

EXHIBIT 2

The Deposition of JASMIN RAMIC, taken on November 14, 2022

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<p>IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION JUDGE FRANKLIN U. VALDERRAMA MAGISTRATE JUDGE SHEILA M. FINNEGAN MASTER DOCKET CASE NO. 19-CV-01717</p> <p>IN RE: WATTS COORDINATED PRETRIAL PROCEEDINGS</p> <p>DEPONENT: CALVIN HOLLIDAY DATE: NOVEMBER 14, 2022 REPORTER: VICTORIA JADICK</p>	<p>1 APPEARANCES 2 3 ON BEHALF OF THE PLAINTIFFS IN THE COORDINATED 4 PROCEEDINGS REPRESENTED BY LOEY & LOEY: 5 Wallace Hike, Esquire 6 Loevy & Loevy 7 311 North Aberdeen Street 8 Third Floor 9 Chicago, Illinois 60607 10 Telephone No.: (312) 243-5900 11 E-mail: hilke@loevy.com 12 (Appeared via videoconference) 13 14 ON BEHALF OF THE FLAXMAN PLAINTIFFS: 15 Kenneth Flaxman, Esquire 16 Law Offices of Kenneth N. Flaxman P.C. 17 200 South Michigan Avenue 18 Suite 201 19 Chicago, Illinois 60604 20 Telephone No.: (312) 427-3200 21 E-mail: knf@kenlaw.com 22 (Appeared via videoconference) 23 24 25</p>
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	<p>Page 4</p> <p>1 APPEARANCES (CONTINUED) 2 3 ON BEHALF OF THE DEFENDANT, RONALD WATTS: 4 Ahmed Kosoko, Esquire 5 Genevieve LeFevour, Esquire 6 Johnson & Bell, LTD 7 33 West Monroe Street 8 Suite 2700 9 Chicago, Illinois 60603 10 Telephone No.: (312) 372-0770 11 E-mail: kosoko@jbltd.com 12 (Appeared via videoconference) 13 ON BEHALF OF THE DEFENDANT, KALLAT MOHAMMED: 14 Gary Ravitz, Esquire 15 Daley Mohan Groble, PC 16 55 West Monroe 17 Suite 1600 18 Chicago, Illinois 60603 19 Telephone No.: (312) 422-9999 20 E-mail: gravitz@daleymohan.com 21 (Appeared via videoconference) 22 23 24 25</p>

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3	10 - Report dated June 2005 PLA10947 98	3	The VIDEO deposition of CALVIN HOLLIDAY was taken at
4	11 - Report of Investigation PLA 018618 100	4	CHURCHILL COURT REPORTING, 110 NORTH WACKER DRIVE,
5	12 - Illinois State Police Report PLA 010911 131	5	CHICAGO, ILLINOIS 60606, via videoconference in which
6	13 - Report dated PLA206 133	6	all participants attended remotely, on MONDAY the 14th
7	14 - Case Supplementary Report EG23980 134	7	day of NOVEMBER 2022 at 9:15 a.m. (CT); said deposition
8	15 - Summary Report dated June 1, 2006 CITY-BG	8	was taken pursuant to the Rules of Civil Procedure for
9	12432 137	9	the United States District Court for the Northern
10	16 - CL Report PLA9959 137	10	District of Illinois, Eastern Division. The oath in
11	17 - Time Line BG23849 138	11	this matter was sworn remotely pursuant to FRCP 30.
12	18 - Summary Report dated November 3, 2005	12	
13	CITY-BG 012903 143	13	It is agreed that VICTORIA JADICK, being a Notary Public
14	19 - Application for Pen register and Caller ID	14	and Court Reporter for the State of ILLINOIS, may swear
