

EXHIBIT 116



KENTUCKIANA
— COURT REPORTERS —

CASE NO. 19-CV-01717

WATTS COORDINATED PRETRIAL PROCEEDINGS

**DEPONENT:
OFFICER BRIAN BOLTON**

**DATE:
March 14, 2022**



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1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF
3 ILLINOIS EASTERN DIVISION
4 MASTER DOCKET CASE NO. 19-CV-01717
5

6 IN RE: WATTS COORDINATED
7 PRETRIAL PROCEEDINGS
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23 DEPONENT: OFFICER BRIAN BOLTON

24 DATE: MARCH 14, 2022

25 REPORTER: KORTNEY CHASE

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1 MR. SULLIVAN: Sean Sullivan --
 2 MR. MICHALIK: Michalik -- go ahead, Sean. I'm
 3 sorry.
 4 MR. SULLIVAN: Sorry. Sean Sullivan for
 5 Defendant Kallat Mohammad, attending remotely from
 6 Chicago.
 7 MR. MICHALIK: Paul Michalik for Defendants,
 8 City of Chicago and some supervisory officials,
 9 attending remotely from Oak Forest, Illinois.
 10 MR. LEINENWEBER: Dan Leinenweber on behalf of
 11 Matthew Cadman and Michael Spaargaran, attending
 12 remotely from Wilmette, Illinois.
 13 MR. KOSOKO: I'm Ed Kosoko on behalf of Ronald
 14 Watts, attending remotely Chicago, Illinois.
 15 COURT REPORTER: Okay. Officer Bolton, will
 16 you please state your name for the record?
 17 THE WITNESS: Sure. My name is Brian Bolton,
 18 B-R-I-A-N, B-O-L-T-O-N.
 19 COURT REPORTER: And do all parties agree that
 20 the witness is, in fact, Brian Bolton?
 21 MR. RAUSCHER: Sure. Yep.
 22 MR. KOSOKO: Yeah.
 23 MR. MICHALIK: Agreed.
 24 MR. SULLIVAN: Yes.
 25 COURT REPORTER: Okay. Officer Bolton, will

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1 you please raise your right hand? Do you solemnly
 2 swear or affirm that the testimony you are about to
 3 give will be the truth, the whole truth, and nothing
 4 but the truth?
 5 THE WITNESS: Yes.
 6 COURT REPORTER: Thank you. You may begin.
 7 DIRECT EXAMINATION
 8 BY MR. RAUSCHER:
 9 Q All right. We're going to get into some
 10 specific cases very soon. I just want to ask a few
 11 preliminary questions before we do that. So are you
 12 still employed as a Chicago police officer?
 13 A Yes.
 14 Q What's your current job with CPD?
 15 A I work in area four, detective division.
 16 Q What do you do in area four, detective
 17 division?
 18 A I answer the phone and I -- filing.
 19 Q Is that job -- how long have you been in area
 20 four, detective division, answering the phone and
 21 filing?
 22 A It'll be two years, I believe, in May.
 23 Q Okay.
 24 A This May.
 25 Q Do you know who Ben Baker or Clarissa Glenn

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1 are?
 2 A I know who Ben Baker is.
 3 Q And well, let's get into that in just a
 4 second, but can you tell me what you did to prepare for
 5 your deposition today?
 6 A I read over some documents with my counsel.
 7 Q What documents did -- well, is that Brian
 8 Stefanich?
 9 A Yes.
 10 Q What documents did you look at with
 11 Mr. Stefanich?
 12 A Several case reports and arrest reports.
 13 Q Did you look at the Ben Baker, Clarissa Glenn
 14 arrest reports?
 15 A I don't know if I specifically looked over
 16 that report. I -- there's a stack of reports here.
 17 Q How do you know Ben Baker?
 18 A I know Ben Baker from Ida B. Wells.
 19 Q And how did you get to know Mr. Baker at
 20 Ida B. Wells?
 21 A He was a drug dealer from Ida B. Wells.
 22 Q How do you know he was a drug dealer?
 23 A He has been arrested several times for
 24 narcotics arrests, and also, he's been arrested by the
 25 DEA by -- for selling narcotics to them.

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1 Q When was he arrested for selling narcotics to
 2 the DEA?
 3 A I don't know what year.
 4 Q What's the -- can you give me a range of when
 5 you think it was? Best estimate?
 6 A I would say in the last few years.
 7 Q All right. So that's separate from
 8 Ida B. Wells, right?
 9 A Yes.
 10 Q But is it your view that the fact that he was
 11 arrested by the DEA sometime in the last few years shows
 12 that he was also a drug dealer at Ida B. Wells?
 13 A No. It shows that he was a drug dealer.
 14 Q I unders -- okay. Got it. And other than the
 15 fact that he was arrested at Ida B. Wells, do you have
 16 any basis for thinking he was selling drugs at
 17 Ida B. Wells?
 18 A Other than being arrested, no.
 19 Q Do you have any personal knowledge as to
 20 whether he was a drug dealer at Ida B. Wells?
 21 A I have no personal knowledge, no.
 22 Q Do you know Clarissa Glenn at all?
 23 A I don't know who that is.
 24 Q Do you know someone named Clarissa Baker?
 25 A I don't know who that is.

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1 Q Were you ever involved in arresting Ben Baker?
 2 A I don't believe so.
 3 Q Do you know what Mr. Baker looks like?
 4 A Yes.
 5 Q Describe what he looks like.
 6 A He's a male, black. I don't know what other
 7 physical characteristics that would have -- I know him
 8 by -- I could know by a picture of him. I would know --
 9 be able to describe him or know that by a picture that
 10 that is that person.
 11 Q Okay. Got it. Did you -- and when you -- are
 12 you -- do you have a vision of what he looks like from
 13 back in Ida B. Wells, or have you seen pictures somewhat
 14 recently? Or do you have some other basis for
 15 remembering what he looks like?
 16 A I saw a picture of him on the news, so that
 17 would be a recent image that I have of him. I don't
 18 remember the year that I saw him on the news, but it --
 19 probably a few years back.
 20 Q And when you saw him on the news, did you
 21 recognize him from Ida B. Wells?
 22 A Yes.
 23 Q So did you know Mr. Baker when you worked at
 24 Ida B. Wells?
 25 A Yes.

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1 Q And did you -- do you know if you ever talked
 2 to him?
 3 A I'm not sure about that.
 4 Q How did you know him from when you were
 5 working at Ida B. Wells?
 6 A I knew him from always being at 527 East
 7 Browning, always being in that area.
 8 Q Do you know if that's where he lived?
 9 A I believe he lived there.
 10 Q Do you remember ever seeing any other officers
 11 on your tactical team talking to Mr. Baker?
 12 A I don't recall any specific instance where
 13 that was, no.
 14 Q And do you understand that Mr. Baker and
 15 Clarissa Glenn -- well, Mr. Baker is suing for multiple
 16 arrests that he alleges were wrongful?
 17 A I understand that.
 18 Q And do you know -- I know you don't know
 19 specifically if you recently looked at his arrest
 20 reports, but do you recall if you've ever looked at his
 21 arrest reports or case of incident reports or similar?
 22 A I have, before.
 23 Q And did looking at those reports refresh your
 24 recollection at all as to whether you were involved in
 25 any of his arrests?

Page 20

1 A No.
 2 MR. RAUSCHER: All right. Let's bring up
 3 exhibit -- so this is Group Exhibit 1, and I think,
 4 for today, I'm just going to refer to the exhibits
 5 by the title of the PDF files that we circulated,
 6 and then I'll send to the court reporter after, if
 7 that's okay with all the other lawyers.
 8 (GROUP EXHIBIT 1 MARKED FOR IDENTIFICATION)
 9 MR. STEFANICH: That's fine.
 10 MR. RAUSCHER: All right. So I'm going to --
 11 I'll -- do you have a -- do you have -- Brian, were
 12 you -- did you print these, or should I share
 13 screen?
 14 MR. STEFANICH: No, he likes them printed, so
 15 we have them printed here.
 16 BY MR. RAUSCHER:
 17 Q Okay. So can you take a look at Group
 18 Exhibit 1, which is a packet of documents relating to
 19 Ben Baker and Clarissa Glenn?
 20 A Okay.
 21 Q Have you had a chance to look through these
 22 documents?
 23 A I believe at some point I looked through these
 24 documents. I don't know if I've recently looked through
 25 these documents -- or this document, I guess I should

Page 21

1 say.
 2 Q Okay. If you look at the third page, which is
 3 Bates stamped City BG00019?
 4 MR. STEFANICH: Here.
 5 A This is it? Okay. Okay, sir.
 6 Q If you look at the bottom of that, it says,
 7 "Assisting R/Os," and it lists, I believe, your name
 8 first.
 9 A Yes, sir.
 10 Q And this is an arrest -- this is a
 11 supplementary report of an arrest of Ben Baker, correct?
 12 A Yes.
 13 Q And for a date of June 17, 2004?
 14 A Yes.
 15 Q Does seeing your name on this report refresh
 16 your recollection as to whether you were involved in
 17 this arrest?
 18 A No.
 19 Q Can you tell me what 4512A stands for?
 20 A That would've been the beat that I was working
 21 that day.
 22 Q And what sort of beat was that?
 23 A It was -- this was a beat in public housing
 24 south.
 25 Q Was that part of tactical team at the time?

Page 22

1 A I believe so.

2 Q And then what's 15903 stand for?

3 A That's my star number.

4 Q Would you have been listed as an assisting,

5 responding, or reporting officer if you were not

6 involved in the arrest?

7 MR. STEFANICH: Object to form. You can

8 answer.

9 A I would've been assisting in some -- in some

10 way. I don't remember, specifically, what way that

11 would be.

12 Q And then what does R/O stand for in this

13 report? It says assisting R/Os?

14 A Reporting officers.

15 Q So although you don't remember specifically,

16 it's safe to say you were involved in some way in the

17 arrest based on the fact that you were listed on the

18 report?

19 A Well, I don't know about the arrest of him,

20 but it's -- at some point, I was involved in some way. I

21 don't know about the actual physical arrest of him, but

22 in some way, I must have been.

23 Q In other -- what other ways could you have

24 been involved?

25 A I could have done a complaint. I could have

Page 23

1 taken him to the bathroom. I could have made copies,

2 run a name, something -- something in that way.

3 Q What is -- what do you -- when you say you

4 "could have done a complaint," what do you mean by that?

5 A Part of the paperwork that would go to -- that

6 would go to court that lists the offense that was

7 committed.

8 Q And then you said you "could have made

9 copies," what do you mean by that?

10 A Photocopies.

11 Q Photocopies of what?

12 A Paperwork.

13 Q And so if you would've made photocopies of

14 paperwork, you'd -- typically, you'd be listed as an

15 assisting reporting officer?

16 A That could happen, yes.

17 Q Is that typically how things would be done? If

18 someone's only role is making copies, they'd be listed

19 as an assisting reporting officer?

20 A That could happen, yes. I don't want to say

21 that happens all the time, but I will say that that

22 would be a reason while someone's name would -- or might

23 be on as a assisting officer.

24 Q When you filled out reports, did you list

25 people as assisting reporting officers who had -- whose

Page 24

1 only role was making copies?

2 A I would.

3 Q You would?

4 A Uh-huh.

5 Q Okay. Were there people in administrative

6 roles at CPD in the summer of 2004 who could help make

7 copies?

8 A I'm sure there were, yes.

9 Q Did you ever utilize the services of any of

10 those people to make copies?

11 A I don't recall that, no.

12 Q Okay. Typically, it would be a team member if

13 you needed a copy of a report?

14 A A team member or the person -- or that person

15 filling out the report, yes.

16 Q And then you also mentioned you could have

17 taken them to the bathroom. Is that something typically

18 you'd list someone as an assisting reporting officer, if

19 they took the arrestee to the bathroom?

20 A Yes.

21 Q Okay. Is there -- are there any other

22 documents you're aware of that we can look at relating

23 to this June 2004 arrest that would show what your role

24 was?

25 A Not that I'm aware of, no. No, sir.

Page 25

1 Q And can you look at the narrative section and

2 then tell me if you have any knowledge, one way or the

3 other, as to whether it's accurate?

4 A Could you repeat your -- your -- your

5 question, sir?

6 Q Yeah. The question is: Do you have any

7 knowledge, one way or the other, as to whether that

8 narrative description is accurate?

9 A No. Other -- other than what's written on

10 this -- on this paper and knowing the individuals that,

11 from what I see, wrote this paper, I assume that the

12 narrative on here is true.

13 Q Right. But my question is different, which

14 is, do you have any personal knowledge as to whether it

15 is true?

16 A No.

17 Q All right. Can you look -- let's have you

18 look down at another arrest from the next year. So if

19 you could look at page 11 and 13 of this PDF, and I can

20 give you numbers. So Baker Glenn 87, although it's not

21 super easy to read. It's a report that starts at Baker

22 Glenn 83, and it starts at like the seventh page of this

23 30-page group exhibit.

24 A Okay. The narrative? Okay. I think I'm in

25 the right spot.

