

EXHIBIT 116



CASE NO. 19-CV-01717

WATTS COORDINATED PRETRIAL PROCEEDINGS

DEPONENT:

OFFICER BRIAN BOLTON

DATE:

March 14, 2022



✉ schedule@kentuckianareporters.com

☎ 877.808.5856 | 502.589.2273

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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

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6 IN RE: WATTS COORDINATED
7 PRETRIAL PROCEEDINGS
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DEPONENT: OFFICER BRIAN BOLTON
DATE: MARCH 14, 2022
REPORTER: KORTNEY CHASE

<p style="text-align: right;">Page 2</p> <p>1 APPEARANCES</p> <p>2</p> <p>3 ON BEHALF OF THE PLAINTIFFS, LOEY & LOEY PLAINTIFFS:</p> <p>4 Scott Rauscher, Esquire</p> <p>5 Loevy & Loevy</p> <p>6 311 North Aberdeen Street</p> <p>7 3rd Floor</p> <p>8 Chicago, Illinois 60607</p> <p>9 Telephone No.: (312) 243-5900</p> <p>10 Facsimile No.: (312) 243-5902</p> <p>11 E-mail: scott@loevy.com</p> <p>12 (Appeared via videoconference)</p> <p>13</p> <p>14 ON BEHALF OF THE PLAINTIFFS REPRESENTED BY KENNETH N.</p> <p>15 FLAXMAN P.C.:</p> <p>16 Joel Flaxman</p> <p>17 Kenneth N. Flaxman P.C.</p> <p>18 200 South Michigan Avenue</p> <p>19 Suite 201</p> <p>20 Chicago, Illinois 60604</p> <p>21 Telephone No.: (312) 427-3200</p> <p>22 E-mail: jaf@kenlaw.com</p> <p>23 (Appeared via videoconference)</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 4</p> <p>1 APPEARANCES (CONTINUED)</p> <p>2</p> <p>3 ON BEHALF OF THE DEFENDANTS, MATTHEW CADMAN AND MICHAEL</p> <p>4 SPAARGAREN:</p> <p>5 Thomas Leinenweber, Esquire</p> <p>6 Megan McGrath, Esquire</p> <p>7 Leinenweber Baroni & Daffada LLC</p> <p>8 120 North LaSalle Street</p> <p>9 Suite 2000</p> <p>10 Chicago, Illinois 60602</p> <p>11 Telephone No.: (312) 606-8695</p> <p>12 E-mail: thomas@ilesq.com</p> <p>13 mkm@ilesq.com</p> <p>14 (Appeared via videoconference)</p> <p>15</p> <p>16 ON BEHALF OF THE DEFENDANTS, CITY OF CHICAGO AND CERTAIN</p> <p>17 SUPERVISORY OFFICIAL DEFENDANTS:</p> <p>18 Paul Michalik, Esquire</p> <p>19 Reiter Burns LLP</p> <p>20 311 South Wacker Drive</p> <p>21 Suite 5200</p> <p>22 Chicago, Illinois 60606</p> <p>23 Telephone No.: (312) 982-0090</p> <p>24 E-mail: pmichalik@reiterburns.com</p> <p>25 (Appeared via videoconference)</p>
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4	2 - General Offense Case Report for Jesse Lockett	103	4 at KENTUCKIANA REPORTERS, 30 SOUTH WACKER DRIVE, 22ND
5	DO-JOINT 018224-018225		5 FLOOR, CHICAGO, ILLINOIS 60606, via videoconference in
6			6 which all participants attended remotely, on MONDAY the
7	Plaintiff Moye Exhibit		7 14th day of MARCH 2022 at approximately 10:07 a.m.; said
8	1 - Arrest Report for Terrence Moye	106	8 deposition was taken pursuant to the FEDERAL Rules of
9	DO-JOINT 031382-031386		9 Civil Procedure. The oath in this matter was sworn
10	2 - Original Case Incident Report from Eisworth	107	10 remotely pursuant to FRCP 30.
11	Smith Incident - DO-JOINT 031374-031376		11
12	3 - Terrence Moye Mugshot - DO-JOINT 031387-031388	108	12 It is agreed that KORTNEY CHASE, being a Notary Public
13	4 - Original Case Incident Report	109	13 and Court Reporter for the State of ILLINOIS, may swear
14	F PL JOINT 03759-03761		14 the witness.
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3	Plaintiff Wilbourn Exhibit	Page	3
4	1 - Vice Case Report for Vondell Wilbourn	114	4 COURT REPORTER: We are now on the record. My
5	COPA-WATTS045494-045495 (CONFIDENTIAL)		5 name is Kortney Chase. I'm the online video
6	2 - Arrest Report for Vondell Wilbourn	115	6 technician and court reporter today, representing
7	COPA-WATTS045277 (CONFIDENTIAL)		6 Kentuckiana Reporters, located at 30 South Wacker
8	3 - Vondell Wilbourn's Mugshot - CITY-BG-052535	116	7 Drive, 22nd floor, Chicago, Illinois 60606. Today
9	4 - Vice Case Report for Torrence Ivory	116	8 is the 14th day of March, 2022. The time is
10	CITY-BG-059987-059988		9 10:07 a.m. Central Time. We are convened by
11			10 videoconference to take the deposition of Officer
12			11 Brian Bolton in the matter of In re: Watts
13			12 Coordinated Pretrial Proceedings, pending in the
14			13 United States District Court for the Northern
15			14 district of Illinois Eastern Division, Master Docket
16			15 Case Number 19-CV-01717. Will everyone but the
17			16 witness please state your appearance, how you are
18			17 attending, and the location you are attending from,
19			18 starting with plaintiff's counsel?
20			19 MR. RAUSCHER: Scott Rauscher for the
21			20 plaintiffs represented by Loevy & Loevy in the
22			21 Watts Coordinated proceedings.
23			22 MR. FLAXMAN: Joel Flaxman for the Flaxman
24			23 plaintiffs, attending remotely from Chicago.
25			24 MR. STEFANICH: Brian Stefanich for Officer
			25 Brian Bolton, and we're in Chicago.

<p>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</p>	<p>Page 14</p> <p>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.</p>
<p>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</p>	<p>Page 15</p> <p>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.</p>

<p style="text-align: right;">Page 18</p> <p>1 Q Were you ever involved in arresting Ben Baker?</p> <p>2 A I don't believe so.</p> <p>3 Q Do you know what Mr. Baker looks like?</p> <p>4 A Yes.</p> <p>5 Q Describe what he looks like.</p> <p>6 A He's a male, black. I don't know what other</p> <p>7 physical characteristics that would have -- I know him</p> <p>8 by -- I could know by a picture of him. I would know --</p> <p>9 be able to describe him or know that by a picture that</p> <p>10 that is that person.</p> <p>11 Q Okay. Got it. Did you -- and when you -- are</p> <p>12 you -- do you have a vision of what he looks like from</p> <p>13 back in Ida B. Wells, or have you seen pictures somewhat</p> <p>14 recently? Or do you have some other basis for</p> <p>15 remembering what he looks like?</p> <p>16 A I saw a picture of him on the news, so that</p> <p>17 would be a recent image that I have of him. I don't</p> <p>18 remember the year that I saw him on the news, but it --</p> <p>19 probably a few years back.</p> <p>20 Q And when you saw him on the news, did you</p> <p>21 recognize him from Ida B. Wells?</p> <p>22 A Yes.</p> <p>23 Q So did you know Mr. Baker when you worked at</p> <p>24 Ida B. Wells?</p> <p>25 A Yes.</p>	<p style="text-align: right;">Page 20</p> <p>1 A No.</p> <p>2 MR. RAUSCHER: All right. Let's bring up</p> <p>3 exhibit -- so this is Group Exhibit 1, and I think,</p> <p>4 for today, I'm just going to refer to the exhibits</p> <p>5 by the title of the PDF files that we circulated,</p> <p>6 and then I'll send to the court reporter after, if</p> <p>7 that's okay with all the other lawyers.</p> <p>8 (GROUP EXHIBIT 1 MARKED FOR IDENTIFICATION)</p> <p>9 MR. STEFANICH: That's fine.</p> <p>10 MR. RAUSCHER: All right. So I'm going to --</p> <p>11 I'll -- do you have a -- do you have -- Brian, were</p> <p>12 you -- did you print these, or should I share</p> <p>13 screen?</p> <p>14 MR. STEFANICH: No, he likes them printed, so</p> <p>15 we have them printed here.</p> <p>16 BY MR. RAUSCHER:</p> <p>17 Q Okay. So can you take a look at Group</p> <p>18 Exhibit 1, which is a packet of documents relating to</p> <p>19 Ben Baker and Clarissa Glenn?</p> <p>20 A Okay.</p> <p>21 Q Have you had a chance to look through these</p> <p>22 documents?</p> <p>23 A I believe at some point I looked through these</p> <p>24 documents. I don't know if I've recently looked through</p> <p>25 these documents -- or this document, I guess I should</p>
<p style="text-align: right;">Page 19</p> <p>1 Q And did you -- do you know if you ever talked</p> <p>2 to him?</p> <p>3 A I'm not sure about that.</p> <p>4 Q How did you know him from when you were</p> <p>5 working at Ida B. Wells?</p> <p>6 A I knew him from always being at 527 East</p> <p>7 Browning, always being in that area.</p> <p>8 Q Do you know if that's where he lived?</p> <p>9 A I believe he lived there.</p> <p>10 Q Do you remember ever seeing any other officers</p> <p>11 on your tactical team talking to Mr. Baker?</p> <p>12 A I don't recall any specific instance where</p> <p>13 that was, no.</p> <p>14 Q And do you understand that Mr. Baker and</p> <p>15 Clarissa Glenn -- well, Mr. Baker is suing for multiple</p> <p>16 arrests that he alleges were wrongful?</p> <p>17 A I understand that.</p> <p>18 Q And do you know -- I know you don't know</p> <p>19 specifically if you recently looked at his arrest</p> <p>20 reports, but do you recall if you've ever looked at his</p> <p>21 arrest reports or case of incident reports or similar?</p> <p>22 A I have, before.</p> <p>23 Q And did looking at those reports refresh your</p> <p>24 recollection at all as to whether you were involved in</p> <p>25 any of his arrests?</p>	<p style="text-align: right;">Page 21</p> <p>1 say.</p> <p>2 Q Okay. If you look at the third page, which is</p> <p>3 Bates stamped City BG00019?</p> <p>4 MR. STEFANICH: Here.</p> <p>5 A This is it? Okay. Okay, sir.</p> <p>6 Q If you look at the bottom of that, it says,</p> <p>7 "Assisting R/Os," and it lists, I believe, your name</p> <p>8 first.</p> <p>9 A Yes, sir.</p> <p>10 Q And this is an arrest -- this is a</p> <p>11 supplementary report of an arrest of Ben Baker, correct?</p> <p>12 A Yes.</p> <p>13 Q And for a date of June 17, 2004?</p> <p>14 A Yes.</p> <p>15 Q Does seeing your name on this report refresh</p> <p>16 your recollection as to whether you were involved in</p> <p>17 this arrest?</p> <p>18 A No.</p> <p>19 Q Can you tell me what 4512A stands for?</p> <p>20 A That would've been the beat that I was working</p> <p>21 that day.</p> <p>22 Q And what sort of beat was that?</p> <p>23 A It was -- this was a beat in public housing</p> <p>24 south.</p> <p>25 Q Was that part of tactical team at the time?</p>

