. 24 Q Sure. Let me try and ask it better.

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10 (37 to 40)

37 1 Were there physical or geographic areas 2 within the 2nd District that you were assigned to 3 when you were part of the tactical team? 4 A As of which time? 5 Q Let's start with when you first joined in 6 November of 2004. 7 A When I first got assigned, I was assigned 8 to the 264 housing/tactical team. So we -- our 9 main focus was on the scattered sites, housing 10 projects in the 2nd District. 11 Q And which housing projects were those? 12 A There was scattered sites on Stateway 13 which is up and down State Street. There's the 14 Ida B. Wells housing complex which consists of 15 35th to 39th, from King Drive to Cottage. 16 There's scattered sites, 40th and 17 Vincennes, Washington Park Homes; and that's what 18 basically -- if I can remember correctly, that's 19 what we were patrolling. 20 Q Did that change at some point? 21 A Yes. Later in my career, it did, yes. 22 Q When did it change? 23 A When all the scattered sites of housing -- 24 the housing projects were getting torn down.	39 1 Q And when did your assignment to the 264 2 tactical team end? 3 A I left the 264 tactical team briefly. I 4 went to another -- well, I went back to the watch, 5 and then I went -- after I came back, I went to 6 another tactical team. 7 Q Which tactical team is that? 8 A I believe it was the 263 tactical team. 9 Q Who was your supervisor when you were part 10 of the 263 team? 11 A Sergeant Kochanny. 12 Q Do you know how to spell Kochanny? 13 A I'm guessing K-o-c-h-a-n-n-y. I'm 14 guessing. 15 Q Okay. And when was it that you were 16 assigned to tactical team 263? 17 A I'm guessing also. Probably 2012, 18 '13-ish, I'm guessing. I'm not 100 percent sure. 19 I'm not 100 percent sure. 20 Q Was it after Sergeant Watts had been 21 arrested? 22 A Yes. 23 Q Was the reason that you were switched to 24 tactical team 263 because Sergeant Watts was
38 1 Q Do you recall when that was? 2 A If I had to guess, I would say around 2008 3 or 2009, I believe. I'm guessing. 4 Q Were there other tactical teams besides 5 the one that you were on that were also assigned 6 to go to the housing projects within the 2nd 7 District? 8 A Yes. There was another tactical team, and 9 they were the 266 housing, slash, tactical team. 10 Q Was there any difference between which 11 projects the 264 team would go to versus which 12 ones the 266 team would go to? 13 A No difference. 14 Q Okay. So your team could go down to the 15 Washington Park Homes, Ida B. Wells, or Stateway; 16 and the 266 team could also go to all three of 17 those; right? 18 A That's correct. 19 Q What were you assigned to do after the 20 housing projects were torn down? 21 A My duties were the 264 tactical team. 22 Q And where was the 264 tactical team 23 assigned? 24 A The whole 2nd District.	40 1 arrested? 2 MR. PALLES: Objection; lack of 3 foundation. 4 MR. KOSOKO: Join. 5 MR. BAZAREK: Join. 6 A Actually, it was my choice to go to the 7 263 team -- or not to that particular team, to 8 leave the 264 team. Because at the time, they 9 were making the 264 team a strictly night team, 10 and I didn't want to work strictly night team at 11 the time. So that's why I left the 264 team. 12 BY MS. KLEINHAUS: 13 Q Did anybody else that you had worked with 14 on the 264 team switch to the 263 team? 15 A Yes. 16 Q Who else switched? 17 A My partner, Officer Leano, L-e-a-n-o, and 18 Officer Gonzalez. 19 Q Do you know if the 264 team was made to be 20 a night team after Sergeant Watts was arrested? 21 A Could you repeat that question? 22 Q Sure. Was the 264 team switched to a 23 night team after Sergeant Watts was arrested? 24 A It was assigned to a night team after he

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11 (41 to 44)

41 1 was arrested. 2 Q About how long after? 3 A When I switched to the 263 team, that's 4 when it went to a night team. 5 Q How long after Watts was arrested was it 6 switched to a night team? 7 A I don't know. 8 Q How did you learn that Sergeant Watts had 9 been arrested? 10 A I learned Sergeant Watts was arrested by 11 the media. 12 Q Did anyone from the Chicago Police 13 Department ever tell you that Sergeant Watts had 14 been arrested? 15 A I don't believe so, no. I don't recall, 16 no. 17 Q Did you ever ask anyone at the Chicago 18 Police Department about Watts being arrested? 19 A Could you repeat that question? 20 Q Sure. 21 MS. KLEINHAUS: Can you read it back. 22 (Pending question read.) 23 A I don't believe so, no. 24 Q Were you curious about his arrest?	43 1 out from the media? 2 A I just watched the news or read the 3 newspaper; or when I saw an article, I read it. 4 Q Okay. Where did you see an article about 5 Sergeant Watts? 6 A I don't recall the specifics. I know I 7 saw it on the news. I thought maybe Chicago 8 Breaking News. 9 Q And what's your understanding of what 10 Watts was arrested and prosecuted for? 11 A To the best of my knowledge what Sergeant 12 Watts got arrested for, that he met with an 13 informant that was working for the FBI at the time 14 when he was off duty. Him and Kallatt Mohammed 15 took money from an informant, and that's what I 16 know about the case. 17 Q Okay. And to this day, has anyone from 18 the Chicago Police Department ever -- or strike 19 that, please. 20 Is everything that you just explained 21 about Watts's arrest and prosecution things you 22 learned from the media? 23 A Yes. 24 Q Is that also true for the arrest and
42 1 MR. NOLAND: Object to the form. 2 MR. BAZAREK: Join. 3 A Was I curious? I was shocked. 4 BY MS. KLEINHAUS: 5 Q What was shocking to you about it? 6 A When he got arrested, I didn't know what 7 to believe. I didn't know, and I never saw any 8 things that would make me think that what he did 9 was what he was doing. 10 Q Did you ever try to find out anything more 11 about his arrest or prosecution? 12 A I don't understand what you're -- what you 13 mean by that. 14 Q I think you testified previously you never 15 asked anyone at CPD about his arrest; right? 16 A That's correct. 17 Q Did you ever try and find anything else 18 about -- find out anything else about it through 19 any other means? 20 MR. BAZAREK: Object to the form of the 21 question, vague, ambiguous, compound. 22 A Maybe just reading what the media was 23 saying. 24 Q Okay. What did you do to find something	44 1 prosecution of Officer Mohammed, everything you 2 know about it comes from the media? 3 A That's correct. 4 Q When was the last time that you spoke with 5 Sergeant Watts? 6 A The last time I spoke to Ronald Watts was 7 at a civil hearing, and I don't recall the exact 8 date. 9 Q Okay. What was the matter being discussed 10 at the civil hearing? 11 A About the case that we were on. 12 Q Okay. I don't want you to tell me 13 anything about any conversations that you had with 14 your attorney but did you see him -- did you see 15 Sergeant Watts in connection with these lawsuits? 16 A With these lawsuits? 17 Q Yes, sir. 18 A No. 19 Q Okay. Was the civil hearing you're 20 referring to a trial where you two were being 21 sued? 22 A That's correct. 23 Q Okay. And whose trial was that? 24 A That was Sondra Cartwright.

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12 (45 to 48)

45 1 Q And when did that case go to trial? 2 A If I had to guess, I believe it was 2012. 3 I'm guessing. Or 2013, I'm guessing. 4 Q Had Sergeant Watts been arrested yet? 5 A Yes. 6 Q Did you talk to him about the fact that he 7 had been arrested? 8 MR. BAZAREK: I just want to make an 9 objection here. 10 If you were represented by counsel in that 11 case, don't discuss any discussions with Watts 12 that you would have had with your counsel -- where 13 your counsel was involved. So just keep that in 14 mind. 15 MR. KOSOKO: Also my firm represented 16 Officer Nichols and the other accused in the 17 Sondra Cartwright case. 18 Q So at the time that you saw Sergeant Watts 19 at the Cartwright trial, did you have any 20 discussion with Watts about his arrest? 21 MR. BAZAREK: This is outside the presence 22 of counsel? 23 MS. KLEINHAUS: Right. You've all made 24 your point.	47 1 Q Okay. What restaurant did you see 2 Sergeant Watts at? 3 A I forgot the name -- it was a hotdog 4 stand. I forgot the name of it. 5 Q Do you remember where it was? 6 A I believe it was 103rd and Kedzie. 7 Q Were you on duty at the time? 8 A I was. 9 Q And what conversation did you have with 10 Sergeant Watts? 11 A Just basic questions, basic conversation, 12 nothing about -- we didn't get into the arrest or 13 anything like that. 14 Q Was that the first time you were seeing 15 him after he had been arrested? 16 A Yes. 17 Q And you didn't say anything about the 18 arrest; right? 19 A No. 20 Q And he didn't say anything about the 21 arrest? 22 A No. 23 Q Do you remember anything about what was 24 said in that conversation?
46 1 Q I'm not asking you about conversations you 2 had with your attorneys. My question relates to 3 your conversation with Sergeant Watts. 4 Did you talk to him about the fact that he 5 had been arrested? 6 A No. 7 Q Did he say anything to you about the fact 8 that he was facing criminal charges? 9 MR. NOLAND: Object to form. 10 MR. KOSOKO: Join. 11 MR. BAZAREK: Join. 12 A No. 13 Q Was that the first time you were seeing 14 him since he had been arrested? 15 MR. KOSOKO: I'm going to object to the 16 form of the question. 17 Go ahead. 18 A I believe we saw him one more time, and 19 that was at a restaurant. 20 Q Okay. When you say "we," who are you 21 referring to? 22 A I believe my partner was there, Officer 23 Leano, and another officer. I don't know who it 24 was at -- I don't recall.	48 1 A I don't. 2 Q Had you met any members of the 264 3 tactical team before you were assigned to that 4 team? 5 A I met Manny Leano a handful of times 6 because he worked midnights the same watch I did, 7 but I didn't really know him. I worked with him 8 maybe once or twice before I got assigned to the 9 tactical team. 10 But to that extent, that was the only 11 person that I knew going back to the tactical 12 team. I didn't really know him, just those two or 13 three times that I worked with him. 14 Q Okay. And you didn't know anyone else 15 from that team besides Leano? 16 A I didn't know a single soul. 17 Q Okay. Over the course of the years that 18 you were on the 264 tactical team -- when I say 19 the 264 team, I mean from when you joined in 20 November 2004 until you left and went to the 263 21 team. 22 Do you understand? 23 A Okay. 24 Q I'm using it for that entire time period

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13 (49 to 52)

49	1 that you were working on that tactical team. 2 Does that make sense? 3 A Yes. But then I went back to the 264 4 tactical team after the 263 tactical team too. 5 Q Okay. I'm sorry. That's my mistake. 6 So when did you go back to 264? 7 A When I talked to my wife about the 8 situation, I went back to the 264 tactical team 9 because I thought nights would work better for my 10 situation. That's why I went back to the 264 11 tactical team and worked strictly nights. 12 Q Okay. Approximately, when was that, that 13 you went back to 264 to work nights? 14 A I only worked the 263 tactical team 15 probably, if I had to guess, maybe less than six 16 months, and I went back to the 264 tactical team. 17 Q And how long did you then work for the 264 18 team? 19 A I was working for the 264 team all the way 20 up until I got told that I was going to admin 21 duties. 22 Q And that was November of 2017? 23 A That was November 2017; correct. 24 Q Okay. So if I refer to the 264 team, I
50	1 mean the team that you joined in November 2004 and 2 all the times that you were part of that team 3 until you left in November of 2017; is that fair? 4 A I'm still currently assigned to the 264 5 team. 6 Q Okay. And how would you describe -- would 7 you say you're detailed to admin duty, or how 8 would you describe your current situation? 9 A I guess I would describe it -- I don't 10 know how to describe it. I know I'm admin, but I 11 know I'm currently assigned to the 264 team. 12 Q During the years that you've worked as 13 part of the 264 team, did you become friends with 14 members of the 264 team? 15 A Members of the 264 team, members of the 16 other tactical teams too, yes. Co-workers, 17 friends, yes. Not just the 264 team, it's other 18 people in the district, other people that are not 19 even back in the tac office, other teams I've 20 become friends with or acquaintance with. I don't 21 know what you consider friends. 22 Q Did you spend time with members of the 264 23 team outside of work? 24 MR. KOSOKO: Object to the form of the
51	1 question. 2 A Very rare. Maybe special occasions, my 3 kids' first birthdays, my wedding, other people on 4 the tactical team, fantasy football; but on a 5 daily basis, no. Did I call them on a daily 6 basis, no. Have I called anyone about -- talking 7 about anything, if that's what you're getting at, 8 no. But special occasions, that's how I would -- 9 first birthdays, fantasy football. 10 BY MS. KLEINHAUS: 11 Q Okay. Who from the 264 team attended your 12 wedding? 13 A Attended my wedding was Ron Watts, 14 Elsworth Smith, Brian Bolton, Robert Gonzalez, and 15 Manuel Leano. 16 Q And what year did you get married? 17 A I got married in July of 2005. 18 Q And which of the members of the 264 team 19 attended birthday parties of your children? 20 A I know Officer Leano did, I'm positive; 21 and Gonzalez and Bolton, I'm 100 percent sure -- 22 almost 100 percent sure. 23 Q And did you attend any of the weddings of 24 anyone else from the 264 team?
52	1 A I have. 2 Q Whose wedding have you attended? 3 A Officer Young, Gonzalez, and Bolton's. 4 Q And have you attended any family events 5 like birthday parties or other celebrations hosted 6 by other members of the 264 team? 7 A I have. 8 Q Okay. And whose celebrations or family 9 events have you attended? 10 A Bolton's. 11 Q Anyone else? 12 A Not that I -- no, not that I recall, no. 13 Q You mentioned fantasy football. 14 Are you part of a fantasy football league 15 with members of the 264 team or former members of 16 the 264 team? 17 A Yes. 18 Q Okay. Who is part of that fantasy 19 football league? 20 A At first, Officer Bolton was, and then 21 he's not in it no longer. Currently, it's Officer 22 Gonzalez and Officer Leano. 23 Q Why did Bolton leave? 24 A To the best of my knowledge, he left

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14 (53 to 56)

53	1 because he was in too many football leagues and he 2 didn't have time to join another one. 3 Q It's not that your league was too 4 competitive for him? 5 A No. 6 Q Okay. 7 A Well, maybe, I don't know. You would have 8 to ask him. 9 Q Do you have the cell phone numbers or 10 personal contact information for members of the 11 264 team if you wanted to get in contact with them 12 today? 13 A I do, and I have a lot of people's 14 contacts in my phone, as we speak today. 15 Q Was Michael Spaargaren part of the 264 16 team while you were a part of it? 17 A No, he was not. 18 Q Have you ever worked with Officer 19 Spaargaren? 20 A I don't believe so, no, never. 21 Q Do you know who he is? 22 A If I'm thinking the right person, I think 23 his business did a home inspection for me, but he 24 did not. I think his partner did it for my home	55	1 if we ever rode together, but I don't believe we 2 ever did. 3 Q Okay. If Leano was off, did you have a 4 typical partner then that you would be assigned 5 with when Leano was away? 6 A Not a typical partner that I was assigned 7 to -- assigned with. I normally rode with Officer 8 Gonzalez and Officer Bolton. 9 Q Who was Officer Lewis's regular partner? 10 A I think she had two partners when she was 11 back in the tactical team, if I'm not mistaken. I 12 believe she had Officer Smith and Officer 13 Mohammed, if I'm not mistaken. 14 Q Okay. And who was Officer Jones, Al 15 Jones's partner? 16 A At which time? 17 Q When you first became part of the 264 18 team. 19 A Officer Young. 20 Q Okay. Did that change at some point? 21 A It did. 22 Q Who was Officer Jones's next partner after 23 Young? 24 A I believe it was Officer Smith.
54	1 inspection at the time. 2 Q Do you know if you've ever met Officer 3 Spaargaren? 4 A I think when I initially called, I think I 5 talked to him, and that's how I met him but 6 face-to-face, no. 7 Q Okay. And approximately when was it that 8 you believe you spoke with him about a home 9 inspection? 10 A In 2006. 11 Q How did you get his name? 12 A Through other officers on the 264 team. 13 Q Who on the 264 team gave you his name? 14 A It was either Officer Gonzalez or Officer 15 Bolton. 16 Q Did you work with Lamonica Lewis? 17 A She was on the tactical team, the 264 18 housing/tactical team. 19 Q Did you ever work as partners with Officer 20 Lewis? 21 A Assigned partners -- I don't know if we 22 ever rode together personally. I don't believe 23 so. My original partner and my assigned partner 24 was Officer Leano, but I don't know if he was off,	56	1 Q And did that change again? 2 A It did. 3 Q And who was the next partner after Smith? 4 A Officer Smith but then she got married. 5 Then her maiden now -- or her name is Officer 6 Young now or Detective Young. 7 Q Do you recall her first name? 8 A Her first name, I believe, was Caroline. 9 Q Okay. Any other partners that you recall 10 for Officer Jones? 11 A Not that I recall. 12 Q Okay. Was Officer Ridgell part of the 264 13 team when you were part of it? 14 A Officer Who? 15 Q Ridgell? 16 A No, if -- no, I don't believe so. No, 17 that name -- 18 Q Okay. What about Jerome Summers? 19 A No. 20 Q Do you know Officer Summers? 21 A His name, yes, seen him a couple times, 22 but that's about it. 23 Q Okay. What about Officer Ridgell or 24 Ridgell? I could be saying it wrong.

