

EXHIBIT 101

Transcript of the Testimony of Sergeant Roddrick Watson

Date: October 6, 2017

Case: Ben Baker and Clarissa Glenn v. City of Chicago, et al.,

Printed On: October 18, 2017

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e-mail: cmsreporters@comcast.net

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IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

BEN BAKER and CLARISSA GLENN)
)
Plaintiffs,)
)
vs) No.16 CV 8940
)
CITY OF CHICAGO Former)
CHICAGO POLICE SERGEANT)
RONALD WATTS, OFFICER KALLATT)
MOHAMMED, SERGEANT ALVIN)
JONES, OFFICER ROBERT)
GONZALEZ, OFFICER CABRALES,)
LT. MICHAEL J. STEVENS,)
OFFICER DOUGLAS NICHOLAS,)
JR., OFFICER MANUEL S. LEANO,)
OFFICER BRIAN BOLTON, OFFICER)
KENNETH YOUNG, JR., OFFICER)
D. SOLTIS, OFFICER ELSWORTH)
J. SMITH, JR., OFFICER EDWARD)
W. GRIFFIN, PHILIP J. CLINE,)
KAREN ROWAN, DEBRA KIRBY, and)
other as yet unidentified)
officers of the Chicago)
Police Department,)
Defendants.

The deposition of
SERGEANT RODDRICK WATSON, taken under oath at
311 North Aberdeen Street, 3rd Floor, Chicago,
Illinois, at 10:08 A.M. on Friday,
October 6, 2017 pursuant to the Rules of
the United States District Court, Northern
District of Illinois, before

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Carol M. Siebert-LaMonica, C.S.R. No.

084.001355 in and for the County of Cook and
State of Illinois, pursuant to notice.

APPEARANCES:

LOEVY & LOEVY, by

MS. ELIZABETH MAZUR

311 North Aberdeen Street, 3rd Floor

Chicago, Illinois 60607

ElizabethM@loevy.com

Appeared on behalf of the plaintiffs;

HALE LAW LLC, by

MR. MATT HURD

MR. MO KHAN

53 West Jackson Blvd. Suite 330

Chicago, IL 60604

Mhurd@ahalelaw.com mkhan@ahalelaw.com

Appeared on behalf of the defendants;

Alvin Jones, Robert Gonzalez, Officer

Cabrales, Michael Stevens, Douglas

Nichols, Jr. Manuel S. Leano, Brian

Bolton, Kenneth Young, Jr., D.

Soltis, Elsworth J. Smith, Jr., and

E.W. Griffin;

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DYKEMA GOSSETT PLLC

MS. MOLLY E. THOMPSON

10 South Wacker Drive, Suite 2300

Chicago, IL 60601

methompson@dykema.com

Appeared on behalf of the defendants;

City of Chicago, Phillip J. Cline,

Karen Rowan and Debra Kirby;

JOHNSON & BELL, LTD.

MR. KEVIN ANTHONY PACINI

33 West Monroe Street, Suite 2700

Chicago, IL 60603

pacinik@jbltd.com

Appeared on behalf of the defendant;

Ronald Watts;

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RAVITZ & PALLES, P.C.
 MS. EMILY WESSEL FARR
 203 North LaSalle Street, Suite 2100
 Chicago, IL 60601
 epalles@ravitzpalles.com
 Appeared on behalf of the defendant;
 Officer Khallat Mohammad.

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SERGEANT RODDRICK WATSON,
 Called as a witness herein, having been first
 duly sworn, was examined upon oral
 interrogatories and testified as follows:

(Witness sworn.)

EXAMINATION

BY MS. MAZUR:

Q. Sir, can you state and spell your
 first and last name for the record?

A. Yes, my first name Roddrick,
 R O D D R I C K. Last name is Watson,
 W A T S O N.

Q. And you are currently a sergeant with
 the Chicago Police Department?

A. Yes.

Q. Just a couple of quick things at the
 outset.

If at any point today, if you
 ever want to take a break, just let me know,
 take your break, the only rule is that if there
 is a question pending I will ask you to answer
 it before we go off the record.

And then if I ever ask a question
 you don't understand, I'm likely to word

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something poorly without thinking about it, let
 me know and I will rephrase, okay?

A. Yes.

Q. Thanks. You are currently employed
 with the Police Department?

A. Yes.

Q. And what is your current assignment?

A. Current assignment is a sergeant with
 the Chicago Police Department, I work out of
 the Bureau of Patrol. And my duties are
 administrative, BRS, balance reduction
 strategy.