15	Trap and Trace Device BG23842 144	15	the witness.
16	20 - Complaint Register March 12, 2004 CITY-BG	16	
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25	*Will forward upon receipt.	25	

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<p>1 PROCEEDINGS</p> <p>2 COURT REPORTER: We are now on the record, and</p> <p>3 my name is Victoria Jadick. I'm the online video</p> <p>4 technician and court reporter today, representing</p> <p>5 Churchill Court Reporting, located at 110 North</p> <p>6 Wacker Drive, Chicago, Illinois 60606. Today is the</p> <p>7 14th day of November, 2022, and the time is 9:15</p> <p>8 a.m., Central Standard. We are convened for a</p> <p>9 videoconference to take the deposition of Calvin</p> <p>10 Holliday in the matter of In Re: Watts Coordinated</p> <p>11 Pre-Trial Proceeding pending in the United States</p> <p>12 District Court for the Northern District of Illinois</p> <p>13 Eastern Division, master docket case number 19-CV-</p> <p>14 01717. Will everyone but the witness please state</p> <p>15 your appearance, how you're attending, and the</p> <p>16 location you're attending from, starting with</p> <p>17 plaintiff's counsel?</p> <p>18 MR. HILKE: Wallace Hilke for Plaintiffs from</p> <p>19 Chicago, Illinois.</p> <p>20 MR. FLAXMAN: I'm Kenneth Flaxman for the</p> <p>21 Flaxman plaintiffs from Illinois.</p> <p>22 MR. HILKE: And I should have distinguished,</p> <p>23 just the Loevy plaintiff's for me.</p> <p>24 MR. NOLAND: Good morning. This is Dan Noland.</p> <p>25 I represent the city and some supervisory officials,</p>	<p>1 and I represent the witness, Calvin Holliday, and I</p> <p>2 am with the witness in Georgia.</p> <p>3 MS. LEFEVOUR: Good morning. This is Jen</p> <p>4 LeFevour, on behalf of Ahmed Kosoko, until he can</p> <p>5 arrive, on behalf of defendant Sergeant Watts, and I</p> <p>6 am in Womac, Illinois.</p> <p>7 MR. RAVITZ: Good morning. This is Gary</p> <p>8 Ravitz. I represent Kallat Mohammed. I'm in</p> <p>9 Chicago.</p> <p>10 MR. STEFANICH: Brian Stefanich on behalf of</p> <p>11 the defendant officers in Womac, Illinois.</p> <p>12 MS. MCGRATH: Megan McGrath on behalf of</p> <p>13 defendants Cardman and Spaargaren, appearing</p> <p>14 remotely from Chicago.</p> <p>15 COURT REPORTER: Okay. And Mr. Holliday, would</p> <p>16 you please state your full name for the record?</p> <p>17 THE WITNESS: Calvin Bernard Holliday.</p> <p>18 COURT REPORTER: Okay. And pursuant to our</p> <p>19 previous discussion off the record, do all Counsel</p> <p>20 agree to stipulate on the record that Mr. Holliday</p> <p>21 is who he says he is, without the usage of his</p> <p>22 identification card?</p> <p>23 MR. HILKE: Yes.</p> <p>24 MS. LEFEVOUR: Yes.</p> <p>25 MS. MCGRATH: Yes.</p>
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<p>1 MR. STEFANICH: Yes.</p> <p>2 MR. RAVITZ: Yes.</p> <p>3 MR. FLAXMAN: Yes.</p> <p>4 COURT REPORTER: Perfect. Thank you.</p> <p>5 MR. NOLAND: Yes.</p> <p>6 COURT REPORTER: Thank you. Mr. Holliday,</p> <p>7 would you please raise your right hand? Do you</p> <p>8 solemnly swear or affirm that the testimony you're</p> <p>9 about to give will be the truth, the whole truth,</p> <p>10 and nothing but the truth?</p> <p>11 THE WITNESS: Yes.</p> <p>12 COURT REPORTER: Thank you. Counsel, you may</p> <p>13 proceed.</p> <p>14 DIRECT EXAMINATION</p> <p>15 BY MR. HILKE:</p> <p>16 Q Good morning, sir.</p> <p>17 A Good morning.</p> <p>18 Q Can you hear me okay? Is our audio working</p> <p>19 well right now?</p> <p>20 A I hear you just fine.</p> <p>21 Q Good. As I mentioned before, my name's Wally</p> <p>22 Hilke, and I'm one of the lawyers representing a number</p> <p>23 of plaintiff's with the firm Loevy & Loevy, who have</p> <p>24 filed lawsuits alleging that they've been wrongfully</p> <p>25 convicted by Sergeant Watts and other Chicago Police</p>	<p>1 Department officers. And before I get started asking</p> <p>2 you questions, I'd just like to go over a few things</p> <p>3 that will make -- make the deposition today easier for</p> <p>4 everybody. I -- and let me ask, have you ever had your</p> <p>5 deposition taken before, sir?</p> <p>6 A On this case? No.</p> <p>7 Q All right. In any other case?</p> <p>8 A Once before, I believe. I don't know which</p> <p>9 case.</p> <p>10 Q Okay. So the first thing is there's a court</p> <p>11 reporter who's taking down everything we say, so it's</p> <p>12 important that we speak one at a time, so she can make a</p> <p>13 clear record. Does that make sense?</p> <p>14 A Yes.</p> <p>15 Q And just like testifying in Court, it's</p> <p>16 important that the answers you give are verbal, as in</p> <p>17 yes's and no's, so we can make a clear record. Does</p> <p>18 that make sense?</p> <p>19 A Yes.</p> <p>20 Q And I'm going to try to only ask questions</p> <p>21 that make sense today, but if I ever ask you something</p> <p>22 you don't understand, will you please ask me to clarify?</p> <p>23 A Yes.</p> <p>24 Q And if -- if you answer a question I've asked,</p> <p>25 I -- I'd like to assume that you understood the question</p>