Page 26

1 Q Okay. So it's an arrest from March 23, 2005.
 2 It's got a -- the first page of that report has a
 3 picture on it.
 4 A On the upper right-hand corner, correct?
 5 Q Yep, exactly.
 6 A Okay.
 7 Q And do you recognize the person depicted
 8 there?
 9 A Yes.
 10 Q And who is that?
 11 A That's Ben Baker.
 12 Q Do you have a independent knowledge of that
 13 being Ben Baker, separate from the fact that it says his
 14 name on the arrest report?
 15 A Well, I know what his -- what he looks like
 16 with the picture. I recognize Ben Baker from this
 17 picture.
 18 Q Yeah. That's what I might -- right. So even
 19 if his name wasn't on there, you'd look -- you'd be able
 20 to look at that and say that's Ben Baker?
 21 A Yes.
 22 Q Okay. Have you read this arrest report
 23 before?
 24 A I may have.
 25 Q You don't remember either way if you've read

Page 27

1 it before?
 2 A I don't remember either way. I may have read
 3 this before, yes.
 4 Q Do you recall whether you were involved in
 5 arresting Mr. Baker in March 2005?
 6 A I don't recall that.
 7 Q Can you take a look at the last page of this
 8 report? Page 5 of 5.
 9 A Okay.
 10 Q You see your name on there as an assisting
 11 arresting officer?
 12 A I do.
 13 Q And then it's got beat 264B next to it?
 14 A Yes.
 15 Q What's 264B?
 16 A That was the beat while I was in the second
 17 district.
 18 Q Second district tactical team?
 19 A Yes.
 20 Q And then it's got Gonzalez with the same beat
 21 that day.
 22 A Yes.
 23 Q Does that mean that he was your partner that
 24 day?
 25 A Yes.

Page 28

1 Q Would that mean that you would've been with
 2 him the whole day while you were on duty?
 3 A That wouldn't mean that, necessarily. Partners
 4 split up if someone has to go to court or something like
 5 that. So I don't -- I don't remember this specific
 6 date, so I don't know if Robert Gonzalez and I were
 7 together the entire day.
 8 Q Okay.
 9 A If that's what you're asking.
 10 Q Do you know if you were together with Officer
 11 Gonzalez during the arrest of Ben Baker?
 12 A I don't know.
 13 Q And do you have any recollection at all of
 14 being involved in arresting Ben Baker on March 23, 2005?
 15 A I have no recollection.
 16 Q Can you take a look at the narrative section
 17 in this report, which is city -- or Baker Glenn 84? It's
 18 page 2 of the report.
 19 A Okay.
 20 Q Read through that, please, and then let me
 21 know if you have any personal knowledge, one way or the
 22 other, as to whether the narrative described there is
 23 accurate.
 24 A Okay. Okay.
 25 Q Do you have any personal knowledge, one way or

Page 29

1 the other, as to whether that narrative description is
 2 accurate?
 3 A No.
 4 Q Do you know how you -- do you know what role
 5 you played as an assisting arresting officer for this
 6 arrest?
 7 A I don't.
 8 Q Is there anywhere else you can look to see
 9 what role you played as the assisting arresting officer
 10 for this arrest?
 11 A If there's a Vice Case Report, I could look
 12 and see if there's anything in there that mentions my
 13 role. But other than that, I wouldn't -- I won't -- I
 14 don't remember.
 15 Q So I believe the Vice Case Report should be
 16 the next two pages --
 17 A Okay.
 18 Q -- following that.
 19 A I see it.
 20 Q Okay. Take a look at that and see if that
 21 helps refresh your recollection, please.
 22 A Okay. Okay.
 23 Q Did looking at that Vice Case Report refresh
 24 your recollection about your -- what your involvement
 25 was as an assisting arresting officer for this arrest?

Page 30

1 A No, sir.

2 Q And you're not aware of any other documents

3 that are out there that might refresh your recollection,

4 are you?

5 A I'm not aware of any other documents, sir.

6 Q Would you agree that just because you thought

7 that Ben Baker was a drug dealer at Ida B. Wells, it

8 wouldn't be okay, as a police officer, to fabricate

9 reports saying he had drugs at a time he didn't?

10 MR. STEFANICH: Objection. Form. You can

11 answer.

12 A Pretty --

13 MR. STEFANICH: Can you repeat the question,

14 Scott?

15 BY MR. RAUSCHER:

16 Q Sure. Let me try to rephrase it. Would you

17 agree that you, as a police officer, are not allowed to

18 frame people because you believe they're drug dealers?

19 A Of course, yes.

20 Q Did Sergeant Watts ever tell you not to frame

21 people?

22 A I was never asked to frame anyone.

23 Q But did -- were you ever told not to frame

24 people?

25 A I was never told that.

Page 31

1 Q Right. You were never -- Sergeant Watts never

2 instructed you, "Do not frame people."

3 MR. STEFANICH: Objection. Asked and answered.

4 Answer again.

5 A That question or statement never happened.

6 I --

7 Q Okay. We're going to skip, mostly just for

8 the record, Group Exhibit 2, which was Lionel White,

9 Senior, because although that was on our list for today,

10 we've already covered that case with Officer Bolton, so

11 I'm going to go ahead to -- Group Exhibit 3 will be the

12 next one we talk about. Before we do that, do you know

13 Leonard Gipson?

14 (GROUP EXHIBIT 3 MARKED FOR IDENTIFICATION)

15 A No.

16 Q Do you know -- did you know someone with a

17 nickname Fuzz when you worked at Ida B. Wells?

18 A No.

19 Q What about Larry Lomax, Christopher Scott, or

20 Bobby Coleman? Do you know any of those names?

21 A I don't recall those people, no.

22 MR. RAUSCHER: Okay. Brian, you handed him

23 Group Exhibit 3?

24 MR. STEFANICH: Yes.

25 MR. RAUSCHER: Did you by chance -- were you

Page 32

1 able to print that picture in color?

2 MR. STEFANICH: Yes.

3 MR. RAUSCHER: I'm sorry. I didn't hear. Was

4 that a yes or no? Because I can share it otherwise.

5 MR. STEFANICH: Yes. There's a colored picture

6 of Mr. Gipson.

7 BY MR. RAUSCHER:

8 Q Okay. Thank you. Having looked at the

9 picture of Mr. Gipson, which is City BG31496, does that

10 refresh your recollection about knowing him at all?

11 A No.

12 Q Okay. Have you had a chance to review the

13 reports in group -- and the documents in Group

14 Exhibit 3?

15 A Like I said before, I -- (coughs) pardon me.

16 I've looked at a stack of reports, so I don't know if,

17 specifically, this one I've reviewed.

18 Q So let me direct you to -- it's page 6 of the

19 document, but the Bates stamp -- trying to make sure it

20 didn't get -- oh, yeah, it's on the side. So the Bates

21 stamp would be Baker Glenn 26196.

22 A Okay.

23 Q Let me know when you have that in front of

24 you. Do you see that?

25 A Yes, sir.

Page 33

1 Q So this is a two-page document. It's a Vice

2 Case Report. It's also PL Joint 26196 to 197. You have

3 that in front of you, right?

4 A Yes, sir.

5 Q All right. Do you see your name listed as one

6 of the witnesses on this Vice Case Report?

7 A Well, I see --

8 MR. STEFANICH: Object to form.

9 THE WITNESS: Okay.

10 MR. STEFANICH: You can answer.

11 BY MR. RAUSCHER:

12 A I see my name at the bottom of box 18, and

13 witness is double X there, yes.

14 Q Yep. And does -- so does the double X

15 indicate to you that you're being listed as witness to

16 this incident?

17 A Yes. That would be -- that would -- that's --

18 yes.

19 Q So Vice Case Reports and arrest reports have

20 slightly different formats, right?

21 A Yes.

22 Q Is witness on the Vice Case Report the

23 equivalent of assisting arresting officer on the arrest

24 report?

25 A No, I don't think so.

Page 34

1 Q Okay. What are the differences between
2 listing someone as -- an officer as a witness on the
3 Vice Case Report and an assisting arresting officer on
4 the arrest report?

5 A Well, this assisting officer, like I said
6 before, could be you take someone to the restroom. You
7 may have been -- may have transported that person to a
8 police facility. You may have just watched them as,
9 like, a prisoner detail, just to make sure that they
10 didn't harm themselves. Something like that. Witness,
11 from what I see here, could mean that you were actually
12 -- witnessed some portion of the event that -- or the
13 event that took place, I guess. Does that make sense?

14 Q You said it could mean that you witnessed a
15 portion of the event? Could it mean something else?

16 A No, it -- I don't think so. I think that's --
17 witness is you witnessed some portion of what took place
18 here.

19 Q And then if you could read through the --
20 well, let me ask you this before we do that. Does
21 looking at this report refresh your recollection as to
22 whether you were involved in the arrests described in
23 this Vice Case Report?

24 A Can I read the narrative real quick?

25 Q Yeah, that -- please do. And I think the

Page 35

1 narrative starts on the first page and carries over to
2 the second page.

3 A Okay. Sorry, I don't read very fast. I
4 apologize for that.

5 Q That's all right. Did you have a chance to
6 read through the full narrative report?

7 A Yes.

8 Q Sorry, the full narrative on the report?

9 A Of the Vice Case Report, I read the narrative.

10 Q And did looking at that narrative on the Vice
11 Case Report refresh your recollection as to what your
12 involvement was, if any, in the arrests described in
13 that Vice Case Report?

14 A No.

15 Q You don't see yourself described in that
16 narrative, do you?

17 A No.

18 Q That you -- okay. Do you know which R/Os it
19 refers to? There's multiple places it says R/Os
20 received information, R/Os did other things. Do you
21 know who it's talking about?

22 A I don't know.

23 Q When you created reports that listed multiple
24 officers -- officers on the report, did you try to
25 identify who did what in the report?

Page 36

1 A If -- yes, I would try to do that. Yes.

2 Q Okay. What was the -- what would be the
3 purpose from your standpoint in identifying which
4 officers took what actions in a police report?

5 A Who may have recovered something, who may have
6 conducted a traffic stop. That's what I would, I guess,
7 list what that person did during -- I would try to do
8 that during an event, I guess, or an arrest.

9 Q So let's just look. Maybe we can just look at
10 this one and it -- there's a bunch of different things
11 that it says R/Os did. One of them about three, six,
12 seven lines in, the last sentence starts, "Offender 2
13 was then heard by R/Os tell offenders 3 and 4, quote,
14 you two are going to work the pack, end quote." Do you
15 see that?

16 A You said the -- seven lines down, correct?

17 Q Yeah. And then goes -- carries on to line 8.

18 A Offender two was then heard by R/Os. Okay,
19 could you --

20 Q I just want to make sure --

21 A Offender 2 was then heard, is that where
22 you're starting, sir?

23 Q Exactly.

24 A Okay. Can you go ahead and repeat the
25 question?

Page 37

1 Q Yeah, so --

2 A I apologize.

3 Q No, I didn't ask a question. It was just, did
4 you -- do you see that first?

5 A Yes.

6 Q If you were writing this report, would you
7 have said which R/Os heard the quote that's identified
8 in this -- these lines?

9 A Well, if there are multiple people hearing
10 this or -- I would try to ask who heard him -- heard
11 this person say that and then put that in the report,
12 yes.

13 Q So as it's written, it's -- it does suggest
14 multiple people heard it, correct?

15 A Yeah. It lists R/Os, so I don't know -- well,
16 R/Os could also mean the people that are actually
17 writing this report, you know, reporting officers, you
18 know, whoever -- I'd have to look and see who wrote the
19 report, so -- they could mean Officer Ridgell and
20 Summers. That could mean that also. R/Os, reporting
21 officers.

22 Q Who else could it mean other than Summers and
23 Ridgell?

24 A Well, they're the reporting officers on this
25 report, so I'm assuming -- I don't -- I didn't prepare

Page 38

1 this report, so I would -- it says R/Os, so I would
2 assume that R/Os are Ridgell and Summers, reporting
3 officers.

4 Q If you were the author of the report and you
5 wrote R/Os, would those be the only two people you'd be
6 referring to?

7 A I can't say that necessarily every time I've
8 -- it could mean that, or it could mean someone else.
9 In this long narrative of -- there's a lot going on
10 here. So I can't say what I would do in this. I don't
11 know -- I don't know what Kelvin and Turone meant by
12 R/Os, if it meant more than just them.

13 Q So is it fair to say it could have meant one
14 or both of them, or it could have meant any of the other
15 nine officers listed as witnesses in box 18?

16 MR. KOSOKO: Object to the form of the
17 question.

18 Q Sorry, it's actually eight. I think I counted
19 Summers twice.

20 A It could have. I don't know. I don't know. I
21 didn't prepare the report, so I don't know what Summers
22 and Ridgell meant by R/Os. I don't remember this event,
23 so I can't -- I can't answer that question. It could.

24 Q If -- when you wrote reports, what was the
25 purpose in, for you, trying to identify who did what?

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1 So, you know, if you said you would've tried to say
2 which R/O or R/Os heard that, what would be the reason
3 to identify who heard what?

4 A To identify what role they may have played --
5 they played during the event.

6 Q But for what -- to what end? Like, for what
7 purpose?

8 A For court purposes. To know what was going --
9 to have a clear of knowledge of what was going on.

10 Q All right. I'm going to have you go turn --
11 look toward the back of this. Well, actually, I guess
12 before we do that, do you have any -- know any personal
13 knowledge, one way or the other, as to whether the
14 narrative description of the arrest described in that
15 Vice Case Report is accurate?

16 A I have no personal knowledge, no.

17 Q Take a look at the last couple pages. So it's
18 15 to 16 of the packet. It's COPA-WATTS 45 -- 45445 to
19 45446. This is an arrest from August 28, 2007. You see
20 that Vice Case Report?