<p>1 A I believe so.</p> <p>2 Q And then what's 15903 stand for?</p> <p>3 A That's my star number.</p> <p>4 Q Would you have been listed as an assisting,</p> <p>5 responding, or reporting officer if you were not</p> <p>6 involved in the arrest?</p> <p>7 MR. STEFANICH: Object to form. You can</p> <p>8 answer.</p> <p>9 A I would've been assisting in some -- in some</p> <p>10 way. I don't remember, specifically, what way that</p> <p>11 would be.</p> <p>12 Q And then what does R/O stand for in this</p> <p>13 report? It says assisting R/Os?</p> <p>14 A Reporting officers.</p> <p>15 Q So although you don't remember specifically,</p> <p>16 it's safe to say you were involved in some way in the</p> <p>17 arrest based on the fact that you were listed on the</p> <p>18 report?</p> <p>19 A Well, I don't know about the arrest of him,</p> <p>20 but it's -- at some point, I was involved in some way. I</p> <p>21 don't know about the actual physical arrest of him, but</p> <p>22 in some way, I must have been.</p> <p>23 Q In other -- what other ways could you have</p> <p>24 been involved?</p> <p>25 A I could have done a complaint. I could have</p>	Page 22	Page 24
<p>1 taken him to the bathroom. I could have made copies,</p> <p>2 run a name, something -- something in that way.</p> <p>3 Q What is -- what do you -- when you say you</p> <p>4 "could have done a complaint," what do you mean by that?</p> <p>5 A Part of the paperwork that would go to -- that</p> <p>6 would go to court that lists the offense that was</p> <p>7 committed.</p> <p>8 Q And then you said you "could have made</p> <p>9 copies," what do you mean by that?</p> <p>10 A Photocopies.</p> <p>11 Q Photocopies of what?</p> <p>12 A Paperwork.</p> <p>13 Q And so if you would've made photocopies of</p> <p>14 paperwork, you'd -- typically, you'd be listed as an</p> <p>15 assisting reporting officer?</p> <p>16 A That could happen, yes.</p> <p>17 Q Is that typically how things would be done? If</p> <p>18 someone's only role is making copies, they'd be listed</p> <p>19 as an assisting reporting officer?</p> <p>20 A That could happen, yes. I don't want to say</p> <p>21 that happens all the time, but I will say that that</p> <p>22 would be a reason while someone's name would -- or might</p> <p>23 be on as a assisting officer.</p> <p>24 Q When you filled out reports, did you list</p> <p>25 people as assisting reporting officers who had -- whose</p>	Page 23	Page 25

<p style="text-align: right;">Page 26</p> <p>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 an 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</p>	<p style="text-align: right;">Page 28</p> <p>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</p>
<p style="text-align: right;">Page 27</p> <p>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.</p>	<p style="text-align: right;">Page 29</p> <p>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?</p>

<p>1 A No, sir.</p> <p>2 Q And you're not aware of any other documents</p> <p>3 that are out there that might refresh your recollection,</p> <p>4 are you?</p> <p>5 A I'm not aware of any other documents, sir.</p> <p>6 Q Would you agree that just because you thought</p> <p>7 that Ben Baker was a drug dealer at Ida B. Wells, it</p> <p>8 wouldn't be okay, as a police officer, to fabricate</p> <p>9 reports saying he had drugs at a time he didn't?</p> <p>10 MR. STEFANICH: Objection. Form. You can</p> <p>11 answer.</p> <p>12 A Pretty --</p> <p>13 MR. STEFANICH: Can you repeat the question,</p> <p>14 Scott?</p> <p>15 BY MR. RAUSCHER:</p> <p>16 Q Sure. Let me try to rephrase it. Would you</p> <p>17 agree that you, as a police officer, are not allowed to</p> <p>18 frame people because you believe they're drug dealers?</p> <p>19 A Of course, yes.</p> <p>20 Q Did Sergeant Watts ever tell you not to frame</p> <p>21 people?</p> <p>22 A I was never asked to frame anyone.</p> <p>23 Q But did -- were you ever told not to frame</p> <p>24 people?</p> <p>25 A I was never told that.</p>	<p>Page 30</p> <p>1 able to print that picture in color?</p> <p>2 MR. STEFANICH: Yes.</p> <p>3 MR. RAUSCHER: I'm sorry. I didn't hear. Was</p> <p>4 that a yes or no? Because I can share it otherwise.</p> <p>5 MR. STEFANICH: Yes. There's a colored picture</p> <p>6 of Mr. Gipson.</p> <p>7 BY MR. RAUSCHER:</p> <p>8 Q Okay. Thank you. Having looked at the</p> <p>9 picture of Mr. Gipson, which is City BG31496, does that</p> <p>10 refresh your recollection about knowing him at all?</p> <p>11 A No.</p> <p>12 Q Okay. Have you had a chance to review the</p> <p>13 reports in group -- and the documents in Group</p> <p>14 Exhibit 3?</p> <p>15 A Like I said before, I -- (coughs) pardon me.</p> <p>16 I've looked at a stack of reports, so I don't know if,</p> <p>17 specifically, this one I've reviewed.</p> <p>18 Q So let me direct you to -- it's page 6 of the</p> <p>19 document, but the Bates stamp -- trying to make sure it</p> <p>20 didn't get -- oh, yeah, it's on the side. So the Bates</p> <p>21 stamp would be Baker Glenn 26196.</p> <p>22 A Okay.</p> <p>23 Q Let me know when you have that in front of</p> <p>24 you. Do you see that?</p> <p>25 A Yes, sir.</p>
<p>Page 31</p> <p>1 Q Right. You were never -- Sergeant Watts never</p> <p>2 instructed you, "Do not frame people."</p> <p>3 MR. STEFANICH: Objection. Asked and answered.</p> <p>4 Answer again.</p> <p>5 A That question or statement never happened.</p> <p>6 I --</p> <p>7 Q Okay. We're going to skip, mostly just for</p> <p>8 the record, Group Exhibit 2, which was Lionel White,</p> <p>9 Senior, because although that was on our list for today,</p> <p>10 we've already covered that case with Officer Bolton, so</p> <p>11 I'm going to go ahead to -- Group Exhibit 3 will be the</p> <p>12 next one we talk about. Before we do that, do you know</p> <p>13 Leonard Gipson?</p> <p>14 (GROUP EXHIBIT 3 MARKED FOR IDENTIFICATION)</p> <p>15 A No.</p> <p>16 Q Do you know -- did you know someone with a</p> <p>17 nickname Fuzz when you worked at Ida B. Wells?</p> <p>18 A No.</p> <p>19 Q What about Larry Lomax, Christopher Scott, or</p> <p>20 Bobby Coleman? Do you know any of those names?</p> <p>21 A I don't recall those people, no.</p> <p>22 MR. RAUSCHER: Okay. Brian, you handed him</p> <p>23 Group Exhibit 3?</p> <p>24 MR. STEFANICH: Yes.</p> <p>25 MR. RAUSCHER: Did you by chance -- were you</p>	<p>Page 33</p> <p>1 Q So this is a two-page document. It's a Vice</p> <p>2 Case Report. It's also PL Joint 26196 to 197. You have</p> <p>3 that in front of you, right?</p> <p>4 A Yes, sir.</p> <p>5 Q All right. Do you see your name listed as one</p> <p>6 of the witnesses on this Vice Case Report?</p> <p>7 A Well, I see --</p> <p>8 MR. STEFANICH: Object to form.</p> <p>9 THE WITNESS: Okay.</p> <p>10 MR. STEFANICH: You can answer.</p> <p>11 BY MR. RAUSCHER:</p> <p>12 A I see my name at the bottom of box 18, and</p> <p>13 witness is double X there, yes.</p> <p>14 Q Yep. And does -- so does the double X</p> <p>15 indicate to you that you're being listed as witness to</p> <p>16 this incident?</p> <p>17 A Yes. That would be -- that would -- that's --</p> <p>18 yes.</p> <p>19 Q So Vice Case Reports and arrest reports have</p> <p>20 slightly different formats, right?</p> <p>21 A Yes.</p> <p>22 Q Is witness on the Vice Case Report the</p> <p>23 equivalent of assisting arresting officer on the arrest</p> <p>24 report?</p> <p>25 A No, I don't think so.</p>

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

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?

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?