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<p style="text-align: center;">Page 13</p> <p>1 I was asking you. Is that a fair assumption for me to 2 make?</p> <p>3 A Yes, it is.</p> <p>4 Q Okay. And we can take as many breaks as you 5 want today. Just let me know you need a break and 6 you'll -- we'll take one. I'll just ask that if I've 7 got a question pending that you ask -- answer the 8 question before we go on break. Does that sound fair?</p> <p>9 A Yes.</p> <p>10 Q Do you have any medical conditions that would 11 impact your ability to testify today?</p> <p>12 A No.</p> <p>13 Q Okay. And do you know of any reason why you 14 wouldn't be able to give full and honest testimony at 15 the deposition today?</p> <p>16 A No, sir.</p> <p>17 Q Cool. And sir, I should have asked, do you 18 prefer Mr. Holliday? What is the best way for me to 19 refer to you during our deposition?</p> <p>20 A Whatever makes you comfortable. Doesn't 21 matter.</p> <p>22 Q Okay, sir. I'm going to start by asking, did 23 you look at any documents before we -- before today's 24 deposition in order to prepare?</p> <p>25 A Yes.</p>	<p style="text-align: center;">Page 14</p> <p>1 Q And what documents did you look at?</p> <p>2 A I would assume that there's -- the same 3 documents that you had.</p> <p>4 Q Do you remember how many -- how many separate 5 documents there were?</p> <p>6 A No, sir. I do not.</p> <p>7 Q About how many pages were the documents you 8 looked at?</p> <p>9 A I have no idea.</p> <p>10 Q Okay. How many -- what do you remember about 11 what the documents you looked at were about?</p> <p>12 A Many of them had my signature.</p> <p>13 Q Okay. And when was the last time you looked 14 at any of these documents?</p> <p>15 A Last night.</p> <p>16 Q Okay. And the documents with your signature 17 on them, were those reports that you had prepared while 18 you were a Chicago police officer?</p> <p>19 A Yes, sir.</p> <p>20 Q And other than reports you prepared, did you 21 look at any other documents?</p> <p>22 A Yes.</p> <p>23 Q What were they?</p> <p>24 A They were A & A sheets, photographs, just 25 various police documents and reports.</p>
<p style="text-align: center;">Page 15</p> <p>1 Q Do you remember who the photographs -- who was 2 pictured in the photographs?</p> <p>3 A No, sir.</p> <p>4 Q And did you say you looked at A & A Sheets?</p> <p>5 A A & A, yes. Attendance and assignment sheets.</p> <p>6 Q Okay. And who were the A & A sheets about?</p> <p>7 A I do not know. I -- you asked me what did I 8 read, and I just saw them. A lot of them, I did not go 9 over, I knew what they were from -- from just being a 10 policeman.</p> <p>11 Q I understand, sir. And I'm not trying to 12 grill you, I genuinely don't know which documents you've 13 looked at to prepare, and that's why I'm trying to get a 14 sense of it before we start. Are there any other kinds 15 of documents you remember reviewing?</p> <p>16 A Basically just the documents that had my 17 signature. I saw a lot of documents, but the ones that 18 I went over were the ones that had my signature.</p> <p>19 Q Okay. I want to ask you about kind of the 20 course of your career as a Chicago Police Department 21 officer. When did you first join the Chicago Police 22 Department?</p> <p>23 A 30th of August 1982.</p> <p>24 Q Okay. And what was your first assignment as a 25 Chicago police officer?</p>	<p style="text-align: center;">Page 16</p> <p>1 A Are you saying after I came out of the 2 academy?</p> <p>3 Q Well, let's start with that. How long were 4 you in the academy?</p> <p>5 A The 30th of August is when I walked in. We 6 did a window, because they needed policemen on the 7 street. So that December, I was on the street in the 8 18th District, doing traffic.</p> <p>9 Q Okay. And where did you go next, after you 10 did traffic in the 18th District?