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15 (57 to 60)

57	1 A If I'm thinking of that same person, that 2 his name is -- I'm not 100 percent what his last 3 name is, yes, I think so, just passing by. 4 Q Okay. You think you know who that is? 5 A Do you know his first name? 6 Q Calvin. 7 A Just passing by and met him a couple 8 times. 9 Q Okay. Who on the 264 team smoked cigars? 10 MR. KOSOKO: Objection; form of the 11 question, foundation. 12 A At work? 13 Q Ever. 14 MR. KOSOKO: Same objection. 15 MR. BAZAREK: I'll join in that objection. 16 A I don't understand. When -- have I ever? 17 Like have I ever smoked a cigar? 18 Q Yes. 19 A I don't -- I don't -- okay. I smoked a 20 cigar in my life. I've seen Officer Jones smoke a 21 cigar before, Officer Watts or Sergeant Watts. I 22 believe, I'm not 100 percent sure, Officer Smith 23 smoked cigars, and I believe that was it that I've 24 seen people smoke a cigar, I do believe.
58	1 Q Have you ever talked to anyone who is a 2 former or current member of the 264 team about the 3 fact that you're on administrative duty? 4 A Could you repeat that question? 5 Q Sure. Have you ever talked to anyone who 6 is a former member of the 264 team or a current 7 member of the 264 team about the fact that you're 8 on administrative duty? 9 MR. BAZAREK: Again, this is outside of 10 conversations when counsel is present. 11 Q Right. Don't tell me anything you talked 12 about with your attorney. 13 A Just basically Officer Gonzalez and 14 Officer Leano, and basically, we were saying that 15 we don't think it's right that we're in this 16 position and we're being treated unfairly, I 17 believe. 18 Q Did you ever talk to either of them about 19 any of the specific cases, lawsuits that have been 20 brought against you? 21 A No. 22 Q When you were assigned to the 264 team, 23 did you become familiar with residents of the 24 Ida B. Wells housing complex?
59	1 MR. KOSOKO: I'm going to object to the 2 form of the question, vague, ambiguous. 3 MR. BAZAREK: Join. 4 A Yes, I knew some of the residents down -- 5 we talked to residents down on the Ida B. Wells 6 housing complex. 7 BY MS. KLEINHAUS: 8 Q Okay. Who do you know from the Ida B. 9 Wells housing complex? 10 A One in particular I know is a lady called 11 Ms. Campbell. 12 Q Okay. And what do you know about 13 Ms. Campbell? 14 A I know she is a really nice old lady. God 15 rest her soul. She passed away. That's basically 16 what I know about Ms. Campbell. 17 Q Okay. Anyone else that you knew or know 18 who was a resident of Ida B. Wells? 19 A I knew other people but -- I talked to 20 them, but I didn't talk to them like I talked to 21 Ms. Campbell. 22 Q Okay. How did you form your relationship 23 with Ms. Campbell? 24 A From being down there and working down at
60	1 Ida B. Wells almost every day and just had a 2 relationship with her. 3 Q Where in Ida B. Wells did Ms. Campbell 4 live? 5 A When she lived down in Ida B. Wells, she 6 lived at 575 East Browning. 7 Q Okay. Any particular floor or unit that 8 you recall? 9 A First floor. 10 Q Do you know which apartment she had on the 11 first floor? 12 A I don't -- don't remember, don't recall 13 the apartment number. 14 Q Okay. Do you know who lived there with 15 her? 16 A I know other people lived there. I don't 17 know everyone that lived there. 18 Q Okay. Who do you know that lived there 19 with her? 20 A I believe a kid named Kiki. I don't know 21 how to spell that. And I believe a female lived 22 there, and I don't know her name either, and small 23 children that I recall. 24 Q Was Kiki male or female?

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16 (61 to 64)

61	1 A That was a male. 2 Q And about how old was Kiki? 3 A If I had to guess I -- today? How old is 4 he today? 5 Q Or when you -- when did you first get to 6 know Ms. Campbell? 7 A I believe when I first met him, I believe 8 he was around 14, 16-ish, if I'm not mistaken. I 9 don't recall. 10 Q When did you first meet or get to know 11 Ms. Campbell? 12 MR. BAZAREK: Yeah. I'm just objecting to 13 the question because I think the witness answered 14 for a different individual, but it's your record. 15 Q Go ahead. 16 A I don't know when I actually met 17 Ms. Campbell, the exact date or time. 18 Q When did you first encounter Kiki, or when 19 would Kiki have been 14 to 16 years old? 20 A Like I said, I'm guessing how old he was. 21 Probably when I first met Ms. Campbell. 22 Q Do you know when that was? 23 A Like I said before, I don't. 24 Q Okay. Other than Ms. Campbell, who do you	63	1 Ida B. Wells when you were part of the 264 team? 2 A There were numerous drug lines down in the 3 Ida B. Wells housing complex. The ones that I 4 recall is Obama, Xbox, and I'm drawing a blank on 5 others. 6 Q Who was selling the Obama line? 7 MR. KOSOKO: I'm going to object just to 8 the form of the question. 9 A I don't know. I don't recall. 10 Q Who was selling the Xbox? 11 MR. KOSOKO: Object to the form of the 12 question. 13 A The same. I don't remember, and I don't 14 recall. 15 Q Do you know someone by the name of Wilbert 16 Moore? 17 A The name -- yes. 18 Q What do you know about Wilbert Moore? 19 A The same, that he was a known drug dealer 20 in the Ida B. Wells housing complex. 21 Q Anything else? 22 A That he was basically the main up there, 23 one of the main guys. 24 Q Do you know whether he's alive or dead?
62	1 know from Ida B. Wells? 2 MR. BAZAREK: In addition to Kiki and the 3 other individuals he just mentioned? 4 BY MS. KLEINHAUS: 5 Q Yeah. Don't tell me anybody you just 6 told me. 7 A I talked to other residents down there, 8 but I don't know their names or anything like 9 that. 10 Q Okay. Did you know anyone who worked in 11 Ida B. Wells as a candy lady selling snacks or 12 treats? 13 A No. 14 Q Do you know someone from Ida B. Wells who 15 had the nickname Shock? 16 A The name sounds familiar. I wouldn't know 17 his first name; or if he walked by me right now, I 18 wouldn't know who he was. 19 Q Okay. What do you know about Shock? 20 A I know he was one of the main drug dealers 21 down in the Ida B. Wells housing complex. 22 Q Do you know what drug line he sold? 23 A I don't. 24 Q What were the drug lines being sold in	64	1 A He's dead. He's deceased. 2 Q Do you know who killed him? 3 A To the best of my knowledge, it went to 4 trial, and the Hobos, the gang the Hobos. The 5 persons, no. 6 Q Did you ever hear anything about Sergeant 7 Watts being connected with the death of Wilbert 8 Moore? 9 A Could you repeat that question? 10 Q Sure. 11 MS. KLEINHAUS: Can you read it back. 12 (Pending question read.) 13 A That he had some involvement in it; is 14 that what you're asking? 15 Q Correct. 16 A No, never. 17 Q The first time you're hearing that is 18 today; right? 19 A That's correct. 20 Q Do you know who Willie Gatti is? 21 A Same. Know his name, and that's it with 22 him. 23 Q Over the course of your career as a 24 Chicago police officer, which arrests do you

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17 (65 to 68)

65 1 recall? 2 MR. KOSOKO: I'm going to object to the 3 form of the question. 4 MR. BAZAREK: Join. 5 MR. NOLAND: Join. 6 MR. PALLES: Join. 7 A In these particular cases or through my 8 career? 9 BY MS. KLEINHAUS: 10 Q Through your career. 11 MR. KOSOKO: Same objection. 12 A I remember a lot of cases. I wouldn't 13 know their names, but I remember a lot of 14 incidents throughout my career. 15 Q Okay. Tell me about the ones that you 16 remember. 17 A I remember one incident, I was wearing my 18 jacket, I put my hoodie on, and I walked into a 19 building by myself in the drug line, and I 20 arrested the guy that was selling narcotics. 21 Q Okay. Where was that? 22 A That one was, I believe, at 5 -- 5135 23 Federal, I believe it was, one of the high rises 24 over there, housing complex.	66 1 Q When was that? 2 A I don't know. 3 Q What was the name of the person that you 4 arrested? 5 A Like I said before, I don't know. 6 Q Was it unusual for you to put your hoodie 7 and jacket on and walk in and arrest someone? 8 A I would say typically, yes. 9 Q And why was that unusual? 10 A Because if they saw a big white guy coming 11 in there to buy drugs -- I don't look like the 12 typical guy buying narcotics. 13 Q Okay. And you said on that occasion you 14 were by yourself? 15 A I walked in the building by myself; that's 16 correct. 17 Q And was it unusual for you to go into a 18 building by yourself? 19 A I wouldn't say it's unusual. Looking back 20 at it, I wouldn't say it's smart either. 21 Q Did that case go to trial? 22 A I don't remember. 23 Q Have you told me everything that you 24 remember about that incident?
67 1 A Of what I recall, yes. 2 Q Okay. Other than that incident, what 3 other arrests from your career do you recall? 4 MR. PALLES: Objection. 5 MR. KOSOKO: Objection; form of the 6 question. 7 A I remember another incident when I was 8 driving with my partner, Officer Leano. We were 9 approaching an alley. A male black came out of 10 the alley, and he had a handgun in his hand, and 11 then he dropped it to the ground right in front 12 of us. 13 Q What else do you remember about that 14 incident? 15 A That's basically it, what I remember about 16 that incident. 17 Q Okay. Do you know when it was? 18 A I don't. 19 Q Do you know where it was? 20 A I don't remember. 21 Q Okay. What other incidents besides what 22 you've already described do you remember? 23 A I remember traffic stops with stolen cars, 24 just pulling over a stolen car before.	68 1 Q Do you remember one incident like that or 2 more than one? 3 A I remember having multiple occasions with 4 stolen cars. 5 Q Okay. Tell me about the first stolen car 6 traffic stop you recall. 7 A I just remember that it was a stolen car, 8 and we arrested a person with a stolen car. 9 Q Was this also with Officer Leano? 10 A I believe so, yes. 11 Q What's the next stolen car incident that 12 you remember? 13 MR. BAZAREK: You know, I'm just going to 14 make a standing objection to all of these 15 questions. You know, we have received 16 notification, my office, on the cases and arrests 17 that you're going to question Officer Nichols on; 18 and now we're veering into tell me every arrest 19 that you've ever had in your career. 20 So I'm just going to make -- I think it's 21 unreasonable questioning, and it's a standing 22 objection to all of this line of questioning. In 23 fact, I would move to strike all of the questions 24 and answers regarding your area of inquiry right

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18 (69 to 72)

69	1 now. 2 MR. PALLES: I join in the objection on 3 the grounds that it's abusive of the discovery 4 process and disproportionate to the needs of the 5 case. 6 MR. KOSOKO: Watts will join in that 7 objection also. 8 MR. NOLAND: Join. 9 A I forgot where we were, ma'am. 10 BY MS. KLEINHAUS: 11 Q The next stolen car incident that you 12 recall. 13 A Just that it was a stolen vehicle also. 14 Q Anything different about that memory than 15 the other stolen car you just told us about? 16 MR. BAZAREK: Object to the form of the 17 question -- 18 MR. KOSOKO: Join. 19 MR. BAZAREK: -- vague, ambiguous, 20 confusing. 21 A Not that I recall. 22 Q So how many separate stolen car incidents 23 do you recall? 24 MR. KOSOKO: Again, standing objection,	71	1 Q Okay. Can you describe the other cases in 2 your career that you do recall, even if you can't 3 remember the names? 4 A I know I've had incidents where -- 5 MR. NOLAND: So I'm going to object just 6 for the record that I think we're potentially 7 leading to -- it's almost like setting him up for 8 potentially inaccurate testimony when you're not 9 nailing down specific cases or incidents and just 10 randomly saying what did you do in your life. It 11 just doesn't seem like an appropriate use of 12 questions or the process. 13 MR. BAZAREK: And there's an unfairness to 14 it, I'll add, that I guess if you want to question 15 him about every arrest he has ever had in his 16 career, that, you know, he have the opportunity to 17 review every arrest if you want to ask questions 18 about it. So I'm not saying to do that, but it is 19 unfair in terms of this line of questioning. I 20 have already made my objection. 21 MS. KLEINHAUS: Okay. You all have made 22 your standing objection. It's on the record. I'm 23 permitted to test his memory, so we're going to 24 proceed.
70	1 along with the Hale firm regarding this line of 2 questioning. 3 MR. BAZAREK: Yeah. There's a standing 4 objection to all these questions. 5 A I remember probably a handful of stolen 6 cars that I was on. I remember -- just remember 7 that it was a stolen car arrest. 8 BY MS. KLEINHAUS: 9 Q Okay. How are you distinguishing one 10 stolen car arrest from another in your memory? 11 MR. KOSOKO: Object to the form of the 12 question. 13 A I'm not. I just remember that it was a 14 stolen vehicle. 15 Q Okay. So your memory is that you know you 16 were involved in some stolen car arrests. 17 A That's correct. 18 Q Okay. Other than the incidents you've 19 told us about, what other arrests do you recall? 20 A On these particular cases, I remember the 21 Ben Baker case. I remember the Anthony McDaniels 22 case and I don't remember -- I don't -- I'm sure 23 there's other cases that I've been involved in, 24 but I don't remember their names.	72	1 MR. BAZAREK: I want to take a break. 2 MR. PALLES: Yeah. 3 THE VIDEOGRAPHER: Off the record, 11:33. 4 (A recess was taken from 11:33 a.m. to 5 11:47 a.m.) 6 THE VIDEOGRAPHER: Back on the record, 7 11:47. 8 MR. BAZAREK: I'd like to state that if 9 this same line of questioning continues, I believe 10 we're going to need to speak with the Judge. I 11 can't imagine where if I was deposing your clients 12 and asking questions about every day in their life 13 that they sold cocaine or heroin or ingested 14 heroin or cocaine, and let's start over from the 15 first time they took drugs until the last time. 16 You probably would agree that that's 17 abusive-type questioning which is -- I think 18 that's what we have here. So I think we need to 19 talk with the Judge. 20 MS. KLEINHAUS: Okay. I take offense at 21 your characterization of my clients. I also take 22 offense to the characterization of the line of 23 questioning. I haven't asked him about every day. 24 I'm simply testing his memory of what he remembers

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19 (73 to 76)

73	1 about his career as a Chicago police officer. 2 So if we need to call the Judge, then we 3 need to call the Judge. 4 MR. BAZAREK: You're asking him to recall 5 every arrest that he has made in his career. 6 MS. KLEINHAUS: No, Bill, I am asking him 7 to tell me the ones he does recall. 8 MR. PALLES: Okay. Let's call the Judge. 9 MR. BAZAREK: Let's call the Judge. 10 MS. KLEINHAUS: Okay. 11 MR. PALLES: I have the number by the way. 12 It's -- when you move the phone over. 13 MR. NOLAND: We've got -- there is a -- 14 we've got a phone at my feet. 15 MS. KLEINHAUS: Can you grab that for me. 16 MR. NOLAND: Well, not so much the suit, I 17 have a bad back. 18 THE WITNESS: Do I have to step out? 19 MR. BAZAREK: No. 20 THE REPORTER: This is still on the 21 record; right? 22 MS. KLEINHAUS: Yes, please. 23 MR. PALLES: 312-435-5657. 24 (Phone message recording off the record.)	75	1 MS. KLEINHAUS: Hello. 2 THE CLERK: Yes. The Judge is not 3 available to speak to you, but she is willing to 4 consider reviewing any problem you have on an 5 expedited basis however you propose to do that. 6 She suggests that you move ahead and cover other 7 topics. As soon as she can, she will review your 8 objections; and again, if you have something to 9 bring to her attention in writing, she is happy to 10 try and consider that on an expedited basis, if 11 you get it to her very quickly. 12 MS. KLEINHAUS: Okay. Thank you. 13 THE CLERK: Okay. Bye bye. 14 MS. KLEINHAUS: Okay. For those of you 15 who have an objection to asking about the 16 witness's memory, do you want to submit something 17 to her on an expedited basis? 18 MR. PALLES: I don't know what that means 19 exactly. I mean, it depends on how long we're 20 here, et cetera, et cetera; but are you going to 21 move on to something else as she -- as was 22 suggested? 23 MS. KLEINHAUS: No. This is a perfectly 24 reasonable line of questioning to test the
74	1 THE CLERK: Judge Finnigan's chambers. 2 MS. KLEINHAUS: Hi, good morning. This is 3 Theresa Kleinhaus. I'm in a deposition in the 4 Watts coordinated pretrial proceedings, and we've 5 come to an issue in the deposition, and we'd like 6 the Judge to rule on certain objections. We were 7 wondering if there was any chance she would be 8 available to speak with us. 9 THE CLERK: Can you tell me generally what 10 the nature of the objection is? 11 MS. KLEINHAUS: Yes. I have been asking 12 the officer questions about his memory, what he 13 recalls during his time as a Chicago police 14 officer, any arrests that he does recall. The 15 objection is that it is abusive. 16 THE CLERK: It's abusive? 17 MR. PALLES: Yes, if I may, Eric 18 Palles for Kallatt Mohammed -- 19 THE CLERK: I don't want to hear argument. 20 I need to convey something to the Judge to see if 21 she is available. I doubt she is, but hang on 22 just a second. 23 MS. KLEINHAUS: Okay. Thank you. 24 THE CLERK: Hello.	76	1 witness's memory. 2 MR. PALLES: How long would you say -- 3 MS. KLEINHAUS: I don't know. 4 MR. PALLES: Well, I don't know that I 5 have any standing. It's not my witness. But I 6 strongly object. You have 18 -- you have 18 cases 7 that you've identified that you're going to 8 discuss today. We've been here two hours, and you 9 haven't discussed one. 10 So, you know, whatever. I will bring it 11 to a head one way or another if I have standing to 12 do so, and I'll look into it. I don't know what 13 everybody else wants to do. 14 MS. KLEINHAUS: I mean, under the rules, 15 the procedure here would be if you want to file an 16 expedited motion for a protective order because 17 you find this abusive and harassing, we can take a 18 break, and you can do that. 19 MR. BAZAREK: Well, and just so it's 20 clear, you are asking this witness -- and we were 21 notified about what arrests you were going to ask 22 him about. You are asking him, without limitation 23 of any sort, to sit at this deposition and recall 24 every arrest from a nearly 17-year career. That's