21 A Last two, okay. Okay, I see it.

22 Q And do you see your name on that report also?

23 A I do.

24 Q And does it -- does the report describe what
25 role you played, if any, in the arrest?

Page 40

1 A Can I read the narrative portion before I
2 answer that?

3 Q Yes. Take as much time as you need to read
4 over the report.

5 A Okay. Thank you. Okay.

6 Q You had a chance to look over the whole Vice
7 Case Report; is that right?

8 A I just want to make sure I read over the
9 entire report --

10 Q Okay.

11 A -- because I just focused on the narrative
12 section, so...

13 Q Okay.

14 A Okay.

15 Q Having looked at this report, do you have a
16 recollection of what role, if any, you played in the --
17 in arresting Mr. Gipson on August 28, 2007.

18 A I don't.

19 Q Are there any other documents you'd like to
20 look at that you think would describe your role?

21 A I'm not aware of any other documents that
22 would describe my role during this event.

23 Q You see in the narrative description, it
24 refers to a premise check?

25 A I see that.

Page 41

1 Q What's a premise check? Let me rephrase. What
2 was a premise check when you were working at
3 Ida B. Wells?

4 A A premise check would be going into the
5 building to make sure that things are okay, any type of
6 vacant apartments weren't boarded up that needed to be
7 taken care of, lights were out, things of that nature.

8 Q When you were going to do premise check, were
9 you also looking for drug activity?

10 A I wouldn't say specifically looking for drug
11 activity, but there were -- drug sales were constant in
12 these buildings, so that would happen, running into drug
13 activity, yes.

14 Q How would you enter the building to do a
15 premise check?

16 A Well, there is a rear entrance and a front
17 entrance to these -- well, 527 East Browning. So either
18 the back would be the -- some may describe it as the
19 back and/or front entrance.

20 Q And then would the -- would multiple officers
21 enter at once? Would one go in? Would it -- would you
22 be running? Would you be walking? Would it just
23 depend?

24 A It would just depend. It would depend.

25 Q Was there a typical method of entering a

Page 42

1 building to do a premise check?

2 A No typical method, no.

3 Q Would it be more common to be running, to run

4 into a building for a premise check? To walk in?

5 A Like I said, we had no common way to enter the

6 building, you know? Walking and/or running, you know?

7 Q If you -- once you've read the narrative

8 description, do you have any personal knowledge, one way

9 or the other, as to whether the narrative description in

10 this Vice Case Report of the August 28, 2007, arrest is

11 accurate?

12 A I have -- I have -- I have no knowledge of

13 that.

14 Q I'm going to ask you to take a look at the

15 last page of Group Exhibit 4.

16 (GROUP EXHIBIT 4 MARKED FOR IDENTIFICATION)

17 A Okay.

18 Q Which should be a picture. And it's City

19 BG052081.

20 A Okay.

21 Q Do you have that picture in front of you?

22 A I do.

23 Q Do you recognize the person in that picture?

24 A No, I do not.

25 Q As far as you know, have you ever seen him

Page 43

1 before?

2 A No.

3 Q Do you know why Larry Lomax was at

4 Ida B. Wells when he was arrested with Leonard Gipson

5 and others? Oh, actually I'm going to rephrase that.

6 Do you know why Larry Lomax was at Ida B. Wells when he

7 was arrested on January 4, 2003?

8 A Unless there is a statement of some sort in

9 the case report somewhere, I don't know the -- I don't

10 remember this person and I don't remember him -- I don't

11 remember him. So no, I don't.

12 Q Well, take a look at the first page of this

13 report.

14 A Okay.

15 Q I'm sorry, not this report, this group

16 exhibit, which is affidavit of Larry Lomax.

17 A Okay.

18 Q And just read paragraph 1.

19 A Okay. I've read it.

20 Q Do you have any knowledge as to whether it's

21 true that Larry Lomax was in Chicago and visiting his

22 brother at Ida B. Wells because his brother had cancer

23 and he was trying to give him money.

24 A I have no knowledge of that.

25 Q Do you know who Larry -- who Lonnie Lomax is?

Page 44

1 A I don't.

2 Q All right. Take a look at Group Exhibit 5. Do

3 you recognize the person pictured in the arrest report

4 on the first page of Group Exhibit 5, which is Bates

5 stamped City-BG-03287.

6 (GROUP EXHIBIT 5 MARKED FOR IDENTIFICATION)

7 A I don't.

8 Q Do you have any recollection at all of being

9 in the arrest -- involved in the arrest of Christopher

10 Scott?

11 A I have no recollection of that.

12 Q Do you have any recollection whatsoever of

13 ever dealing with someone named Christopher Scott?

14 A No.

15 Q Do you want to read the arrest report and tell

16 me if that helps refresh your recollection, or have you

17 already read this report?

18 A I'd like to read the report. Like I said

19 earlier, I've read stacks of reports, so I don't know. I

20 want to make sure that I have a good -- I got to read

21 the narrative portion of this to make sure I know what's

22 going on. Okay, I've read the narrative --

23 Q And --

24 A -- of the arrest report. Yeah.

25 Q Does reading that report refresh your

Page 45

1 recollection, one way or the other, as to whether you

2 were ever involved in arresting Christopher Scott?

3 A No.

4 Q And does it refresh your recollection seeing a

5 picture or reading the report as to whether you ever

6 interacted with Christopher Scott at all?

7 A No.

8 Q Take a look at the third page of Group

9 Exhibit 6, which is another picture. And it's Bates

10 stamped City-BG-051681.

11 (GROUP EXHIBIT 6 MARKED FOR IDENTIFICATION)

12 A You said the third page, sir?

13 Q Yeah, it should be a picture.

14 A Okay.

15 Q Do you recognize the person in that picture?

16 A Yes.

17 Q Who's the person in this picture?

18 A He was -- he hung out in Ida B. Wells.

19 Q Do you know his name?

20 A Well, from the front of this document, it says

21 Bobby Coleman.

22 Q Other than seeing that the front of the

23 document says Bobby Coleman, do you know who -- do you

24 know -- like, do you have an independent recollection of

25 this being Bobby Coleman?

Page 46

1 A I remember this person. I remember this
2 person. I don't remember the name of this -- other than
3 looking at the name on the sheet here, I -- but I
4 remember this individual.

5 Q So you remember him, but is it fair to say if
6 this wasn't in a packet of documents that had Bobby
7 Coleman's name all over them, you wouldn't know this
8 person as Bobby Coleman?

9 A Right.

10 Q Do you know -- did this person have a nickname
11 to your knowledge?

12 A Not to my knowledge.

13 Q And when you say you recognize him from
14 Ida B. Wells, what specifically do you remember, if
15 anything, about this person?

16 A I remember this person being extremely,
17 extremely tall, and I remember him being very tall, very
18 big. That's what I remember.

19 Q Do you know if he was involved in the drug
20 trade at Ida B. Wells?

21 A I don't recall that.

22 Q Do you recall ever being involved in the
23 arrest of Bobby Coleman?

24 A I don't recall that either.

25 Q You've already had a chance to look at the

Page 47

1 Vice Case Report describing the arrest, but would you
2 like to look again?

3 A Sure.

4 Q That's the last two pages -- are the Vice Case
5 Report.

6 A Okay. Okay. I just read this.

7 Q Yeah, this is the same Vice Case Report from
8 the --

9 A Okay.

10 Q -- first one in the --

11 A I'm sorry.

12 Q That's okay.

13 A Apologize.

14 Q No, that -- I'm -- is it fair to say, seeing
15 this for the second time today does not refresh your
16 recollection about being involved in this arrest?

17 A No.

18 MR. RAUSCHER: I hate to ask so soon, but would
19 it be okay if we just took a couple-minute break
20 everyone?

21 MR. KOSOKO: Let's take, like, a five-minute
22 break, Scott.

23 MR. RAUSCHER: Okay. Sounds good. Five's
24 fine.

25 MR. KOSOKO: All right.

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1 MR. RAUSCHER: Thanks.

2 COURT REPORTER: Okay. We're now off the
3 record. The time is 11:02 a.m.

4 (OFF THE RECORD)

5 COURT REPORTER: We are back on the record for
6 the deposition of Brian Bolton being conducted by
7 videoconference. My name is Kortney Chase. Today
8 is March 14, 2022. The time is 11:19 a.m.

9 BY MR. RAUSCHER:

10 Q Do you know someone named Isaac Weekly?

11 A No, sir.

12 Q All right. Can you take a look at Group
13 Exhibit 7, please?

14 (GROUP EXHIBIT 7 MARKED FOR IDENTIFICATION)

15 A Okay.

16 Q Take a look at the third page in that PDF,
17 which is City-BG-052506.

18 A Okay.

19 Q Do you recognize the person in that picture?

20 A No.

21 Q Have you had a chance to review the reports in
22 Group Exhibit 7?

23 A At some point, I -- like I said, I reviewed a
24 bunch of reports, so I can't recall specifically this
25 packet.

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1 Q So I can tell you that your name appears on

2 page 8 of the PDF, which is City-BG-052497. And then
3 there's also a Vice Case Report, which is page 10 of the
4 PDF, where your name also appears. That's

5 City-BG-052502. Would you like to look at those reports
6 and tell me if it refreshes your recollection as to
7 whether you were ever involved in the arrest of
8 Isaac Weekly?

9 A Yes. I'd like to look at the reports. That
10 would be helpful. Okay.

11 Q You had a chance to look at the reports in
12 Group Exhibit 7?

13 A Yes, sir.

14 Q Having looked at those reports, do you know
15 whether you were involved in arresting Isaac Weekly?

16 A I don't recall.

17 Q You have no memory of being involved in the
18 arrest of Isaac Weekly?

19 A No, sir.

20 Q The reports did not help refresh your
21 recollection as to whether you were involved in his
22 arrest?

23 A No, sir.

24 Q And do you have any recollection or do the
25 reports refresh your recollection as to whether you were

Page 50

1 involved in some way in interacting with Isaac Weekly in
 2 August of -- August 19, 2007?
 3 A No, sir.
 4 Q Do you have any personal knowledge, one way or
 5 the other, as to whether the narratives described about
 6 Mr. Weekly's arrest are accurate?
 7 A No, sir.
 8 Q All right. Do you know who Chauncey Ali is?
 9 A No, sir.
 10 Q What about Stefon Harrison?
 11 A No, sir.
 12 Q Tyrone Herron?
 13 A No, sir.
 14 Q Do you recall being involved in arresting any
 15 of those people?
 16 A No, sir.
 17 Q And have you looked at any reports relating to
 18 their arrests that you are aware of?
 19 A I may have. I'm not sure, sir.
 20 Q Take a look at Group Exhibit 8, please.
 21 (GROUP EXHIBIT 8 MARKED FOR IDENTIFICATION)
 22 A Okay.
 23 Q You see a picture on the first page?
 24 A Yes, sir.
 25 Q You recognize the person depicted in that

Page 51

1 picture?
 2 A No, sir.
 3 Q Take a look through the arrest report and let
 4 me know if that refreshes your recollection about being
 5 involved in arresting Chauncey Ali?
 6 A No, sir.
 7 Q Do you see your name listed as an assisting
 8 arresting officer on the last page of the arrest report,
 9 City-BG-56835?
 10 A Yes, sir.
 11 Q But you don't know what you did to assist with
 12 the arrest?
 13 A Can I read the Vice Case Report prior to the
 14 -- I --
 15 Q Of course.
 16 A May be something in the narrative.
 17 Q Sure. The Vice Case Report is -- just follows
 18 that. It's PL Joint 44816 to 817.
 19 A Okay.
 20 Q And having read the Vice Case Report, does
 21 that refresh your recollection about being involved in
 22 the arrest described in that Vice Case Report?
 23 A No, sir.
 24 Q And you see your name listed on the Vice Case
 25 Report in box 18?

Page 52

1 A Yes, sir.
 2 Q That one, it doesn't check what your role was
 3 supposed to be, discovered, witness, reported, right?
 4 A There's no check box there, yes.
 5 Q And looking at the report, you have no way of
 6 determining what role you played in the arrest described
 7 in this report?
 8 A No, sir.
 9 Q Are there any other documents you can think of
 10 that would help you remember what role you played in
 11 these arrests?
 12 A Not at this time, sir.
 13 Q Take a look at page 8 of this PDF, which is
 14 COPA-Watts 045245.
 15 A Okay.
 16 Q There should be a picture in the top-right
 17 corner.
 18 THE WITNESS: Brian, is it this one?
 19 MR. STEFANICH: Yes.
 20 A Okay.
 21 Q Do you see that picture?
 22 A Yes.
 23 Q Do you know who that person is who's pictured?
 24 A No, sir.
 25 Q Do you have any personal knowledge -- going

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1 back to the Vice Case Report, do you have any personal
 2 knowledge, one way or the other, whether the narrative
 3 description is accurate in this Vice Case Report?
 4 A No, sir.
 5 Q All right. Do you know who Derrick Mapp is?
 6 A No, sir.
 7 Q Take a look at Group Exhibit 9.
 8 (GROUP EXHIBIT 9 MARKED FOR IDENTIFICATION)
 9 A Okay.
 10 Q Do you see a picture in the top right-hand
 11 corner of the first page of Group Exhibit 9, COPA-Watts
 12 45042?
 13 A Yes, sir.
 14 Q Do you recognize the person who's pictured?
 15 A No, sir.
 16 Q Do you have any recollection of interacting
 17 with Derrick Mapp whatsoever?
 18 A No, sir.
 19 Q Do you have any recollection of being involved
 20 in arresting Derrick Map April 12, 2006?
 21 A No, sir.
 22 Q Have you had a chance to look at the reports
 23 in Group Exhibit 9?
 24 A I may have, sir. Like I said prior, I don't
 25 remember reading these reports, specifically.

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1 Q If you could take a look at these reports, and
2 I can tell you your name shows up as assisting arresting
3 officer on page 5 of the PDF, which is COPA-Watts
4 045046.