Q. Are you currently assigned to a
 district?

A. No, assigned to the Bureau of Patrol
 which is at headquarters.

Q. Okay. Good.

And when did you begin working
 with the Chicago Police Department?

A. I began actually November, I believe,
 the 4th, 1996.

Q. Okay. And just -- can you walk me kind
 of through your first few assignments in the
 Police Department?

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A. Yes. I actually -- once I had gotten
 out of the academy I was assigned or detailed
 to the 18th district. I worked there in '96 as
 well.

Q. I'm sorry. Can you --

A. '96, I was detailed to the 18th
 district.

Q. Okay.

A. And then from there, '97 I was
 assigned to the 5th District.

Returned back, I believe, in
 2000, I think back to the 18th district.

And then in 2002, I believe I was
 assigned to gang intelligence and then I was
 there until 2004 or '05.

Q. Okay.

A. I'm sorry. 2005.

And then I got promoted from
 there.

Q. Okay.

A. And within 2005 I was promoted.

Q. Okay. And when you say promoted you
 mean to sergeant?

A. To sergeant, yes.

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Q. And did your assignment change when you got the promotion?

A. Yes. I was assigned to the 3rd district.

Q. Okay.

A. And that would have been in 2006 and I believe until 2007.

Q. Okay. And so when you were in the 3rd district were you a patrol sergeant?

A. I had -- I started off as a rapid -- yes, so patrol sergeant. And then I actually was assigned to a tact team --

Q. Okay.

A. -- during that course of time.

Q. Okay.

A. So maybe within three or four months I went from being a rapid sergeant to a tactical sergeant.

Q. And that was in the 3rd District?

A. Correct.

Q. Okay. And did you leave the 3rd district around 2007?

A. Yes, I believe it was 2007 I was assigned to narcotics.

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Q. And how long were you assigned to narcotics?

A. From 2007 until -- two years ago. So that would be -- what are we '17 -- so 2015.

Q. Okay. And is -- when you were assigned to narcotics, when you were initially assigned to narcotics, were you assigned to any -- well, strike -- let me ask you differently.

When you were first assigned to narcotics, where physically did you work out of?

A. Homan Square.

Q. Okay. And what is narcotics, sort of like within the Police Department, is it -- if I took a look at your organizational chart, how would you describe it?

A. Yes, it is actually considered within the Organized Crime Division --

Q. Okay.

A. -- of the Police Department and specifically their -- their assignments are undercover missions.

Q. Okay.

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A. So that would work differently from patrol, because -- I know sometimes people confuse tact and narcotics, but they are not the same.

Q. Okay. And how are they different?

A. Well, officers conduct undercover missions, so they might play the role of a narcotics dealer or buyer or we might do surveillance work, wires, et cetera.

Q. Okay. And is -- when you were first assigned to narcotics was it like --

First of all, would you call it a division or a unit?

A. It is a unit.

Q. And is it like a citywide unit?

A. Yes. Just -- well, yes, they work citywide, but they have within the unit there are teams assigned to certain districts and areas.

Q. Okay. And when you were first -- when you first joined narcotics in 2007, were you assigned to a particular geographic area?

A. No, I actually was considered a relief sergeant. So I didn't get a team at that time.

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So I actually -- primarily I did work the west side but I would fill in kind of like a substitute teacher, whenever a sergeant goes on vacation, I would actually fill in for their team.

Q. Okay. And then was there a time when you were assigned a team?

A. Yes. I think I was assigned a team, I would want to say 2010, yes.

Q. And you said you initially worked out of Homan Square in the narcotics unit, is that correct?

A. Correct.

Q. And what other -- like was there a time that you worked for narcotics in a different location?

A. Can you rephrase that?

Q. Yes. Sure. Well, did you ever work out of the 2nd district?

A. That would have been in 2010, I believe.

Q. Okay.

A. When I was assigned a team.

Q. And what was your -- what was the

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1 assignment in 2010?

2 A. We were considered at that time,
3 because I mean my initial assignment would have
4 been -- we were called ANET team, which was a
5 buy-bust team. A N E T.

6 Q. Okay.

7 A. We were considered a buy-bust team at
8 that time. They had long-term teams and
9 buy-bust teams at the time.

10 Q. All right. And what is a buy-bust
11 team?

12 A. A buy-bust team is we were assigned
13 specific missions that they were involved in a
14 location that a complaint came in, we would be
15 assigned to that particular location.