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20 (77 to 80)

77	1 what you're doing. 2 You're asking him tell me every arrest 3 that you have had since you've been a Chicago 4 police officer that you recall. Is that not what 5 you're asking him or not? 6 MS. KLEINHAUS: The record speaks for 7 itself. So are you going to file something right 8 now on an expedited basis or not? 9 MR. NOLAND: Why not -- maybe this would 10 be a solution is that you move on now. You give 11 Mr. Nichols' counsel time to evaluate the 12 questions and then -- we're back here tomorrow, 13 aren't we? 14 And so that if this -- it would then -- 15 this does affect, I think, all parties too because 16 he's a witness in these cases, that we could 17 evaluate it and put something on file tonight, if 18 necessary, and hopefully, have a review -- a 19 resolution by tomorrow, and then you can get back 20 into the topic tomorrow. 21 MS. KLEINHAUS: I'm going to finish the 22 line of questions about what he remembers. If you 23 want to file something tonight, obviously, you're 24 welcome to do that.	79	1 MS. KLEINHAUS: I would prefer to finish 2 my questioning today, and that's what I intend 3 to do. 4 MR. PALLES: Okay. 5 MR. NOLAND: Should we take a break? 6 MR. BAZAREK: Yeah. Let's take another 7 break. 8 MS. KLEINHAUS: Okay. Let's go off the 9 record. 10 THE VIDEOGRAPHER: Off the record at 11 11:59. 12 (A recess was taken from 11:59 a.m. to 13 1:04 p.m.) 14 THE VIDEOGRAPHER: Back on the record, 15 1:04. 16 MS. KLEINHAUS: Okay. Prior to the break, 17 we agreed to take a lunch break so that counsel 18 could get the transcript of the last line of 19 questioning and can decide this afternoon whether 20 to file an expedited motion. 21 We're going to proceed this afternoon 22 avoiding that line of questioning, and we can come 23 back to it after you've made a decision on whether 24 you're going to file; is that fair?
78	1 MR. NOLAND: Why can't you wait? The 2 Court just told us that she couldn't take it now. 3 MR. BAZAREK: Ms. Court Reporter, could 4 you right now where this line of questioning 5 began -- are you able to send that transcript via 6 e-mail to me right now? Are you able to do that, 7 and we can take a break? 8 THE REPORTER: I need to read through it. 9 MR. BAZAREK: How long would that take? 10 MS. KLEINHAUS: Under Rule 30, you get to 11 make your objections. I get to keep asking 12 questions. If you want to file for a protective 13 order, you can do that tonight. 14 This is a perfectly reasonable line of 15 questioning, and I'm going to finish it up, and 16 you can do standing objections or you can object 17 every time. It's up to you. 18 MR. PALLES: May I ask this? First of 19 all, expedited doesn't mean it has to be filed 20 tonight. So if everybody were to walk out here 21 and say that we're going to bring it -- we're 22 going to get a transcript over the next week or 23 two, and you could reschedule him sometime in 24 February or March, would you prefer to do that?	80	1 MR. BAZAREK: Yeah, I appreciate that, 2 Counsel. 3 MS. KLEINHAUS: Okay. 4 BY MS. KLEINHAUS: 5 Q Are you familiar with the term "reverse 6 sting"? 7 A Yes. 8 Q Okay. What is a reverse sting? 9 A A reverse sting is where you have officers 10 outside the building or wherever you are, the 11 location, and you have officers acting as drug 12 dealers trying to sell narcotics to passers-by or 13 whomever comes to purchase narcotics. 14 Q Were you part of reverse sting operations 15 at the Ida B. Wells housing complex? 16 A I have. 17 Q Okay. And what was your role in reverse 18 stings? 19 A My role is an enforcement officer or a 20 takedown officer. It depends on where we were. 21 Q Okay. What does an enforcement officer 22 do? 23 A An enforcement officer is just 24 basically -- we're in a secure -- or not secure,

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21 (81 to 84)

81	1 in a place, and we watch the individuals that come 2 in that tried to purchase narcotics. 3 Q Okay. And in Ida B. Wells, where would 4 you be physically if you were acting as the 5 enforcement officer? 6 A In Ida B. Wells, I'd be in -- 7 MR. KOSOKO: I'm just going to object to 8 the form of the question, vague, and ambiguous. 9 A In Ida B. Wells, I'd be located inside the 10 building. 11 Q And where inside the building would you be 12 if you were acting as the enforcement officer? 13 A On the first floor. 14 Q Where on the first floor would you be? 15 A I don't know the exact position I would be 16 in, but I'd be on the first floor. 17 Q Okay. Would you be hidden from view in 18 some way? 19 A Yes. I wouldn't be in plain view for 20 outside people to see me inside the building. 21 Q Okay. Can you describe what the first 22 floor in Ida B. Wells -- what the layout of that 23 space was? 24 A I'm not 100 percent, but I know there's a	83	1 Ida B. Wells housing complex. 2 Q So were you thinking of one of those 3 buildings in particular when you described the 4 layout of the first floor? 5 A If I remember right, the building that I 6 described was -- they were basically similar to 7 the 511, 527, 540, 559, 574, 575, basically. 8 I'm sorry. I'll slow down. 9 (Continuing.) Basically, the buildings -- 10 511, 527, 540, 559, 574, and 575, if I'm not 11 mistaken, were all similar. 12 Q Okay. What were some of the places on the 13 first floor of those buildings where you could be 14 hidden from view as an enforcement officer? 15 A Off to the side from the front entrance. 16 Q Okay. Anywhere else? 17 A In a stairwell. 18 Q Okay. Anywhere else? 19 A That's basically what I recall for right 20 now. 21 Q Okay. And you mentioned another role that 22 you would sometimes play in the reverse stings 23 besides the enforcement officer. 24 What was that role?
82	1 front door and a back door. There's two different 2 stairwells going up. There was -- I believe there 3 was two elevators inside the lobby area, and then 4 there was, like, maybe a hallway leading to 5 another apartment, I believe. I'm not 100 percent 6 sure exactly. 7 MR. KOSOKO: And I'm sorry to do this, but 8 I do have an objection regarding foundation, 9 ambiguous, and vague question. 10 BY MS. KLEINHAUS: 11 Q When you -- the description that you just 12 gave, was that for the high rises? 13 A What do you -- high rises at where? 14 Q Was the first floor description that you 15 gave for an Ida B. Wells high rise type building? 16 A I wouldn't call the Ida B. Wells housing 17 complex a high-rise. 18 Q Okay. What buildings are you familiar 19 with that were part of the Ida B. Wells housing 20 complex? 21 A Well, there was 511 East Browning, 527 22 East Browning, 540 East 36th Street, 559 East 23 Browning, 575 East Browning, 574 East 36th Street, 24 and then there was scattered sites in the	84	1 A It was called a takedown officer. 2 Q Okay. What does the takedown officer do? 3 A Go in there, get the individual that 4 they -- tried to purchase narcotics, and get them 5 out of the area. 6 Q Okay. Would it be the responsibility of 7 the takedown officer to put handcuffs on the 8 person being arrested? 9 MR. KOSOKO: I'm going to object, just 10 form, foundation. 11 A Maybe, sometimes, yes. 12 Q What's the difference between what the 13 enforcement officer would do and what the takedown 14 officer would do? 15 A Basically, a takedown officer, like I 16 said, if we didn't have a secure location, we'd 17 come in there in a squad car or maybe on foot, 18 grab the person and get him out of the area. 19 The enforcement officers were just in the 20 secure area watching the offenders. 21 Q Other than the enforcement officer and the 22 takedown officer, what were the other typical 23 roles in a reverse sting? 24 A For me personally or --

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22 (85 to 88)

85 1 Q For the team. 2 A You had -- you had security officers 3 outside watching the officers to make sure they 4 were safe, you had officers acting as drug 5 dealers, and I believe that was about it for the 6 other officers. 7 Q Okay. Did Sergeant Watts ever play the 8 role of acting like a drug dealer? 9 A I don't know. 10 Q Who on the team would take on the role of 11 acting like a drug dealer? 12 A It would be typically African-American 13 officers. 14 Q Who -- I'm sorry -- you said security 15 officers. 16 That's different than the enforcement 17 officers? 18 A Yes. 19 Q Okay. And can you explain the difference 20 between those two roles? 21 A The security officer is watching the other 22 officers on scene just to make sure they're safe 23 when they're outside. 24 Q Okay. When they're outside. Okay.	86 1 And the enforcement officers are inside? 2 A Correct. 3 Q Is that the difference between the two? 4 A I would say yes. 5 Q Okay. Did you ever observe Sergeant Watts 6 use force on anyone? 7 MR. KOSOKO: Objection to the form of the 8 question, vague, ambiguous, foundation. 9 A Not that I recall, no. 10 Q Did you ever see Al Jones use force on 11 anyone? 12 A Not that I recall, no. 13 Q As part of the tactical team, were you 14 familiar with a practice of trying to trade up to 15 make arrests? In other words, getting information 16 from an arrestee about other individuals in the 17 drug trade and not -- I'm sorry -- strike that. 18 Let me try it again. 19 Are you familiar with the concept of 20 trading up? 21 A I don't know what that means -- what that 22 word means. 23 Q Okay. Was it ever a practice, while you 24 were on the tactical team, to get information from
87 1 someone and because you got information from them 2 about the drug trade, not arrest them and instead 3 use the information to try to arrest someone else? 4 MR. BAZAREK: I'd object to the form of 5 the question to the extent it's compound and 6 vague. 7 MR. KOSOKO: I also join. 8 A No. I never -- what -- you used trade up. 9 I never used that because I don't have the 10 capability of offering that to an individual. 11 BY MS. KLEINHAUS: 12 Q Okay. Did you ever observe Sergeant Watts 13 offer that to an individual? 14 A No, I have not. 15 Q Who does have the capability of offering 16 that to an individual? 17 MR. BAZAREK: I'd object to the form of 18 the question to the extent it calls for 19 speculation. 20 A To the best of my knowledge, it would be a 21 state's attorney. 22 Q Did you ever observe Sergeant Watts direct 23 anyone on the team not to complete the processing 24 of an arrest?	88 1 A No, I have not. 2 Q Did you make trespassing arrests at 3 Ida B. Wells? 4 A I have. 5 Q And in those instances, how would you 6 determine whether or not someone was a resident of 7 Ida B. Wells? 8 A On prior occasions when we would talk to 9 individuals, we'd know they weren't living there, 10 and there's no trespassing signs on the property. 11 Q Do you have any benchmark or standards or 12 amount of trespassing arrests that you were 13 expected to make? 14 A No. We never had a quota. We don't have 15 a quota or anything like that in the Chicago 16 Police Department, and we never had one in the tac 17 office. 18 Q Can you describe the tac office, please? 19 A Our tactical office is -- consists of four 20 rooms. We have a -- when you first enter -- well, 21 it depends what -- if you enter from the back door 22 and go in, we have a large room. We have 23 computers there where we process. We have a bench 24 where we put our offenders.

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23 (89 to 92)

89	1 The adjacent room is another room where 2 our supervisors have a room and our lieutenant has 3 a room and our tac secretary sits, and there's 4 also computers in that room, too. 5 Q Could arrestees or detainees be brought 6 into the supervisors' room? 7 MR. KOSOKO: I'm going to object to the 8 form of the question, vague, ambiguous. 9 A Could they? 10 Q Were they? 11 A I've seen some individuals in the 12 sergeants' office room before, yes. 13 Q Did Sergeant Watts patrol with the team? 14 MR. KOSOKO: I'm going to object to the 15 form of the question, vague, ambiguous. 16 A Could you -- I don't understand what you 17 mean. 18 Q Would Watts go in cars with members of the 19 team out into the 2nd District? 20 A Yes. 21 Q Who would he typically ride with? 22 A He would typically ride with Officer Jones 23 and his partner and usually Officer Smith, his 24 partner which was -- I'm sorry -- Officer Mohammed	91
90	1 they were residents. 2 Q Okay. Did you have anyone who you 3 considered an informant who would give you 4 information about the drug trade at Ida B. Wells? 5 A Not consistently, no. 6 Q Did other members of the 264 team have 7 regular informants? 8 A That I couldn't answer. I don't know. 9 Q Are you related to anyone else who works 10 for the Chicago Police Department? 11 A I'm not related to anyone in the Chicago 12 Police Department. 13 Q Okay. It's my understanding that there 14 was a lockup keeper with the last name of Nichols 15 at the 2nd District. 16 Are you any relation to that person? 17 A No. He's an African-American. No, I'm 18 not related to him. 19 Q In your time on the 264 team, did you ever 20 sign someone else's name on a report? 21 A I probably have, yes. 22 Q Under what circumstances have you done 23 that? 24 A When they gave me authorization to do so.	92
90	1 which was his partner, Officer Smith, or whoever 2 Officer Mohammed's partner was. 3 Q Do you know why Officer Young left the 4 264 team? 5 A I don't know why he left, no. 6 Q When was the last time you were in touch 7 with Officer Young? 8 A I don't know. I couldn't even guess. I 9 don't know. 10 Q Did you ever give your cell phone number 11 out to residents of Ida B. Wells? 12 A I'm sure I have. 13 Q Would that be a work cell phone number or 14 personal cell phone number? 15 A At the time it was my personal cell phone 16 number. 17 Q Okay. And did you observe Sergeant Watts 18 give his cell phone number out to residents of 19 Ida B. Wells? 20 A No. 21 Q Did you receive information from residents 22 of Ida B. Wells about the drug trade? 23 A I don't know if it was residents. It 24 might have been other citizens. I don't know if	92

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24 (93 to 96)

93 1 A No. 2 Q When you were part of the 264 tactical 3 team, did you have a specific beat that you were a 4 part of? 5 A Which time? 6 Q Well, let's start with when you first 7 joined the team in November 2004. 8 A Yeah, I was 264C, as in Charlie. 9 Q Okay. And at other points in your time on 10 264 did that change? 11 A Yes. 12 Q And when did that change? 13 A When I left the 263 team, and I came back 14 to the 264 team. 15 Q Okay. What was your beat after that? 16 A 264A, as in Adam. 17 Q I think we talked earlier about various 18 police reports that you were trained to complete. 19 Do you recall that? 20 A Yes. 21 Q Okay. Is it typically the same person who 22 writes up the narrative in the vice case report 23 and the narrative in the arrest report? 24 A Could you repeat that question?	94 1 Q Yeah. There's a narrative section to a 2 vice case report. 3 Do you recall that? 4 A Yes. 5 Q And there's a narrative section to the 6 arrest report. 7 Do you recall that? 8 A Yes. 9 Q Is it typically the same person who writes 10 up both narrative sections for the same arrest? 11 A Typically, yes. 12 Q Was it your practice, when you were part 13 of the 264 team, to take notes on the arrests that 14 you were making? 15 A To take notes, no. 16 Q Have you ever been interviewed by federal 17 law enforcement about your time working on the 18 264 team? 19 A I never talked to the federal government 20 before. 21 Q Did you ever conduct a floor-by-floor 22 check of an Ida B. Wells building? 23 A Yes. 24 Q Okay. When would you do that?
95 1 A It would be numerous times. When we were 2 doing building checks, we would do floor-by-floor. 3 If we were conducting a mission, we would do a 4 floor-by-floor. There's so many different 5 instances we would do floor-by-floor. There's not 6 a specific time where we would do it. You know, 7 there's so many different circumstances we would 8 do a floor-by-floor check. 9 Q You mentioned one of those circumstances 10 would be a mission? 11 A Yes. 12 Q Would that be -- tell me what you mean by 13 mission? 14 A A mission -- if we were doing a reverse 15 sting mission, we would do a floor-by-floor check 16 of the building. 17 Q Would you do that before the officer 18 posing as a drug dealer would make the purchase? 19 A Yes. 20 Q Do you know who Shannon Spalding is? 21 A I know her from social media -- not social 22 media, the media, I should say. I know her from 23 the media, and that's about the extent I know of 24 Shannon Spalding.	96 1 Q You've never met her in person? 2 A I have never met her in person. No, I 3 have not. 4 Q Okay. Do you know who Daniel Echeverria 5 is? 6 A Same thing. I know him from the media, 7 and that's it. 8 Q Are you aware that Shannon Spalding has 9 alleged that you would shake down drug dealers for 10 money? 11 A That I would? 12 Q Yes. 13 MR. NOLAND: I just object to the form of 14 the question. 15 MR. BAZAREK: Join. 16 MR. KOSOKO: Join. 17 MR. PALLES: Join. 18 A No, I was not aware. 19 Q Have you ever lied under oath? 20 A Never. I have never lied under oath. 21 Q Have you ever fabricated a police report? 22 A Absolutely not. 23 Q Have you ever planted drugs on someone? 24 A Absolutely not. I never would do that.