5 A Okay. Okay.

6 Q Why don't you look at that report, and there's
7 a vice case later. And tell me if it refreshes your
8 recollection about what involvement you had with this
9 arrest.

10 A Okay.

11 THE WITNESS: The copy's kind of -- sir --

12 MR. STEFANICH: Scott, can you put the vice
13 case up on the screen? The copy we have is pretty
14 hard to read.

15 MR. RAUSCHER: Yeah, it's actually just as bad
16 probably. But I'm happy to share it.

17 MR. STEFANICH: All right. Let's see if it's
18 any better.

19 MR. RAUSCHER: Do you see it now? Oh, I
20 haven't pressed it. Do you see it now?

21 THE WITNESS: Oh, boy.

22 MR. RAUSCHER: The second page is better.

23 MR. STEFANICH: Okay.

24 MR. RAUSCHER: Let me know when you want me to
25 scroll.

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1 THE WITNESS: Oh, I'm sorry. I apologize. If
2 you could scroll to the -- there we go.

3 MR. RAUSCHER: To the second page, or...

4 THE WITNESS: Yes, sir. There we go. Thank
5 you.

6 MR. RAUSCHER: Sure.

7 THE WITNESS: Okay. Thank you, sir.

8 BY MR. RAUSCHER:

9 Q Did looking at the arrest or Vice Case Report
10 refresh your recollection as to whether you were
11 involved in the arrest of Derrick Mapp?

12 A No, sir.

13 Q And did it refresh your recollection as to who
14 Derrick Mapp is?

15 A No, sir.

16 Q Or whether you knew Derrick Mapp at all?

17 A No, sir.

18 Q Are there any other documents that you could
19 look at that would refresh your recollection as to what
20 role you played in the arrest of Derrick Mapp?

21 A Not that I'm aware of at this time, sir.

22 Q Do you have any personal knowledge as to
23 whether the narrative description in the arrest report,
24 or the Vice Case Report is accurate?

25 A No, sir.

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1 Q And just to be clear, that's the same answer
2 for both reports, no personal knowledge?

3 A I have no personal knowledge, sir.

4 Q Do you know who Jermaine Morris is?

5 A No, sir.

6 Q Do you know if you were involved in arresting
7 Jermaine Morris?

8 A I'm not sure, sir.

9 Q Take a look at Group Exhibit 10.

10 (GROUP EXHIBIT 10 MARKED FOR IDENTIFICATION)

11 A Okay.

12 Q All right. You have that in front of you?

13 A I do, sir.

14 Q And this actually has arrests of two people,
15 but one of them we already covered a previous
16 deposition.

17 A Okay.

18 Q So I just want to ask about Jermaine Morris.
19 Have you had a chance to review the reports in Group
20 Exhibit 10?

21 A Like I said before, I've looked through
22 several different reports, so I'm not sure specifically
23 about this one. If I could take a moment to read
24 through some of the rest, and maybe possibly the case
25 report. Would that be possible?

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1 Q Sure. Of course. And I can, if it would help
2 you, direct you to PL Joint 041854, which is a page that
3 has your name listed as an assisting arresting officer.
4 But take your time to look through as much of it as
5 you'd like.

6 A Okay. Thank you sir. Okay, sir.

7 Q Have you had a chance to look at the reports
8 now?

9 A Yes, sir.

10 Q And specifically for the February 4, 2006,
11 arrest, you looked at that and saw your name on it?

12 A I don't see my name here.

13 Q That report starts PL Joint 41850.

14 A 50? Okay. Yes, sir. I see my name.

15 Q You see your name?

16 A Yes, sir.

17 Q Does seeing your name on this report refresh
18 your recollection as to what role you had with respect
19 to arresting Jermaine Morris February 4, 2006.

20 A No, sir.

21 Q Do you have any personal knowledge, one way or
22 the other, as to whether the narrative description in
23 this arrest report is accurate?

24 A No, sir.

25 Q Are there any other documents you could look

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1 at to help refresh your recollection about this arrest?

2 A Not at this time, sir.

3 Q Do you know who Alvin Waddy is?

4 A No, sir.

5 MR. RAUSCHER: And I guess before we ask some

6 questions about Alvin Waddy, this one is in State

7 Court, this case. This is for the lawyers, it's not

8 so much for you, Officer Bolton. Brian, it's my

9 understanding that we have an agreement that we can

10 use the Watts depositions basically the same way

11 that discovery depositions can be used in State

12 court. And so if we have that, then we don't need

13 to do a whole separate deposition? Is that --

14 MR. STEFANICH: That's agreed.

15 BY MR. RAUSCHER:

16 Q Okay. Do you know who Alvin Waddy is?

17 A No, sir.

18 Q Do you have any recollection of being involved

19 in arresting Alvin Waddy?

20 A No, sir.

21 Q Take a look at the third page of the PDF of

22 Group Exhibit 11.

23 A Okay.

24 Q The Bates stamp is IND DEF-AW a bunch of

25 leading zeros and a one. You see that?

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1 (GROUP EXHIBIT 11 MARKED FOR IDENTIFICATION)

2 A Yes, sir.

3 Q Do you see a picture?

4 A Yes, sir.

5 Q Do you recognize the person in this picture?

6 A No, sir.

7 Q Have you had a chance to read over this

8 report, the arrest report?

9 A I may have, sir.

10 Q And you have no independent recollection at

11 this time of being involved in the arrest of Alvin Waddy

12 on April 4, 2007, correct?

13 A No, sir.

14 Q Would you like to read over the report, the

15 arrest report, and see if it helps refresh your

16 recollection as to your involvement in this arrest?

17 A Yes, sir.

18 Q Okay. Please do that and let me know when

19 you've finished.

20 A Thank you. Okay, sir.

21 Q Did you also look at the Vice Case Report?

22 A I did, sir.

23 Q Okay. Having looked at the arrest report and

24 the Vice Case Report, do you have any recollection of

25 being involved in the -- arresting Alvin Waddy?

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1 A No, sir.

2 Q Do you have any knowledge, one way or the

3 other, as to whether the narrative description in the

4 Vice Case Report is accurate?

5 A No, sir.

6 Q Do you have any knowledge, one way or the

7 other, as to whether the narrative description in the

8 arrest report is accurate?

9 A No, sir.

10 Q Do you know -- you were on the tactical team

11 with Mickey Spaargaren for some period of time, correct?

12 A Yes, sir.

13 Q Do you know why he left the team?

14 A He was --

15 MS. MCGRATH: Calls for speculation.

16 A I remember a brief incident where him and

17 Ronald Watts got into an argument. I don't remember

18 exactly. They were in a private room arguing and

19 screaming with each other, so I don't remember the exact

20 words that were said within that argument. But I -- he

21 was removed from that TAC team right after that.

22 Q Do you remember what the gist of the argument

23 was?

24 A I remember race being involved in it, and

25 that's what I remember. It was quite some time ago, but

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1 I remember race being involved.

2 Q How so? Like how -- just what do you mean by

3 race being involved?

4 A Black officers being treated differently than

5 white officers.

6 Q And was someone making accusations in that?

7 A From what I recall, I recall Mike not being --

8 feeling that he was treated differently than black

9 officers. And it became a big, heated argument in a

10 office that was in our station, and he was removed from

11 the TAC team after that.

12 Q He thought he was -- Spaargaren thought he was

13 being treated differently than black officers?

14 A Yes.

15 Q Do you know in what way he thought he was

16 being treated differently than black officers?

17 A I don't recall that.

18 Q Do you know if it had anything to do with him

19 taking time off or wanting to take time off?

20 A I can't remember that. I don't remember that.

21 Q Do you know if it had anything to do with him

22 wanting to run another business?

23 A I know that he was starting a business during

24 that time and was leaving work quite often to run this

25 other business. It was a -- not a construction

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1 business. It was like a building inspection business.
2 Q Do you know if the argument had anything to do
3 with his building inspection business?

4 A I don't recall that. I don't -- it's a long
5 time ago, so I don't remember -- I don't remember all
6 that.

7 Q Do you remember any other -- any discussions
8 among team members about whether officers were treated
9 differently based on race?

10 A No, I don't recall any other discussions about
11 that.

12 Q Do you ever -- do you recall Spaargaren ever
13 talking about that or saying that to any -- at any time
14 other than the argument you overheard?

15 A No. I don't remember that.

16 Q And then were you ever told at roll call not
17 to frame people?

18 A I've never had any conversations about framing
19 any people. I --

20 Q Or not framing people?

21 A Not framing people, framing people. I -- it
22 was -- I've never had any conversation, in my almost
23 24 years as a policeman, about not framing people or
24 framing people. It's -- I don't -- I've never had that
25 conversation with anyone.

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1 MR. RAUSCHER: Okay. Those are all the
2 questions that I have on individual cases. So I
3 think, Brian, I'll turn it over to Joel for his
4 cases. And then let's see how much time we have
5 left, and if we can do some CRs or CR topic, we can
6 do that. Does that work?

7 MR. STEFANICH: That's nice.

8 EXAMINATION

9 BY MR. FLAXMAN:

10 Q Officer Bolton, can you hear me?

11 A I can hear you, sir.

12 Q Okay. My name's Joel Flaxman. I represent
13 some other plaintiffs in this case, and I'm going to go
14 through some questions for you on them. You should have
15 some exhibits that we provided.

16 MR. STEFANICH: Yes, we got those Joel.

17 MR. FLAXMAN: Okay. Do you have them in order?
18 I know -- I'll just go through alphabetically if
19 that's okay.

20 MR. STEFANICH: Yeah. That's how we organized
21 them.

22 BY MR. FLAXMAN:

23 Q Okay. Great. And actually, before I get into
24 that, let me just ask you very quickly a follow-up on
25 one of the exhibits that Mr. Rauscher looked at with

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1 you. Could you please go back to Exhibit 4, the Larry
2 Lomax packet that Mr. Rauscher questioned you on?

3 A Okay.

4 Q And I just want to ask you about the Vice Case
5 Report that's in that packet. I have it as the fifth
6 page of the exhibit, Group Exhibit number 4.

7 A Okay.

8 Q And that's a Vice Case Report dated
9 January 4, 2003, correct?

10 A Yes, sir.

11 Q Okay. The first offender is Bobby T. Coleman,
12 III?

13 A Yes, sir.

14 Q Okay. And it continues with a list of
15 offenders into the narrative. And I wanted to ask you
16 about offender number 5, do you see, is named George
17 Ollie, O-L-L-I-E?

18 A Yes, sir.

19 Q Okay. Do you have any recollection of
20 somebody named George Ollie?

21 A No, sir.

22 Q Okay. And there's also a nickname next to him
23 of G-Dog. Do you see that?

24 A Yes, sir.

25 Q Do you have any recollection of somebody with

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1 a nickname G-Dog?

2 A No, sir.

3 Q Okay. And is it correct that you don't have
4 any personal knowledge of this arrest on January 4,
5 2003?

6 A No, sir. I don't remember this arrest.

7 Q Okay. You can put that exhibit aside. Thank
8 you. Okay. The next person I want to ask you about is
9 name Demetris Adams. Do you have any recollection of
10 Demetris Adams?

11 A No, sir.

12 Q Okay. Let me ask you to look at what's marked
13 Plaintiff's -- Plaintiff Adams Exhibit number 1, please.
14 And is that the Vice Case Report from June 26, 2004, the
15 arrest of Demetris Adams?

16 (PLAINTIFF ADAMS EXHIBIT 1 MARKED FOR
17 IDENTIFICATION)

18 A Yes, sir.

19 Q Do you see your name on this report?

20 A I do, sir.

21 Q And where is your name?

22 A It's in box -- continuation of box 18.
23 Box 18, it looks, sir.

24 Q And what do you take that to mean?

25 A That I had some role in the event that

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1 happened that day.
 2 Q And is it correct that you don't have any
 3 recollection of what that role was?
 4 A I don't remember, sir.
 5 Q Okay. And does the report explain what your
 6 role was?
 7 A May I read the narrative portion, sir?
 8 Q Please. Yes, please. After reviewing the
 9 report, I'll ask you to answer that question.
 10 A Okay. Thank you. Okay, sir.
 11 Q You've now reviewed the Vice Case Report,
 12 Plaintiff Adams Exhibit 1?
 13 A Yes, sir.
 14 Q Okay. And does that report explain your
 15 involvement in this arrest?
 16 A No, sir.
 17 Q This report states that the address of the
 18 occurrence was 574 East 36th Street. Do you see that?
 19 A Yes, sir.
 20 Q And do you recognize that as the address of an
 21 apartment building at the Wells homes?
 22 A Yes, sir.
 23 Q Do you recall that building having any
 24 reputation?
 25 A A repu -- I don't understand. A reputation

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1 meaning?
 2 Q Well, were there differences between who lived
 3 in the buildings or what kind of activity happened at
 4 each building?
 5 A No, drugs were sold at this building.
 6 Q And is that something that you remember or
 7 that you're basing on this report?
 8 A I remember drugs being sold here at this
 9 building.
 10 Q Did you see the report referred to drugs being
 11 sold on the fifth floor of this building?
 12 A I don't recall a floor, but I remember drugs
 13 being sold here at this building.
 14 Q Okay. And did you see on the second page of
 15 the report it said that the offender fled to the door of
 16 apartment number 510?
 17 A Yes, sir.
 18 Q Do you recall anything about apartment 510 at
 19 574 East 36th Street?
 20 A No, sir.
 21 Q Can I ask you to look at Plaintiff Adams
 22 Exhibit 2, please? And is that the arrest report of
 23 Demetris Adams from June 26, 2004?
 24 (PLAINTIFF ADAMS EXHIBIT 2 MARKED FOR
 25 IDENTIFICATION)

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1 A Yes, sir.
 2 Q And do you see that there's an Alias or
 3 nickname under Mr. Adams name, Dee, D-E-E?
 4 A Yes.
 5 Q Okay. Do you recall somebody with the
 6 nickname, D-E-E?
 7 A No, sir.
 8 Q Okay. And does looking at the arrest report
 9 refresh your recollection about this arrest?
 10 A No, sir.
 11 Q All right. And can you please look at the
 12 next exhibit, Plaintiff Adams Exhibit 3?
 13 (PLAINTIFF ADAMS EXHIBIT 3 MARKED FOR
 14 IDENTIFICATION)
 15 A Okay.
 16 Q And are those three different mugshots that
 17 say Adams, Demetris, Dee, at the top?
 18 A Yes, sir.
 19 Q Do you recognize the person depicted in these
 20 pictures?
 21 A No, sir.
 22 Q So looking at these three exhibits has not
 23 helped you remember anything about the arrest of
 24 Mr. Adams on June 26, 2004; is that right?
 25 A I do not recognize this person.