16 Q. Okay. And before you went to that
17 team in 2010 -- so between like 2007 and 2010,
18 where like physically did you work out of?

19 A. Homan Square.

20 Q. Okay.

21 A. Between Homan Square and the 25th
22 district, because I stayed there a long time as
23 well because that sergeant I think was on
24 medical for a while.

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1 Q. Okay. And so when you -- went to the
2 ANET team in 2010, am I using the right
3 terminology?

4 A. Yes.

5 Q. Did -- you were a sergeant, correct?

6 A. Yes.

7 Q. And were you doing undercover work at
8 the time, too?

9 A. Well -- yes, I mean I actually went in
10 the field with my team. I didn't do any buys,
11 but I supervised.

12 Q. Okay.

13 A. I played a role from time to time, you
14 know, just to blend in to help my guys out.

15 Q. Okay. And just to make the record
16 clear, and under -- there is like tactical
17 officers may be in unmarked cars, but they are
18 still like not hiding the fact that they are
19 police officers, and are undercover officers
20 different?

21 A. Yes.

22 Q. Can you explain a little bit?

23 A. Well, an undercover officer is not
24 necessarily identifying himself as an

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1 undercover officer. He may play the role of a
2 narcotics purchaser. Or, depending on the
3 situation, he might be the one portraying that
4 he is buy and sell, actually being a narcotics
5 dealer.

6 Q. Okay.

7 A. So --

8 Q. And so when you were on -- well, how
9 were you on that ANET team?

10 A. I mean I actually -- that's -- well,
11 the assignment changed I want to say in 2012
12 and it became a long-term team.

13 Q. I'm sorry. 2000 what?

14 A. '12.

15 Q. Okay.

16 A. I believe that we became, between '12
17 and '13 I believe we became more of a long-term
18 team, and I think we were assigned with the DEA
19 task force at that time.

20 Q. Okay. And did you ever work with an
21 Officer named Danny Echeverria?

22 A. Yes.

23 Q. And did you ever work with an Officer
24 named Shannon Spaulding?

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1 A. Yes.

2 Q. And was that on that ANET team?

3 A. Yes. I believe they were actually on
4 my team, yes.

5 Q. Okay. And the -- there were -- were
6 you the only sergeant who supervised that team?

7 A. I mean I was actually the only
8 sergeant that was assigned that team, yes.

9 Q. Okay. Got it.

10 And do you know how long roughly
11 you worked with Danny Echeverria on that
12 assignment?

13 A. Maybe three years.

14 Q. Okay. And how about Shannon
15 Spaulding?

16 A. Maybe a year.

17 Q. Okay. And you -- when you worked on
18 the ANET team you were physically like housed
19 within the 2nd district, correct?

20 A. We had a satellite office there.

21 Q. Okay.

22 A. That -- we actually were assigned
23 Homan Square, but since we worked primarily the
24 south side, they gave us a satellite office in

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1 2nd district.

2 Q. And how big was the satellite office?

3 A. It really wasn't big. I'm trying to
4 give a rough estimate.

5 It might have been the size of
6 this section off -- it might have been the size
7 of this office here. (Indicating.)

8 Q. Okay. And I guess I don't know --

9 A. Because it was sectioned off. It was
10 actually the old youth office. So they had a
11 cage -- detectives used it. They had a cage
12 that was there. It wasn't as big as this
13 office. It might be half the size.

14 Q. Okay. And were there -- times -- I
15 will ask it this way.

16 How many -- like the satellite
17 office that you had in the 2nd district, did it
18 have like desks in it?

19 A. Yes.

20 Q. And roughly how many desks?

21 A. Well, it had one official desk. The
22 other ones were like tables that we used, kind
23 of make-shift.

24 Q. Got it. And did -- did your team ever

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1 make arrests?

2 A. Yes.

3 Q. And if you made arrests did you bring
4 arrestees back to the 2nd district?

5 A. Yes.

6 Q. And I think you testified earlier, and
7 correct me if I am wrong, there were times
8 where you personally would be out in the field
9 undercover, correct?

10 A. Yes.

11 Q. And again this is at -- during that
12 period of time when you were in that ANET
13 assignment between roughly 2010 and 2012?

14 A. Yes.

15 Q. And were there also times where you
16 didn't go out in the field where you stayed
17 back at the district?

18 A. With my team?

19 Q. Yes.

20 A. I never stayed -- if my team was out
21 in the field, I was actually out with my team
22 as well. If that's what you are asking?