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

<p style="text-align: right;">Page 38</p> <p>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.</p> <p>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?</p> <p>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.</p> <p>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?</p> <p>16 MR. KOSOKO: Object to the form of the 17 question.</p> <p>18 Q Sorry, it's actually eight. I think I counted 19 Summers twice.</p> <p>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.</p> <p>24 Q If -- when you wrote reports, what was the 25 purpose in, for you, trying to identify who did what?</p>	<p style="text-align: right;">Page 40</p> <p>1 A Can I read the narrative portion before I 2 answer that?</p> <p>3 Q Yes. Take as much time as you need to read 4 over the report.</p> <p>5 A Okay. Thank you. Okay.</p> <p>6 Q You had a chance to look over the whole Vice 7 Case Report; is that right?</p> <p>8 A I just want to make sure I read over the 9 entire report --</p> <p>10 Q Okay.</p> <p>11 A -- because I just focused on the narrative 12 section, so...</p> <p>13 Q Okay.</p> <p>14 A Okay.</p> <p>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.</p> <p>18 A I don't.</p> <p>19 Q Are there any other documents you'd like to 20 look at that you think would describe your role?</p> <p>21 A I'm not aware of any other documents that 22 would describe my role during this event.</p> <p>23 Q You see in the narrative description, it 24 refers to a premise check?</p> <p>25 A I see that.</p>
<p style="text-align: right;">Page 39</p> <p>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?</p> <p>4 A To identify what role they may have played -- 5 they played during the event.</p> <p>6 Q But for what -- to what end? Like, for what 7 purpose?</p> <p>8 A For court purposes. To know what was going -- 9 to have a clear of knowledge of what was going on.</p> <p>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?</p> <p>16 A I have no personal knowledge, no.</p> <p>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?</p> <p>21 A Last two, okay. Okay, I see it.</p> <p>22 Q And do you see your name on that report also?</p> <p>23 A I do.</p> <p>24 Q And does it -- does the report describe what 25 role you played, if any, in the arrest?</p>	<p style="text-align: right;">Page 41</p> <p>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?</p> <p>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.</p> <p>8 Q When you were going to do premise check, were 9 you also looking for drug activity?</p> <p>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.</p> <p>14 Q How would you enter the building to do a 15 premise check?</p> <p>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.</p> <p>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?</p> <p>24 A It would just depend. It would depend.</p> <p>25 Q Was there a typical method of entering a</p>

<p>1 building to do a premise check?</p> <p>2 A No typical method, no.</p> <p>3 Q Would it be more common to be running, to run</p> <p>4 into a building for a premise check? To walk in?</p> <p>5 A Like I said, we had no common way to enter the</p> <p>6 building, you know? Walking and/or running, you know?</p> <p>7 Q If you -- once you've read the narrative</p> <p>8 description, do you have any personal knowledge, one way</p> <p>9 or the other, as to whether the narrative description in</p> <p>10 this Vice Case Report of the August 28, 2007, arrest is</p> <p>11 accurate?</p> <p>12 A I have -- I have -- I have no knowledge of</p> <p>13 that.</p> <p>14 Q I'm going to ask you to take a look at the</p> <p>15 last page of Group Exhibit 4.</p> <p>16 (GROUP EXHIBIT 4 MARKED FOR IDENTIFICATION)</p> <p>17 A Okay.</p> <p>18 Q Which should be a picture. And it's City</p> <p>19 BG052081.</p> <p>20 A Okay.</p> <p>21 Q Do you have that picture in front of you?</p> <p>22 A I do.</p> <p>23 Q Do you recognize the person in that picture?</p> <p>24 A No, I do not.</p> <p>25 Q As far as you know, have you ever seen him</p>	<p>Page 42</p> <p>1 A I don't.</p> <p>2 Q All right. Take a look at Group Exhibit 5. Do</p> <p>3 you recognize the person pictured in the arrest report</p> <p>4 on the first page of Group Exhibit 5, which is Bates</p> <p>5 stamped City-BG-03287.</p> <p>6 (GROUP EXHIBIT 5 MARKED FOR IDENTIFICATION)</p> <p>7 A I don't.</p> <p>8 Q Do you have any recollection at all of being</p> <p>9 in the arrest -- involved in the arrest of Christopher</p> <p>10 Scott?</p> <p>11 A I have no recollection of that.</p> <p>12 Q Do you have any recollection whatsoever of</p> <p>13 ever dealing with someone named Christopher Scott?</p> <p>14 A No.</p> <p>15 Q Do you want to read the arrest report and tell</p> <p>16 me if that helps refresh your recollection, or have you</p> <p>17 already read this report?</p> <p>18 A I'd like to read the report. Like I said</p> <p>19 earlier, I've read stacks of reports, so I don't know. I</p> <p>20 want to make sure that I have a good -- I got to read</p> <p>21 the narrative portion of this to make sure I know what's</p> <p>22 going on. Okay, I've read the narrative --</p> <p>23 Q And --</p> <p>24 A -- of the arrest report. Yeah.</p> <p>25 Q Does reading that report refresh your</p>
<p>1 before?</p> <p>2 A No.</p> <p>3 Q Do you know why Larry Lomax was at</p> <p>4 Ida B. Wells when he was arrested with Leonard Gipson</p> <p>5 and others? Oh, actually I'm going to rephrase that.</p> <p>6 Do you know why Larry Lomax was at Ida B. Wells when he</p> <p>7 was arrested on January 4, 2003?</p> <p>8 A Unless there is a statement of some sort in</p> <p>9 the case report somewhere, I don't know the -- I don't</p> <p>10 remember this person and I don't remember him -- I don't</p> <p>11 remember him. So no, I don't.</p> <p>12 Q Well, take a look at the first page of this</p> <p>13 report.</p> <p>14 A Okay.</p> <p>15 Q I'm sorry, not this report, this group</p> <p>16 exhibit, which is affidavit of Larry Lomax.</p> <p>17 A Okay.</p> <p>18 Q And just read paragraph 1.</p> <p>19 A Okay. I've read it.</p> <p>20 Q Do you have any knowledge as to whether it's</p> <p>21 true that Larry Lomax was in Chicago and visiting his</p> <p>22 brother at Ida B. Wells because his brother had cancer</p> <p>23 and he was trying to give him money.</p> <p>24 A I have no knowledge of that.</p> <p>25 Q Do you know who Larry -- who Lonnie Lomax is?</p>	<p>Page 43</p> <p>1 recollection, one way or the other, as to whether you</p> <p>2 were ever involved in arresting Christopher Scott?</p> <p>3 A No.</p> <p>4 Q And does it refresh your recollection seeing a</p> <p>5 picture or reading the report as to whether you ever</p> <p>6 interacted with Christopher Scott at all?</p> <p>7 A No.</p> <p>8 Q Take a look at the third page of Group</p> <p>9 Exhibit 6, which is another picture. And it's Bates</p> <p>10 stamped City-BG-051681.</p> <p>11 (GROUP EXHIBIT 6 MARKED FOR IDENTIFICATION)</p> <p>12 A You said the third page, sir?</p> <p>13 Q Yeah, it should be a picture.</p> <p>14 A Okay.</p> <p>15 Q Do you recognize the person in that picture?</p> <p>16 A Yes.</p> <p>17 Q Who's the person in this picture?</p> <p>18 A He was -- he hung out in Ida B. Wells.</p> <p>19 Q Do you know his name?</p> <p>20 A Well, from the front of this document, it says</p> <p>21 Bobby Coleman.</p> <p>22 Q Other than seeing that the front of the</p> <p>23 document says Bobby Coleman, do you know who -- do you</p> <p>24 know -- like, do you have an independent recollection of</p> <p>25 this being Bobby Coleman?</p>

<p style="text-align: right;">Page 46</p> <p>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.</p> <p>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?</p> <p>9 A Right.</p> <p>10 Q Do you know -- did this person have a nickname 11 to your knowledge?</p> <p>12 A Not to my knowledge.</p> <p>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?</p> <p>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.</p> <p>19 Q Do you know if he was involved in the drug 20 trade at Ida B. Wells?</p> <p>21 A I don't recall that.</p> <p>22 Q Do you recall ever being involved in the 23 arrest of Bobby Coleman?</p> <p>24 A I don't recall that either.</p> <p>25 Q You've already had a chance to look at the</p>	<p style="text-align: right;">Page 48</p> <p>1 MR. RAUSCHER: Thanks.</p> <p>2 COURT REPORTER: Okay. We're now off the 3 record. The time is 11:02 a.m.</p> <p>4 (OFF THE RECORD)</p> <p>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.</p> <p>9 BY MR. RAUSCHER:</p> <p>10 Q Do you know someone named Isaac Weekly?</p> <p>11 A No, sir.</p> <p>12 Q All right. Can you take a look at Group 13 Exhibit 7, please?</p> <p>14 (GROUP EXHIBIT 7 MARKED FOR IDENTIFICATION)</p> <p>15 A Okay.</p> <p>16 Q Take a look at the third page in that PDF, 17 which is City-BG-052506.</p> <p>18 A Okay.</p> <p>19 Q Do you recognize the person in that picture?</p> <p>20 A No.</p> <p>21 Q Have you had a chance to review the reports in 22 Group Exhibit 7?</p> <p>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.</p>
<p style="text-align: right;">Page 47</p> <p>1 Vice Case Report describing the arrest, but would you 2 like to look again?</p> <p>3 A Sure.</p> <p>4 Q That's the last two pages -- are the Vice Case 5 Report.</p> <p>6 A Okay. Okay. I just read this.</p> <p>7 Q Yeah, this is the same Vice Case Report from 8 the --</p> <p>9 A Okay.</p> <p>10 Q -- first one in the --</p> <p>11 A I'm sorry.</p> <p>12 Q That's okay.</p> <p>13 A Apologize.</p> <p>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?</p> <p>17 A No.</p> <p>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?</p> <p>21 MR. KOSOKO: Let's take, like, a five-minute 22 break, Scott.</p> <p>23 MR. RAUSCHER: Okay. Sounds good. Five's 24 fine.</p> <p>25 MR. KOSOKO: All right.</p>	<p style="text-align: right;">Page 49</p> <p>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?</p> <p>9 A Yes. I'd like to look at the reports. That 10 would be helpful. Okay.</p> <p>11 Q You had a chance to look at the reports in 12 Group Exhibit 7?</p> <p>13 A Yes, sir.</p> <p>14 Q Having looked at those reports, do you know 15 whether you were involved in arresting Isaac Weekly?</p> <p>16 A I don't recall.</p> <p>17 Q You have no memory of being involved in the 18 arrest of Isaac Weekly?</p> <p>19 A No, sir.</p> <p>20 Q The reports did not help refresh your 21 recollection as to whether you were involved in his 22 arrest?</p> <p>23 A No, sir.</p> <p>24 Q And do you have any recollection or do the 25 reports refresh your recollection as to whether you were</p>

<p style="text-align: right;">Page 50</p> <p>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. (GROUP EXHIBIT 8 MARKED FOR IDENTIFICATION) 21 A Okay. 22 Q You see a picture on the first page? 23 A Yes, sir. 24 Q You recognize the person depicted in that</p>	<p style="text-align: right;">Page 52</p> <p>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</p>
<p style="text-align: right;">Page 51</p> <p>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?</p>	<p style="text-align: right;">Page 53</p> <p>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. (GROUP EXHIBIT 9 MARKED FOR IDENTIFICATION) 8 A Okay. 9 Q Do you see a picture in the top right-hand 10 corner of the first page of Group Exhibit 9, COPA-Watts 11 45042? 12 A Yes, sir. 13 Q Do you recognize the person who's pictured? 14 A No, sir. 15 Q Do you have any recollection of interacting 16 with Derrick Mapp whatsoever? 17 A No, sir. 18 Q Do you have any recollection of being involved 19 in arresting Derrick Map April 12, 2006? 20 A No, sir. 21 Q Have you had a chance to look at the reports 22 in Group Exhibit 9? 23 A I may have, sir. Like I said prior, I don't 24 remember reading these reports, specifically.</p>