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25 (97 to 100)

97	1 Q Have you ever been aware of another police 2 officer fabricating a police report? 3 A No. I never saw anyone -- absolutely not 4 have I ever witnessed that. 5 Q Have you ever witnessed another officer 6 plant drugs on someone? 7 A No. 8 Q Have you ever arrested someone because 9 they would not give you information about the drug 10 trade? 11 MR. KOSOKO: I object to the form of the 12 question, vague, and ambiguous. 13 A No, I have never not arrested someone that 14 would not give me information. 15 Q Have you ever observed another officer 16 arrest someone because the person refused to give 17 information about the drug trade? 18 A No, never, absolutely not, no. 19 Q I want to talk to you about my client 20 Andre McNairy. 21 Do you know Mr. McNairy? 22 A I believe I heard his name before, and 23 that's about the extent I know Andre McNairy. 24 Q Okay. Have you reviewed the complaint	99	1 Q Okay. Did you review any testimony from 2 that trial in preparation for your deposition 3 today? 4 A I don't believe so, no. 5 (Nichols Deposition Exhibit 3 marked for 6 identification and attached to the transcript.) 7 Q I'm going to show you what we will mark as 8 Exhibit 3. I'll represent to you, I think, your 9 testimony starts on the fourth page. 10 I'm going to ask you to go ahead and 11 review your testimony. It starts on page 4, ends 12 on page 16. 13 MS. KLEINHAUS: If it's okay, I think we 14 can go off the record for a second while he 15 reviews it. Let's go off the record, please. 16 THE VIDEOGRAPHER: Off the record, 1:30. 17 (A recess was taken from 1:30 p.m. to 18 1:41 p.m.) 19 THE VIDEOGRAPHER: Back on the record, 20 1:41. 21 BY MS. KLEINHAUS: 22 Q Okay. Sir, having reviewed Exhibit 3, did 23 that refresh your recollection at all about the 24 arrest of Andre McNairy?
98	1 that he filed in this lawsuit? 2 A No, I don't believe I have. 3 (Nichols Deposition Exhibit 2 marked for 4 identification and attached to the transcript.) 5 BY MS. KLEINHAUS: 6 Q I'm going to show you what we'll mark as 7 Exhibit 2. If you could look at that, please. 8 It's a photo of Mr. McNairy, and it's 9 marked with his name there. 10 Does seeing that photo refresh your 11 recollection at all as to who Mr. McNairy is? 12 A No. 13 Q You can put that to the side. 14 Did you review documents related to the 15 arrest of Mr. McNairy as part of your preparation 16 for the deposition today? 17 A I might have briefly looked at his arrest 18 report and case report. 19 Q Okay. Did that allow you to remember 20 anything about his arrest? 21 A No. 22 Q Okay. Do you recall testifying in 23 Mr. McNairy's criminal trial? 24 A I don't.	100	1 A No, it does not. 2 (Nichols Deposition Exhibit 4 marked for 3 identification and attached to the transcript.) 4 BY MS. KLEINHAUS: 5 Q Okay. I'm going to show you the arrest 6 report from that arrest. We'll mark it as 7 Exhibit 4. 8 A Do you want me to put this off to the 9 side? 10 Q Yes, please. 11 Okay. Turn please to the narrative 12 section. 13 Is this one of the reports that you 14 reviewed in preparation for your deposition today? 15 A Like I said, I don't know if I looked at 16 this, but I might have looked at this. I don't 17 know if I looked at it. I don't recall if I did 18 or didn't. 19 Q Okay. Read the narrative section, please, 20 and then I'm going to ask you some questions about 21 it. 22 A Okay. 23 Q Did reviewing that narrative help you 24 recall this arrest at all?

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26 (101 to 104)

101 1 A No, it does not. 2 Q Okay. Do you know whether, in the course 3 of this arrest, you asked Mr. McNairy for any 4 information about the drug trade at Ida B. Wells? 5 A I don't recall. I don't know. 6 Q Okay. Turn with me to the following page. 7 It's the third page of the arrest report. You're 8 listed there as the attesting officer. 9 Do you see that? 10 A I do. 11 Q What does it mean for you to be the 12 attesting officer? 13 A The attesting officer is where you would 14 log in to the computer, and you log in to the 15 arrest report with your credentials. 16 Q Okay. And is the attesting officer 17 typically the officer who is called to testify at 18 trial? 19 MR. NOLAND: Objection; form. 20 MR. KOSOKO: Join. 21 MR. BAZAREK: Join. 22 A Could you repeat that question? I don't 23 understand. 24 Q Sure. Is the attesting officer typically	103 1 A Yes. Vaguely, yes. 2 Q Okay. Is Box 1 the same as the first 3 arresting officer? 4 A Yes. 5 Q Okay. And is the person who is in Box 1 6 or who is listed as the first arresting officer 7 someone who has personal knowledge of the facts 8 contained in the narrative section? 9 MR. KOSOKO: Objection; form of the 10 question, foundation. 11 MR. BAZAREK: I'll join. 12 A Yes. A person in Box 1 would have 13 knowledge of the case, either through observing 14 it, through another officer, many ways; but they 15 would have knowledge of the case; correct. 16 Q Okay. You can put this exhibit to the 17 side. 18 (Nichols Deposition Exhibit 5 marked for 19 identification and attached to the transcript.) 20 Q I'm going to show the case incident report 21 for this arrest. 22 Do you know whether you have reviewed that 23 in preparation for today's deposition? 24 A Like I said, I don't recall. I don't
102 1 the officer who is called to testify at trial? 2 A Not necessarily, no. 3 Q Okay. By logging in and completing this 4 as the attesting officer, you were declaring that 5 the facts contained in the report were truthful 6 and accurate to the best of your knowledge; right? 7 A That's correct. 8 Q Okay. And you're listed here as the first 9 arresting officer. 10 Do you see that? 11 A I do. 12 Q What does it mean for you to be the first 13 arresting officer? 14 A The first arresting officer is just that 15 person in the -- that box, and they are 16 generating -- they are filling out the report. 17 Q Okay. And the person listed as the first 18 arresting officer is the same as what you were 19 describing earlier as Box 1; right? 20 A Could you repeat that question? I'm 21 sorry. 22 Q Yeah. Earlier in the day, you testified 23 about someone being Box 1 on a report. 24 Do you remember that?	104 1 know. 2 Q Okay. This exhibit contains the original 3 case incident report and a couple of supplement 4 reports. 5 I'd just ask you to review this exhibit 6 and let me know if it refreshes your recollection 7 about the arrest of Mr. McNairy. 8 Have you had a chance to review it? 9 A Yes. 10 Q Does that refresh your recollection at all 11 about the arrest of Mr. McNairy? 12 A It does not. 13 (Nichols Deposition Exhibit 6 marked for 14 identification and attached to the transcript.) 15 Q I'm going to show you an inventory report 16 from this arrest. 17 MR. BAZAREK: What's the number, Counsel? 18 MS. KLEINHAUS: No. 6. 19 Q This is a two-sided exhibit. 20 A Okay. 21 Q Having reviewed that, does it refresh 22 your recollection about the arrest of Mr. McNairy 23 at all? 24 A It does not.

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27 (105 to 108)

105	1 (Nichols Deposition Exhibit 7 marked for 2 identification and attached to the transcript.) 3 BY MS. KLEINHAUS: 4 Q Okay. I'm going to show you what we'll 5 mark as Exhibit 7. This is the affidavit of Andre 6 McNairy. 7 Have you reviewed his affidavit before? 8 A I don't believe so, no. 9 Q Okay. Go ahead and take a moment to 10 review it, please. 11 MR. PALLES: This is 6 or 7? 12 MS. KLEINHAUS: No. 7. 13 A Okay. 14 Q Okay. Having reviewed this affidavit, 15 does that allow you to recall who Mr. McNairy is? 16 A No, it does not. 17 Q Does it refresh your recollection at all 18 about the arrest of Mr. McNairy? 19 A No, it does not. 20 Q Okay. I want to turn your attention to 21 the third paragraph in this affidavit. It's at 22 the bottom of the first page. It says -- this is 23 talking about something that happened a few weeks 24 before the arrest that we just -- I just showed	107	1 saying you didn't do that. If someone -- if a 2 police officer did do that and brought someone in 3 to try and get information, threatened to charge 4 them with a drug crime, that would be wrong, 5 wouldn't it? 6 A Yes. 7 MR. PALLES: I object. 8 BY MS. KLEINHAUS: 9 Q Okay. That would be a violation of his 10 rights, wouldn't it? 11 MR. KOSOKO: I'm just going to -- I know 12 where you're going but I'm just going to the -- 13 it's assuming facts not in evidence. 14 MR. PALLES: I'm going to object to laying 15 a foundation. 16 MR. BAZAREK: Further object to the 17 hypothetical. 18 A If they didn't have any other reason to 19 bring him into the station, that's correct. 20 Q Okay. Turn with me please to the fifth 21 paragraph. It says, "At the station, they strip 22 searched me. They confiscated some drugs and 23 money I had in my possession." 24 Do you know whether that happened or not?
106	1 you all the reports for. Okay. 2 It says that Mr. McNairy was by himself at 3 40th and Oakwood when you and Officer Gonzalez 4 stopped him and asked about drugs. 5 Do you know whether that encounter 6 happened or not? 7 A I don't know if I had any encounter with 8 him that day, no. 9 Q Okay. Below that it says, "I told them I 10 didn't have anything, and they said just give me 11 the heroin. We gonna to work with you." 12 Do you see that? 13 A Yes. 14 Q Okay. Do you know whether that discussion 15 or conversation happened or not? 16 A I know that conversation never happened. 17 Q And how do you know that? 18 A Because I never asked him that. 19 Q And why do you think you never asked him 20 that? 21 A Because I wouldn't bring him in the 22 station and ask him for heroin if I didn't observe 23 it. 24 Q Okay. And if you had -- I know you're	108	1 A That did not happen. 2 Q Okay. Why do you believe that did not 3 happen? 4 A Because I never strip searched him or did 5 I observe anyone strip search him. 6 Q How do you know that? 7 A Because I never strip searched someone in 8 my career. 9 Q Okay. And if you wanted to strip search 10 someone, was there a process at the 2nd District 11 you would have needed to go through? 12 A To the best of my knowledge, if an officer 13 wanted to strip someone, an offender, they would 14 have to go to a watch commander and get, like, an 15 assent, to the best of my knowledge. 16 Q Okay. If an officer were to strip search 17 someone at the district without that permission, 18 that would be against the rules; right? 19 A Yes. 20 MR. PALLES: Object. Lay a foundation. 21 Q Okay. Look with me, please, at 22 paragraph 6 of the affidavit. It says, "A little 23 bit later, Watts comes out of the office and told 24 Nichols to 'hold up.' Nichols was at the desk at

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28 (109 to 112)

109 1 his computer. Watts then alone took me to his 2 office alone. This was the first time I had ever 3 spoken to Watts." 4 Do you know whether or not that happened? 5 A I don't know. I don't recall this 6 incident. 7 Q Okay. Turn with me, please, to 8 paragraph 11. 9 Mr. McNairy mentions a Mohammed Blanden. 10 He was also mentioned in some of the previous 11 reports I showed you. 12 Do you know who Mr. Blanden is? 13 A No. I can't say that I do. 14 Q Okay. Turn with me, please, to 15 paragraph 14. It says, "One of the officers 16 said," quote, 'Where did you find that?', end 17 quote, "and Watts said he pulled back some wood in 18 an abandoned building." 19 Did you ever observe that conversation? 20 A Was he talking -- where did he find that? 21 I never observed Watts saying that that I recall. 22 No. What is -- I don't understand what -- where 23 did you find that. What is he talking about. 24 Q Okay. You can put that exhibit to the	111 1 today? 2 A Maybe briefly, yes. 3 Q Okay. Do you know which reports you 4 reviewed? 5 A Maybe a general case report -- or a vice 6 case report, a booking photo, and the arrest 7 report, if any. 8 Q Okay. You said you may have looked at 9 those or you looked at them? 10 A I don't recall. I believe I did. I can't 11 recall if I did or didn't. 12 (Nichols Deposition Exhibit 9 marked for 13 identification and attached to the transcript.) 14 Q Okay. I'll hand you what we'll mark as 15 Exhibit 9. It's the arrest report for Chris 16 Scott. 17 MR. KOSOKO: Do you mean to give me the 18 vice case report for this? 19 MS. KLEINHAUS: I didn't, but hang on to 20 it. You'll need it in a second. 21 Q Review the narrative portion of this 22 report, please. 23 A Okay. 24 Q Okay. Did reviewing that narrative
110 1 side. 2 I'd like to talk to you about my client 3 Christopher Scott. 4 Do you know who Mr. Scott is? 5 A I think I heard of the name before, yes. 6 Q Okay. Other than having heard the name 7 before, do you know anything about Mr. Scott? 8 A Not that I recall, no. 9 Q Okay. Do you know of any nicknames for 10 Mr. Scott? 11 A No. Not that I recall, no. 12 Q Okay. Do you recall anyone in the 13 Ida B. Wells housing complex with the nickname 14 Greedy? 15 A Greedy? No. 16 (Nichols Deposition Exhibit 8 marked for 17 identification and attached to the transcript.) 18 Q I'm going to show you what we'll mark as 19 Exhibit 14. Sorry, my bad, Exhibit 8. 20 Do you recognize the person that you see 21 in Exhibit 8? 22 A No, I don't. 23 Q Did you review reports related to 24 Mr. Scott in preparation for your deposition	112 1 portion of the report refresh your recollection at 2 all about the arrest of Chris Scott? 3 A No, it does not. 4 Q Okay. Turn with me to the fifth page of 5 this exhibit. You're listed there as an assisting 6 arresting officer. 7 Do you know what you did to assist with 8 this arrest? 9 A No, I do not. 10 Q Can you think of anything that you could 11 review that would tell you what you did? 12 A Maybe I did an inventory. Maybe -- I 13 don't know. Maybe I did complaints. Maybe I 14 searched. Maybe a lot of things that would 15 consist of an assisting arresting officer on the 16 case. 17 Q Right. Do you know of anything -- any 18 documents that would tell us what your role was 19 specifically? 20 MR. BAZAREK: Other than what he just 21 testified to? 22 A Other than maybe the vice -- or the 23 inventory slip, maybe. 24 Q Okay. Other than the inventory slip, is

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29 (113 to 116)

113	1 there anything that could tell us what you did? 2 A Not that I'm aware of, no. 3 Q Okay. You can put that to the side. 4 And is that true for all arrests? Other 5 than if you did the inventory so your name is on 6 that, is there any way for us to know what you did 7 if you're listed as an assisting officer? 8 MR. BAZAREK: Object to the form of the 9 question, foundation, compound, vague, and 10 ambiguous. 11 MR. NOLAND: I object to the extent it 12 mischaracterizes. 13 MR. KOSOKO: Join in both of those 14 objections. 15 MR. BAZAREK: And I join that one too. 16 A Maybe the narrative in the arrest report 17 or the case report of what I did. 18 Q Okay. Other than the narrative, is there 19 any document you know of that would tell us what 20 the assisting officers did? Besides the 21 inventory, you told us that. 22 MR. BAZAREK: Same objection. 23 A Other than the case report and the arrest 24 report, I don't believe so, no.	115	1 the arrest of Christopher Scott? 2 A No. 3 Q Okay. I'm going to direct your attention 4 to the third paragraph of this affidavit. He 5 describes a scheme where officers would go to the 6 second floor of the building and use individuals 7 in the projects to solicit drug purchasers. 8 MR. BAZAREK: I just want to object to the 9 way you're paraphrasing it. I mean 3 -- No. 3 10 says what it says. 11 MR. KOSOKO: Join in that. 12 A Where the -- could you repeat that 13 question, ma'am. 14 Q Sure. You've read paragraph 3; right? 15 A Yes. 16 Q Okay. Are you familiar with the scheme 17 where officers would ask people from the projects 18 to solicit drug purchasers for them? 19 A No, never. 20 Q Are you familiar with a mission or a 21 process or a project where the sales would happen 22 on the second floor; and then when the purchasers 23 would go down to the first floor, they'd get 24 arrested?
114	1 (Nichols Deposition Exhibit 10 marked for 2 identification and attached to the transcript.) 3 BY MS. KLEINHAUS: 4 Q Okay. I'm going to show you what we'll 5 mark as the next exhibit. It's the vice case 6 report. 7 MR. BAZAREK: This is 10; right? 8 MS. KLEINHAUS: Yes. 9 A Okay. 10 Q Does reviewing this vice case report 11 refresh your recollection about this arrest? 12 A It does not. 13 Q Okay. You can put that to the side. 14 (Nichols Deposition Exhibit 11 marked for 15 identification and attached to the transcript.) 16 Q I'm going to show you what we'll mark as 17 Exhibit 11. This is the affidavit of Christopher 18 Scott. 19 A Okay. 20 Q Okay. Having reviewed this affidavit, 21 does it refresh your recollection at all about who 22 Christopher Scott is? 23 A No. 24 Q Does it refresh your recollection about	116	1 A No, never, no. 2 Q Okay. You can put that exhibit to the 3 side. 4 How many times were you part of a reverse 5 sting with the 264 team? 6 A I don't know. 7 Q Would it be more than 10 times? 8 A Like I said, I don't know. I don't know. 9 I'd be guessing. I don't know. 10 Q You have no idea if it's 2 times or 100 11 times? 12 A Like I said, I don't know an exact number. 13 I don't know. 14 Q I'm not asking for an exact number. 15 Do you know approximately how many times? 16 A No, I don't know. I don't know. 17 Q When you would participate in the reverse 18 stings, where in the building would that happen? 19 A Excuse me? 20 Q Where would the reverse stings take place? 21 A Like I stated before, the reverse stings, 22 I would be inside the building, and then the 23 officers would be outside the building. 24 Q The officers posing as drug dealers would