23 Q. I think I may be just using some bad
24 terminology.

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1 What does it mean to be out in
2 the field as you used that term?

3 A. Well, actually out on assignment.

4 Q. And would that be like on an
5 undercover assignment?

6 A. Yes.

7 Q. Okay. And were there times when you
8 had this assignment again on the ANET team
9 where you like just wore your uniform to work,
10 your police uniform?

11 A. No. The uniform I have on now is what
12 you are asking?

13 Q. Something similar to that, yes.

14 A. No.

15 Q. And like so when you reported to work,
16 like for the beginning of your shift, did you
17 just go in plain clothes?

18 A. Yes.

19 Q. And you remained in plain clothes sort
20 of throughout your work assignment?

21 A. Yes.

22 Q. Okay. And was that more or less the
23 case on -- every day that you worked on that
24 ANET team?

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1 A. Can you --

2 Q. I will ask that again. Yes.

3 Again just focusing on the period
4 of time of when you were on this ANET team,
5 were you in plain clothes pretty much everyday?

6 A. For the mostpart unless assigned
7 otherwise, yes, unless we had to do some
8 special detail, yes.

9 Q. Okay. And were there -- when -- were
10 there times where the team would be out in the
11 field and you would be back at 2nd district in
12 the satellite office?

13 A. No, that's where I was going to ask
14 you, so are you asking if they were assigned
15 something in the field was I doing maybe
16 administrative work. No, any time they were in
17 the field I was out in the field with them.

18 Q. You were out with them?

19 A. Yes.

20 Q. Okay. And when narcotics officers make
21 arrests, again this is kind of focusing on this
22 assignment, were there times where officers
23 would debrief arrestees?

24 A. Yes.

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Q. And what does that entail?

A. Asking relevant questions pertaining to maybe the actual case, homicides, narcotic locations.

Q. Okay. Did -- were there times when your team may be doing undercover work where you would interact with regular uniform officers or were they -- did they kind of know -- well, that's a bad question.

Were there times when your team was out doing undercover work where you maybe would interact with regular uniformed officers?

A. In what capacity? I mean --

Q. Well, would you see them out sometimes?

A. Might -- well, the whole goal is to remain undercover.

Q. Sure.

A. No. Our goal is to remain undercover.

So we -- I mean when you work in a particular area, you know, but, no, we wouldn't interact.

I mean I'm trying to get clarity on what you mean.

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Q. Sure. I'm asking it bad.

Were there times where -- let me ask differently.

The uniformed officers who may be patrolling an area where you are doing undercover work, to your knowledge did they know that you were undercover officers?

A. That's what I thought you were asking. If they recognize us in the station, yes, they would know that we are undercover officers, if we are in that area.

Q. Okay. And so if your team was doing like some undercover work where they are pretending to be someone, buying and selling drugs, were they ever inadvertently arrested by a uniformed officer?

A. Actually from time to time, if necessary, they would appear to put them in custody, yes.

Q. Okay. There was -- did your ANET team participate in like a roll call with other 2nd district officers at all?

A. No.

Q. And other than having the satellite

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office in 2nd district, was your team sort of like integrated in any way with the other officers in the 2nd district?

A. No. I need clarity on that. Yes.

Q. Okay. That's a bad question.

How big was that team roughly like on any given shift when you were at work?

A. My team?

Q. Yes.

A. It started off I think we had maybe 12. I think the most we might have had, maybe close to 13. On average it was 10.

Q. Okay.

A. I mean the numbers varied, because we would lose some to long-term teams, but initially I think we had maybe 12 to 13.

Q. Okay. And did you ever interact with Sergeant Ronald Watts when you were on the assignment on the ANET team?

A. I had one encounter as far as interaction.

Q. And what was that?

A. Sergeant Watts approached one of my officers pertaining to a mission we were doing.

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Q. Okay.

A. And he asked my officer what is he actually -- did he need any help with that mission? And then he actually had a CI that would help him, if need be.

Q. Okay.

A. In turn my officer approached me and explained to me that he was approached by Sergeant Watts pertaining to that.

And at which time I actually told him no, we are not going to work in conjunction with him okay. I would walk down there with you and talk to him, and let him know that we are not going to utilize his CI, we were okay.

Q. Do you know roughly when that happened, what year?

A. I think it was during -- whatever year that they were actually -- during the same year in which he actually got indicted, I believe.