<p style="text-align: right;">Page 54</p> <p>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.</p> <p>5 A Okay. Okay.</p> <p>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.</p> <p>10 A Okay.</p> <p>11 THE WITNESS: The copy's kind of -- sir --</p> <p>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.</p> <p>15 MR. RAUSCHER: Yeah, it's actually just as bad 16 probably. But I'm happy to share it.</p> <p>17 MR. STEFANICH: All right. Let's see if it's 18 any better.</p> <p>19 MR. RAUSCHER: Do you see it now? Oh, I 20 haven't pressed it. Do you see it now?</p> <p>21 THE WITNESS: Oh, boy.</p> <p>22 MR. RAUSCHER: The second page is better.</p> <p>23 MR. STEFANICH: Okay.</p> <p>24 MR. RAUSCHER: Let me know when you want me to 25 scroll.</p>	<p style="text-align: right;">Page 56</p> <p>1 Q And just to be clear, that's the same answer 2 for both reports, no personal knowledge?</p> <p>3 A I have no personal knowledge, sir.</p> <p>4 Q Do you know who Jermaine Morris is?</p> <p>5 A No, sir.</p> <p>6 Q Do you know if you were involved in arresting 7 Jermaine Morris?</p> <p>8 A I'm not sure, sir.</p> <p>9 Q Take a look at Group Exhibit 10.</p> <p>10 (GROUP EXHIBIT 10 MARKED FOR IDENTIFICATION)</p> <p>11 A Okay.</p> <p>12 Q All right. You have that in front of you?</p> <p>13 A I do, sir.</p> <p>14 Q And this actually has arrests of two people, 15 but one of them we already covered a previous 16 deposition.</p> <p>17 A Okay.</p> <p>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?</p> <p>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?</p>
<p style="text-align: right;">Page 55</p> <p>1 THE WITNESS: Oh, I'm sorry. I apologize. If 2 you could scroll to the -- there we go.</p> <p>3 MR. RAUSCHER: To the second page, or...</p> <p>4 THE WITNESS: Yes, sir. There we go. Thank 5 you.</p> <p>6 MR. RAUSCHER: Sure.</p> <p>7 THE WITNESS: Okay. Thank you, sir.</p> <p>8 BY MR. RAUSCHER:</p> <p>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?</p> <p>12 A No, sir.</p> <p>13 Q And did it refresh your recollection as to who 14 Derrick Mapp is?</p> <p>15 A No, sir.</p> <p>16 Q Or whether you knew Derrick Mapp at all?</p> <p>17 A No, sir.</p> <p>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?</p> <p>21 A Not that I'm aware of at this time, sir.</p> <p>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?</p> <p>25 A No, sir.</p>	<p style="text-align: right;">Page 57</p> <p>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.</p> <p>6 A Okay. Thank you sir. Okay, sir.</p> <p>7 Q Have you had a chance to look at the reports 8 now?</p> <p>9 A Yes, sir.</p> <p>10 Q And specifically for the February 4, 2006, 11 arrest, you looked at that and saw your name on it?</p> <p>12 A I don't see my name here.</p> <p>13 Q That report starts PL Joint 41850.</p> <p>14 A 50? Okay. Yes, sir. I see my name.</p> <p>15 Q You see your name?</p> <p>16 A Yes, sir.</p> <p>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.</p> <p>20 A No, sir.</p> <p>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?</p> <p>24 A No, sir.</p> <p>25 Q Are there any other documents you could look</p>

<p style="text-align: right;">Page 58</p> <p>1 at to help refresh your recollection about this arrest?</p> <p>2 A Not at this time, sir.</p> <p>3 Q Do you know who Alvin Waddy is?</p> <p>4 A No, sir.</p> <p>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 --</p> <p>14 MR. STEFANICH: That's agreed.</p> <p>15 BY MR. RAUSCHER:</p> <p>16 Q Okay. Do you know who Alvin Waddy is?</p> <p>17 A No, sir.</p> <p>18 Q Do you have any recollection of being involved 19 in arresting Alvin Waddy?</p> <p>20 A No, sir.</p> <p>21 Q Take a look at the third page of the PDF of 22 Group Exhibit 11.</p> <p>23 A Okay.</p> <p>24 Q The Bates stamp is IND DEF-AW a bunch of 25 leading zeros and a one. You see that?</p>	<p style="text-align: right;">Page 60</p> <p>1 A No, sir.</p> <p>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?</p> <p>5 A No, sir.</p> <p>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?</p> <p>9 A No, sir.</p> <p>10 Q Do you know -- you were on the tactical team 11 with Mickey Spaargaren for some period of time, correct?</p> <p>12 A Yes, sir.</p> <p>13 Q Do you know why he left the team?</p> <p>14 A He was --</p> <p>15 MS. MCGRATH: Calls for speculation.</p> <p>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.</p> <p>22 Q Do you remember what the gist of the argument 23 was?</p> <p>24 A I remember race being involved in it, and 25 that's what I remember. It was quite some time ago, but</p>
<p style="text-align: right;">Page 59</p> <p>1 (GROUP EXHIBIT 11 MARKED FOR IDENTIFICATION)</p> <p>2 A Yes, sir.</p> <p>3 Q Do you see a picture?</p> <p>4 A Yes, sir.</p> <p>5 Q Do you recognize the person in this picture?</p> <p>6 A No, sir.</p> <p>7 Q Have you had a chance to read over this 8 report, the arrest report?</p> <p>9 A I may have, sir.</p> <p>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?</p> <p>13 A No, sir.</p> <p>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?</p> <p>17 A Yes, sir.</p> <p>18 Q Okay. Please do that and let me know when 19 you've finished.</p> <p>20 A Thank you. Okay, sir.</p> <p>21 Q Did you also look at the Vice Case Report?</p> <p>22 A I did, sir.</p> <p>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?</p>	<p style="text-align: right;">Page 61</p> <p>1 I remember race being involved.</p> <p>2 Q How so? Like how -- just what do you mean by 3 race being involved?</p> <p>4 A Black officers being treated differently than 5 white officers.</p> <p>6 Q And was someone making accusations in that?</p> <p>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.</p> <p>12 Q He thought he was -- Spaargaren thought he was 13 being treated differently than black officers?</p> <p>14 A Yes.</p> <p>15 Q Do you know in what way he thought he was 16 being treated differently than black officers?</p> <p>17 A I don't recall that.</p> <p>18 Q Do you know if it had anything to do with him 19 taking time off or wanting to take time off?</p> <p>20 A I can't remember that. I don't remember that.</p> <p>21 Q Do you know if it had anything to do with him 22 wanting to run another business?</p> <p>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</p>

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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 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 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 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

<p>Page 66</p> <p>1 happened that day.</p> <p>2 Q And is it correct that you don't have any</p> <p>3 recollection of what that role was?</p> <p>4 A I don't remember, sir.</p> <p>5 Q Okay. And does the report explain what your</p> <p>6 role was?</p> <p>7 A May I read the narrative portion, sir?</p> <p>8 Q Please. Yes, please. After reviewing the</p> <p>9 report, I'll ask you to answer that question.</p> <p>10 A Okay. Thank you. Okay, sir.</p> <p>11 Q You've now reviewed the Vice Case Report,</p> <p>12 Plaintiff Adams Exhibit 1?</p> <p>13 A Yes, sir.</p> <p>14 Q Okay. And does that report explain your</p> <p>15 involvement in this arrest?</p> <p>16 A No, sir.</p> <p>17 Q This report states that the address of the</p> <p>18 occurrence was 574 East 36th Street. Do you see that?</p> <p>19 A Yes, sir.</p> <p>20 Q And do you recognize that as the address of an</p> <p>21 apartment building at the Wells homes?</p> <p>22 A Yes, sir.</p> <p>23 Q Do you recall that building having any</p> <p>24 reputation?</p> <p>25 A A repu -- I don't understand. A reputation</p>	<p>Page 68</p> <p>1 A Yes, sir.</p> <p>2 Q And do you see that there's an Alias or</p> <p>3 nickname under Mr. Adams name, Dee, D-E-E?</p> <p>4 A Yes.</p> <p>5 Q Okay. Do you recall somebody with the</p> <p>6 nickname, D-E-E?</p> <p>7 A No, sir.</p> <p>8 Q Okay. And does looking at the arrest report</p> <p>9 refresh your recollection about this arrest?</p> <p>10 A No, sir.</p> <p>11 Q All right. And can you please look at the</p> <p>12 next exhibit, Plaintiff Adams Exhibit 3?</p> <p>13 (PLAINTIFF ADAMS EXHIBIT 3 MARKED FOR</p> <p>14 IDENTIFICATION)</p> <p>15 A Okay.</p> <p>16 Q And are those three different mugshots that</p> <p>17 say Adams, Demetris, Dee, at the top?</p> <p>18 A Yes, sir.</p> <p>19 Q Do you recognize the person depicted in these</p> <p>20 pictures?</p> <p>21 A No, sir.</p> <p>22 Q So looking at these three exhibits has not</p> <p>23 helped you remember anything about the arrest of</p> <p>24 Mr. Adams on June 26, 2004; is that right?</p> <p>25 A I do not recognize this person.</p>
<p>Page 67</p> <p>1 meaning?</p> <p>2 Q Well, were there differences between who lived</p> <p>3 in the buildings or what kind of activity happened at</p> <p>4 each building?</p> <p>5 A No, drugs were sold at this building.</p> <p>6 Q And is that something that you remember or</p> <p>7 that you're basing on this report?</p> <p>8 A I remember drugs being sold here at this</p> <p>9 building.</p> <p>10 Q Did you see the report referred to drugs being</p> <p>11 sold on the fifth floor of this building?</p> <p>12 A I don't recall a floor, but I remember drugs</p> <p>13 being sold here at this building.</p> <p>14 Q Okay. And did you see on the second page of</p> <p>15 the report it said that the offender fled to the door of</p> <p>16 apartment number 510?</p> <p>17 A Yes, sir.</p> <p>18 Q Do you recall anything about apartment 510 at</p> <p>19 574 East 36th Street?</p> <p>20 A No, sir.</p> <p>21 Q Can I ask you to look at Plaintiff Adams</p> <p>22 Exhibit 2, please? And is that the arrest report of</p> <p>23 Demetris Adams from June 26, 2004?</p> <p>24 (PLAINTIFF ADAMS EXHIBIT 2 MARKED FOR</p> <p>25 IDENTIFICATION)</p>	<p>Page 69</p> <p>1 Q Okay. And does looking at these exhibits help</p> <p>2 you remember the arrest of Mr. Adams on June 26, 2004?</p> <p>3 A No, sir.</p> <p>4 Q Is it correct that you do not have any</p> <p>5 personal knowledge of the arrest of Demetris Adams on</p> <p>6 June 26, 2004?</p> <p>7 A No, sir.</p> <p>8 Q Okay. The next person I want to ask you about</p> <p>9 is named Catrina Bonner. Do you have any memory of a</p> <p>10 woman named Catrina Bonner?</p> <p>11 A No, sir.</p> <p>12 Q Okay. Can I ask you please to look at</p> <p>13 Plaintiff Bonner Exhibit 1?</p> <p>14 (PLAINTIFF BONNER EXHIBIT 1 MARKED FOR</p> <p>15 IDENTIFICATION)</p> <p>16 A Okay.</p> <p>17 Q Is that a Vice Case Report dated March 28,</p> <p>18 2007?</p> <p>19 A Yes, sir.</p> <p>20 Q Okay. And it lists the first offender is</p> <p>21 Frank Saunders and the second offender is Catrina</p> <p>22 Bonner?</p> <p>23 A Yes, sir.</p> <p>24 Q Okay. Let me also -- before I ask questions</p> <p>25 about the Vice Case Report, I'd ask you to look at</p>