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1 Q Okay. And does looking at these exhibits help
 2 you remember the arrest of Mr. Adams on June 26, 2004?
 3 A No, sir.
 4 Q Is it correct that you do not have any
 5 personal knowledge of the arrest of Demetris Adams on
 6 June 26, 2004?
 7 A No, sir.
 8 Q Okay. The next person I want to ask you about
 9 is named Catrina Bonner. Do you have any memory of a
 10 woman named Catrina Bonner?
 11 A No, sir.
 12 Q Okay. Can I ask you please to look at
 13 Plaintiff Bonner Exhibit 1?
 14 (PLAINTIFF BONNER EXHIBIT 1 MARKED FOR
 15 IDENTIFICATION)
 16 A Okay.
 17 Q Is that a Vice Case Report dated March 28,
 18 2007?
 19 A Yes, sir.
 20 Q Okay. And it lists the first offender is
 21 Frank Saunders and the second offender is Catrina
 22 Bonner?
 23 A Yes, sir.
 24 Q Okay. Let me also -- before I ask questions
 25 about the Vice Case Report, I'd ask you to look at

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1 Plaintiff Bonner Exhibit 4, please. Is that the arrest
 2 report for Frank Saunders dated March 28, 2007?
 3 (PLAINTIFF BONNER EXHIBIT 4 MARKED FOR
 4 IDENTIFICATION)
 5 A Yes.
 6 Q Okay. And if you look on the last page of
 7 that, page 505, do you see your name listed?
 8 A I do.
 9 Q Okay. And how are you listed there?
 10 A Assisting arresting officer.
 11 Q Do you know what you did to be an assisting
 12 arresting officer for this arrest?
 13 A No, sir.
 14 Q And does the report state what you did to be
 15 an assisting arresting officer?
 16 A Can I read the narrative, sir?
 17 Q Yes, please.
 18 A I've read the narrative, sir.
 19 Q Does reviewing the narrative help you recall
 20 what you did to be an assisting arresting officer in
 21 this arrest?
 22 A No, sir.
 23 Q And it doesn't state in the narrative what you
 24 did; is that right?
 25 A No, sir.

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1 Q And this arrest report -- I'm sorry, let me
 2 start that question over. Does this arrest report
 3 describe the same event that was described in the Vice
 4 Case Report that was Exhibit 1?
 5 A Yes, sir.
 6 Q And do you see your name listed in the Vice
 7 Case Report, Exhibit number 1?
 8 A I'm not seeing my name on the Vice Case
 9 Report, sir. Maybe --
 10 Q Oh, go ahead. Let me know when you're done
 11 looking at it.
 12 A I don't see it here.
 13 Q When you prepared Vice Case Reports, was it
 14 your practice to list the assisting arresting officers
 15 on the Vice Case Report?
 16 A For me, as an officer, that usually happens.
 17 But occasionally, you know, mistakes are made.
 18 Q Sure.
 19 A So I can't say what Officer Muhammad and
 20 officer Lewis -- I don't know why I'm not listed on --
 21 in the arrest report, but not the case -- I'm sorry, the
 22 Vice Case Report. I don't know why.
 23 Q All right. And did you review the narrative
 24 in the Vice Case Report?
 25 A I did.

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1 Q And does reviewing the narrative help you
 2 recall the events described in this report?
 3 A No, sir.
 4 Q Did you see that the narrative states that
 5 offender number 2 was a known offender?
 6 A I see that, sir.
 7 Q Do you take that to mean that one of the
 8 officers recognized Ms. Bonner and knew her name?
 9 MR. STEFANICH: Objection. Form.
 10 A It appears that Officer -- well, Muhammad and
 11 Officer Lewis made this report, so I can't really -- I
 12 don't know if -- what they were -- what they recognized
 13 who this person was.
 14 Q Okay. Well, somebody recognized this person,
 15 whether it was Muhammad, Lewis, or some other officer;
 16 isn't that right?
 17 A Reading the report, it seems to be that way,
 18 sir.
 19 Q And reading the Vice Case Report and the
 20 arrest report doesn't refresh your recollection of these
 21 events on March 28, 2007; is that right?
 22 A No, sir.
 23 Q Okay. And the exhibits -- Exhibit 2, can you
 24 please just look at the first page to see that that's an
 25 arrest report of Catrina Bonner?

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1 (PLAINTIFF BONNER EXHIBIT 2 MARKED FOR
 2 IDENTIFICATION)
 3 A Okay.
 4 Q And then Exhibit 3 is a document called a
 5 prisoner transportation transmittal. Can you let me
 6 know when you're looking at that?
 7 (PLAINTIFF BONNER EXHIBIT 3 MARKED FOR
 8 IDENTIFICATION)
 9 A (Coughs) Pardon me. Okay.
 10 Q And I'm not going to ask you about the
 11 contents of these reports. I just wanted you to look at
 12 the picture. Does looking at the woman depicted in
 13 these pictures help you remember --
 14 A Okay.
 15 Q Does looking at the woman in these pictures
 16 help you remember anybody?
 17 A No, sir.
 18 Q It doesn't refresh your recollection about
 19 Catrina Bonner?
 20 A No, sir.
 21 Q All right. So then is it the case that you do
 22 not have any personal knowledge of the arrest of
 23 Catrina Bonner -- I'm sorry. That's misdirecting. Is
 24 it correct that you do not have any personal knowledge
 25 of the events that were described in these reports

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1 related to Catrina Bonner on March 28, 2007?
 2 A No, sir.
 3 Q No, you don't have personal knowledge?
 4 A I don't recall these people and/or this
 5 arrest, sir.
 6 Q Okay. All right. Thanks. The next thing I
 7 want to ask about, Jermaine Coleman and Jabal Stokes. Do
 8 you have any recollection of those two men?
 9 A No, sir.
 10 Q No? Okay. Could you please take a look at
 11 Plaintiff Coleman Exhibit 1?
 12 (PLAINTIFF COLEMAN EXHIBIT 1 MARKED FOR
 13 IDENTIFICATION)
 14 A Okay.
 15 Q And is that the arrest report of Jermaine
 16 Coleman from May 3, 2006?
 17 A Yes, sir.
 18 Q And are you listed on the last page of this
 19 report as an assisting arresting officer?
 20 A Yes, sir.
 21 Q Do you know what you did to be an assisting
 22 arresting officer?
 23 A Can I read the narrative, sir?
 24 Q Sure.
 25 A Okay, sir.

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1 Q Do you remember what you did to be an
 2 assisting arresting officer for the arrest of Jermaine
 3 Coleman?
 4 A No, sir.
 5 Q Okay. And reading the report doesn't tell you
 6 the answer to that?
 7 A No, sir.
 8 Q Could you please look at Plaintiff Coleman
 9 Exhibit 2 now?
 10 (PLAINTIFF COLEMAN EXHIBIT 2 MARKED FOR
 11 IDENTIFICATION)
 12 A That's right. Okay.
 13 Q Is that the arrest report for Jabal Stokes
 14 from May 3, 2006?
 15 A Yes, sir.
 16 Q Do you see that you were listed on the last
 17 page of this report as an assisting arresting officer?
 18 A Yes, sir.
 19 Q And do you know what you did to be an
 20 assisting arresting officer on this arrest?
 21 A No, sir.
 22 Q Let me ask you to look at the narrative of
 23 this arrest report on page 2, please.
 24 A 205, sir?
 25 Q Yes, correct.

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1 A Oh, okay.
 2 Q Okay. And the narrative section begins with
 3 the event number. Do you see that?
 4 A I do.
 5 Q And then the next thing is the first sentence
 6 of the narrative states, "This is an arrest by tact
 7 units BT.264D, B, & C." Did I read that right?
 8 A Yes, sir.
 9 Q Okay. Do you take BT to mean beat?
 10 A Yes.
 11 Q And does this report state that the officers
 12 on those beats were the arresting officers?
 13 A Not on this page. On the -- would be the 3
 14 out of the 5 page. It says, "First arresting officer,"
 15 and then, "Second arresting officer."
 16 Q Okay. So what does it mean to state that the
 17 arrest was by those beats in the narrative?
 18 MR. STEFANICH: Objection. Form. You can
 19 answer.
 20 A It means that there was some role in the
 21 arrest during -- or some -- the officers on those beats
 22 had some -- some type of role in the arrest of this
 23 person.
 24 Q And that's what you talked about before as
 25 being listed as an assisting arresting officer?

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1 A Yes, sir.
 2 Q Okay. Can I ask you please to look at
 3 Plaintiff Coleman Exhibit number 3? And is that the
 4 Vice Case Report for the arrest of Mr. Coleman and
 5 Mr. Stokes on May 3, 2006?
 6 (PLAINTIFF COLEMAN EXHIBIT 3 MARKED FOR
 7 IDENTIFICATION)
 8 A Yes, sir.
 9 Q And do you see your name on this report?
 10 A I do, sir.
 11 Q And where is your name listed?
 12 A In box 18, sir.
 13 Q And is the box for witness checked in box 18?
 14 A It is sir.
 15 Q I take that to mean that you were a witness in
 16 this incident?
 17 A If the box is checked witness, I must have
 18 witnessed something. Not too sure what that is, sir.
 19 Q Sure. So -- and please take a look at the
 20 report, and I'll ask you the question again.
 21 A Okay. Okay. Okay, sir.
 22 Q And you've reviewed the narrative of the
 23 Vice Case Report?
 24 A I did, sir.
 25 Q And does that refresh your recollection about

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1 the arrest of Mr. Coleman and Mr. Stokes?
 2 A No, sir.
 3 Q Okay. And does the narrative of the report
 4 explain your role in the arrest?
 5 A No, sir.
 6 Q I wanted to ask you, in the report it refers
 7 to officers setting up surveillance and then also for
 8 officers calling for enforcement. Are those terms that
 9 you've heard, surveillance officers and enforcement
 10 officers?
 11 A Yes, sir.
 12 Q Okay. And what do they mean?
 13 A Surveillance officers would be the officers
 14 observing the crime that is occurring, and the
 15 enforcement officers would be the officers that are
 16 apprehending -- or apprehending the offenders.
 17 Q And do you have experience in both roles?
 18 A Yes.
 19 Q Whenever you were assigned to be a
 20 surveillance officer, would you always have enforcement
 21 officers working with you?
 22 A Usually, yes.
 23 Q Would you not want to be involved as a
 24 surveillance officer if there wasn't somebody else
 25 working enforcement?

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1 A That's -- no, you could -- you would be -- you
 2 could break your surveillance and then go and apprehend
 3 the offender. That's a possibility, sir. So I wouldn't
 4 say I would not want to do that.
 5 Q Let me ask you please to look at the last two
 6 exhibits for Plaintiff Coleman, numbers 4 and 5.
 7 (PLAINTIFF COLEMAN EXHIBIT 4 MARKED FOR
 8 IDENTIFICATION)
 9 (PLAINTIFF COLEMAN EXHIBIT 5 MARKED FOR
 10 IDENTIFICATION)
 11 A Okay.
 12 THE WITNESS: Take a break?
 13 MR. STEFANICH: Joel, we're going to take a
 14 break at 12:30.
 15 MR. FLAXMAN: Okay. Do you want to take a
 16 break after we do these two pictures?
 17 THE WITNESS: Yeah, that'll be good.
 18 MR. STEFANICH: Okay. Yeah, that's fine.
 19 Thanks.
 20 MR. FLAXMAN: Sure. Let's just do those, and
 21 then we'll go off the record.
 22 MR. STEFANICH: Thank you.
 23 BY MR. FLAXMAN:
 24 Q Is Coleman Exhibit number 4 -- do you see
 25 that? There's a picture of a man. It says "Jermaine

Page 80

1 Coleman" above him.
 2 A Yes, sir.
 3 Q Okay. Does that person depicted on Coleman
 4 Exhibit 4 look familiar?
 5 A No, sir.
 6 Q Okay. And then could you look please at
 7 Exhibit 5? Do you see a picture of a man and above him
 8 it says, "Stokes, Jabal"?
 9 A Yes, sir.
 10 Q Okay. Does the picture in Exhibit 5 look
 11 familiar?
 12 A No, sir.
 13 Q Okay. Having reviewed all of these exhibits,
 14 are you still unable to remember the arrest of
 15 Mr. Coleman and Mr. Stokes on May 3, 2006?
 16 A I'm unable to remember, sir.
 17 Q Okay. And is it still correct that you do not
 18 have any personal knowledge of the arrest of
 19 Jermaine Coleman and Jabal Stokes on May 3, 2006?
 20 A That's correct, sir.
 21 Q Okay.
 22 MR. FLAXMAN: We can go off the record.
 23 COURT REPORTER: Okay. We are now off the
 24 record. The time is 12:17 p.m.
 25 (OFF THE RECORD)

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1 COURT REPORTER: We are back on the record for
 2 the deposition of Brian Bolton being conducted by
 3 videoconference. My name is Kortney Chase. Today
 4 is March 14, 2022. The time is 12:46 p.m.
 5 BY MR. FLAXMAN:
 6 Q Officer Bolton, you're in a room today with
 7 your attorney, Mr. Stefanich, right?
 8 A Yes, sir.
 9 Q Okay. Is anybody else in the room with you?
 10 A No, sir.
 11 Q Okay. And that's been true all day?
 12 A Yes, sir.
 13 Q Okay. I next want to ask you about someone
 14 named Trinere Johnson. Do you have any recollection of
 15 Trinere Johnson?
 16 A No, sir.
 17 Q Okay. Could I ask you please to look at
 18 Plaintiff Johnson Exhibit 1?
 19 (PLAINTIFF JOHNSON EXHIBIT 1 MARKED FOR
 20 IDENTIFICATION)
 21 A Okay.
 22 Q And is that the arrest report of Trinere
 23 Johnson dated March 3, 2008?
 24 A Yes, sir.
 25 Q And you see the picture of Ms. Johnson at the

Page 82

1 top right of that report?