Q. Oh, okay. So more like -- like 2012ish, 2013?

A. Yes.

Q. Okay. And do you recall the name of the person who he approached on your team?

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1 A. Yes, Jerry Scaife J E R R Y.

2 S C A I F E.

3 Q. And were you working --

4 MR. HURD: I'm sorry.
5 could I have that one more time?

6 THE WITNESS: J E R R Y. S C A --

7 S C A -- what did I say? S C A R I F E.

8 BY MS. MAZUR:

9 Q. And was -- I lost my train of thought.

10 And outside of that one
11 interaction that you just described, did you
12 have any other interactions, that you can
13 recall, with Sergeant Watts during the time at
14 the Chicago Police Department?

15 A. To a certain extent, that's what I
16 mean. I spoke to everyone in the hall.

17 Q. Sure.

18 A. If that's what you mean. Saying "hi".

19 Q. Yes. It sounds like you might have
20 said like "Hi" or had greetings with him,
21 because you worked physically out of the same
22 location --

23 A. Yes.

24 Q. Correct?

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1 A. Yes.

2 Q. Can you, as you sit here today, ever
3 recall any conversation that you had with
4 Sergeant Watts?

5 A. Outside of the one I just explained.
6 We never had any other particular conversation
7 besides "hey, hi".

8 Q. Okay. And I'm not asking you to tell
9 me who it is, but during the course of that
10 interaction that you just described with
11 Sergeant Watts, did he tell you who the CI was?

12 A. No, I didn't even want to know. No.

13 Q. And was there any reason why you
14 didn't take him up on that offer for the help
15 with the CI?

16 A. Narcotics, we generally don't work in
17 conjunction with patrol into that capacity.

18 Q. Okay.

19 A. So we kind of cultivate our own CIs.

20 Q. Okay.

21 A. Whether it be from a previous mission
22 or what we call a walk up, and they would
23 walk up with a particular subject that they see
24 and actually purchase narcotics and develop a

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1 relationship and then eventually we might
2 utilize them down the line, at the end of the
3 mission, and carry them over to another
4 mission. But, no, we generally do not work
5 with patrol on that.

6 Q. Did you ever do any undercover work in
7 the Ida B. Wells housing project?

8 A. We tried to, that was the one that
9 we -- the one that he actually approached my
10 officers on.

11 Q. Okay. You were trying to do work in
12 Ida B. Wells?

13 A. We tried to do it, yes. We actually
14 never got into that mission. It didn't work
15 out. We didn't actually get in, we tried.

16 Q. And prior to that time when you
17 describe that encounter with Sergeant Watts,
18 had you done any undercover work in Ida B.
19 Wells?

20 A. Not that I recall.

21 Q. Okay. Did you ever -- so this may be
22 repetitive, but just to make the record.

23 Did you ever do any -- well,
24 never mind -- Strike that.

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1 Was there ever an occasion where
2 Danny Echeverria asked you to meet with someone
3 who he had arrested who was alleging that
4 Sergeant Watts had engaged in some criminal
5 activity?

6 A. No.

7 Q. That didn't happen?

8 A. No.

9 Q. Are you aware that Danny Echeverria
10 has testified to the effect that there was some
11 encounter like that?

12 A. I was aware he gave that statement.
13 Yes.

14 Q. Okay. And so -- but that never
15 happened as far as you are concerned?

16 A. No.

17 Q. Okay. Have you ever -- I guess
18 setting aside -- well, take a step back a
19 second.

20 There was a time, I apologize I
21 don't have the date off of the top of my head,
22 but sometime after 2012 Sergeant Watts was
23 arrested and indicted, you are aware of that,
24 correct?

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1 A. Yes.

2 Q. And prior to that, so setting aside
3 anything you might have learned kind of after
4 that incident where Sergeant Watts was
5 arrested, did any -- did any officer ever tell
6 that you they suspected that Sergeant Watts was
7 involved in any criminal activity?

8 A. No.

9 Q. Okay. And prior to that again, had you
10 ever heard any like rumors among other officers
11 that Sergeant Watts was involved in any
12 criminal activity?

13 A. Not until the whole indictment and
14 question about if they were doing an
15 investigation in the whole 2nd district, then
16 that came up. Outside of that, no.

17 Q. Okay. And when you say it came up,
18 that was like after it became public and people
19 started talking?

20 A. Yes, exactly.

21 Q. Okay. And the -- and did -- I think
22 I'm just kind of -- these are going to feel a
23 little repetitive, but just to make my record.