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30 (117 to 120)

117 1 be outside the building? 2 A That's correct. 3 Q Okay. Do you know someone by the name of 4 Jamell Sanders? 5 A I believe so, yes. 6 Q Okay. What do you know about Mr. Sanders? 7 A That he was a regular drug dealer down in 8 Ida B. Wells. 9 Q Okay. And what drugs did he sell? 10 A I believe he would sell either heroin or 11 crack cocaine. 12 Q What did Mr. Sanders look like? 13 A If I'm thinking of the right person, he 14 had basically no neck. 15 Q Did you arrest Mr. Sanders? 16 A I don't recall. I would have to look at 17 documents or anything that would refresh my 18 memory. 19 Q How old was Mr. Sanders when you knew him? 20 A I think he was a teenager at the time or 21 16 or young adult at the time. I don't exact -- 22 know exactly how old he was at the time. 23 Q Who did he live with? 24 A I couldn't tell you. I don't know.	119 1 A Yes, I talked to other officers about 2 Mr. Sanders. 3 BY MS. KLEINHAUS: 4 Q Okay. What did you discuss? 5 A Like I said, I don't remember. 6 Q What do you remember about the 7 discussions? 8 A That he was a known drug dealer in the 9 Ida B. Wells housing complex. 10 Q Okay. Where did those conversations take 11 place? 12 A That I don't remember. 13 Q When did you first encounter Mr. Sanders? 14 A I don't remember that either. I don't 15 know. 16 Q You mentioned you knew he was a drug 17 dealer from prior investigations. 18 What prior investigations did you do with 19 Mr. Sanders? 20 MR. KOSOKO: I'm going to object to the 21 form of the question, vague, ambiguous, 22 foundation. 23 MR. BAZAREK: I'll join. 24 MR. KOSOKO: And the form of the question,
118 1 Q Which Ida B. Wells building did he live 2 in? 3 A I don't even know if he lived in 4 Ida B. Wells. I couldn't tell you that either. 5 Q What makes you believe that he was a drug 6 dealer? 7 A Just from prior investigations and talking 8 to fellow officers. 9 Q Who did you talk to about Mr. Sanders? 10 A My other teammates and people in the tac 11 office. 12 Q Which teammates? 13 A The teammates that were on my team. 14 Q Which ones did you talk to about 15 Mr. Sanders? 16 A I don't recall. 17 Q Do you know whether or not you ever talked 18 to them about Mr. Sanders? 19 A Excuse me? 20 Q Do you know whether you actually talked to 21 them about Mr. Sanders? 22 MR. PALLES: Objection; asked and 23 answered. 24 MR. BAZAREK: Yeah. Asked and answered.	120 1 of Sanders. 2 A Other investigations, talking to other 3 fellow officers. 4 Q Right. What prior investigations or other 5 investigations are you reviewing to? 6 A Well, investigations when I was talking to 7 other officers. 8 Q Who were you investigating? 9 A The known drug dealers in the Ida B. Wells 10 housing complex. 11 Q Who else do you consider to be a known 12 drug dealer at the Ida B. Wells housing complex? 13 A That I recall, there was a name -- Brian 14 Ford, Ben Baker, Allen Jackson, Mr. Pearson. I 15 don't remember off the top of my head anyone else 16 at this time. 17 Q Do you know anyone that you believe 18 Mr. Sanders to be working with? 19 A No, I don't. I don't know. 20 Q Do you know of any nicknames for 21 Mr. Sanders? 22 A I believe his nickname was No Neck, if I'm 23 thinking of the right person. 24 Q Anything else?

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31 (121 to 124)

121 1 A Not that I recall, no. 2 Q Do you know whether or not you were 3 actually ever part of any investigations of 4 Mr. Sanders? 5 A I know I talked to other officers about 6 the investigations -- or investigations of known 7 drug dealers in the Ida B. Wells housing complex, 8 yes. 9 Q Were you part of any investigations of 10 Mr. Sanders? 11 A Excuse me? 12 Q Were you part of any investigations of 13 Mr. Sanders? 14 A Yes. 15 MR. BAZAREK: Object to the form of the 16 question. Also I think it's been asked and 17 answered. 18 MR. KOSOKO: I'll join that. 19 A Yes. As I stated before, I had other 20 conversations with fellow officers about 21 Mr. Sanders. 22 Q Okay. Which investigations of Mr. Sanders 23 do you recall? 24 A I don't recall any.	123 1 arrest of Mr. Sanders in preparation for your 2 deposition today? 3 A I believe so, briefly, yes. 4 Q Okay. Did those reports allow you to 5 refresh your recollection about an arrest of 6 Mr. Sanders? 7 A No. 8 Q Okay. Did you review the arrest report? 9 A I believe I did, yes. I believe so. 10 Q Okay. Did you review the vice case 11 report? 12 A I think I did very briefly, yes. 13 Q Okay. Who else was on that arrest with 14 you? Which other officers were on that arrest? 15 A I would have to look at the arrest report 16 to find out who was on that with me or even if I 17 was there. I don't remember. 18 (Nichols Deposition Exhibit 12 marked for 19 identification and attached to the transcript.) 20 Q Is this the person that you're referring 21 to when you talk about Mr. Sanders? 22 A That's correct. 23 Q You recognize him from the photo? 24 A I do.
122 1 Q So the investigations you discussed with 2 your teammates weren't investigations of 3 Mr. Sanders? 4 MR. BAZAREK: Object to the form of the 5 question, compound, vague, ambiguous. 6 MR. KOSOKO: Join. 7 A Like I stated before, we talked about 8 known drug dealers in the Ida B. Wells housing 9 complex. 10 Q And my question is what investigations of 11 Mr. Sanders did you discuss with them? 12 MR. KOSOKO: Objection; asked and 13 answered. 14 MR. BAZAREK: Join. 15 A Like I stated before, we talked about 16 known drug dealers in the Ida B. Wells housing 17 complex. 18 Q That wasn't my question. 19 Did you discuss investigations of 20 Mr. Sanders with your teammates? 21 A Other than talking about known drug 22 dealers in the Ida B. Wells housing complex? I 23 don't recall. I don't know. 24 Q Did you review documents related to an	124 1 Q Okay. That's the person you're referring 2 to as No Neck; right? 3 A That's correct. 4 Q Okay. You can put that to the side. 5 MR. BAZAREK: Counsel, that was 6 Exhibit 12? That was No. 12, the booking photo? 7 MS. KLEINHAUS: Yep. 8 MR. BAZAREK: This is 13? 9 MS. KLEINHAUS: Yep. 10 (Nichols Deposition Exhibit 13 marked for 11 identification and attached to the transcript.) 12 Q Okay. Is this the arrest report that you 13 reviewed? 14 A I believe so, yes. 15 Q Okay. And take a look at the narrative 16 section of this report, and let me know if it 17 refreshes your recollection about this arrest. 18 A Okay. 19 Q Having reviewed the narrative section, 20 does it refresh your recollection about this 21 arrest? 22 A It does not. 23 Q You don't know what role you played in 24 this arrest; right?

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32 (125 to 128)

125 1 A I do not. 2 Q And you didn't write it down at the time; 3 right? 4 A I did not, no. 5 Q Okay. Turn to the front page of this 6 exhibit, it shows there that Mr. Sanders would 7 have been 17 years old at the time of this arrest. 8 Had you encountered him when he was 9 younger than that? 10 A I'm sure -- I don't know if I actually 11 encountered him but -- face-to-face, I don't know. 12 (Nichols Deposition Exhibit 14 marked for 13 identification and attached to the transcript.) 14 Q Okay. This is Exhibit 14. It's the vice 15 case report for the arrest of Mr. Sanders. 16 A Okay. 17 Q Okay. Having reviewed the vice case 18 report, does it refresh your recollection about 19 this arrest report? 20 A It does not. 21 Q Okay. In the narrative section, it 22 describes doing a premise check. 23 Do you see that? 24 A Yes.	127 1 Q Okay. Turn with me, please, to the second 2 page of this affidavit. I want to focus your 3 attention on paragraph 7. It says, "While there, 4 Watts received a call from someone. The officers 5 then took me to an apartment in the complex. They 6 opened the door and put me in there." 7 Do you know whether that happened or not? 8 A No, I don't know. I don't know. 9 Q Okay. And looking below that to paragraph 10 8, it says, "The officers then searched the 11 apartment. I saw Watts open a cabinet and recover 12 a bunch of drugs." 13 Do you know whether that happened or not? 14 A No, I don't. 15 Q Okay. Turn to the next paragraph, it's 16 paragraph 9. It says, Watts then said if I tell 17 him where the stuff -- where stuff is, he would 18 let me go. 19 Do you know whether that happened or not? 20 A No, I don't. I don't know. 21 Q Okay. Looking below that at paragraph 11, 22 it says, "They took me to 51st and Wentworth. 23 While I was there, Gonzalez said to me," quote, 24 'you had a chance to say something but you didn't.
126 1 Q What is a premise check? 2 A A premise check of the building is when 3 you enter the location and you go floor-by-floor 4 of the building. 5 Q You can put that exhibit to the side. 6 (Nichols Deposition Exhibit 15 marked for 7 identification and attached to the transcript.) 8 Q I'm handing you what's been marked as 9 Exhibit 15, this is the affidavit of Jamell 10 Sanders. 11 Have you seen this affidavit before? 12 A No. 13 Q Take a moment to review it, please. 14 A Okay. 15 Q Okay. Having reviewed this affidavit, 16 does it refresh your recollection about the arrest 17 of Mr. Sanders? 18 A No, it doesn't. 19 Q Has it refreshed your recollection about 20 any encounters that you had with Mr. Sanders? 21 A No, it does not. 22 Q Do you have any recollection of any 23 encounters with him at all? 24 A No. Not that I can think of, no.	128 1 So now you got to go to jail." 2 Do you know whether that happened or not? 3 A I don't know. 4 Q Okay. You can put this exhibit to the 5 side. 6 MR. NOLAND: I'm going to object to the 7 form of those questions to the extent that any 8 implication could be met if they were 9 incorporating sentences of the affidavit that were 10 not read to the witness. 11 MR. BAZAREK: I'll join. 12 MR. KOSOKO: Join. 13 Q Do you know who Cleon Glover is? 14 A No, I don't. 15 (Nichols Deposition Exhibit 16 marked for 16 identification and attached to the transcript.) 17 Q I'm going to show you an exhibit with 18 Mr. Glover's photo on it. It's got his name on it 19 too. I want you tell me whether this refreshes 20 your recollection at all as to who Mr. Glover is. 21 A It does not. 22 (Nichols Deposition Exhibit 17 marked for 23 identification and attached to the transcript.) 24 Q You can put that to the side, sir.

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33 (129 to 132)

129	1 I'm going to show you what we've marked as 2 Exhibit 17. 3 A Okay. 4 Q Have you reviewed the narrative portion of 5 that report? 6 A I did. 7 Q Did it refresh your recollection at all 8 about the arrest of Mr. Glover? 9 A It did not. 10 Q Okay. You wrote the narrative section of 11 this report; is that correct? 12 A I believe I did, yes. 13 Q Okay. In the narrative section in a few 14 different places it refers to A, slash, O's, A, 15 forward slash, O's. 16 Do you see what I'm talking about? For 17 example, A/O's entered the rear door. 18 A Okay. 19 Q What does A/O stand for? 20 A A/O's could stand for me and my partner in 21 the rear door of that. 22 Q Okay. A/O would be the arresting 23 officers; right? 24 A Yes.	131	1 Q Okay. How would you decide whether you 2 thought it referred to the assisting arresting 3 officer or not? 4 MR. NOLAND: Objection; argumentative. 5 MR. KOSOKO: Join. 6 MR. BAZAREK: Also object to the form, 7 vague, ambiguous, compound. 8 A Just like if they entered the rear door 9 with me at that time, they could be considered 10 A/O's. 11 Q My question is about you as the author of 12 the narrative section, whether you considered 13 A/O's to include them or not? 14 A In which part? I don't understand. 15 Entered the rear door? 16 Q Yeah. Let's start there. 17 A It could and it couldn't. I don't know. 18 I don't remember this. So I don't know. 19 Q Okay. When would you, as the writer, 20 intend for it to refer to the assisting arresting 21 officers? 22 A Excuse me? 23 MR. KOSOKO: I'll object to the form of 24 the question, vague, ambiguous, calls for
130	1 Q Okay. And that would refer to you and 2 Officer Leano; is that right? 3 A Yes. 4 Q Okay. Was it your practice for that to 5 also refer to the officers listed as assisting? 6 MR. KOSOKO: Object to the form of the 7 question, foundation. 8 A It depends if -- yes, it could. It could 9 mean that too, yes. 10 Q Does it refer to the assisting arresting 11 officers in this narrative? 12 A In which part? We entered the rear door? 13 I don't know what you're -- 14 Q Any of the parts that it says A/O's. 15 Let's start with the first one. A/O's entered the 16 rear door. 17 Does that include the assisting arresting 18 officers? 19 A I don't recall this incident, so I don't 20 know. 21 Q Was it your practice, when you were 22 writing narratives for police reports, for A/O's 23 to refer to the assisting arresting officer? 24 A It could.	132	1 speculation. 2 MR. PALLES: (Inaudible) from reading the 3 draft of the report. 4 MR. BAZAREK: I'll join. 5 A I don't understand the question. I don't 6 know. 7 Q Okay. Is it your testimony that sometimes 8 A/O's includes the assisting arresting officers 9 and sometimes it doesn't? 10 MR. BAZAREK: Objection; asked and 11 answered. 12 A It could, yes. 13 Q Why? 14 A Just like what I stated before, if they 15 entered the rear door with me, they could be 16 A/O's. 17 Q How could anyone reading your narrative 18 ever know who is included in the A/O's? 19 MR. BAZAREK: Object to the form of the 20 question, foundation. 21 MR. KOSOKO: I'm going to join and add to 22 that as argumentative, and it assumes facts not in 23 evidence -- 24 MR. FLAXMAN: We got your objection.

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34 (133 to 136)

133 1 Thanks. 2 MR. KOSOKO: -- regarding the report. 3 MR. BAZAREK: I join with the extras. 4 A Well, because it's happened before, maybe 5 I would have a better recollection of who was the 6 A/O's at the time of this incident. 7 BY MS. KLEINHAUS: 8 Q Okay. My question is a little bit 9 different. I'm focused on how someone reading 10 this could know who the abbreviation A/O's refers 11 to in this report. 12 MR. BAZAREK: Objection; argumentative, 13 same objections. 14 MR. KOSOKO: Join. 15 A It could mean the arresting officers. 16 Q How would someone know who it refers to? 17 MR. BAZAREK: Objection; argumentative. 18 A Because there's a list of arresting 19 officers on here. There's officer Leano on this 20 case report. There's Officer Gonzalez on this 21 arrest report, Officer Bolton on this arrest 22 report, Officer Jones on this arrest report. 23 Q All right. And it's your testimony that 24 it may or may not refer to those people; correct?	135 1 side. 2 Do you know whether you looked at the vice 3 case report for Mr. Glover in preparation for your 4 deposition today? 5 A I believe I did very briefly, but I'm not 6 100 percent sure. But I believe I did. 7 (Nichols Deposition Exhibit 18 marked for 8 identification and attached to the transcript.) 9 Q Okay. I'm going to show you what we'll 10 mark as Exhibit 18. 11 A Okay. 12 Q Okay. Does reviewing that vice case 13 report refresh your recollection at all about the 14 arrest of Mr. Glover? 15 A It does not. 16 Q Okay. You can put that to the side. 17 (Nichols Deposition Exhibit 19 marked for 18 identification and attached to the transcript.) 19 Q I'll show you what's been marked as 20 Exhibit 19. This is the original case incident 21 report for Mr. Glover's arrest. 22 A Okay. 23 Q And that's a two-sided exhibit. You saw 24 that.
134 1 A As the assisting officers? I don't know. 2 Q And you're the one who wrote it; right? 3 A I did. 4 Q Okay. Were you trained by the Chicago 5 Police Department not to explain in the narrative 6 what assisting arresting officers did? 7 MR. BAZAREK: Object to the form of the 8 question. 9 MR. KOSOKO: Join. 10 MR. NOLAND: Join. Objection; form, 11 foundation. 12 A Were we trained not to? 13 Q Yes, sir. 14 A Not that I recall, no. 15 Q Okay. Was it your practice to explain 16 what the assisting arresting officers did? 17 MR. KOSOKO: Object to the form of the 18 question. 19 MR. BAZAREK: And further object vague, 20 ambiguous. 21 A If they had anything with -- facts that 22 they did personally, yes, I would put them in 23 there. 24 Q Okay. You can put that exhibit to the	136 1 Does this exhibit refresh your 2 recollection about the arrest of Mr. Glover? 3 A It does not. 4 (Nichols Deposition Exhibit 20 marked for 5 identification and attached to the transcript.) 6 BY MS. KLEINHAUS: 7 Q Okay. I'm going to show you what we'll 8 mark as Exhibit 20. 9 A Okay. 10 Q This is the inventory report for the 11 arrest of Mr. Glover; correct? 12 A Correct. 13 Q Does this refresh your recollection about 14 the arrest of Mr. Glover? 15 A It does not. 16 Q Okay. You're listed here as the 17 investigating officer for this arrest. 18 Do you see that? 19 A Yes, I do. 20 Q And what does it mean to be the 21 investigating officer on the inventory form? 22 MR. NOLAND: Objection; foundation. 23 MR. BAZAREK: Join. 24 MR. KOSOKO: Join.