2 A Yes, sir.

3 Q Okay. Does the person in that picture look

4 familiar to you?

5 A No, sir.

6 Q All right. Let me ask you, then, to look at

7 Plaintiff Johnson Exhibit 2, please.

8 (PLAINTIFF JOHNSON EXHIBIT 2 MARKED FOR

9 IDENTIFICATION)

10 A Okay.

11 Q And is that the Vice Case Report dated

12 March 3, 2008, for Darnell Trabeck and Trinere Johnson?

13 A Yes, sir.

14 Q And do you see your name listed on this

15 report?

16 A Yes, sir.

17 Q Where's your name listed?

18 A In the extension of box 18, sir.

19 Q Okay. And is the box for witness checked?

20 A Yes, sir.

21 Q All right. And do you know what you did in

22 relation to this arrest?

23 A No, sir.

24 Q Okay. And --

25 A May I read the narrative of the arrest report,

Page 83

1 sir? Oh, I'm sorry, the Vice Case Report. Just

2 double-check that, sir.

3 Q Yes, and why -- yeah. And actually, before

4 you do that, let me just -- why don't you also look at

5 Exhibit 3 at the same time? Do you have that in front

6 of you?

7 (PLAINTIFF JOHNSON EXHIBIT 3 MARKED FOR

8 IDENTIFICATION)

9 A Yes, sir.

10 Q And is that the arrest report of Darnell

11 Trabeck on March 3, 2008?

12 A Yes, sir.

13 Q Okay, well -- so yeah, why don't you take a

14 moment to look at the two arrest reports and the Vice

15 Case Report. And let me know when you've done that.

16 A Okay. Thank you, sir. Okay, sir, I've read

17 the narrative of both or all three reports.

18 Q And does reviewing the three reports about

19 Mr. Trabeck and Ms. Johnson refresh your recollection

20 about their arrests?

21 A No, sir.

22 Q Is it correct that you do not have any

23 personal knowledge of the arrests of Mr. Trabeck and

24 Ms. Johnson on March 3, 2008?

25 A No, sir.

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1 Q No, sir, you do not have recollection --

2 A I don't have -- I don't recall any of the

3 events that took place that day.

4 Q Okay. Let me show you some other reports that

5 are marked with these as Johnson Exhibit 4. I want you

6 to look at that one first, please. And is that an

7 arrest report of someone named John Massey?

8 (PLAINTIFF JOHNSON EXHIBIT 4 MARKED FOR

9 IDENTIFICATION)

10 A Yes, sir.

11 Q Okay. And if you look at that at the same

12 time as you're looking at the arrest report for

13 Ms. Johnson, do you see that it's the same location on

14 the same day, but ten minutes later?

15 A Oh, the arrest report. I apologize. Yes,

16 sir.

17 Q And I'm not asking about this report because

18 you didn't create this arrest report for Mr. Massey,

19 right?

20 A No, sir.

21 Q Okay. When you did create arrest reports, how

22 would you determine the time when you put that for the

23 arrest date and time?

24 A Well, most of the time, we'd let the

25 dispatcher know that we'd be going into the station with

Page 85

1 an arrest. So back then, there were no body cameras, so

2 it was kind of -- you had to gauge of when you went in

3 for the arrest and when you left the location or let the

4 dispatcher know that you were leaving. And you'd have

5 to gauge approximate when that person was actually

6 placed into custody. We didn't have body cameras to

7 review -- at that time during the police -- at that

8 point in the police department, there were no body cams,

9 so you kind of had to gauge when you were leaving and

10 when the person was placed into custody.

11 Q And Mr. Massey was arrested for trespassing.

12 Is that what the report says?

13 A Yes, sir.

14 Q And it looks like, according to the reports,

15 he was arrested in a different location from Ms. Johnson

16 but at the same building; is that right?

17 A Can you ask the question one more time? I

18 apologize.

19 Q Sure. Well, let me -- I'll ask it based on

20 other reports. Do you have any recollection of

21 Mr. Massey?

22 A I don't.

23 Q Okay. And you don't know any -- do you know

24 anything about this arrest of Mr. Massey for

25 trespassing?

Page 86

1 A I don't.

2 Q Okay. Can I ask you to look at Plaintiff

3 Johnson Exhibit 5, please? Do you have that arrest

4 report?

5 (PLAINTIFF JOHNSON EXHIBIT 5 MARKED FOR

6 IDENTIFICATION)

7 A McElrath?

8 Q So you're looking at the arrest report for

9 Gregory McElrath now?

10 A Yes, sir.

11 Q And do you have any knowledge of

12 Mr. McElrath's arrest?

13 A No, sir.

14 Q Okay. And the picture of Mr. McElrath and the

15 picture of Mr. Massey on the reports didn't help you

16 remember anything about them?

17 A No, sir.

18 Q Okay. And then let me ask you to look at

19 Johnson Exhibit 6, please. Do you have that general

20 offense case report for Mr. McElrath and Mr. Massey in

21 front of you?

22 (PLAINTIFF JOHNSON EXHIBIT 6 MARKED FOR

23 IDENTIFICATION)

24 A I do.

25 Q Okay. And does looking at the report help you

Page 87

1 remember anything about the arrest of these two people?

2 A No, sir.

3 Q Okay. This -- the general offense case

4 report, do you see in the narrative, it states that

5 officers encountered Mr. McElrath and Mr. Massey in the

6 lobby of the building?

7 A Yes, sir.

8 Q And did you recall, or if you want to look

9 back at it, that the arrest reports for Ms. Johnson and

10 Mr. Trabek were about their arrests on the fifth floor

11 of the same building?

12 A Yes, sir. Fifth floor. Yes, sir.

13 Q And -- okay. And based on your experience

14 writing arrest reports as a Chicago police officer, was

15 that the usual practice that if there was two arrests in

16 the lobby and two separate arrests on the fifth floor,

17 they'd be written up on separate reports?

18 A Well, one includes narcotics, and from what I

19 understand -- I don't -- I don't know -- I don't know

20 why they're on two reports. I don't know why because --

21 well, they're at different times, so maybe that's the

22 reason why they're on two separate reports, sir. I --

23 maybe that's why.

24 Q Sure. And in general, was there some way of

25 determining when multiple arrests would be on separate

Page 88

1 reports?

2 A I guess I don't understand your question.

3 Would there be a time where there'd be multiple arrests

4 on different reports? I guess in different -- different

5 incidents, maybe. Different incident.

6 Q Sure.

7 A But at the same location where one wasn't --

8 one did not have to deal with the other one, I guess,

9 maybe.

10 Q So in that situation, it would make sense for

11 them to be on separate reports.

12 A Yes, sir.

13 Q If two people are arrested together, one for

14 drugs and one for trespassing, would you write them up

15 on the same report?

16 A Well, if it involved the same incident, I --

17 this was a -- this always came up with case reporting to

18 put people that were trespassed pot on a Vice Case

19 Report because Vice Case Reports, you usually deal with

20 narcotics. So it was always -- it was always a case

21 reporting issue in certain circumstances where someone

22 would be arrested during the incident, but trespassed.

23 And they should -- like, some supervisors wouldn't

24 approve certain reports because they felt that

25 narcotics-related offenses should only be on Vice Case

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1 Reports. But then -- but that we've also had, if

2 someone was involved in, you know, trespassing or

3 soliciting a lawful business, but there was a prob --

4 which would be a part of the -- possibly be vice

5 incident that they would be put on it. So this became

6 somewhat of a back-and-forth of what should be on where

7 and what should be on another one. Does that make

8 sense?

9 Q I think it does.

10 A Okay. I guess that's kind of where I'm going

11 with it, you know?

12 Q Yeah. And were there times that you were

13 instructed that you shouldn't have included somebody on

14 a Vice Case Report?

15 A I can't remember any certain instance where

16 that took place.

17 Q Okay.

18 A I don't -- I can't give a specific time or a

19 specific incident where that took place, sir.

20 Q And do you remember conversations with

21 Sergeant Watts about this multiple-person issue?

22 A No, sir.

23 Q Do you remember which supervisors it was?

24 A I don't remember, sir.

25 Q All right. Let me ask you to look at the next

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1 Johnson Exhibit number 7.
 2 (PLAINTIFF JOHNSON EXHIBIT 7 MARKED FOR
 3 IDENTIFICATION)
 4 A Okay. Is this --
 5 Q And this is an arrest report of Angelo --
 6 A This is all part of -- this is all still part
 7 of this other -- still on the same thing. Okay.
 8 Q Yes. This is still Johnson.
 9 A I apologize.
 10 Q That's okay.
 11 A Okay.
 12 Q And you're looking at the arrest report of
 13 Angelo M. Shenault?
 14 A Yes, sir.
 15 Q Okay. And you see the arrest date is
 16 March 3, 2008. Time is 17:10 hours.
 17 A Yes, sir.
 18 Q And do you see your name listed as an
 19 assisting arresting officer on the last page of this
 20 report?
 21 A Yes, sir.
 22 Q Do you have any recollection of this arrest?
 23 A No, sir.
 24 Q And I'm just going to ask you if looking at
 25 the report helps you remember it, and you may as well

Page 91

1 look at the Vice Case Report at the same time. If you
 2 could just look at Plaintiff Johnson Exhibit 8, please.
 3 And is that the Vice Case Report for Angelo Shenault on
 4 March 3, 2008?
 5 (PLAINTIFF JOHNSON EXHIBIT 8 MARKED FOR
 6 IDENTIFICATION)
 7 A Yes -- yes, sir.
 8 Q Okay. And do you see your name listed on the
 9 Vice Case Report?
 10 A I don't see my name listed on the report, sir.
 11 Q Okay. We did see your name listed on the
 12 arrest report, right?
 13 A Yes, sir.
 14 Q Okay. Well, let me ask you, please, to review
 15 the arrest report and the Vice Case Report, and I'll ask
 16 you if they refresh your recollection about the arrest.
 17 A Okay, sir.
 18 Q So please let me know once you've looked at
 19 them.
 20 A Okay. Okay, sir.
 21 Q So you reviewed Exhibit 7 and Exhibit 8?
 22 A The arrest report and the Vice Case Report for
 23 Angelo Shenault, correct?
 24 Q Yes.
 25 A Okay.

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1 Q Okay. And --
 2 A Yes, sir.
 3 Q Okay. And does reviewing the arrest report
 4 and the Vice Case Report Angelo Shenault dated March 3,
 5 2008, refresh your recollection about this arrest?
 6 A No, sir.
 7 Q Okay. And is it correct that you do not have
 8 personal knowledge of the arrest of Mr. Shenault on
 9 March 3, 2008?
 10 A I have no personal knowledge, sir.
 11 Q Okay. And let me ask you to look at one last
 12 exhibit on these, Plaintiff Johnson Exhibit 9. And do
 13 you see that? That's a photograph of a man wearing a
 14 jacket that says Yale on?
 15 (PLAINTIFF JOHNSON EXHIBIT 9 MARKED FOR
 16 IDENTIFICATION)
 17 A Yes, sir.
 18 Q Does the man depicted there look familiar to
 19 you?
 20 A No, sir.
 21 Q All right. You could put the Johnson exhibit
 22 to the side.
 23 A This whole packet here. Okay.
 24 Q Next I want to ask you about some arrests. The
 25 first name on the report is D'Andra Woods. Do you have

Page 93

1 any recollection of that person?
 2 A No, sir.
 3 Q Okay. Do you have any recollection of someone
 4 named Victor Cline?
 5 A No, sir.
 6 Q Kenneth Jones?
 7 A No, sir.
 8 Q Lolita Sparks?
 9 A No, sir.
 10 Q Okay. If you take a look please at Plaintiff
 11 Lewis Exhibit 1.
 12 (PLAINTIFF LEWIS EXHIBIT 1 MARKED FOR
 13 IDENTIFICATION)
 14 A Okay.
 15 Q And is that the Vice Case Report for Woods,
 16 Cline, Jones, and Sparks?
 17 A Yes, sir.
 18 Q Okay. And do you see your name on this
 19 report?
 20 A Yes, sir.
 21 Q Where are you listed on this report?
 22 A At the bottom of the report, sir.
 23 Q Okay. Were you --
 24 A Box 40 -- I think it's 46, sir.
 25 Q Okay. And is that a reporting officer?