<p style="text-align: right;">Page 70</p> <p>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)</p> <p>5 A Yes.</p> <p>6 Q Okay. And if you look on the last page of 7 that, page 505, do you see your name listed?</p> <p>8 A I do.</p> <p>9 Q Okay. And how are you listed there?</p> <p>10 A Assisting arresting officer.</p> <p>11 Q Do you know what you did to be an assisting 12 arresting officer for this arrest?</p> <p>13 A No, sir.</p> <p>14 Q And does the report state what you did to be 15 an assisting arresting officer?</p> <p>16 A Can I read the narrative, sir?</p> <p>17 Q Yes, please.</p> <p>18 A I've read the narrative, sir.</p> <p>19 Q Does reviewing the narrative help you recall 20 what you did to be an assisting arresting officer in 21 this arrest?</p> <p>22 A No, sir.</p> <p>23 Q And it doesn't state in the narrative what you 24 did; is that right?</p> <p>25 A No, sir.</p>	<p style="text-align: right;">Page 72</p> <p>1 Q And does reviewing the narrative help you 2 recall the events described in this report?</p> <p>3 A No, sir.</p> <p>4 Q Did you see that the narrative states that 5 offender number 2 was a known offender?</p> <p>6 A I see that, sir.</p> <p>7 Q Do you take that to mean that one of the 8 officers recognized Ms. Bonner and knew her name?</p> <p>9 MR. STEFANICH: Objection. Form.</p> <p>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.</p> <p>14 Q Okay. Well, somebody recognized this person, 15 whether it was Muhammad, Lewis, or some other officer; 16 isn't that right?</p> <p>17 A Reading the report, it seems to be that way, 18 sir.</p> <p>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?</p> <p>22 A No, sir.</p> <p>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?</p>
<p style="text-align: right;">Page 71</p> <p>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?</p> <p>5 A Yes, sir.</p> <p>6 Q And do you see your name listed in the Vice 7 Case Report, Exhibit number 1?</p> <p>8 A I'm not seeing my name on the Vice Case 9 Report, sir. Maybe --</p> <p>10 Q Oh, go ahead. Let me know when you're done 11 looking at it.</p> <p>12 A I don't see it here.</p> <p>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?</p> <p>16 A For me, as an officer, that usually happens. 17 But occasionally, you know, mistakes are made.</p> <p>18 Q Sure.</p> <p>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.</p> <p>23 Q All right. And did you review the narrative 24 in the Vice Case Report?</p> <p>25 A I did.</p>	<p style="text-align: right;">Page 73</p> <p>1 (PLAINTIFF BONNER EXHIBIT 2 MARKED FOR 2 IDENTIFICATION)</p> <p>3 A Okay.</p> <p>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?</p> <p>7 (PLAINTIFF BONNER EXHIBIT 3 MARKED FOR 8 IDENTIFICATION)</p> <p>9 A (Coughs) Pardon me. Okay.</p> <p>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 --</p> <p>14 A Okay.</p> <p>15 Q Does looking at the woman in these pictures 16 help you remember anybody?</p> <p>17 A No, sir.</p> <p>18 Q It doesn't refresh your recollection about 19 Catrina Bonner?</p> <p>20 A No, sir.</p> <p>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</p>

<p style="text-align: right;">Page 74</p> <p>1 related to Catrina Bonner on March 28, 2007?</p> <p>2 A No, sir.</p> <p>3 Q No, you don't have personal knowledge?</p> <p>4 A I don't recall these people and/or this</p> <p>5 arrest, sir.</p> <p>6 Q Okay. All right. Thanks. The next thing I</p> <p>7 want to ask about, Jermaine Coleman and Jabal Stokes. Do</p> <p>8 you have any recollection of those two men?</p> <p>9 A No, sir.</p> <p>10 Q No? Okay. Could you please take a look at</p> <p>11 Plaintiff Coleman Exhibit 1?</p> <p>12 (PLAINTIFF COLEMAN EXHIBIT 1 MARKED FOR</p> <p>13 IDENTIFICATION)</p> <p>14 A Okay.</p> <p>15 Q And is that the arrest report of Jermaine</p> <p>16 Coleman from May 3, 2006?</p> <p>17 A Yes, sir.</p> <p>18 Q And are you listed on the last page of this</p> <p>19 report as an assisting arresting officer?</p> <p>20 A Yes, sir.</p> <p>21 Q Do you know what you did to be an assisting</p> <p>22 arresting officer?</p> <p>23 A Can I read the narrative, sir?</p> <p>24 Q Sure.</p> <p>25 A Okay, sir.</p>	<p style="text-align: right;">Page 76</p> <p>1 A Oh, okay.</p> <p>2 Q Okay. And the narrative section begins with</p> <p>3 the event number. Do you see that?</p> <p>4 A I do.</p> <p>5 Q And then the next thing is the first sentence</p> <p>6 of the narrative states, "This is an arrest by tact</p> <p>7 units BT.264D, B, & C." Did I read that right?</p> <p>8 A Yes, sir.</p> <p>9 Q Okay. Do you take BT to mean beat?</p> <p>10 A Yes.</p> <p>11 Q And does this report state that the officers</p> <p>12 on those beats were the arresting officers?</p> <p>13 A Not on this page. On the -- would be the 3</p> <p>14 out of the 5 page. It says, "First arresting officer,"</p> <p>15 and then, "Second arresting officer."</p> <p>16 Q Okay. So what does it mean to state that the</p> <p>17 arrest was by those beats in the narrative?</p> <p>18 MR. STEFANICH: Objection. Form. You can</p> <p>19 answer.</p> <p>20 A It means that there was some role in the</p> <p>21 arrest during -- or some -- the officers on those beats</p> <p>22 had some -- some type of role in the arrest of this</p> <p>23 person.</p> <p>24 Q And that's what you talked about before as</p> <p>25 being listed as an assisting arresting officer?</p>
<p style="text-align: right;">Page 75</p> <p>1 Q Do you remember what you did to be an</p> <p>2 assisting arresting officer for the arrest of Jermaine</p> <p>3 Coleman?</p> <p>4 A No, sir.</p> <p>5 Q Okay. And reading the report doesn't tell you</p> <p>6 the answer to that?</p> <p>7 A No, sir.</p> <p>8 Q Could you please look at Plaintiff Coleman</p> <p>9 Exhibit 2 now?</p> <p>10 (PLAINTIFF COLEMAN EXHIBIT 2 MARKED FOR</p> <p>11 IDENTIFICATION)</p> <p>12 A That's right. Okay.</p> <p>13 Q Is that the arrest report for Jabal Stokes</p> <p>14 from May 3, 2006?</p> <p>15 A Yes, sir.</p> <p>16 Q Do you see that you were listed on the last</p> <p>17 page of this report as an assisting arresting officer?</p> <p>18 A Yes, sir.</p> <p>19 Q And do you know what you did to be an</p> <p>20 assisting arresting officer on this arrest?</p> <p>21 A No, sir.</p> <p>22 Q Let me ask you to look at the narrative of</p> <p>23 this arrest report on page 2, please.</p> <p>24 A 205, sir?</p> <p>25 Q Yes, correct.</p>	<p style="text-align: right;">Page 77</p> <p>1 A Yes, sir.</p> <p>2 Q Okay. Can I ask you please to look at</p> <p>3 Plaintiff Coleman Exhibit number 3? And is that the</p> <p>4 Vice Case Report for the arrest of Mr. Coleman and</p> <p>5 Mr. Stokes on May 3, 2006?</p> <p>6 (PLAINTIFF COLEMAN EXHIBIT 3 MARKED FOR</p> <p>7 IDENTIFICATION)</p> <p>8 A Yes, sir.</p> <p>9 Q And do you see your name on this report?</p> <p>10 A I do, sir.</p> <p>11 Q And where is your name listed?</p> <p>12 A In box 18, sir.</p> <p>13 Q And is the box for witness checked in box 18?</p> <p>14 A It is sir.</p> <p>15 Q I take that to mean that you were a witness in</p> <p>16 this incident?</p> <p>17 A If the box is checked witness, I must have</p> <p>18 witnessed something. Not too sure what that is, sir.</p> <p>19 Q Sure. So -- and please take a look at the</p> <p>20 report, and I'll ask you the question again.</p> <p>21 A Okay. Okay. Okay, sir.</p> <p>22 Q And you've reviewed the narrative of the</p> <p>23 Vice Case Report?</p> <p>24 A I did, sir.</p> <p>25 Q And does that refresh your recollection about</p>