</p> <p>11 A I don't remember if we came back to the 12 academy for a minute, but I was detailed, so I was sent 13 to the 22nd District, where I did my field training. 14 Assigned to an FTO, field training officer.</p> <p>15 Q Okay. Where did you go after that?</p> <p>16 A My class graduated the 30th of August, and I 17 went to the Sixth District.</p> <p>18 Q What was your assignment in the Sixth 19 District?</p> <p>20 A Just regular patrol, driving the blue and 21 white.</p> <p>22 Q Okay. How long did you remain in that 23 position, and where did you go next?</p> <p>24 A I was there a -- a little -- about a year. And 25 I left there and I went to the organized crime division,</p>

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<p style="text-align: center;">Page 17</p> <p>1 1984.</p> <p>2 Q Okay. What were your responsibilities in 3 organized crime?</p> <p>4 A Drug dealers.</p> <p>5 Q And what -- can you tell me a little bit about 6 the work you did in that role?</p> <p>7 A I was in the narcotics section of the 8 organized crime division, and we chased behind drug 9 dealers.</p> <p>10 Q Okay. And what kinds of operations did you 11 participate in, in that role?</p> <p>12 A Search warrants, street sweeps, and 13 occasionally we would just go out in the streets and see 14 what we could see.</p> <p>15 Q Okay. And did you have a partner during that 16 time?</p> <p>17 A Yes.</p> <p>18 Q Who was your partner?</p> <p>19 A I had several. John Clunk (phonetic), Robert 20 Montgomery, John Michael Wozniak (phonetic). There were 21 a few others.</p> <p>22 Q And did -- who was your -- who was your direct 23 supervisor, or who were your direct supervisors?</p> <p>24 A When I walked in the door, Sergeant Nimet Boyd 25 (phonetic), and when he left, I went to work for</p>	<p style="text-align: center;">Page 18</p> <p>1 Sergeant Robert Thorne (phonetic).</p> <p>2 Q And what was your -- how long did you remain 3 in organized crime/narcotics division?</p> <p>4 A In 1988, I was detailed out to the drug 5 enforcement administration, and I went to work in the 6 federal building for four and a half years.</p> <p>7 Q Okay. So that was from 1988 until when?</p> <p>8 A Sometime in 1992. I think it was October. I'm 9 not certain.</p> <p>10 Q And what were your responsibilities in the DEA 11 detail?</p> <p>12 A Drug dealers.</p> <p>13 Q What kinds of operations did you participate 14 in?</p> <p>15 A Wire taps, street enforcement on occasion. But 16 basically wire taps and just larger scale operations, 17 big investigations.</p> <p>18 Q Were there particular areas of the city that 19 you concentrated it?</p> <p>20 A No.</p> <p>21 Q And did you work with other CPD officers at 22 the DEA detail?</p> <p>23 A I was assigned to the DEA group. The only 24 other officer that was in that group with me was Bob 25 Montgomery.</p>
<p style="text-align: center;">Page 19</p> <p>1 Q Okay. And who was your CPD supervisor when 2 you were in -- on the DEA detail?</p> <p>3 A The head of the unit at the time that I walked 4 in the door, was Lieutenant Maurice Daly.</p> <p>5 Q I'm sorry. Could you spell that last name?</p> <p>6 A I believe it's D-A-L-Y.</p> <p>7 Q Okay. And during that time, were you -- was 8 most of your work in the field, or was a lot of your 9 work in office, at the federal building?</p> <p>10 A We did field work. When we were in the 11 office, we were doing reports, but we did field work 12 also when we -- we had to go out and arrest people.</p> <p>13 Q And were there differences in the kinds of 14 targets you investigated in the DEA detail, compared to 15 when you were in organized crime, when you were detailed 16 to organized crime?</p> <p>17 A What we were looking for on the federal level 18 was people that were higher up the food chain, yes.</p> <p>19 Q Okay. And did you -- did you seek the detail, 20 the DEA detail when you were assigned there?</p> <p>21 A No.</p> <p>22 Q How did you come to be assigned there?</p> <p>23 A The chief of the organized crime division 24 called me into his office one day and told me that I was 25 going, and my partner Bob Montgomery and another guy,</p>	<p style="text-align: center;">Page 20</p> <p>1 and that's how I got there.</p> <p>2 Q Do you know -- did he explain why he was 3 giving you that assignment?</p> <p>4 A No, sir.</p> <p>5 Q Do you have a -- was it a desired assignment 6 in the depart- -- in organized crime?</p> <p>7 A Yeah, definitely.