Page 94

1 A Yes, sir.

2 Q Would you consider yourself to be the second

3 reporting officer in this report?

4 A Yes, sir.

5 Q And was it the practice that Officer Gonzalez,

6 as the first reporting officer, would've prepared the

7 report?

8 A Yes, sir.

9 Q Would you have assisted Officer Gonzalez in

10 preparing the report?

11 A This report or the arrest, yes, sir. Maybe

12 not the report, but the arrest in some way, sir.

13 Q You would've been involved in the arrest?

14 A In some ways sir, yes.

15 Q Okay. And what was your answer to whether you

16 would've assisted with preparing the report?

17 A Well, I don't know. I don't remember the

18 incident, so I don't remember --

19 Q Okay.

20 A -- who prepared the report.

21 Q Okay.

22 A But Officer Gonzalez, I'm assuming him and I

23 were partners in that -- that day. So I would have

24 assisted him in some -- some way with the processing of

25 the arrests.

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1 Q And is that your signature under your name at

2 the bottom of the report?

3 A No, that's not my signature.

4 Q Okay. Do you know who signed your name?

5 A I don't know.

6 Q Was it a common practice for somebody to sign

7 your name on a Vice Case Report?

8 MR. MICHALEK: Objection. Foundation.

9 A It -- it would be common for someone to ask

10 permission to sign your name on a report, yes.

11 Q And would you expect that before signing your

12 name, somebody -- another officer would ask you for that

13 permission?

14 A Yes. Or you would be like, "Just sign my

15 name."

16 Q Okay.

17 A They wouldn't necessarily have to ask. It

18 would -- "Just sign my name."

19 Q So you mean either you would give it after a

20 request or you would give it before a request, your --

21 give your permission?

22 A I would give my permission, yes.

23 Q Okay. And do you have experience signing

24 other officers' names?

25 A I have signed other officers' names on

Page 96

1 reports. Yes, sir.

2 Q Okay. And did you always have their

3 permission to do that?

4 A If not permission that they were -- they had

5 knew that I was signing and giving -- they giving me

6 permission prior to not even asking.

7 Q And why would you sign another officer's name?

8 A Well, in the event of arrests, it would just

9 go smoother just by asking, "Can I sign your name on

10 this complaint," would be easier than just -- well, it

11 would ease the process, I guess you'd say, of paperwork.

12 Q Okay. Is that because the person who needed

13 to sign might not be in the room at the time you needed

14 to sign or something like that?

15 A Or they may be doing another piece of

16 paperwork.

17 Q So you could sign it without an interruption?

18 A Correct.

19 Q Okay. And have you had a chance to review

20 this Vice Case Report?

21 A I may have.

22 Q Okay.

23 A I don't remember, like I said prior.

24 Q Okay. Sure. Why don't you take a look at it

25 and let me know after you've reviewed that?

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1 A Okay. Okay. Okay.

2 Q Does reviewing the report help you remember

3 these arrests on June 28, 2004?

4 A No, sir.

5 Q Okay. And does the report state your role in

6 these arrests?

7 A No, sir.

8 Q Let me ask you to look at Plaintiff Lewis

9 Exhibit 2, and this should be the four arrest reports

10 for the people listed in the Vice Case Report.

11 (PLAINTIFF LEWIS EXHIBIT 2 MARKED FOR

12 IDENTIFICATION)

13 A Okay.

14 Q Are you looking at those?

15 A Yes, sir. One is kind of cut off at the top.

16 Q Okay.

17 A It would be the -- I don't know how your --

18 hold on. 0150. I can read the word maybe "Kenneth" on

19 the top of it.

20 Q Okay.

21 A But it's...

22 Q Yeah, I understand that one is a tough one to

23 read. But you do have the -- you have four arrest

24 reports, right?

25 A Yes, sir. I do.

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1 Q And each one lists you as the second arresting
 2 officer, correct?
 3 A Yes, sir.
 4 Q All right. All right. I want to ask you to
 5 take a moment to review these arrest reports, and then
 6 I'll ask you about them.
 7 A Okay. Okay, sir.
 8 Q Okay. And does looking at those arrest
 9 reports refresh your recollection about these arrests?
 10 A No, sir.
 11 Q And the arrest reports don't state what you
 12 did in relation to the arrests, correct?
 13 A No, sir.
 14 Q Okay. And they -- the arrest reports also
 15 list some assisting arresting officers; is that right?
 16 A Yes, sir.
 17 Q Officer Rodriguez, Jones, Young, Summers,
 18 Ridgell, Edwards, Mohammed, correct?
 19 A Yes, sir.
 20 Q Okay. And the arrest reports in the Vice Case
 21 Report do not state what those officers did in relation
 22 to these arrests, correct?
 23 A They do not, sir.
 24 Q All right. Is it correct that you do not have
 25 any personal knowledge of the arrests of Woods, Cline,

Page 99

1 Jones, and Sparks on June 28, 2004?
 2 A I have no personal knowledge, sir.
 3 Q Let ask you to look at two more exhibits. The
 4 next one is Plaintiff Lewis Exhibit 4. Do you have
 5 that? A Vice Case Report for the arrest of Jamar Lewis
 6 on June 28, 2004?
 7 (PLAINTIFF LEWIS EXHIBIT 4 MARKED FOR
 8 IDENTIFICATION)
 9 A Yes, sir.
 10 Q Okay. And do you see your name at the first
 11 line of the narrative section?
 12 A Yes, sir.
 13 Q Do you have any recollection of this arrest of
 14 Jamar Lewis?
 15 A No, sir.
 16 Q Okay. Do you remember Jamar Lewis?
 17 A No, sir.
 18 Q Okay. Let me ask you to please look at the
 19 Vice Case Report and let me know when you're done
 20 reviewing.
 21 A Okay. Okay, sir. Read it.
 22 Q And does reviewing the Vice Case Report
 23 refresh your recollection about this arrest?
 24 A No, sir.
 25 Q Okay. And the Vice Case Report doesn't state

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1 what you did in relation to this arrest; is that
 2 correct?
 3 A Correct, sir.
 4 Q Can I ask you, please, to look at Plaintiff
 5 Lewis Exhibit 5? Is that the arrest report for
 6 Jamar Lewis for the date of June 28, 2004?
 7 (PLAINTIFF LEWIS EXHIBIT 5 MARKED FOR
 8 IDENTIFICATION)
 9 A Yes, sir.
 10 Q Okay. Can you please take a look at that
 11 report and let me know when you're done looking at it?
 12 A Okay, sir.
 13 Q Okay. And does looking at the arrest report
 14 refresh your recollection about the arrest of
 15 Jamar Lewis on June 28, 2004?
 16 A No, sir.
 17 Q Okay. And the arrest report does not state
 18 what your role was in the arrest?
 19 A No, sir.
 20 Q Can I ask you please to look at Plaintiff
 21 Lewis Exhibit 6, which should be the first page of the
 22 rap sheet from the Chicago Police Department?
 23 (PLAINTIFF LEWIS EXHIBIT 6 MARKED FOR
 24 IDENTIFICATION)
 25 A Okay.

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1 Q And do you see the picture on that exhibit of
 2 a man?
 3 A Yes, sir.
 4 Q Okay. And does the man depicted in that
 5 picture look familiar to you?
 6 A No, sir.
 7 Q Okay. All right. Is it correct that you do
 8 not have any personal knowledge of the arrest of
 9 Jamar Lewis on June 28, 2000?
 10 A I have no personal knowledge, sir, of this.
 11 Q Put those exhibits to the side. The next
 12 person I want to ask about is Jesse Lockett. Do you
 13 remember Jesse Lockett?
 14 A No, sir.
 15 Q Okay. Let me ask you to please look Plaintiff
 16 Lockett Exhibit 1. Let me know when you're looking at
 17 that.
 18 (PLAINTIFF LOCKETT EXHIBIT 1 MARKED FOR
 19 IDENTIFICATION)
 20 A Okay, sir.
 21 Q Okay. You're looking at the arrest report of
 22 Jesse J. Lockett dated May 12, 2005?
 23 A Yes, sir.
 24 Q And do you see your name listed as an
 25 assisting arresting officer on page 5 of 5?

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1 A Yes, sir.
 2 Q Do you have any recollection of this arrest?
 3 A No, sir.
 4 Q And have you reviewed the arrest report?
 5 Sorry. Why don't you take a minute and let me know when
 6 you've looked at it?
 7 A Okay, sir. Okay, sir. Sorry. I apologize
 8 for that.
 9 Q All right. You've looked over the arrest
 10 report. It's Plaintiff Lockett Exhibit 1.
 11 A Yes, sir.
 12 Q Okay. And does that refresh your recollection
 13 about the arrest of Mr. Lockett?
 14 A No, sir.
 15 Q And it's the report -- excuse me. Does the
 16 report state what you did to be listed as an assisting
 17 arresting officer?
 18 A No, sir.
 19 Q On the first page of the report, under the
 20 name, it has a AKA of Stanley Mack. Do you see that?
 21 A Yes, sir.
 22 Q Okay. Do you remember anybody named
 23 Stanley Mack?
 24 A No, sir.
 25 Q Okay. It also has a nickname in quotes,

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1 "Jay," J-A-Y. Do you have any recollection of somebody
 2 with that nickname?
 3 A No, sir.
 4 Q The narrative also mentions an individual that
 5 goes by the street name JJ. Do you have any
 6 recollection of somebody that went by the street named
 7 JJ?
 8 A No, sir.
 9 Q Do you recall during your time working at
 10 Ida B. Wells knowing any nicknames of individuals who
 11 were in that area?
 12 A I can't recall at this time any nicknames.
 13 Q Okay.
 14 A It's been a long time. I don't recall.
 15 Q Okay. Sure. At that time, might you have
 16 known some nicknames?
 17 A That's a possibility, sir.
 18 Q All right. All right. Let me ask you, then,
 19 to look at Plaintiff Lockett Exhibit 2. Do you have
 20 that in front of you now?
 21 (PLAINTIFF LOCKETT EXHIBIT 2 MARKED FOR
 22 IDENTIFICATION)
 23 A I do.
 24 Q And is that the general offense case report
 25 for the arrest of Jesse Lockett on May 12, 2005?

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1 A Yes, sir.
 2 Q Okay. Do you see your name on the first page
 3 of this report?
 4 A Yes, sir.
 5 Q Okay. And where is your name listed?
 6 A It's listed in the additional victims box here
 7 on the general offense case report.
 8 Q Do you take that to mean that you were being
 9 listed as an assisting arresting officer?
 10 A Yes, sir.
 11 Q Okay. And is your name listed again on the
 12 second page as -- after the words "also arresting"?
 13 A Yes, sir.
 14 Q And above also arresting, it says
 15 "Notifications." Do you see that?
 16 A Yes, sir.
 17 Q Do you know what that means?
 18 A It would be -- someone was notified. I don't
 19 know. I don't recognize the beat 9610, so I don't know
 20 who that is nor I -- or there's no name there either. So
 21 I don't know what beat 9610 is.
 22 Q Do you remember times when you made arrests
 23 when you would then notify some other beat of the
 24 arrest?
 25 A Yes, sir.

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1 Q And when would you do that?
 2 A If the detective division needed to be
 3 notified for some type of arrest, they would be -- they
 4 would be notified or evidence technician maybe needed to
 5 be notified, something like that.
 6 Q All right. Why don't you take a moment to
 7 review this report and then I'll ask you about it?
 8 A Okay. Okay, sir.
 9 Q Does reviewing that report refresh your
 10 recollection about the arrest of Mr. Lockett on May 12,
 11 2005?
 12 A No, sir.
 13 Q And does the general offense case report state
 14 what your involvement was in the arrest?
 15 A No, sir.
 16 Q And is it true that you do not have personal
 17 knowledge of the arrest of Jesse Lockett on May 12, 2005?
 18 A I do not have personal knowledge of this
 19 arrest, sir. I don't remember.
 20 Q The next person I want to ask you about is
 21 named Terrence Moye. Do you have any recollection of
 22 someone named Terrence Moye?
 23 A No, sir.
 24 Q What about a nickname T. Dog?
 25 A No, sir.

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1 Q Okay. Can I ask you please to look at
 2 Plaintiff Moye Exhibit 1?
 3 (PLAINTIFF MOYEE EXHIBIT 1 MARKED FOR
 4 IDENTIFICATION)
 5 A Okay.
 6 Q Is that the arrest report of Terrence Moye
 7 dated July 21, 2008?
 8 A Yes, sir.
 9 Q And are you listed on the fifth page as an
 10 assisting arresting officer?
 11 A Yes, sir.
 12 Q Sorry, do you know what you did to be an
 13 assisting arresting officer for this arrest?
 14 A No, sir.
 15 Q All right. Why don't you look at the arrest
 16 report and let me know when you've had a chance to read
 17 it, please?
 18 A Okay. Okay, sir.
 19 Q All right. Does reviewing the arrest report
 20 refresh your recollection of the arrest of Mr. Moye on
 21 July 21, 2008?
 22 A No, sir.
 23 Q Okay. And does the report state what your
 24 role was in the arrest?
 25 A No, sir.