<p>1 the arrest of Mr. Coleman and Mr. Stokes?</p> <p>2 A No, sir.</p> <p>3 Q Okay. And does the narrative of the report</p> <p>4 explain your role in the arrest?</p> <p>5 A No, sir.</p> <p>6 Q I wanted to ask you, in the report it refers</p> <p>7 to officers setting up surveillance and then also for</p> <p>8 officers calling for enforcement. Are those terms that</p> <p>9 you've heard, surveillance officers and enforcement</p> <p>10 officers?</p> <p>11 A Yes, sir.</p> <p>12 Q Okay. And what do they mean?</p> <p>13 A Surveillance officers would be the officers</p> <p>14 observing the crime that is occurring, and the</p> <p>15 enforcement officers would be the officers that are</p> <p>16 apprehending -- or apprehending the offenders.</p> <p>17 Q And do you have experience in both roles?</p> <p>18 A Yes.</p> <p>19 Q Whenever you were assigned to be a</p> <p>20 surveillance officer, would you always have enforcement</p> <p>21 officers working with you?</p> <p>22 A Usually, yes.</p> <p>23 Q Would you not want to be involved as a</p> <p>24 surveillance officer if there wasn't somebody else</p> <p>25 working enforcement?</p>	<p>Page 78</p> <p>1 Coleman" above him.</p> <p>2 A Yes, sir.</p> <p>3 Q Okay. Does that person depicted on Coleman</p> <p>4 Exhibit 4 look familiar?</p> <p>5 A No, sir.</p> <p>6 Q Okay. And then could you look please at</p> <p>7 Exhibit 5? Do you see a picture of a man and above him</p> <p>8 it says, "Stokes, Jabal"?</p> <p>9 A Yes, sir.</p> <p>10 Q Okay. Does the picture in Exhibit 5 look</p> <p>11 familiar?</p> <p>12 A No, sir.</p> <p>13 Q Okay. Having reviewed all of these exhibits,</p> <p>14 are you still unable to remember the arrest of</p> <p>15 Mr. Coleman and Mr. Stokes on May 3, 2006?</p> <p>16 A I'm unable to remember, sir.</p> <p>17 Q Okay. And is it still correct that you do not</p> <p>18 have any personal knowledge of the arrest of</p> <p>19 Jermaine Coleman and Jabal Stokes on May 3, 2006?</p> <p>20 A That's correct, sir.</p> <p>21 Q Okay.</p> <p>22 MR. FLAXMAN: We can go off the record.</p> <p>23 COURT REPORTER: Okay. We are now off the</p> <p>24 record. The time is 12:17 p.m.</p> <p>25 (OFF THE RECORD)</p>
<p>Page 79</p> <p>1 A That's -- no, you could -- you would be -- you</p> <p>2 could break your surveillance and then go and apprehend</p> <p>3 the offender. That's a possibility, sir. So I wouldn't</p> <p>4 say I would not want to do that.</p> <p>5 Q Let me ask you please to look at the last two</p> <p>6 exhibits for Plaintiff Coleman, numbers 4 and 5.</p> <p>7 (PLAINTIFF COLEMAN EXHIBIT 4 MARKED FOR</p> <p>8 IDENTIFICATION)</p> <p>9 (PLAINTIFF COLEMAN EXHIBIT 5 MARKED FOR</p> <p>10 IDENTIFICATION)</p> <p>11 A Okay.</p> <p>12 THE WITNESS: Take a break?</p> <p>13 MR. STEFANICH: Joel, we're going to take a</p> <p>14 break at 12:30.</p> <p>15 MR. FLAXMAN: Okay. Do you want to take a</p> <p>16 break after we do these two pictures?</p> <p>17 THE WITNESS: Yeah, that'll be good.</p> <p>18 MR. STEFANICH: Okay. Yeah, that's fine.</p> <p>19 Thanks.</p> <p>20 MR. FLAXMAN: Sure. Let's just do those, and</p> <p>21 then we'll go off the record.</p> <p>22 MR. STEFANICH: Thank you.</p> <p>23 BY MR. FLAXMAN:</p> <p>24 Q Is Coleman Exhibit number 4 -- do you see</p> <p>25 that? There's a picture of a man. It says "Jermaine</p>	<p>Page 81</p> <p>1 COURT REPORTER: We are back on the record for</p> <p>2 the deposition of Brian Bolton being conducted by</p> <p>3 videoconference. My name is Kortney Chase. Today</p> <p>4 is March 14, 2022. The time is 12:46 p.m.</p> <p>5 BY MR. FLAXMAN:</p> <p>6 Q Officer Bolton, you're in a room today with</p> <p>7 your attorney, Mr. Stefanich, right?</p> <p>8 A Yes, sir.</p> <p>9 Q Okay. Is anybody else in the room with you?</p> <p>10 A No, sir.</p> <p>11 Q Okay. And that's been true all day?</p> <p>12 A Yes, sir.</p> <p>13 Q Okay. I next want to ask you about someone</p> <p>14 named Trinere Johnson. Do you have any recollection of</p> <p>15 Trinere Johnson?</p> <p>16 A No, sir.</p> <p>17 Q Okay. Could I ask you please to look at</p> <p>18 Plaintiff Johnson Exhibit 1?</p> <p>19 (PLAINTIFF JOHNSON EXHIBIT 1 MARKED FOR</p> <p>20 IDENTIFICATION)</p> <p>21 A Okay.</p> <p>22 Q And is that the arrest report of Trinere</p> <p>23 Johnson dated March 3, 2008?</p> <p>24 A Yes, sir.</p> <p>25 Q And you see the picture of Ms. Johnson at the</p>

<p>1 top right of that report?</p> <p>2 A Yes, sir.</p> <p>3 Q Okay. Does the person in that picture look</p> <p>4 familiar to you?</p> <p>5 A No, sir.</p> <p>6 Q All right. Let me ask you, then, to look at</p> <p>7 Plaintiff Johnson Exhibit 2, please.</p> <p>8 (PLAINTIFF JOHNSON EXHIBIT 2 MARKED FOR</p> <p>9 IDENTIFICATION)</p> <p>10 A Okay.</p> <p>11 Q And is that the Vice Case Report dated</p> <p>12 March 3, 2008, for Darnell Trabeck and Trinere Johnson?</p> <p>13 A Yes, sir.</p> <p>14 Q And do you see your name listed on this</p> <p>15 report?</p> <p>16 A Yes, sir.</p> <p>17 Q Where's your name listed?</p> <p>18 A In the extension of box 18, sir.</p> <p>19 Q Okay. And is the box for witness checked?</p> <p>20 A Yes, sir.</p> <p>21 Q All right. And do you know what you did in</p> <p>22 relation to this arrest?</p> <p>23 A No, sir.</p> <p>24 Q Okay. And --</p> <p>25 A May I read the narrative of the arrest report,</p>	<p>Page 82</p> <p>1 Q No, sir, you do not have recollection --</p> <p>2 A I don't have -- I don't recall any of the</p> <p>3 events that took place that day.</p> <p>4 Q Okay. Let me show you some other reports that</p> <p>5 are marked with these as Johnson Exhibit 4. I want you</p> <p>6 to look at that one first, please. And is that an</p> <p>7 arrest report of someone named John Massey?</p> <p>8 (PLAINTIFF JOHNSON EXHIBIT 4 MARKED FOR</p> <p>9 IDENTIFICATION)</p> <p>10 A Yes, sir.</p> <p>11 Q Okay. And if you look at that at the same</p> <p>12 time as you're looking at the arrest report for</p> <p>13 Ms. Johnson, do you see that it's the same location on</p> <p>14 the same day, but ten minutes later?</p> <p>15 A Oh, the arrest report. I apologize. Yes,</p> <p>16 sir.</p> <p>17 Q And I'm not asking about this report because</p> <p>18 you didn't create this arrest report for Mr. Massey,</p> <p>19 right?</p> <p>20 A No, sir.</p> <p>21 Q Okay. When you did create arrest reports, how</p> <p>22 would you determine the time when you put that for the</p> <p>23 arrest date and time?</p> <p>24 A Well, most of the time, we'd let the</p> <p>25 dispatcher know that we'd be going into the station with</p>
<p>Page 83</p> <p>1 sir? Oh, I'm sorry, the Vice Case Report. Just</p> <p>2 double-check that, sir.</p> <p>3 Q Yes, and why -- yeah. And actually, before</p> <p>4 you do that, let me just -- why don't you also look at</p> <p>5 Exhibit 3 at the same time? Do you have that in front</p> <p>6 of you?</p> <p>7 (PLAINTIFF JOHNSON EXHIBIT 3 MARKED FOR</p> <p>8 IDENTIFICATION)</p> <p>9 A Yes, sir.</p> <p>10 Q And is that the arrest report of Darnell</p> <p>11 Trabeck on March 3, 2008?</p> <p>12 A Yes, sir.</p> <p>13 Q Okay, well -- so yeah, why don't you take a</p> <p>14 moment to look at the two arrest reports and the Vice</p> <p>15 Case Report. And let me know when you've done that.</p> <p>16 A Okay. Thank you, sir. Okay, sir, I've read</p> <p>17 the narrative of both or all three reports.</p> <p>18 Q And does reviewing the three reports about</p> <p>19 Mr. Trabeck and Ms. Johnson refresh your recollection</p> <p>20 about their arrests?</p> <p>21 A No, sir.</p> <p>22 Q Is it correct that you do not have any</p> <p>23 personal knowledge of the arrests of Mr. Trabeck and</p> <p>24 Ms. Johnson on March 3, 2008?</p> <p>25 A No, sir.</p>	<p>Page 85</p> <p>1 an arrest. So back then, there were no body cameras, so</p> <p>2 it was kind of -- you had to gauge of when you went in</p> <p>3 for the arrest and when you left the location or let the</p> <p>4 dispatcher know that you were leaving. And you'd have</p> <p>5 to gauge approximate when that person was actually</p> <p>6 placed into custody. We didn't have body cameras to</p> <p>7 review -- at that time during the police -- at that</p> <p>8 point in the police department, there were no body cams,</p> <p>9 so you kind of had to gauge when you were leaving and</p> <p>10 when the person was placed into custody.</p> <p>11 Q And Mr. Massey was arrested for trespassing.</p> <p>12 Is that what the report says?</p> <p>13 A Yes, sir.</p> <p>14 Q And it looks like, according to the reports,</p> <p>15 he was arrested in a different location from Ms. Johnson</p> <p>16 but at the same building; is that right?</p> <p>17 A Can you ask the question one more time? I</p> <p>18 apologize.</p> <p>19 Q Sure. Well, let me -- I'll ask it based on</p> <p>20 other reports. Do you have any recollection of</p> <p>21 Mr. Massey?</p> <p>22 A I don't.</p> <p>23 Q Okay. And you don't know any -- do you know</p> <p>24 anything about this arrest of Mr. Massey for</p> <p>25 trespassing?</p>