</p> <p>8 Q Is -- and did you enjoy working the DEA 9 assignment?</p> <p>10 A Yes.</p> <p>11 Q What did you like about it?</p> <p>12 MR. NOLAND: Objection. Relevance. But yeah, 13 go ahead. You may answer.</p> <p>14 A If -- it was a great place to work, the 15 travel, walk in the doors, they swear you in, give you a 16 free gas credit card and a new car. You worked 24/7. 17 Opportunities to learn, which I did. They had an 18 opportunity to learn from me, I had an opportunity to 19 learn from them. What was not to like?</p> <p>20 Q Sure. What was your next assignment after the 21 DEA detail?</p> <p>22 A Came back to the police department, went to 23 the prostitution section for organized crime.</p> <p>24 Q And how -- and was it -- was that a transfer 25 that you sought?</p>

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<p>1 A I did not want to come back to the police 2 department, but my time was up, and I came back. And 3 rather than go to patrol, yes, I -- I asked if I could 4 go someplace other than to patrol, and then I went to 5 the -- went to prostitution.</p> <p>6 Q Got it. How long did you remain in that 7 assignment?</p> <p>8 A One year.</p> <p>9 Q Okay. Where did you go next?</p> <p>10 A Internal affairs confidential section.</p> <p>11 Q And how did you come to -- how did you come to 12 move to internal affairs confidential section?</p> <p>13 A So I -- I don't understand your question now.</p> <p>14 Q Sure. Did you -- was that a transfer that you 15 sought, to internal affairs?</p> <p>16 A Yes.</p> <p>17 Q And why did you seek that transfer?</p> <p>18 A Because I had gone -- I had to give a 19 statement once, at internal affairs, and I did not like 20 the way that I was treated. And so I said if I ever get 21 the chance to go there, whoever comes by me will get a 22 fair shot, right or wrong.</p> <p>23 Q What happened when you had to give a statement 24 to internal affairs?</p> <p>25 A It was just the way that the -- the officers</p>	<p>1 treated me when I was there. They treated me like -- 2 you know, like I'm -- I'm sitting in there lying to them 3 as I was a criminal, and I did not like it.</p> <p>4 Q Yeah. When you joined internal affairs in 5 1993, did you say that you joined the confidential 6 investigation section?</p> <p>7 A That's where I was assigned. That -- it -- I 8 just requested a transfer to internal affairs, and I was 9 sent -- I was assigned to confidential section.</p> <p>10 Q And what -- when you joined internal affairs, 11 what was the -- what were the divisions within that 12 department?</p> <p>13 A They had the advocate section, general 14 investigations, and confidential investigations.</p> <p>15 Q Okay.</p> <p>16 A That I can remember.</p> <p>17 Q Okay. What kind of training or orientation 18 did you get when you joined internal affairs?</p> <p>19 A Their paperwork, different things about 20 investigations that I had not -- that I had not known 21 before.</p> <p>22 Q Okay.</p> <p>23 A That's about the only thing I could really 24 tell you, that I could remember.</p> <p>25 Q I'm sorry. Could the reporter read back that</p>
<p style="text-align: center;">Page 23</p> <p>1 last part of the answer, please?</p> <p>2 COURT REPORTER: Yes, sir. One moment, please.</p> <p>3 MR. HILKE: Thank you.</p> <p>4 (REPORTER PLAYS BACK REQUESTED TESTIMONY)</p> <p>5 COURT REPORTER: I believe, Counsel, that's the 6 end of the answer.</p> <p>7 MR. HILKE: Okay.</p> <p>8 MR. NOLAND: Hold on. That was not the end of 9 the answer --</p> <p>10 MR. HILKE: Right. No, there --</p> <p>11 COURT REPORTER: Oh, I'm sorry. One moment.</p> <p>12 MR. HILKE: I think there is a little more, 13 yes.</p> <p>14 COURT REPORTER: Oh, you're right. I'm sorry. 15 I missed it. Hold on a second.</p> <p>16 (REPORTER PLAYS BACK REQUESTED TESTIMONY)</p> <p>17 COURT REPORTER: Let -- let me rewind it a 18 little bit.</p> <p>19 (REPORTER PLAYS BACK REQUESTED TESTIMONY)</p> <p>20 COURT REPORTER: That part. Let me try --</p> <p>21 MR. HILKE: I'm sorry. Victoria, would you 22 play that one more time?</p> <p>23 COURT REPORTER: Absolutely.</p> <p>24 MR. HILKE: Thank you.</p> <p>25 (REPORTER PLAYS BACK REQUESTED TESTIMONY)</p>	<p style="text-align: center;">Page 24</p> <p>1 BY MR. HILKE:</p> <p>2 Q And Mr. Holliday, when you say, "their 3 paperwork," what are you referring to in terms of 4 training and orientation you received when you started 5 at IAD?