24 Did Danny Echeverria ever say

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1 anything to you about Sergeant Watts that you
2 can recall?

3 A. No.

4 Q. And did Shannon Spaulding ever say
5 anything to you about Sergeant Watts?

6 A. Not while they were on my team. No.

7 Q. Did you ever testify in connection
8 with the legal matter that Shannon Spaulding
9 and Danny Echeverria raised?

10 A. No, I was looking forward to it -- I'm
11 just -- no.

12 Q. Didn't get your chance.

13 A. No.

14 Q. And did -- to your knowledge was --
15 well, again prior to the time that you heard
16 that Sergeant Watts had been arrested, were you
17 aware that Shannon Spaulding had been assisting
18 the FBI on the investigation?

19 A. No.

20 Q. And same question, prior to that time
21 that Sergeant Watts got arrested, were you
22 aware that Danny Echeverria had been assisting
23 in the FBI investigation of Watts?

24 A. No.

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1 Q. Do you know what HIDTA is, H I D T A?

2 A. HIDTA, yes. I'm trying to think of
3 the acronym.

4 Pretty much they are the -- they
5 filter -- HIDTA filters information through
6 various agencies of the department, you know,
7 and we do de-conflictions through them.

8 They let us know whether or not a
9 particular agency is working on something. And
10 they also help us out with any additional
11 investigations as well.

12 Q. Okay.

13 A. They are just an additional resource.

14 Q. Is it like a joint thing between CPD
15 and DEA?

16 A. Well, HIDTA deals with multiple
17 agencies.

18 So, for instance, if I was to
19 de-conflict an address or location, I would
20 have to get a de-confliction through HIDTA, and
21 HIDTA would then let me know that someone else
22 is actually working, and they actually have to
23 de-conflict. And I need to talk with that
24 agency just to make sure we are not

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1 overstepping our boundaries or stepping or
2 looking at the same subject or maybe we can
3 work together with that agency.

4 Q. Okay. De-confliction, what does that
5 mean?

6 A. Meaning that you are actually letting
7 them know that other agencies, various
8 agencies, whether it be DEA another police
9 department that this particular location is
10 already being looked at by one particular
11 entity or another.

12 Q. Okay. Did you know Sergeant Henry
13 Harris had any involvement with HIDTA?

14 A. Henry Harris, no, that name doesn't
15 ring a bell right now.

16 Q. And I know I asked you some questions
17 about whether your team had personally ever
18 done any undercover work in Ida B. Wells, to
19 your knowledge did any other -- was any other
20 agency doing narcotics work in Ida B. Wells?

21 A. I'm sure there were. There were a lot
22 of agencies that were doing work in Ida B.
23 Wells.

24 I mean it depends on, are you

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1 talking about the high-rises or the row houses?

2 I'm sure there were other
3 agencies that were doing them, and I believe
4 might have got wind of some of them, but I'm
5 not -- I can't --

6 Q. -- think of anything specific.

7 A. Right. No, not at all.

8 MS. MAZUR: I think I may be close to
9 through.

10 Can I take a couple of minutes?

11 (Recess.)

12
13 MR. HURD: You are done.

14 MS. MAZUR: Do you want to reserve
15 signature?

16 MR. KHAN: No. Waive, right? Waived.
17
18
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1 STATE OF ILLINOIS)
2) SS:
3 COUNTY OF COOK)

4 I, Carol M. Siebert-LaMonica, C.S.R.
5 in and for the County of Cook and State of
6 Illinois, do hereby certify that SERGEANT
7 RODDRICK WATSON was duly sworn by me to testify
8 the whole truth, and that the foregoing
9 deposition was recorded stenographically by me
10 and was reduced to computerized transcript
11 under my direction, and that the said
12 deposition constitutes a true record of the
13 testimony given by said witness.

14 I further certify that the reading and
15 signing of the deposition was waived by
16 SERGEANT RODDRICK WATSON.
17

18 I further certify that I am not a
19 relative or employee or attorney or counsel of
20 any of the parties, or a relative or employee
21 of such attorney or counsel, or financially
22 interested directly or indirectly in this
23 action.
24

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1 IN WITNESS WHEREOF, I have hereunto
2 affixed my license number for the State of
3 Illinois, in the City of Chicago, Illinois on
4 October 15, 2017.

5
6 

7
8 Carol M. Siebert-LaMonica
9 Illinois CSR License 084.00135
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