<p>1 A I don't.</p> <p>2 Q Okay. Can I ask you to look at Plaintiff</p> <p>3 Johnson Exhibit 5, please? Do you have that arrest</p> <p>4 report?</p> <p>5 (PLAINTIFF JOHNSON EXHIBIT 5 MARKED FOR</p> <p>6 IDENTIFICATION)</p> <p>7 A McElrath?</p> <p>8 Q So you're looking at the arrest report for</p> <p>9 Gregory McElrath now?</p> <p>10 A Yes, sir.</p> <p>11 Q And do you have any knowledge of</p> <p>12 Mr. McElrath's arrest?</p> <p>13 A No, sir.</p> <p>14 Q Okay. And the picture of Mr. McElrath and the</p> <p>15 picture of Mr. Massey on the reports didn't help you</p> <p>16 remember anything about them?</p> <p>17 A No, sir.</p> <p>18 Q Okay. And then let me ask you to look at</p> <p>19 Johnson Exhibit 6, please. Do you have that general</p> <p>20 offense case report for Mr. McElrath and Mr. Massey in</p> <p>21 front of you?</p> <p>22 (PLAINTIFF JOHNSON EXHIBIT 6 MARKED FOR</p> <p>23 IDENTIFICATION)</p> <p>24 A I do.</p> <p>25 Q Okay. And does looking at the report help you</p>	<p>Page 86</p> <p>1 reports?</p> <p>2 A I guess I don't understand your question.</p> <p>3 Would there be a time where there'd be multiple arrests</p> <p>4 on different reports? I guess in different -- different</p> <p>5 incidents, maybe. Different incident.</p> <p>6 Q Sure.</p> <p>7 A But at the same location where one wasn't --</p> <p>8 one did not have to deal with the other one, I guess,</p> <p>9 maybe.</p> <p>10 Q So in that situation, it would make sense for</p> <p>11 them to be on separate reports.</p> <p>12 A Yes, sir.</p> <p>13 Q If two people are arrested together, one for</p> <p>14 drugs and one for trespassing, would you write them up</p> <p>15 on the same report?</p> <p>16 A Well, if it involved the same incident, I --</p> <p>17 this was a -- this always came up with case reporting to</p> <p>18 put people that were trespassed pot on a Vice Case</p> <p>19 Report because Vice Case Reports, you usually deal with</p> <p>20 narcotics. So it was always -- it was always a case</p> <p>21 reporting issue in certain circumstances where someone</p> <p>22 would be arrested during the incident, but trespassed.</p> <p>23 And they should -- like, some supervisors wouldn't</p> <p>24 approve certain reports because they felt that</p> <p>25 narcotics-related offenses should only be on Vice Case</p>
<p>Page 87</p> <p>1 remember anything about the arrest of these two people?</p> <p>2 A No, sir.</p> <p>3 Q Okay. This -- the general offense case</p> <p>4 report, do you see in the narrative, it states that</p> <p>5 officers encountered Mr. McElrath and Mr. Massey in the</p> <p>6 lobby of the building?</p> <p>7 A Yes, sir.</p> <p>8 Q And did you recall, or if you want to look</p> <p>9 back at it, that the arrest reports for Ms. Johnson and</p> <p>10 Mr. Trabek were about their arrests on the fifth floor</p> <p>11 of the same building?</p> <p>12 A Yes, sir. Fifth floor. Yes, sir.</p> <p>13 Q And -- okay. And based on your experience</p> <p>14 writing arrest reports as a Chicago police officer, was</p> <p>15 that the usual practice that if there was two arrests in</p> <p>16 the lobby and two separate arrests on the fifth floor,</p> <p>17 they'd be written up on separate reports?</p> <p>18 A Well, one includes narcotics, and from what I</p> <p>19 understand -- I don't -- I don't know -- I don't know</p> <p>20 why they're on two reports. I don't know why because --</p> <p>21 well, they're at different times, so maybe that's the</p> <p>22 reason why they're on two separate reports, sir. I --</p> <p>23 maybe that's why.</p> <p>24 Q Sure. And in general, was there some way of</p> <p>25 determining when multiple arrests would be on separate</p>	<p>Page 89</p> <p>1 Reports. But then -- but that we've also had, if</p> <p>2 someone was involved in, you know, trespassing or</p> <p>3 soliciting a lawful business, but there was a prob --</p> <p>4 which would be a part of the -- possibly be vice</p> <p>5 incident that they would be put on it. So this became</p> <p>6 somewhat of a back-and-forth of what should be on where</p> <p>7 and what should be on another one. Does that make</p> <p>8 sense?</p> <p>9 Q I think it does.</p> <p>10 A Okay. I guess that's kind of where I'm going</p> <p>11 with it, you know?</p> <p>12 Q Yeah. And were there times that you were</p> <p>13 instructed that you shouldn't have included somebody on</p> <p>14 a Vice Case Report?</p> <p>15 A I can't remember any certain instance where</p> <p>16 that took place.</p> <p>17 Q Okay.</p> <p>18 A I don't -- I can't give a specific time or a</p> <p>19 specific incident where that took place, sir.</p> <p>20 Q And do you remember conversations with</p> <p>21 Sergeant Watts about this multiple-person issue?</p> <p>22 A No, sir.</p> <p>23 Q Do you remember which supervisors it was?</p> <p>24 A I don't remember, sir.</p> <p>25 Q All right. Let me ask you to look at the next</p>

<p>1 A Yes, sir.</p> <p>2 Q Would you consider yourself to be the second</p> <p>3 reporting officer in this report?</p> <p>4 A Yes, sir.</p> <p>5 Q And was it the practice that Officer Gonzalez,</p> <p>6 as the first reporting officer, would've prepared the</p> <p>7 report?</p> <p>8 A Yes, sir.</p> <p>9 Q Would you have assisted Officer Gonzalez in</p> <p>10 preparing the report?</p> <p>11 A This report or the arrest, yes, sir. Maybe</p> <p>12 not the report, but the arrest in some way, sir.</p> <p>13 Q You would've been involved in the arrest?</p> <p>14 A In some ways sir, yes.</p> <p>15 Q Okay. And what was your answer to whether you</p> <p>16 would've assisted with preparing the report?</p> <p>17 A Well, I don't know. I don't remember the</p> <p>18 incident, so I don't remember --</p> <p>19 Q Okay.</p> <p>20 A -- who prepared the report.</p> <p>21 Q Okay.</p> <p>22 A But Officer Gonzalez, I'm assuming him and I</p> <p>23 were partners in that -- that day. So I would have</p> <p>24 assisted him in some -- some way with the processing of</p> <p>25 the arrests.</p>	<p>Page 94</p> <p>1 reports. Yes, sir.</p> <p>2 Q Okay. And did you always have their</p> <p>3 permission to do that?</p> <p>4 A If not permission that they were -- they had</p> <p>5 knew that I was signing and giving -- they giving me</p> <p>6 permission prior to not even asking.</p> <p>7 Q And why would you sign another officer's name?</p> <p>8 A Well, in the event of arrests, it would just</p> <p>9 go smoother just by asking, "Can I sign your name on</p> <p>10 this complaint," would be easier than just -- well, it</p> <p>11 would ease the process, I guess you'd say, of paperwork.</p> <p>12 Q Okay. Is that because the person who needed</p> <p>13 to sign might not be in the room at the time you needed</p> <p>14 to sign or something like that?</p> <p>15 A Or they may be doing another piece of</p> <p>16 paperwork.</p> <p>17 Q So you could sign it without an interruption?</p> <p>18 A Correct.</p> <p>19 Q Okay. And have you had a chance to review</p> <p>20 this Vice Case Report?</p> <p>21 A I may have.</p> <p>22 Q Okay.</p> <p>23 A I don't remember, like I said prior.</p> <p>24 Q Okay. Sure. Why don't you take a look at it</p> <p>25 and let me know after you've reviewed that?</p>
<p>Page 95</p> <p>1 Q And is that your signature under your name at</p> <p>2 the bottom of the report?</p> <p>3 A No, that's not my signature.</p> <p>4 Q Okay. Do you know who signed your name?</p> <p>5 A I don't know.</p> <p>6 Q Was it a common practice for somebody to sign</p> <p>7 your name on a Vice Case Report?</p> <p>8 MR. MICHALEK: Objection. Foundation.</p> <p>9 A It -- it would be common for someone to ask</p> <p>10 permission to sign your name on a report, yes.</p> <p>11 Q And would you expect that before signing your</p> <p>12 name, somebody -- another officer would ask you for that</p> <p>13 permission?</p> <p>14 A Yes. Or you would be like, "Just sign my</p> <p>15 name."</p> <p>16 Q Okay.</p> <p>17 A They wouldn't necessarily have to ask. It</p> <p>18 would -- "Just sign my name."</p> <p>19 Q So you mean either you would give it after a</p> <p>20 request or you would give it before a request, your --</p> <p>21 give your permission?</p> <p>22 A I would give my permission, yes.</p> <p>23 Q Okay. And do you have experience signing</p> <p>24 other officers' names?</p> <p>25 A I have signed other officers' names on</p>	<p>Page 97</p> <p>1 A Okay. Okay. Okay.</p> <p>2 Q Does reviewing the report help you remember</p> <p>3 these arrests on June 28, 2004?</p> <p>4 A No, sir.</p> <p>5 Q Okay. And does the report state your role in</p> <p>6 these arrests?</p> <p>7 A No, sir.</p> <p>8 Q Let me ask you to look at Plaintiff Lewis</p> <p>9 Exhibit 2, and this should be the four arrest reports</p> <p>10 for the people listed in the Vice Case Report.</p> <p>11 (PLAINTIFF LEWIS EXHIBIT 2 MARKED FOR</p> <p>12 IDENTIFICATION)</p> <p>13 A Okay.</p> <p>14 Q Are you looking at those?</p> <p>15 A Yes, sir. One is kind of cut off at the top.</p> <p>16 Q Okay.</p> <p>17 A It would be the -- I don't know how your --</p> <p>18 hold on. 0150. I can read the word maybe "Kenneth" on</p> <p>19 the top of it.</p> <p>20 Q Okay.</p> <p>21 A But it's...</p> <p>22 Q Yeah, I understand that one is a tough one to</p> <p>23 read. But you do have the -- you have four arrest</p> <p>24 reports, right?</p> <p>25 A Yes, sir. I do.</p>