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35 (137 to 140)

137 1 A I believe -- I believe that box is for -- 2 that the investigation -- the officer who wants to 3 hold that for the court purposes. 4 Q Okay. 5 A Because I'm holding it for the 6 investigation. 7 Q Okay. What is it that you would be 8 holding for the investigation? 9 A The narcotics, the money. 10 Q Okay. All right. You can put that 11 exhibit to the side. 12 (Nichols Deposition Exhibit 21 marked for 13 identification and attached to the transcript.) 14 Q I'm going to show you what we'll mark as 15 Exhibit 21. This is the affidavit of Mr. Glover. 16 A Okay. 17 Q Okay. Having reviewed this affidavit, 18 does it refresh your recollection at all about an 19 encounter with Cleon Glover? 20 A No. It doesn't have me listed in his 21 affidavit either. 22 Q Okay. Look with me, please, at 23 paragraph 3. You've had a chance to review that. 24 A Okay.	139 1 paragraph 3, that's not based on your personal 2 recollection; it's based on your reliance on the 3 reports; right? 4 MR. NOLAND: Object to the form. 5 MR. KOSOKO: Join. 6 MR. BAZAREK: Join. 7 MR. PALLES: Join. 8 MR. BAZAREK: Also mischaracterizes his 9 testimony. 10 MR. KOSOKO: Join. 11 A That's based on the reports, correct. 12 BY MS. KLEINHAUS: 13 Q Okay. Looking at paragraph 4, it says, 14 "Watts grabbed me and put up against the wall and 15 asked me 'where the shit at?'" 16 Do you know whether that happened? 17 A If we're talking about this in the case 18 report, it did not happen. I know it didn't 19 happen that way. 20 Q And is that again because you rely on the 21 reports? 22 MR. NOLAND: Object to the form. 23 MR. KOSOKO: Join. 24 A That's correct.
138 1 Q Do you know whether or not what's 2 described in paragraph 3 happened or not? 3 A On which location on what day? 4 Q Well, if you look above paragraph 3, it's 5 June 6th, 2006. 6 A No. This didn't happen on the -- if we're 7 talking about the arrest incident, no, it did not 8 happen this way. 9 Q Okay. How do you know that? 10 A Because I know that we walked in there and 11 we observed him giving an object to a female, and 12 the female tendered him money, and then the female 13 fled. So that's how I know that didn't happen. 14 Q Okay. Do you recall the arrest? 15 A No, I don't. 16 Q Okay. So are you -- is your testimony 17 that you believe that the report is accurate? 18 A If I wrote the report, it's going to be 19 accurate. If another officer -- I would have no 20 way of knowing if it was false or not, and I would 21 believe that officer was telling the truth, and I 22 would have no reason not to believe that officer. 23 Q Okay. So when you're saying you don't 24 think it happened the way it's described in	140 1 BY MS. KLEINHAUS: 2 Q Okay. You can put that exhibit to the 3 side. 4 MR. BAZAREK: Take a break? 5 MS. KLEINHAUS: Sure. 6 THE VIDEOGRAPHER: Off the record, 2:49. 7 (A recess was taken from 2:49 p.m. to 8 2:59 p.m.) 9 THE VIDEOGRAPHER: Back on the record, 10 2:59. 11 BY MS. KLEINHAUS: 12 Q Sir, in the course of your career, how 13 many vehicle chases have you been part of? 14 A I don't know. I don't know. 15 Q Is it more than 12 or less than 12? 16 A I don't know. 17 Q No idea? 18 A No idea. 19 Q Okay. How many foot chases have you been 20 part of? 21 A Many. 22 Q Dozens? 23 A I don't know. I know it's many. 24 Q Do you know who Brian Hunt is?

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36 (141 to 144)

141 1 A Not that I can recall, no. 2 Q Okay. Do you know whether you have 3 reviewed a lawsuit -- a complaint filed by Brian 4 Hunt in these cases? 5 A Not that I'm aware of, no. 6 (Nichols Deposition Exhibit 22 marked for 7 identification and attached to the transcript.) 8 Q I'm going to show you a photo -- an 9 exhibit that we'll mark as Exhibit 22. 10 Do you recognize the person depicted in 11 that photo? 12 A I don't. 13 Q You can put that to the side. 14 (Nichols Deposition Exhibit 23 marked for 15 identification and attached to the transcript.) 16 Q I'm going to show you what we'll mark as 17 Exhibit 23. This is the arrest report of Brian 18 Hunt. 19 Did you review reports related to an 20 arrest of Brian Hunt in preparation for your 21 deposition today? 22 A Probably, briefly, yes. 23 Okay. 24 Q Having reviewed the arrest report, does	143 1 A No, I don't. That I recall, no. 2 Q Okay. Turning your attention to the third 3 paragraph of this affidavit, do you know whether 4 or not what's described there happened or not? 5 A No. It did not happen. Because reading 6 the case report, I believe it did not happen, and 7 I would say it didn't happen. 8 Q Okay. Is there something in the case 9 report that you think contradicts what's in 10 paragraph 3? 11 A It doesn't -- the narrative in the case 12 report doesn't say they were ever in a bathroom. 13 Q Okay. Is that something that you 14 typically would include in the narrative of a case 15 report? 16 A Most definitely. 17 Q And why is that? 18 A If it was pertinent to the case, yes, you 19 would -- to this, yes. 20 Q Okay. And why would it be pertinent to 21 the case that you questioned someone in the 22 bathroom? 23 A Why would you -- why would you question 24 him? Like how he states, why would you say where
142 1 that refresh your recollection about the arrest of 2 Mr. Hunt? 3 A It does not. 4 Q Put that to the side. 5 (Nichols Deposition Exhibit 24 marked for 6 identification and attached to the transcript.) 7 Q I'm going to show you what we'll mark as 8 Exhibit 24. This is the vice case report of the 9 arrest of Mr. Hunt. 10 A Okay. 11 Q Having reviewed the vice case report, does 12 that refresh your recollection about the arrest of 13 Mr. Hunt? 14 A Does not. 15 (Nichols Deposition Exhibit 25 marked for 16 identification and attached to the transcript.) 17 Q I'm going to show you what we'll mark as 18 Exhibit 25. This is the affidavit of Mr. Hunt. 19 A Okay. 20 Q Having reviewed the affidavit of Mr. Hunt, 21 does that refresh your recollection at all about 22 any encounters you've had with him? 23 A No, it does not. 24 Q Do you know who Deonta Smith is?	144 1 are the drugs in a bathroom? Why? 2 Q Okay. So other than the fact that a 3 description of questioning in the bathroom isn't 4 in the narrative section of the report, do you 5 have any other reason that you believe what's 6 described in paragraph 3 didn't happen? 7 A Yes. Because I believe I had no other 8 facts stating otherwise, that it would -- all 9 that's true on the case report and the arrest 10 report is not factual. 11 Q Okay. Other than those reports, are you 12 relying on anything else, in your opinion, that 13 what's described in paragraph 3 didn't happen? 14 A Just on the reports, no. 15 Q Okay. I think I may have asked a bad 16 question. 17 Are you relying on anything else besides 18 the reports to come to your conclusion that what's 19 described in paragraph 3 didn't happen? 20 A I'm just relying on the reports. 21 Q Okay. You can put that exhibit to the 22 side. 23 Do you know who Willie Martin is? 24 A Not that I recall, no.

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37 (145 to 148)

145 1 Q Have you ever been disciplined by the 2 Chicago Police Department? 3 A No, I have not. 4 (Nichols Deposition Exhibit 26 marked for 5 identification and attached to the transcript.) 6 BY MS. KLEINHAUS: 7 Q Okay. I'm going to show you what we'll 8 mark as Exhibit 26. 9 A Okay. 10 Q Okay. Prior to seeing this exhibit, were 11 you aware that Mr. Martin had filed this complaint 12 against you? 13 A No. This is my first time I'm seeing 14 this. 15 Q Okay. And this complaint is from October 16 of 2007. 17 Do you see that? 18 A Yes, I do. 19 Q Okay. Did anyone from the Chicago Police 20 Department ever question you about any of the 21 allegations contained here? 22 A No. 23 Q Okay. Turn with me please to the second 24 page where the allegations are listed.	147 1 A I don't know this incident. I don't 2 remember this incident. 3 MR. NOLAND: I would just state for the 4 record that it looks like this is an excerpt of 5 this Complaint Register No. 100585 that you have 6 provided to the witness, and it looks like there's 7 over 100 pages that you have not provided to the 8 witness. Am I right about that? 9 MS. KLEINHAUS: Yeah. There are hundreds 10 of duplicates, and I chose an excerpt that's 11 relevant to this witness. So what you're looking 12 at is an excerpt of the complaint that he never 13 knew about. 14 MR. NOLAND: Hold on. Duplicates, I'm not 15 certain that's -- that's not the point I'm getting 16 at. It looks like you omitted things from the 17 complaint register file; right? 18 MS. KLEINHAUS: That's true. 19 MR. NOLAND: Okay. 20 MS. KLEINHAUS: That's true. I omitted 21 things from the complaint register file, and I'm 22 using an excerpt from the exhibit -- or from that 23 complaint register to talk to this witness who has 24 never heard of this before.
146 1 The first allegation is that on 2 August 18th of 2006 at approximately 2125 hours in 3 the vicinity of 540 West Browning Avenue, you and 4 Officers Leano, Mohammed, Smith, and Jones failed 5 to inventory \$916. 6 Do you deny that allegation? 7 A I completely deny that allegation, and 8 Mr. Martin is a complete liar. 9 Q Okay. Look at the second allegation 10 there. It says -- it's an allegation that you, 11 Officer Leano, Officer Mohammed, Officer Smith, 12 and Officer Jones pushed him to the ground. 13 Do you deny that? 14 A I don't recall this incident. 15 Q Okay. 16 A But I know we didn't place our feet on 17 his neck. 18 Q Okay. So am I understanding you 19 correctly, you're not sure about him being pushed 20 to the ground, but you know for sure you didn't 21 place your feet on his neck? 22 A I know I didn't place my feet on his neck. 23 Q Okay. What about pushing him to the 24 ground?	148 1 MR. NOLAND: Well -- 2 MR. BAZAREK: I'll also object further to 3 the doctrine of completeness in terms of this 4 exhibit, and it's kind of hodgepodge. These are 5 things are slapped together, it looks like. 6 MS. KLEINHAUS: Okay. Well, that's a fine 7 trial objection, but your objection is noted. 8 BY MS. KLEINHAUS: 9 Q Okay. Looking at the third allegation 10 there, it says, Officer Nic -- listed as Nicholas, 11 Leano, Mohammed, Smith, and Jones attempted to 12 coerce Mr. Martin to admit to a crime by hitting 13 him and kicking him. 14 Do you deny that? 15 A I completely deny that, and Mr. Martin is 16 a complete liar. 17 Q Okay. And looking below that fourth 18 allegation, is that Officers Nicholas, which 19 appears to be a typo, Leano, Mohammed, Smith, and 20 Jones demanded money and information, handcuffed 21 him too tightly, and beat him. 22 Do you deny that? 23 A I completely deny that. 24 Q Okay. Turning to the next page in this

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38 (149 to 152)

149 1 exhibit, this is for the August arrest. There's a 2 vice case report there. 3 You've had a chance to review that; right? 4 A Yes. 5 Q Okay. Does that refresh your recollection 6 at all about an encounter with Mr. Martin? 7 A It does not. 8 Q Okay. Following that is the handwritten 9 complaint from Mr. Martin. 10 You've had a chance to review that; right? 11 A Very briefly, yes. 12 Q Okay. Does that refresh your recollection 13 at all about any encounter with Mr. Martin? 14 A No, it does not. 15 Q Okay. Turning from that, there's the 16 arrest report from this August encounter with 17 Mr. Martin. 18 Does that refresh your recollection at all 19 about an August encounter with Mr. Martin? 20 A No, it does not. 21 Q He has a nickname listed here as a Fatty. 22 Does that refresh your recollection at all 23 as to who this is? 24 A It does not.	151 1 A When he would not be? Maybe an officer 2 forgot to put an officer on it. I don't know. 3 Maybe he didn't do anything with the processing of 4 the arrest or any involvement with the arrest, so 5 that's why he would not be on it. 6 BY MS. KLEINHAUS: 7 Q Okay. If someone did assist with the 8 arrest in some way -- 9 MR. BAZAREK: Object. Sorry, I thought 10 you were done. 11 Q Okay. All right. I'm going to show you 12 the next exhibit, and we'll compare them. 13 A Keep this one to the side? 14 Q Yes. No, not to the side. Keep that in 15 front of you. We're going to talk about both of 16 them. 17 (Nichols Deposition Exhibit 28 marked for 18 identification and attached to the transcript.) 19 MR. BAZAREK: Can we go off the record for 20 a minute? 21 MS. KLEINHAUS: Can we just finish this -- 22 MR. BAZAREK: Oh, sure, yeah. 23 MS. KLEINHAUS: -- and then we'll do it. 24 MR. BAZAREK: Sure.
150 1 Q Okay. You can put that exhibit to the 2 side. 3 (Nichols Deposition Exhibit 27 marked for 4 identification and attached to the transcript.) 5 Q I'm going to show you what we'll mark as 6 Exhibit 27. This is the arrest report for the 7 September 2006 arrest of Mr. Martin. 8 A Okay. 9 Q All right. Does this arrest report 10 refresh your recollection about an encounter with 11 Mr. Martin? 12 A It does not and I'm not even on the -- 13 listed in the case report. I'm not assisting, not 14 arresting, in that box, not the first arresting 15 officer, not the second arresting officer, not 16 assisting arresting report on this case report. 17 Q Right. And if you were part of this 18 arrest, you should have been included; right? 19 A Yes. Not in all circumstances but 20 typically, yes. 21 Q When would an officer who was part of an 22 arrest not be listed on the arrest reports? 23 MR. KOSOKO: Objection; form of the 24 question.	152 1 A Okay. 2 BY MS. KLEINHAUS: 3 Q Okay. Having reviewed the vice case 4 report for this arrest, you see that you're listed 5 on the vice case report; right? 6 A I do. 7 Q And as you already noted, you're not on 8 the arrest report; right? 9 A That's correct. 10 Q Do you know why you're not included on the 11 arrest report? 12 MR. PALLES: Objection; lack of 13 foundation. 14 MR. KOSOKO: Join. 15 MR. BAZAREK: Join. 16 A I don't know. 17 Q Okay. Were you ever given any instruction 18 on who to include on an arrest report? 19 MR. PALLES: Objection; asked and 20 answered. 21 A Could you repeat that question? 22 MR. KOSOKO: Join. 23 Q Were you ever given any instruction on 24 which officers to list on an arrest report?