</p> <p>6 A Every place that you go to work, everybody had 7 their own set of paperwork that was the way they liked 8 things done, reports that they used, and that's what I 9 was referring to.</p> <p>10 Q Okay. And was there someone in particular who 11 showed you how to fill out the paperwork?</p> <p>12 A The sergeant that I was working for.</p> <p>13 Q Who is that?</p> <p>14 A Charles Williams.</p> <p>15 Q And you also mentioned different things you 16 had not known about investigations. What are you 17 referring to with that?</p> <p>18 A I really -- not anything that I can name. The 19 reason -- you have to understand, I come from an 20 investigative background, and so there were a lot of 21 things that -- it may have been just the way that they 22 did it or whatever, but that's for what? 20 -- 24 of my 23 26 years, that's all I did was investigate.</p> <p>24 Q Got it. So is there anything specific about - 25 - is there any specific new thing about doing</p>

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<p style="text-align: center;">Page 25</p> <p>1 investigations you remember being taught when you joined 2 IAD?</p> <p>3 A Not that I could remember offhand. No, sir.</p> <p>4 Q Okay. How long did you remain in confidential 5 investigations?</p> <p>6 A Until -- until 2005 or early 2006, something 7 like that.</p> <p>8 Q Okay. And what did you do after? What was 9 your next assignment?</p> <p>10 A Retired.</p> <p>11 Q Okay. So this was your last assignment until 12 your retirement?</p> <p>13 A Yes, sir.</p> <p>14 Q Okay.</p> <p>15 A Well, it -- here. When I left confidential, I 16 went to the general section, and I -- you know, in 17 general section of the confidence -- of the internal 18 affairs division. And then, in the 7th of -- the 15th 19 of January 2007 was my last day. That was my date of 20 retirement.</p> <p>21 Q I understand. And about how long was that 22 last assignment to general investigations?</p> <p>23 A About a year.</p> <p>24 Q Okay. And did you seek that transfer from 25 confidential investigations to general investigations?</p>	<p style="text-align: center;">Page 26</p> <p>1 A No, sir.</p> <p>2 Q And who did -- if you know, who decided that 3 you would transfer?</p> <p>4 A It was the deputy's decision, and that was 5 Karen Rowan (phonetic) at the time, I believe.</p> <p>6 Q And Karen Rowan, what was she the deputy in 7 charge of at that time?</p> <p>8 A She was the deputy in charge of the internal 9 affairs division.</p> <p>10 Q Okay. And how did you -- how did you learn 11 that you would be transferred to general investigations?</p> <p>12 A Called into the -- I was told by either the 13 administrative sergeant in the confidential section or 14 the lieutenant in charge, one of them.</p> <p>15 Q And what were you told?</p> <p>16 A That I was being sent to the general section, 17 period.</p> <p>18 Q What was your understanding of the reason for 19 that transfer?</p> <p>20 MR. NOLAND: Objection. Calls for speculation. 21 You may answer.</p> <p>22 A I -- I have no idea.</p> <p>23 Q And sitting here today, do you have any 24 understanding of why you were transferred?</p> <p>25 A No, sir.</p>
<p style="text-align: center;">Page 27</p> <p>1 Q Okay. And when you transferred, did you stop 2 -- did you have active investigations you were working 3 on in the confidential investigations section?</p> <p>4 A Yes.</p> <p>5 Q And do you remember how many such 6 investigations you had open at that time?</p> <p>7 A I do not remember how many. No, sir.</p> <p>8 Q Okay. Did you remain working on any of those 9 investigations after your transfer?</p> <p>10 A No.</p> <p>11 Q Did you have to hand off any of those 12 investigations to the new officers who would be working 13 them?</p> <p>14 MR. NOLAND: I object to the form of the 15 question.</p> <p>16 Q You can answer.</p> <p>17 A Okay. I did not hand them off, I just left 18 them. Confidential things stayed in confidential.</p> <p>19 Q Okay. So after you learned you would be 20 transferred, did you have any conversations with the 21 officers who took them over about those investigations?</p> <p>22 A No.</p> <p>23 MR. NOLAND: Object to the form of that.</p> <p>24 Q That's fine. Okay. In the time you were in 25 confidential investigations -- well, strike that. I had</p>	<p style="text-align: center;">Page 28</p> <p>1 -- I have a different question. When you started in 2 confidential investigations, what was the process to 3 conduct a confidential investigation?</p> <p>4 MR. NOLAND: Objection. Vague, ambiguous, 5 overly broad. Incomplete hypothetical but go ahead 6 and answer if you can.