<p style="text-align: right;">Page 98</p> <p>1 Q And each one lists you as the second arresting 2 officer, correct?</p> <p>3 A Yes, sir.</p> <p>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.</p> <p>7 A Okay. Okay, sir.</p> <p>8 Q Okay. And does looking at those arrest 9 reports refresh your recollection about these arrests?</p> <p>10 A No, sir.</p> <p>11 Q And the arrest reports don't state what you 12 did in relation to the arrests, correct?</p> <p>13 A No, sir.</p> <p>14 Q Okay. And they -- the arrest reports also 15 list some assisting arresting officers; is that right?</p> <p>16 A Yes, sir.</p> <p>17 Q Officer Rodriguez, Jones, Young, Summers, 18 Ridgell, Edwards, Mohammed, correct?</p> <p>19 A Yes, sir.</p> <p>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?</p> <p>23 A They do not, sir.</p> <p>24 Q All right. Is it correct that you do not have 25 any personal knowledge of the arrests of Woods, Cline,</p>	<p style="text-align: right;">Page 100</p> <p>1 what you did in relation to this arrest; is that 2 correct?</p> <p>3 A Correct, sir.</p> <p>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?</p> <p>7 (PLAINTIFF LEWIS EXHIBIT 5 MARKED FOR 8 IDENTIFICATION)</p> <p>9 A Yes, sir.</p> <p>10 Q Okay. Can you please take a look at that 11 report and let me know when you're done looking at it?</p> <p>12 A Okay, sir.</p> <p>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?</p> <p>16 A No, sir.</p> <p>17 Q Okay. And the arrest report does not state 18 what your role was in the arrest?</p> <p>19 A No, sir.</p> <p>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?</p> <p>23 (PLAINTIFF LEWIS EXHIBIT 6 MARKED FOR 24 IDENTIFICATION)</p> <p>25 A Okay.</p>
<p style="text-align: right;">Page 99</p> <p>1 Jones, and Sparks on June 28, 2004?</p> <p>2 A I have no personal knowledge, sir.</p> <p>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?</p> <p>7 (PLAINTIFF LEWIS EXHIBIT 4 MARKED FOR 8 IDENTIFICATION)</p> <p>9 A Yes, sir.</p> <p>10 Q Okay. And do you see your name at the first 11 line of the narrative section?</p> <p>12 A Yes, sir.</p> <p>13 Q Do you have any recollection of this arrest of 14 Jamar Lewis?</p> <p>15 A No, sir.</p> <p>16 Q Okay. Do you remember Jamar Lewis?</p> <p>17 A No, sir.</p> <p>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.</p> <p>21 A Okay. Okay, sir. Read it.</p> <p>22 Q And does reviewing the Vice Case Report 23 refresh your recollection about this arrest?</p> <p>24 A No, sir.</p> <p>25 Q Okay. And the Vice Case Report doesn't state</p>	<p style="text-align: right;">Page 101</p> <p>1 Q And do you see the picture on that exhibit of 2 a man?</p> <p>3 A Yes, sir.</p> <p>4 Q Okay. And does the man depicted in that 5 picture look familiar to you?</p> <p>6 A No, sir.</p> <p>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?</p> <p>10 A I have no personal knowledge, sir, of this.</p> <p>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?</p> <p>14 A No, sir.</p> <p>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.</p> <p>18 (PLAINTIFF LOCKETT EXHIBIT 1 MARKED FOR 19 IDENTIFICATION)</p> <p>20 A Okay, sir.</p> <p>21 Q Okay. You're looking at the arrest report of 22 Jesse J. Lockett dated May 12, 2005?</p> <p>23 A Yes, sir.</p> <p>24 Q And do you see your name listed as an 25 assisting arresting officer on page 5 of 5?</p>

<p style="text-align: right;">Page 102</p> <p>1 A Yes, sir.</p> <p>2 Q Do you have any recollection of this arrest?</p> <p>3 A No, sir.</p> <p>4 Q And have you reviewed the arrest report?</p> <p>5 Sorry. Why don't you take a minute and let me know when</p> <p>6 you've looked at it?</p> <p>7 A Okay, sir. Okay, sir. Sorry. I apologize</p> <p>8 for that.</p> <p>9 Q All right. You've looked over the arrest</p> <p>10 report. It's Plaintiff Lockett Exhibit 1.</p> <p>11 A Yes, sir.</p> <p>12 Q Okay. And does that refresh your recollection</p> <p>13 about the arrest of Mr. Lockett?</p> <p>14 A No, sir.</p> <p>15 Q And it's the report -- excuse me. Does the</p> <p>16 report state what you did to be listed as an assisting</p> <p>17 arresting officer?</p> <p>18 A No, sir.</p> <p>19 Q On the first page of the report, under the</p> <p>20 name, it has a AKA of Stanley Mack. Do you see that?</p> <p>21 A Yes, sir.</p> <p>22 Q Okay. Do you remember anybody named</p> <p>23 Stanley Mack?</p> <p>24 A No, sir.</p> <p>25 Q Okay. It also has a nickname in quotes,</p>	<p style="text-align: right;">Page 104</p> <p>1 A Yes, sir.</p> <p>2 Q Okay. Do you see your name on the first page</p> <p>3 of this report?</p> <p>4 A Yes, sir.</p> <p>5 Q Okay. And where is your name listed?</p> <p>6 A It's listed in the additional victims box here</p> <p>7 on the general offense case report.</p> <p>8 Q Do you take that to mean that you were being</p> <p>9 listed as an assisting arresting office?</p> <p>10 A Yes, sir.</p> <p>11 Q Okay. And is your name listed again on the</p> <p>12 second page as -- after the words "also arresting"?</p> <p>13 A Yes, sir.</p> <p>14 Q And above also arresting, it says</p> <p>15 "Notifications." Do you see that?</p> <p>16 A Yes, sir.</p> <p>17 Q Do you know what that means?</p> <p>18 A It would be -- someone was notified. I don't</p> <p>19 know. I don't recognize the beat 9610, so I don't know</p> <p>20 who that is nor I -- or there's no name there either. So</p> <p>21 I don't know what beat 9610 is.</p> <p>22 Q Do you remember times when you made arrests</p> <p>23 when you would then notify some other beat of the</p> <p>24 arrest?</p> <p>25 A Yes, sir.</p>
<p style="text-align: right;">Page 103</p> <p>1 "Jay," J-A-Y. Do you have any recollection of somebody</p> <p>2 with that nickname?</p> <p>3 A No, sir.</p> <p>4 Q The narrative also mentions an individual that</p> <p>5 goes by the street name JJ. Do you have any</p> <p>6 recollection of somebody that went by the street named</p> <p>7 JJ?</p> <p>8 A No, sir.</p> <p>9 Q Do you recall during your time working at</p> <p>10 Ida B. Wells knowing any nicknames of individuals who</p> <p>11 were in that area?</p> <p>12 A I can't recall at this time any nicknames.</p> <p>13 Q Okay.</p> <p>14 A It's been a long time. I don't recall.</p> <p>15 Q Okay. Sure. At that time, might you have</p> <p>16 known some nicknames?</p> <p>17 A That's a possibility, sir.</p> <p>18 Q All right. All right. Let me ask you, then,</p> <p>19 to look at Plaintiff Lockett Exhibit 2. Do you have</p> <p>20 that in front of you now?</p> <p>21 (PLAINTIFF LOCKETT EXHIBIT 2 MARKED FOR</p> <p>22 IDENTIFICATION)</p> <p>23 A I do.</p> <p>24 Q And is that the general offense case report</p> <p>25 for the arrest of Jesse Lockett on May 12, 2005?</p>	<p style="text-align: right;">Page 105</p> <p>1 Q And when would you do that?</p> <p>2 A If the detective division needed to be</p> <p>3 notified for some type of arrest, they would be -- they</p> <p>4 would be notified or evidence technician maybe needed to</p> <p>5 be notified, something like that.</p> <p>6 Q All right. Why don't you take a moment to</p> <p>7 review this report and then I'll ask you about it?</p> <p>8 A Okay. Okay, sir.</p> <p>9 Q Does reviewing that report refresh your</p> <p>10 recollection about the arrest of Mr. Lockett on May 12,</p> <p>11 2005?</p> <p>12 A No, sir.</p> <p>13 Q And does the general offense case report state</p> <p>14 what your involvement was in the arrest?</p> <p>15 A No, sir.</p> <p>16 Q And is it true that you do not have personal</p> <p>17 knowledge of the arrest of Jesse Lockett on May 12, 2005?</p> <p>18 A I do not have personal knowledge of this</p> <p>19 arrest, sir. I don't remember.</p> <p>20 Q The next person I want to ask you about is</p> <p>21 named Terrence Moye. Do you have any recollection of</p> <p>22 someone named Terrence Moye?</p> <p>23 A No, sir.</p> <p>24 Q What about a nickname T. Dog?</p> <p>25 A No, sir.</p>

<p style="text-align: right;">Page 106</p> <p>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.</p>	<p style="text-align: right;">Page 108</p> <p>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?</p>
<p style="text-align: right;">Page 107</p> <p>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?</p>	<p style="text-align: right;">Page 109</p> <p>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.</p>

<p style="text-align: right;">Page 110</p> <p>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.</p>	<p style="text-align: right;">Page 112</p> <p>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.</p>
<p style="text-align: right;">Page 111</p> <p>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</p>	<p style="text-align: right;">Page 113</p> <p>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 MOYE EXHIBIT 6 MARKED FOR 13 IDENTIFICATION) 14 (PLAINTIFF MOYE 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.</p>

<p style="text-align: right;">Page 114</p> <p>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?</p>	<p style="text-align: right;">Page 116</p> <p>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</p>
<p style="text-align: right;">Page 115</p> <p>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 Roady, 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 Roady? 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)</p>	<p style="text-align: right;">Page 117</p> <p>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</p>

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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 CERTIFICATE OF REPORTER
 2 STATE OF ILLINOIS
 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.
 15
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 22 KORTNEY CHASE,
 23 COURT REPORTER / NOTARY
 24 COMMISSION EXPIRES ON: 09/24/2025
 25 SUBMITTED ON: 03/23/2022



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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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