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153 1 A Instruction by who? I don't understand 2 the -- 3 Q Your employer or anybody else. 4 A No. 5 Q Okay. Did anybody tell you, and that 6 means anyone from the Chicago Police Department, 7 who to list as officers on a vice case report? 8 MR. BAZAREK: Object to foundation, form. 9 A If they had anything -- involvement with 10 the arrest report or the arrest process, yes, they 11 would typically be listed. In some circumstances, 12 they're left off. 13 Q Okay. Other than the circumstance that 14 you mentioned where someone just forgets, is there 15 any other circumstance that you know of where an 16 officer should be left off? 17 MR. KOSOKO: Object; form of the question, 18 calls for a speculative response. 19 MR. BAZAREK: Join. 20 A Could you repeat that question? 21 MS. KLEINHAUS: Could you read it back, 22 please. 23 (Pending question read.) 24 A Not that I'm aware of, no.	155 1 there from September of 2006 where it says, 2 "inventory creator," and then it has your name. 3 Do you see that? 4 A Yes. 5 Q Okay. Was it your practice to -- I'm 6 sorry -- strike that, please. 7 How would you create a record of the chain 8 of custody for narcotics that you recovered? 9 A Like I stated before, I don't know about 10 this paper, but I can talk to you about the 11 inventory process. 12 Q Sure. How would you create an inventory? 13 MR. NOLAND: I would object. You said 14 narcotics. This relates to money -- 15 THE WITNESS: Or money. 16 MR. NOLAND: -- but I don't know if you 17 were -- 18 MS. KLEINHAUS: Oh, I'm sorry. Okay. 19 MR. NOLAND: -- you know, specifying one 20 or the other. 21 Q I'll rephrase. 22 How would you do an inventory for money? 23 A I would log in to an eTrack, the eTrack 24 system, and then I would go into the computer, and
154 1 MS. KLEINHAUS: Okay. We can go off the 2 record now, Bill. 3 THE VIDEOGRAPHER: Off the record, 3:24. 4 (A recess was taken from 3:24 p.m. to 5 3:28 p.m.) 6 THE VIDEOGRAPHER: Back on the record, 7 3:28. 8 BY MS. KLEINHAUS: 9 Q Sir, do either of the reports you've just 10 looked at, the arrest report and the vice case 11 report, refresh your recollection about an arrest 12 of Willie Martin from September of 2006? 13 A It does not. 14 (Nichols Deposition Exhibit 29 marked for 15 identification and attached to the transcript.) 16 Q Showing you what's been marked as 17 Exhibit 29. It's a two-sided exhibit. 18 A Okay. 19 Q Are you familiar with this type of 20 document? 21 A I am not. 22 Q Okay. It's labeled an "eTrack Chain of 23 Custody." I want to turn your attention to the 24 back side of this document. There's an entry	156 1 it would generate a unique number for that 2 incident. 3 After I get that unique number, I fill in 4 the boxes; and then after I check all the boxes or 5 fill in all the boxes that need to be, I submit it 6 for approval. 7 Q Okay. And who has to approve it? 8 A A sergeant. 9 Q Okay. If you turn to the front page, at 10 the very bottom there it says "inventory 11 submitter" next to your name. 12 Do you see that? 13 A Yes. 14 Q And when you finished creating an 15 inventory, would there be an option on the screen 16 for you to submit it? 17 A Yes. 18 Q Okay. If you look one line above that, it 19 says "hold creator." 20 Do you know how in the system you would 21 create a hold? 22 A Like I said before, maybe if it's hold for 23 investigation. That's why the hold create- -- but 24 I'm not too familiar with this particular sheet.

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40 (157 to 160)

157 1 I never saw one of these before. 2 Q Okay. When you would use the eTrack for 3 inventories, was there an option in that system 4 for you to place something on hold or create a 5 hold? 6 A Yes. 7 Q Okay. Do you know in this instance why 8 you would be the one creating and submitting the 9 inventory but Officer Mohammed would be the one 10 creating the hold? 11 A Because that was my duties during the -- 12 this particular arrest. I was inventorying the 13 money. 14 Q Okay. And would those typically be 15 different duties, the person inventorying versus 16 the person creating the hold? 17 MR. NOLAND: Objection; foundation. 18 MR. BAZAREK: Yeah. I'd object, compound. 19 A I don't understand what you're -- what you 20 mean. 21 Q Okay. You said it was part of your duties 22 for this arrest to create the inventory and submit 23 it; right? 24 A This particular arrest, that's what it	159 1 eTrack system that you've described -- 2 A Yes. 3 Q -- after you've created the inventory and 4 you've submitted the inventory, would you have an 5 option to create a hold? 6 A No. We have to -- we have to create that 7 before we even submit it. We have to put for hold 8 for investigation -- or what we're doing with the 9 money before we even submit it. 10 Q Okay. So I must have misunderstood. 11 So you create the inventory, and then you 12 have an option to create a hold or press a button 13 that says "hold"? 14 A Yes. 15 Q Okay. Is there any reason when you were 16 creating the inventory that you wouldn't also 17 create the hold at the same time? 18 A I don't understand. Could you repeat that 19 one more time? 20 Q Yeah. After you create an inventory, is 21 there any reason you couldn't then just click hold 22 after you've created your inventory? 23 A I don't understand the question. 24 Q Okay. As an officer, could you do a hold
158 1 looks like I did. 2 Q Okay. Were there some arrests where it 3 was your responsibility to create a hold? 4 A We never -- I don't create a hold. It's 5 through the inventory process. We don't go in and 6 create a hold. 7 Q Okay. So do you know what it means on the 8 line above that where it says "hold creator"? 9 A I see it. 10 Q Do you have an understanding of what that 11 phrase means? 12 A On this piece of paper, no. 13 Q What about in the system that you used for 14 eTrack? 15 A There's a box on eTrack that says "hold 16 for investigation," and then you put an officer's 17 name in there. 18 Q Okay. Is there any reason why you would 19 create the inventory and not also click hold for 20 investigation? 21 MR. BAZAREK: Object to the form of the 22 question. 23 A Could you repeat that? 24 Q Yeah. When you're in the system, the	160 1 on money that you had inventoried? Like the 2 inventory form we saw before that says "hold for 3 investigation"? 4 A Correct. 5 Q Okay. Is that something that you could do 6 in the eTrack system? 7 A The hold for investigation? 8 Q Yes, sir. 9 A Yes. That's a box in the eTrack when we 10 create an inventory. 11 Q Okay. You can put that to the side. 12 Was 38th and Cottage Grove an area with 13 public housing units? 14 A I don't recall what was over there. I 15 know it's part of the Ida B. Wells housing 16 complex. 17 Q I'm going to talk about the arrest of 18 James Moore. 19 Do you know who Mr. Moore is? 20 A No, I don't. 21 (Nichols Deposition Exhibit 30 marked for 22 identification and attached to the transcript.) 23 Q I'll show you what we'll mark as 24 Exhibit 30.

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161 1 Do you recognize the person that you see 2 depicted in Exhibit 30? 3 A I don't. 4 Q Okay. You can put that to the side. 5 (Nichols Deposition Exhibit 31 marked for 6 identification and attached to the transcript.) 7 BY MS. KLEINHAUS: 8 Q I'll show you what we'll mark as 9 Exhibit 31. This is the arrest report for James 10 Moore. 11 A Okay. 12 Q Having reviewed Exhibit 30 [sic], does 13 this refresh your recollection about the arrest of 14 James Moore? 15 MS. KLEINHAUS: I suppose, I do. Yes, 31. 16 Q Do you remember -- based on this report, 17 do you remember this arrest? 18 A No, I don't. 19 Q Okay. Looking at the narrative section 20 here, it says "during a narcotics investigation." 21 Do you see that? 22 A Okay. Yes, I do. 23 Q Okay. Do you have an understanding of 24 whether there was a separate narcotics	163 1 can you? 2 MR. BAZAREK: Object to the form of the 3 question, argumentative. 4 A No, I don't know. It possibly could be. 5 It possibly can't be. I don't know. 6 BY MS. KLEINHAUS: 7 Q Okay. Can you actually turn with me, 8 please, to the fifth page of this exhibit. You're 9 listed as an assisting arresting officer. 10 Do you see that? 11 A Yes, I do. 12 Q What did you do as part of the arrest of 13 Mr. Moore? 14 A It looks like I was doing the heading to 15 this narrative. 16 Q Okay. How can you tell that you did the 17 heading to the narrative? 18 A Because I was the attesting officer. 19 Q What does it mean to do the heading to the 20 narrative? 21 A The particulars, the name, charge, 22 everything -- everything that's pertinent to this 23 case. 24 Q Okay. So is the attesting officer
162 1 investigation, besides talking to Mr. Moore, going 2 on? 3 A I don't know. 4 Q You can't tell from this narrative, can 5 you? 6 A If there was another investigation going 7 on at the time? 8 Q Right. 9 A No. You can't tell if there was another 10 investigation going on. 11 Q It says below that when "A/O stated, 12 quote, 'I'll take one' the subject produced from 13 his pants pocket a clear plastic bag with a white 14 chunky rock-like substance, suspect crack 15 cocaine." 16 Do you see that? 17 A Yep. Yes, I do. 18 Q Based on that, do you believe this was 19 part of a reverse sting? 20 MR. BAZAREK: I'd object to the form of 21 that question, foundation. 22 A I don't know if it was part of a reverse 23 sting or not. I don't know. 24 Q Okay. You can't tell from this narrative,	164 1 responsible for all the portions of the report 2 besides the narrative? 3 A No, it could be -- he could write the 4 narrative also. 5 Q Okay. How is it that you can tell that 6 this report -- I'm sorry -- strike that, please. 7 Was it your practice that where you were 8 the attesting officer, you completed the headings? 9 A You could do numerous things. You could 10 do the heading. You could do the narrative. You 11 could do many things as the attesting officer. 12 Q Okay. Was it your practice as the 13 attesting officer to complete the headings? 14 MR. BAZAREK: Object to foundation. 15 MR. KOSOKO: Join. 16 A As attesting officer, you would be logging 17 in to the arrest report. I would assume that you 18 were doing the arrest report. 19 Q Sir, my question is very specific to you 20 and your practice. 21 When you were the attesting officer, did 22 you complete the headings? 23 MR. BAZAREK: Object to foundation and 24 form.

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42 (165 to 168)

165 1 A Yes, I believe so. 2 BY MS. KLEINHAUS: 3 Q Okay. And that was true whenever you were 4 the attesting officer; correct? 5 A Yes, yes. 6 Q Okay. All right. You can put that one to 7 the side. 8 (Nichols Deposition Exhibit 32 marked for 9 identification and attached to the transcript.) 10 Q Showing you what's been marked as 11 Exhibit 32, this is the affidavit of James Moore. 12 Just take a moment to review it, please. 13 A Okay. 14 Q Okay. Does reviewing the affidavit of 15 Mr. Moore refresh your recollection about any 16 encounters that you had with him? 17 A No, it does not. 18 Q Okay. If you look at the first paragraph 19 of that affidavit, he refers to someone by the 20 name of Tuti. 21 Do you see that? 22 A Yes, I do. 23 Q Do you know who Tuti is? 24 A No, I don't.	166 1 Q Okay. Looking below that in paragraph 4, 2 the second sentence in paragraph 4 says, "At the 3 station, the officers put me into a room, and 4 Watts and another African-American officer came 5 into the room. When Watts entered, he threw a 6 sandwich bag full of what appeared to be drugs 7 onto a table and told me they were mine." 8 Do you have any reason to dispute the two 9 sentences I just read to you? 10 A Yes. 11 Q Okay. What's the basis of that? 12 A The arrest report and the case report, and 13 I have no other reason to believe why it would be 14 false, and this did not happen. 15 Q Okay. In coming to that conclusion, are 16 you relying on anything besides the reports? 17 A Other than the reports, no. 18 Q Okay. You can put that exhibit to the 19 side. 20 Do you know who Lionel White, Jr., is? 21 A Can we go back to the affidavit, please? 22 Q Sure. Is there an answer that you'd like 23 to add to? 24 A Yes.
167 1 Q Okay. 2 A If you can look at Exhibit 31 and 32, 3 please. 4 Q What question is it that you want to add 5 to your answer? 6 A His affidavit -- it says November 5th, 7 2005. 8 Q Uh-huh. 9 A His arrest date was November 30th of 2005. 10 Q Okay. You still don't remember him; 11 right? 12 A I still don't remember him, no. 13 Q Okay. All right. Thank you for that. 14 A Thank you. 15 MR. NOLAND: Is the affidavit wrong? 16 MS. KLEINHAUS: That's not a proper 17 question. 18 MR. NOLAND: I mean, is it a typo that 19 you've got November 5th in here? Is he referring 20 to -- your office prepared this affidavit and 21 tendered it to us. Is this something you'd like 22 to correct for us now if that was a mistake that 23 was made with respect to the affidavit? 24 MS. KLEINHAUS: I think that's entirely	168 1 improper. 2 MR. NOLAND: It would be improper if you 3 asked him questions about a false -- an affidavit 4 that had an inaccurate assertion of the entire 5 incident in it and filing a lawsuit based upon it. 6 BY MS. KLEINHAUS: 7 Q Sir, do you know who Lionel White, Jr., 8 is? 9 A The name sounds familiar. 10 Q Okay. Have you reviewed reports related 11 to Lionel White, Jr.? 12 A I briefly did, yes. 13 (Nichols Deposition Exhibit 33 marked for 14 identification and attached to the transcript.) 15 Q Okay. I'm going to show you what we'll 16 mark as Exhibit 33. 17 Do you recognize the person that you see 18 in Exhibit 33? 19 A I don't. 20 Q Okay. Put that exhibit to the side. 21 Do you know someone who goes by the 22 nickname Pig? 23 A No, I don't. 24 Q Okay. Do you know a person by the name of

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169 1 Larry Southern? 2 A Larry Southern? 3 Q Yes, sir. 4 A No. 5 (Nichols Deposition Exhibit 34 marked for 6 identification and attached to the transcript.) 7 BY MS. KLEINHAUS: 8 Q I'm going to show you what we'll mark as 9 Exhibit 34. 10 A Okay. 11 Q Okay. Having reviewed the narrative of 12 the arrest report, does that refresh your 13 recollection at all about the arrest of Lionel 14 white, Jr.? 15 A It does not. 16 Q Okay. If you look at the top of the third 17 page, you'll see the attesting officer is Officer 18 Mohammed. 19 Do you see that? 20 A I do. 21 Q Okay. Based on that, would you conclude 22 that Officer Mohammed completed the headings for 23 this report? 24 MR. BAZAREK: Object to the form of the	171 1 MR. KOSOKO: Join. 2 A Not necessarily. I could -- if I'm not 3 the first arresting officer, I could tell another 4 officer what happened, and he could write the 5 narrative. 6 BY MS. KLEINHAUS: 7 Q Okay. Is the only way to know is by 8 asking the individual officer what his practice 9 was? 10 MR. BAZAREK: Objection; argumentative. 11 A Could you repeat that question? 12 Q Sure. 13 MS. KLEINHAUS: Can you read it back. 14 (Pending question read.) 15 MR. NOLAND: Object to form. 16 MR. BAZAREK: Join. 17 MR. KOSOKO: Join. 18 A Yes, but it could be -- like I said, on 19 different circumstances, he could write the 20 narrative or another officer could write the 21 narrative. 22 Q Okay. Or Sergeant Watts could have 23 written the narrative? 24 MR. KOSOKO: Objection.
170 1 question, foundation, calls for speculation. 2 MR. PALLES: Join. 3 MR. KOSOKO: Join. 4 A I don't know what he did. I would assume 5 that he did the heading and maybe did the 6 narrative. I can't tell you. 7 BY MS. KLEINHAUS: 8 Q Okay. If you look below that, it lists 9 the first arresting officer as Officer Jones. 10 Do you see that? 11 A I do. 12 Q Okay. Based on that, would you assume 13 that Officer Jones wrote the narrative section of 14 the report? 15 MR. BAZAREK: Object to the form of the 16 question, foundation, speculation. 17 MR. KOSOKO: Join. 18 A I don't know who wrote the narrative to 19 this report. 20 Q Okay. Was it the practice on the 264 team 21 that the first arresting officer would write the 22 narrative of the report? 23 MR. BAZAREK: Object to the form and 24 foundation.	172 1 MR. PALLES: Objection. 2 MR. KOSOKO: Argumentative, calls for 3 speculation, form. 4 A Well, if he witnessed it and he did it, 5 then, yes, he could write the narrative. 6 BY MS. KLEINHAUS: 7 Q Okay. Someone who is not even listed on 8 the report could have written the narrative; 9 right? 10 MR. BAZAREK: Object to the form of the 11 question, foundation, speculation. 12 MR. KOSOKO: Join. 13 A Could you repeat that question? 14 MS. KLEINHAUS: Can you read it back. 15 (Pending question read.) 16 A Someone who is not listed on the report, 17 no. 18 Q Okay. So it should be someone who is 19 listed on the report; right? 20 A Correct. 21 Q But based on the report itself, we can't 22 tell who actually wrote the narrative for this 23 arrest report; right? 24 A That's correct.