</p> <p>7 A First of all, you promptly want to identify 8 your target and -- and put together some sort of 9 background of them. It -- it -- it's just -- you know, 10 there's just a lot of things that you do. You -- you 11 know, you just don't walk out the door and -- and here, 12 I got a -- I have a complaint against you, and I come 13 looking for you. No. There's -- it's just a lot with 14 that. A lot of groundwork, just like when you put your 15 case together.</p> <p>16 BY MR. HILKE:</p> <p>17 Q Sure. All right. And how did you -- how did 18 you receive assignments when you were in confidential 19 investigations?</p> <p>20 A Come to work, and they hand you a folder that 21 says, "This is yours."</p> <p>22 Q Okay. And who -- what's the difference 23 between confidential investigations and general 24 investigations in terms of the kinds of assignments you 25 would have?</p>

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<p style="text-align: center;">Page 29</p> <p>1 A Confidential investigations are generally -- a 2 lot of them are criminal complaints against policemen, 3 or complaints of a severe nature where it requires that 4 you quietly do some background work before -- well, a 5 lot of background work before you can, you know, close 6 your case.</p> <p>7 Q Okay. And can you give me a general sense of 8 how many different investigations you worked on in your 9 time at confidential investigations?</p> <p>10 A I have no idea. I was there, what, about ten 11 years ago. I -- I don't know.</p> <p>12 Q Sure. Did you -- can you give me a general 13 sense of, in a given year, about how many different 14 investigations you would work on?</p> <p>15 A Let me say this. When you're in the 16 confidential office, it's not only your case that you 17 work on. A lot of times, there's things going on where 18 you assist in other cases. And so, you know, when you 19 ask me how many cases I worked, I have no idea. I don't 20 know. I can't give you a number.</p> <p>21 Q I understand. I -- I guess -- well, let me 22 ask you, about how much of your time did you spend 23 working on your own cases as opposed to helping with 24 other people's cases?</p> <p>25 A That's not -- again, I -- I can't give you a -</p>	<p style="text-align: center;">Page 30</p> <p>1 - a number. I spent a lot of time working on my own 2 cases. Otherwise, if you don't work your own cases, you 3 know, there are other people that are looking for that 4 spot.</p> <p>5 Q Uh-huh. I mean, did you spend more of your 6 time working on your own cases or more of your time 7 working on other people's cases?</p> <p>8 A I spent the majority of the time working on my 9 own cases.</p> <p>10 Q Okay. And is it the case that every time you 11 got a new case, you're getting handed a folder, and 12 that's how you're starting your investigation?</p> <p>13 MR. NOLAND: Objection. Form, foundation, 14 incomplete hypothetical, confusing. You can answer.</p> <p>15 A Ask your question again, please.</p> <p>16 Q Yeah. When you are -- were assigned a new 17 case in confidential investigations, did it always start 18 with you being handed a folder of materials?</p> <p>19 A Yes.</p> <p>20 Q Okay.</p> <p>21 MR. NOLAND: Same objection.</p> <p>22 Q And do you have any sense of -- and I know you 23 don't have a specific number, but any sense of whether 24 you had more, like, say -- let me ask this. In a 25 typical year, did you have more than two new cases that</p>
<p style="text-align: center;">Page 31</p> <p>1 year?</p> <p>2 MR. NOLAND: Objection, asked and answered, 3 lack of foundation, calls for speculation. You can 4 answer.</p> <p>5 A Of course.</p> <p>6 BY MR. HILKE:</p> <p>7 Q In a typical year, would you have more than 8 ten new cases in a year?</p> <p>9 A You could say that.</p> <p>10 Q Could be more than 20?</p> <p>11 A Not -- I don't -- I -- now I don't know. I 12 don't know. I -- I won't say that.</p> <p>13 Q Okay. And what kind -- after you were 14 assigned a new case, what kinds of things did you do to 15 investigate that case?</p> <p>16 MR. NOLAND: Objection, incomplete 17 hypothetical, form. You can answer, though.</p> <p>18 A As I stated before, you -- you do all sorts of 19 background work on the person and you work yourself up 20 to where you can -- whatever the allegation is, check 21 with the witness -- check with the people that made the 22 allegation, especially their witnesses, and what their 23 witnesses say, if they have any. That's any and all. Go 24 out and observe, set up -- set up sting operations. 