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1 Q Okay. Let me ask you please to look at
 2 Plaintiff Moye Exhibit 2 now. And do you have in front
 3 of you now the original case incident report for the
 4 arrest of Mr. Moye on July 21, 2008?
 5 (PLAINTIFF MOYEE EXHIBIT 2 MARKED FOR
 6 IDENTIFICATION)
 7 A Yes, sir.
 8 Q And are you listed on page 3 of 3 as an
 9 assisting officer?
 10 A Yes, sir.
 11 Q And this report also lists a supervisor on
 12 scene and says Ronald Watts.
 13 A Yes, sir.
 14 Q Is it your practice to include Sergeant Watts
 15 when he was on the scene?
 16 MR. KOSOKO: Object to foundation.
 17 MR. STEFANICH: Objection. Form.
 18 A I can't remember if that was a common practice
 19 or not, sir.
 20 Q Okay. All right. Well, why don't you look at
 21 this report and let me know when you've reviewed it, and
 22 I'll ask you a question about it.
 23 A Okay. Okay, sir.
 24 Q All right. You've had a chance to review the
 25 original case incident report?

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1 A Yes, sir.
 2 Q Okay. Does that refresh your recollection
 3 about the arrest of Mr. Moye on July 21, 2008?
 4 A No, sir.
 5 Q Does the report state what you did to be an
 6 assisting officer in this arrest?
 7 A No, sir.
 8 Q All right. Let me ask you to look at
 9 Plaintiff Moye Exhibit 3 please. It should be two
 10 pictures. Do you have Exhibit 3 that's two pages of
 11 mugshot pictures?
 12 (PLAINTIFF MOYEE EXHIBIT 3 MARKED FOR
 13 IDENTIFICATION)
 14 A Yes, sir.
 15 Q Okay. And does the person in those pictures
 16 look familiar to you?
 17 A No, sir.
 18 Q All right. Is it correct that you do not have
 19 personal knowledge of the arrest of Terrence Moye on
 20 July 21, 2008?
 21 A That's correct.
 22 Q All right. Let me ask you to look at
 23 Plaintiff Moye Exhibit 4, please. And do you see that's
 24 an original case incident report that's also dated
 25 July 21, 2008?

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1 (PLAINTIFF MOYEE EXHIBIT 4 MARKED FOR
 2 IDENTIFICATION)
 3 A Yes, sir.
 4 Q And it lists four suspects, although the name
 5 of the last suspect is blacked out. Do you see that?
 6 A Yes, sir.
 7 Q All right. Do you remember the first one,
 8 Dashon Hendricks?
 9 A No, sir.
 10 Q Okay. Do you remember the second one
 11 Cinque Abbott, A-B-B-O-T-T?
 12 A No, sir.
 13 Q For the court reporter's benefit, the first
 14 name there is C-I-N-Q-U-E. Did I read that right?
 15 A C-I-N-Q-U-E.
 16 Q Thanks. And the last name is Milton Sims. Do
 17 you remember that person?
 18 A No, sir.
 19 Q All right. Do you see on the last page that
 20 you're listed as the first arresting officer on this
 21 report?
 22 A Yes, sir.
 23 Q And Officer Gonzalez is listed as the second
 24 arresting officer?
 25 A Yes, sir.

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1 Q A little lower down, Officer Gonzalez is
 2 listed as the reporting officer?
 3 A Yes, sir.
 4 Q Do you know why Officer Gonzalez was the
 5 reporting officer and the second arresting officer?
 6 A I don't know, sir.
 7 Q Was it unusual for the second arresting
 8 officer to be the reporting officer?
 9 A I would not say unusual, sir.
 10 Q Can you tell from the assignments who it was
 11 who prepared this report?
 12 A I'm looking to see who generated the report,
 13 and it's blocked out by marker, it looks like.
 14 Q Looking at the bottom of the page where it
 15 says print generated by?
 16 A Yeah, it's blocked out.
 17 Q Oh, okay. Is the answer that you can't tell
 18 who wrote the report?
 19 A I can't tell, sir --
 20 Q Okay.
 21 A -- because of the markings that are on the
 22 report.
 23 Q Have you had a chance to look at the report?
 24 Let me know when you've taken a look at the narratives
 25 on it.

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1 A Okay. Okay. Okay.
 2 Q And does reviewing that help you remember the
 3 arrest of these four suspects?
 4 A No, sir.
 5 Q Okay. And the narrative sections begins by
 6 saying A/Os initiated narcotics mission. Do you see
 7 that?
 8 A Yes, sir.
 9 Q Does A/O mean arresting officers?
 10 A Yes, sir.
 11 Q And who are the arresting officers on this
 12 report?
 13 A That would be myself.
 14 Q Okay. Just you?
 15 A Well, it says first arresting officer Bolton,
 16 and then second arresting officer Robert Gonzalez.
 17 Q Okay. And do you take this report to be
 18 describing what you and Gonzalez did or just what you
 19 did?
 20 A I take it myself and Gonzalez.
 21 Q Okay. All right, the -- I'm sorry, was there
 22 something you want to say?
 23 A No, sir.
 24 Q Could you please look at the next exhibit,
 25 Plaintiff Moye Exhibit 5? Is that the arrest report of

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1 Dashon Hendricks?
 2 (PLAINTIFF MOYE EXHIBIT 5 MARKED FOR
 3 IDENTIFICATION)
 4 A Yes, sir.
 5 Q And do you see that you were listed as the
 6 attesting officer for this report?
 7 A Yes, sir.
 8 Q And what's your understanding of what an
 9 attesting officer is?
 10 A The attesting officer is the one that believes
 11 that the probable cause and/or narrative is factual.
 12 Q Okay. I think I didn't hear your whole
 13 answer. Sorry about that.
 14 A I said -- I said the attesting officer is the
 15 officer that is the officer that believes probable cause
 16 has been met and that is saying that the narrative and
 17 the arrest is to be true.
 18 Q Thank you for that. I did miss a couple
 19 words, I think, because of my internet connection, so
 20 I'm sorry about that. And are you also listed as the
 21 first arresting officer?
 22 A Yes, sir.
 23 Q Okay. And Officer Gonzalez is the second
 24 arresting officer?
 25 A Yes, sir.

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1 Q All right. And do you know who it was who
 2 wrote the narrative of this arrest report?
 3 A I don't remember.
 4 Q Would it have been you or Officer Gonzalez?
 5 A Yes, sir.
 6 Q Have you had a chance to look at the narrative
 7 in this report?
 8 A Can I read it now, sir?
 9 Q Yeah. And why don't you go ahead and read
 10 Exhibit 6 and 7 at the same time, too, and let me know
 11 when you've looked at them.
 12 (PLAINTIFF MOYEE EXHIBIT 6 MARKED FOR
 13 IDENTIFICATION)
 14 (PLAINTIFF MOYEE EXHIBIT 7 MARKED FOR
 15 IDENTIFICATION)
 16 A Okay. Okay.
 17 Q So you've had a chance to look at the -- first
 18 the arrest report of Dashon Hendricks?
 19 A Yes, sir.
 20 Q You've also looked at the arrest report of
 21 Cinque Abbott?
 22 A Yes, sir.
 23 Q And you've also looked at the arrest report of
 24 Milton Sims?
 25 A Yes, sir.

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1 Q Okay. And has reviewing these arrest reports
 2 helped you remember these arrests on July 21, 2008?
 3 A No, sir.
 4 Q And you were the attesting officer and the
 5 first arresting officer on all three reports, right?
 6 A Yes, sir.
 7 Q And is it correct that you do not have
 8 personal knowledge of the arrest of Hendricks, Abbott,
 9 Sims, and the fourth suspect on July 21, 2008?
 10 A That's true. Yes, sir.
 11 Q Okay. You can put those exhibits to the side.
 12 And the last person I want to ask you about was Vondell
 13 Wilbourn. Do you remember Vondell Wilbourn?
 14 A No, sir.
 15 Q Okay. I'm asking you, please, to look at
 16 Plaintiff Wilbourn Exhibit 1. Do you have that in front
 17 of you, the Vice Case Report for the arrest of Vondell
 18 Wilbourn --
 19 (PLAINTIFF WILBOURN EXHIBIT 1 MARKED FOR
 20 IDENTIFICATION)
 21 A Yes, sir.
 22 Q -- on July 27, 2004?
 23 A Yes, sir.
 24 Q Do you see your name on the second page as
 25 assisting arrest?

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1 A Yes, sir.
 2 Q Okay. Will you please review this report and
 3 let me know when you've taken a look at it?
 4 A Okay. Okay, sir.
 5 Q All right. Does reviewing the Vice Case
 6 Report for Mr. Wilbourn help you remember this arrest?
 7 A No, sir.
 8 Q Okay. And does the report explain what you
 9 did to be an assisting arresting officer?
 10 A No, sir.
 11 Q And the -- if you look at Mr. Wilbourn's,
 12 there's a box for offender's name, number 19. Do you
 13 see that?
 14 A Yes, sir.
 15 Q Okay. And then two boxes over, number 21, has
 16 a nickname Ready, R-O-A-D-Y. Do you see that?
 17 A Yes, sir.
 18 Q And are you familiar with somebody with the
 19 nickname Ready?
 20 A No, sir.
 21 Q Okay. Can I ask you please to look at
 22 Plaintiff Wilbourn Exhibit 2? Is that the arrest report
 23 for Vondell Wilbourn dated July 27, 2004?
 24 (PLAINTIFF WILBOURN EXHIBIT 2 MARKED FOR
 25 IDENTIFICATION)

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1 A Yes, sir.
 2 Q Please take a look at that and let me know
 3 when you've reviewed it.
 4 A Okay. Okay, sir.
 5 Q Does looking at the arrest report help you
 6 recall the arrest of Mr. Wilbourn on July 27, 2004?
 7 A No, sir.
 8 Q Let me ask you to look at Plaintiff Wilbourn
 9 Exhibit 3. Do you have that in front of you? It should
 10 be a mugshot that says Wilbourn, Vondell J. at the top.
 11 (PLAINTIFF WILBOURN EXHIBIT 3 MARKED FOR
 12 IDENTIFICATION)
 13 A Yes, sir.
 14 Q Okay. And do you recommend the -- excuse me.
 15 Do you recognize the man depicted in Plaintiff Wilbourn
 16 Exhibit 3?
 17 A No, sir.
 18 Q Is it correct that you do not have personal
 19 knowledge of the arrest of Vondell Wilbourn on July 27,
 20 2004?
 21 A That's correct, sir.
 22 Q Let me ask you to look at Plaintiff Wilbourn
 23 Exhibit 4, please. Do you have that Vice Case Report
 24 for Torrence Ivory on July 27, 2004, in front of you?
 25 (PLAINTIFF WILBOURN EXHIBIT 4 MARKED FOR

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1 IDENTIFICATION)
 2 A Yes, sir.
 3 Q And do you have any recollection of
 4 Torrence Ivory?
 5 A No, sir.
 6 Q Do you see that you're listed on this report?
 7 A Yes, sir.
 8 Q What's your role on this report?
 9 A Box 46, reporting officer.
 10 Q Okay. Were you the second reporting officer?
 11 A Second reporting officer, sir.
 12 Q Okay. Is that your signature under your name?
 13 A No, sir.
 14 Q Do you know who signed your name?
 15 A I don't know, sir.
 16 Q Am I correct that your practice would be that
 17 -- I'm sorry. Is it correct that you would expect the
 18 person signing your name to have your authority to do
 19 so?
 20 A Yes, sir.
 21 Q When you were second reporting officer, was it
 22 your practice to review the reports that your name was
 23 on?
 24 A Not all the time, sir.
 25 Q What about when you were an assisting

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1 arresting officer? Was it your practice to review
 2 reports that you were listed on?
 3 A No, sir. Not all the time.
 4 Q Sometimes you would, sometimes you wouldn't?
 5 A Yes, sir.
 6 Q Okay. Let me ask you to review this report,
 7 please.
 8 A Okay. Okay, sir.
 9 Q All right. Does reviewing the report help you
 10 remember the arrest of Mr. Ivory?
 11 A No, sir.
 12 Q And are you able to tell from the report who
 13 drafted the report?
 14 A No, sir.
 15 Q Would you expect it to be Officer Gonzalez who
 16 wrote the report?
 17 A That's possible, sir.
 18 Q Is it possible that you wrote the report?
 19 A That's possible, sir.
 20 Q Is it possible that an officer that -- other
 21 than you or Officer Gonzalez wrote the report?
 22 A Normally, that's not common practice that --
 23 usually the first and/or second arresting -- second --
 24 I'm sorry. First reporting officer or the second
 25 reporting officer would be the ones that would be

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1 preparing the Vice Case Report, sir.
 2 Q All right. And is it correct that you do not
 3 have personal knowledge of the arrest of Torrence Ivory
 4 on July 27, 2004?
 5 A That's correct, sir.
 6 MR. FLAXMAN: I don't have any more questions.
 7 Why don't we go off the record and discuss?
 8 COURT REPORTER: Okay. We are now off the
 9 record. The time is 2:03 p.m.
 10 (DEPOSITION CONCLUDED AT 2:03 P.M.)
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CERTIFICATE OF REPORTER

STATE OF ILLINOIS

1
 2
 3
 4 I do hereby certify that the witness in the foregoing
 5 transcript was taken on the date, and at the time and
 6 place set out on the Title page hereof by me after first
 7 being duly sworn to testify the truth, the whole truth,
 8 and nothing but the truth; and that the said matter was
 9 recorded by me and then reduced to typewritten form
 10 under my direction, and constitutes a true record of the
 11 transcript as taken, all to the best of my skills and
 12 ability. I certify that I am not a relative or employee
 13 of either counsel, and that I am in no way interested
 14 financially, directly or indirectly, in this action.
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22 KORTNEY CHASE,
 23 COURT REPORTER / NOTARY
 24 COMMISSION EXPIRES ON: 09/24/2025
 25 SUBMITTED ON: 03/23/2022