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173	1 (Nichols Deposition Exhibit 35 marked for 2 identification and attached to the transcript.) 3 Q Exhibit 35 is the affidavit of Lionel 4 White, Jr. 5 A Okay. 6 Q Okay. Having reviewed the affidavit of 7 Lionel White, Jr., does that refresh your 8 recollection about any encounters with him? 9 A No, it does not. 10 Q Okay. Looking to the second paragraph it 11 refers to officers Mohammed, Jones, and Smitty. 12 Do you see that? 13 A I do. 14 Q Do you know Officer Smith to go by the 15 nickname Smitty? 16 A Yes. 17 Q Okay. Below that in paragraph 3, it says, 18 "The police started grabbing people. Watts 19 grabbed me and put me against the wall of the 20 building. I told Watts that I didn't have any 21 drugs on me, and he replied by saying, 'Take it up 22 with Al. Al wants you.' I understood that he was 23 referring to Officer Jones." 24 Do you see that?	175	1 Q You can put that to the side. 2 (Nichols Deposition Exhibit 37 marked for 3 identification and attached to the transcript.) 4 Q Showing you what's been marked as 5 Exhibit 37, it's the arrest report for Frank 6 Saunders. 7 A Okay. 8 Q Having reviewed that report, does that 9 refresh your recollection at all about the arrest 10 of Frank Saunders? 11 A It does not. 12 Q Okay. Looking at the first page of that 13 report, can you tell me which portions you see on 14 the first page that you would complete if you were 15 assigned to complete the headings? 16 A If I was -- I don't know if I completed 17 the first headings, but I'm almost positive I did. 18 Q Okay. If you were the person assigned to 19 complete the headings, what on the first 20 page would you complete? 21 A I could have completed the narrative too. 22 I don't know. 23 Q Okay. And putting aside the narrative, 24 just focusing on the first page, what do we see
174	1 A I do. 2 Q Do you have any basis on which to dispute 3 that paragraph? 4 A I think it's a complete lie; and reading 5 the arrest report, it did not happen. 6 Q Okay. And that's based on your reliance 7 on the reports; right? 8 A That's correct. 9 Q Okay. You can put that to the side. 10 Do you know who Frank Saunders is? 11 A No, I don't. 12 Q Have you ever read the complaint and the 13 lawsuit that Frank Saunders filed against you? 14 A I'm not sure if I read the complaint. 15 I'm -- I don't recall. 16 (Nichols Deposition Exhibit 36 marked for 17 identification and attached to the transcript.) 18 Q Okay. Showing you what's been marked as 19 Exhibit 36. 20 A Okay. 21 Q Having reviewed this series of photos in 22 Exhibit 36, does that refresh your recollection at 23 all about who Frank Saunders is? 24 A No, it does not.	176	1 there that are headings that you would have 2 completed if you were the one assigned to complete 3 the headings? 4 A Well, if you're assigned -- his name, 5 address, date of birth. Do you want me to go 6 through the whole thing? 7 Q Yes, please. 8 A His age, place of birth, if he was armed 9 with anything, the beat where he lives, or that 10 generates for you once you put in his address. If 11 he's a male or female, black, whatever race he 12 was, 5-10, 215, brown eyes, black hair, short 13 hairstyle, what complexion he was, which he was 14 dark. If he has any tattoos, the marks. You put 15 tattoos, a cross on the lower right arm. 16 Q Let me stop you there. 17 So that information in the left column 18 starting with his address, is that information 19 that you would get from talking to the arrestee? 20 A Normally, yes. 21 Q Okay. And would you get the date of birth 22 from the arrestee? 23 A Normally, yes. 24 Q Okay. And if I understood you correctly,

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177	1 once you have the person's address, then the beat 2 that they live in would -- 3 A Generate for you. 4 Q -- generate for you. Thank you for that. 5 Okay. Looking in the box to the right 6 there, that physical description of the arrestee, 7 is that -- that would be based on your own 8 observation if you're filling out the headings; 9 right? 10 A Which part? The male and if he's 11 Caucasian, black? Is that what you're -- 12 Q Let's start with those two. 13 So his race and gender, would that be 14 based on your observation? 15 A Observation and sometimes I could ask the 16 person too. 17 Q Okay. What about the height? How would 18 you get that information? 19 A I would normally ask the person. 20 Q Okay. Same for weight? 21 A Yes. 22 Q Okay. And then in terms of the 23 description of the hairstyle, is that something 24 you would ask the person or that would be based on
178	1 your observation? 2 A Based on my observation. 3 Q Okay. How about for complexion? Is that 4 something you would ask or that would be based on 5 your observation? 6 A Normally based on my observation. 7 Q Okay. For the tattoos, would you ask the 8 arrestee to show you the tattoos that he has? 9 A Yeah. I would ask the arrestee if he had 10 any tattoos or scars. 11 Q Okay. Okay. Looking below that in the 12 boxes marked "Incident," what portions of that 13 would you complete if you were the person assigned 14 to complete the headings? 15 A The arrest date. If there was a TRR 16 completed. 17 Q Okay. And what is a TRR? 18 A Tactical response report. 19 Q And what type of information do you 20 include in a TRR? 21 A If there was any physical altercation, 22 like an emergency takedown, if you had to do 23 open-hand strikes no the individual. 24 Q Okay. And to determine whether or not a
179	1 TRR was completed, would you talk to your fellow 2 officers about the arrest? 3 A If I didn't witness it, yes. 4 Q Okay. And if you did witness it, would 5 your answer to that question be based on your 6 observation? 7 A Yes. 8 Q Okay. Looking below that where it says 9 "resisted arrest." 10 Do you see that part? 11 A Yes. 12 Q Would that be based on your observation if 13 you witnessed the arrest? 14 A Would I mark it if I observed it? 15 Q I'm sorry. Let me try and ask it better. 16 How would you gather the information 17 necessary to answer that question, resisted 18 arrest? 19 A Well, if I didn't observe it, then I would 20 ask that other officer if he resisted arrest 21 or not. 22 Q Okay. If you look next to that where it 23 says "dependent children," would you talk to the 24 arrestee to get that information?
180	1 A Yes. 2 Q Okay. And next to that it says "DCFS 3 ward." 4 Would you talk to the arrestee to get that 5 information? 6 A Yes. 7 Q Okay. Looking below that under charges, 8 would that be something that you would complete, a 9 section that you would complete if you were the 10 one assigned to complete the headings? 11 A Yes. 12 Q Okay. Looking below that under recovered 13 narcotics, is that something that you would 14 complete if you were the person assigned to 15 complete the headings? 16 A Yes. 17 Q Okay. And how would you know what to 18 include as the weight or quantity? 19 A Either I would weigh it or another officer 20 would weigh the suspect narcotics. 21 Q Okay. How would you determine the 22 estimated street value? 23 A There's an estimated street value in the 24 Chicago Police Department. There's an estimated

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181 1 street value for each kind of narcotics. 2 Q Okay. And under the warrant section, if 3 you were the person assigned to complete the 4 headings, would you fill out the warrant section? 5 A Yes. 6 Q Okay. And What would you do in order to 7 complete that section? 8 A To complete the warrant section? 9 Q Yes, sir. 10 A I would -- someone would have to run his 11 name to see if he had or didn't have a warrant. 12 In other circumstances, if they're on parole, we 13 would have to call IDOC to see if they are going 14 to issue a warrant or not. 15 Q Okay. In the course of processing 16 arrestees and completing these reports -- not 17 specific to this arrest, but in the course of 18 processing arrestees, did you ever have someone 19 complain to you that they had been falsely 20 arrested? 21 A No. 22 Q Did you ever have someone complain to you 23 that drugs had been planted on them? 24 A Never.	183 1 Q Turn to the second page, please. 2 If you were the person assigned to 3 complete the headings, which portions of the 4 second page would you complete? 5 A The victim and complainant. 6 Q Okay. 7 A Maybe the narrative, court date, if he had 8 a vehicle, if he had any property. 9 Q Would you complete the bond information? 10 A No, I would not. 11 Q Okay. Turn with me to the third page. 12 A Okay. 13 Q If you were the officer assigned to 14 complete the headings for the report, would you 15 complete anything that you see on the third page? 16 A I put the first arresting officer and the 17 second arresting officer's name in there. 18 Q Okay. And if you're the one assigned to 19 complete the headings, would someone else tell you 20 who is going to be Box 1 and Box 2? 21 A Yes. 22 Q Okay. Is there anything else that we see 23 on page 3 that you would complete if you were the 24 one assigned to complete the headings?
182 1 Q Okay. Did anyone ever complain to you 2 that money had been stolen from them? 3 A Yes. 4 Q Okay. When did that happen? 5 A I believe it was 2017. We had arrested an 6 individual, and he said I took money from him -- 7 or no, it wasn't that date. Strike that. I don't 8 remember when it was, but it was inventoried. 9 Then there was another incident in 2017 10 that we allegedly took money, but I don't know if 11 he filed a complaint or not. He called me the 12 next day at the station. 13 Q Okay. And those were instances where 14 during the arrest process, arrestees complained to 15 you that money had been taken? 16 A The second incident was the next day. He 17 called the station. The first incident was that 18 day, and we showed him the piece of paper where 19 the inventory -- that's where his money was. 20 Q Okay. Turn with me to the second page, 21 please. 22 A Excuse me -- 23 Q I'm sorry. 24 A -- the second page?	184 1 A No, not that I see. 2 Q Okay. Turn please to the fourth page. 3 If you were the person assigned to 4 complete the headings, what would you complete on 5 the fourth page? 6 A The transport details, and I don't know if 7 I generate the holding facility. I don't know if 8 that generates when I put in the first box. I 9 don't know if that generates to this one either. 10 Q Okay. So the parts about -- I'm sorry. 11 Strike that, please. 12 Where it says "prints taken," you wouldn't 13 complete that. 14 A No. 15 Q And the photograph taken, you wouldn't 16 complete that either; right? 17 A No, I would not. 18 Q Okay. Where -- you said -- next to that, 19 it says "transport details." 20 Do you see that? 21 A Yes. 22 Q What does 2PO mean? 23 A 2PO. Two police officers that are 24 assigned to that vehicle.

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185 1 Q All right. Under visual check of 2 arrestee, would you complete any of that? 3 A I would not. 4 Q And under arrestee questionnaire, would 5 you ask any of those questions of the arrestee? 6 A I would not. 7 Q Okay. Turn with me to the fifth page. 8 If you were the person assigned to 9 complete the headings, what portions of the fifth 10 page would you do? 11 A List the assisting officers. 12 Q Okay. Anything else on the fifth 13 page that you would do? 14 A No. 15 Q Based on this report, do you believe that 16 you completed the headings for this arrest? 17 A I believe so, but I couldn't answer that 18 100 percent sure. But I believe I did. 19 Q Okay. You can put that exhibit to the 20 side. 21 MR. BAZAREK: Can we take a break? 22 MS. KLEINHAUS: Sure. 23 THE VIDEOGRAPHER: Off the record, 4:10. 24 (A recess was taken from 4:10 p.m. to	187 1 Do you see that? 2 A I do. 3 Q Okay. Do you know who Tricey is? 4 A I do not. 5 Q Okay. Looking below that in paragraph 4, 6 it says, "At some point, I heard someone yell 7 'clean up.'" 8 Do you see that? 9 A I do. 10 Q Do you know what the term "clean up" 11 means? 12 A The best of my knowledge is when they 13 clean up, they try to get the narcotics in a safe 14 spot which they -- and try to get away from us as 15 the police officers. 16 Q Okay. Looking below that in paragraph 5, 17 it refers to some nicknames. 18 Do you see Doug there? 19 A I do. 20 Q Is that a nickname used for you? 21 A I wouldn't say a nickname used for me. I 22 don't -- my name is Douglas. So it goes by -- 23 short by Doug. 24 Q Okay. Next to that it says "Chinaman."
186 1 4:23 p.m.) 2 THE VIDEOGRAPHER: Back on the record, 3 4:23. 4 BY MS. KLEINHAUS: 5 Q Sir, do you know who George Almond is? 6 A The name, yes. 7 Q Okay. Other than the name, are you 8 familiar with George Almond? 9 A I'd maybe recognize him, but, yes, that's 10 about it. 11 Q Okay. Do you have any recollection of 12 being involved in the arrest of George Almond? 13 A I don't. 14 (Nichols Deposition Exhibit 38 marked for 15 identification and attached to the transcript.) 16 Q Showing you what we'll mark as Exhibit 38. 17 This is the affidavit of George Almond. 18 A Okay. 19 Q Having reviewed the affidavit of George 20 Almond, does that refresh your recollection at all 21 about an encounter you had with him? 22 A No, it does not. 23 Q Okay. If you look at the third paragraph, 24 he makes reference to a person called Tricey.	188 1 Do you see that? 2 A Yes. 3 Q Are you familiar with that nickname? 4 A I am. 5 Q Okay. Who does that refer to? 6 A My partner, Officer Leano. 7 Q Okay. The next one is Co-Co. 8 Are you familiar with that nickname? 9 A I am. 10 Q And who does that refer to? 11 A Lamonica Lewis. 12 Q Okay. Turn with me please to paragraph 9. 13 It says, "Once in the stairwell, Watts asked me if 14 I had any money on me. I told him I only had a 15 few dollars. Watts said that wasn't enough and 16 that I was going to jail. I asked why, and he 17 said that he got some rocks and that they were my 18 drugs. I knew he was setting me up." 19 Do you know whether what's described in 20 paragraph 9 happened or not? 21 A It did not happen. 22 Q Okay. Is that based on reports that 23 you've reviewed? 24 A And based -- and his affidavit.

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189 1 Q Okay. What about his affidavit convinces 2 you that it didn't happen? 3 A Because he's saying I was there and I was 4 in the hallway, and he's saying that I falsely 5 arrested him and was putting narcotics on him, and 6 there's no way I would do that to any individual. 7 Q Okay. Looking below that in paragraph 10, 8 it says, "At the station, Mohammed was writing up 9 my report while I was handcuffed to a bench. 10 Watts, Jones, and Doug were also in the room at 11 the time. I asked Mohammed what I was being 12 charged with. At some point one of them put drugs 13 out on the table. Watts told me they were going 14 to charge me with possession and manufacturing." 15 Do you know whether what was described in 16 paragraph 10 happened or not? 17 A I know that's completely false too. 18 Q How do you know that? 19 A Because I know no one put drugs on someone 20 that I observed or -- and I believe another 21 officer would not do that. 22 Q Okay. You can put that exhibit to the 23 side. 24 Do you know who Deandre Bell is?	190 1 A No, I don't. 2 (Nichols Deposition Exhibit 39 marked for 3 identification and attached to the transcript.) 4 Q Showing you what's been marked as 5 Exhibit 39, this is a vice case report for Deandre 6 Bell. 7 A Okay. 8 Q Having reviewed the vice case report, does 9 that refresh your recollection about the arrest of 10 Deandre Bell? 11 A No, it does not. 12 Q Okay. If you look on the back, on the 13 second page of this vice case report, it refers to 14 Terra L. Johnson. 15 Do you know who Terra L. Johnson is? 16 A I do not. 17 Q Okay. You can put that exhibit to the 18 side. 19 (Nichols Deposition Exhibit 40 marked for 20 identification and attached to the transcript.) 21 Q Showing you what's been marked as 22 Exhibit 40, it's the affidavit of Deandre Bell. 23 A Okay. 24 Q Okay. Did reviewing the affidavit of
191 1 Mr. Bell refresh your recollection at all about an 2 encounter you had with him in August of 2006? 3 A No. 4 Q Okay. If you look at paragraph 3, it 5 refers to a person by the name of China Watkins. 6 Do you see that? 7 A I do. 8 Q Do you know who China Watkins is? 9 A I don't. 10 Q Okay. Looking below that in paragraph 4, 11 it says, "I came out of the room, and Watts was 12 standing behind the door inside our apartment. He 13 grabbed me and stuck his hand in my hoodie pocket. 14 He then pretended to pull out two bags of drugs 15 from my pocket. He looked" -- it seems to be a 16 typo. It should say at me -- "and said 'Told you 17 I was going to get you.' He dragged me out into 18 the hallway." 19 Do you know whether that happened or not? 20 A It did not happen. 21 Q Okay. Is that based on your review of the 22 vice case report? 23 A The vice case report and I would have 24 no -- I wouldn't arrest someone illegally.	192 1 Q Okay. 2 MS. KLEINHAUS: All right. Put that to 3 the side. 4 So I think that concludes for today. By 5 agreement of the parties, we're holding the 6 McDaniels case over until tomorrow. The witness 7 has some family obligations, so we're going to 8 stop there. 9 THE VIDEOGRAPHER: This concludes day 1 of 10 the video deposition of Douglas Nichols at 4:35. 11 (Off the record at 4:35 p.m.) 12 13 14 15 16 17 18 19 20 21 22 23 24

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193 1 ACKNOWLEDGMENT OF DEPONENT 2 3 I, DOUGLAS NICHOLS, do hereby acknowledge 4 that I have read and examined the foregoing 5 testimony, and the same is a true, correct, and 6 complete transcription of the testimony given by 7 me and any corrections appear on the attached 8 errata sheet signed by me. 9 10 11 12 _____ 13 (DATE) (SIGNATURE) 14 15 16 17 18 19 20 21 22 23 24	
194 1 CERTIFICATE OF COURT REPORTER - NOTARY PUBLIC 2 3 I, Joanne Ely, Certified Shorthand 4 Reporter No. 84-4169, CSR, RPR, and a Notary 5 Public in and for the County of Kane, State of 6 Illinois, the officer before whom the foregoing 7 deposition was taken, do hereby certify that the 8 foregoing transcript is a true and correct record 9 of the testimony given; that said testimony was 10 taken by me stenographically and thereafter 11 reduced to typewriting under my direction; that 12 review was requested; and that I am neither 13 counsel for, related to, nor employed by any of 14 the parties to this case and have no interest, 15 financial or otherwise, in its outcome. 16 IN WITNESS WHEREOF I have hereunto set my 17 hand and affixed my notarial seal this 22nd day of 18 February, 2020. 19 20 My commission expires: May 16, 2020 21 22 <u>Joanne E. Ely</u>  23 Notary Public in and for the 24 State of Illinois	

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