25 There's many things that you can do.</p>	<p style="text-align: center;">Page 32</p> <p>1 Q And as you investigate, are you trying to 2 avoid the subject of the investigation learning that 3 they are being investigated?</p> <p>4 A Of course.</p> <p>5 Q Okay. And in the course of the investigation, 6 are there points where you need a supervisor's approval 7 to move forward with a step in the investigation?</p> <p>8 A There are points in the investigation where 9 there may be -- there may be places where you need your 10 supervisor's approval, but during the investigation, 11 your supervisors are always aware of what you're doing.</p> <p>12 Q Okay. And why is it that they are always 13 aware of what you are doing?</p> <p>14 A That's their job, to know where you are. 15 Somebody is -- somebody's responsible for you, and then 16 also they may offer helpful hints, or there's any -- any 17 number of reasons.</p> <p>18 Q Okay. And how many -- or how often would you 19 meet with your supervisors when you were in IAD?</p> <p>20 A We worked in the same office, I mean, every 21 day, just informal conversation. "How's it going," 22 whatever. Sometimes we'd talk about cases, but once a 23 week we would have our -- if you're -- if you're saying 24 that -- once a week we would have our meeting time with 25 them individually.</p>

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<p>1 Q And did that remain true throughout the course 2 of your time in IAD?</p> <p>3 A Yes.</p> <p>4 Q What steps in an investigation did you need a 5 supervisor's approval for?</p> <p>6 MR. NOLAND: Objection to form, incomplete 7 hypothetical. You can answer.</p> <p>8 A You -- you can't say. It -- it depends on who 9 it is and what you're doing.</p> <p>10 Q So how -- how would you know what you needed 11 approval for and what you didn't?</p> <p>12 MR. NOLAND: Objection, speculation, form. You 13 can go -- go ahead.</p> <p>14 A Sometimes you would -- you would run an idea 15 by your supervisor and he would say, "That sounds good," 16 sometimes he would say, "That's not good. That won't 17 work. We can't do this, we can't do that." And then, 18 on occasion, they would say, "This is too much for us, 19 and I'm going to talk to the lieutenant," his boss. His 20 boss would say, "I'm going to talk to the deputy," his 21 boss and -- and up to the superintendent, and a lot of 22 things got shipped out.</p> <p>23 Q Okay. Did you say a lot of things got shut 24 down?</p> <p>25 A Shipped out.</p>	<p>1 Q What does that mean, shipped out?</p> <p>2 A They would transfer it to another agency.</p> <p>3 Q Okay. What kinds of things would get shipped 4 out?</p> <p>5 A Things that were -- that were considered too 6 big or we didn't have the resources to -- to handle 7 within the department.</p> <p>8 Q Do you have an example of something that got 9 shipped out while you were in IAD?</p> <p>10 MR. NOLAND: Objet to the form. You can 11 answer.</p> <p>12 A There were many cases shipped out when I was 13 in IAD. I mean, are you looking for names?</p> <p>14 Q Situations. I'm looking for an example of 15 what you're describing. Can you share an example of 16 what you're describing?</p> <p>17 A Can I speak to my attorney for a moment?</p> <p>18 Q I --</p> <p>19 MR. NOLAND: I think we have some concerns 20 about confidentiality and disclosing information 21 that he may not be authorized to disclose.</p> <p>22 MR. HILKE: Yeah. You're welcome to go off the 23 record to discuss for a second. I'm just -- I don't 24 care about names, but I'm looking for an example of 25 what he's describing.</p>
<p style="text-align: center;">Page 35</p> <p>1 MR. NOLAND: Yeah. I think it's probably hard 2 to give an example without names is probably what's 3 going on. So why don't we -- if it's okay with you, 4 if we could just take a moment so I can confer with 5 Mr. Holliday and we go back on?</p> <p>6 MR. HILKE: Go ahead.</p> <p>7 COURT REPORTER: Okay. We are going off the 8 record.</p> <p>9 (OFF THE RECORD)</p> <p>10 COURT REPORTER: Okay. We are back on the 11 record for the deposition of Calvin Holliday being 12 conducted by video conference. My name is Victoria 13 Jadick. Today's date is November 14, 2022, and the 14 time is 10:02 a.m. Central Standard.</p> <p>15 BY MR. HILKE:</p> <p>16 Q Okay. Mr. Holliday --</p> <p>17 MR. NOLAND: Thank you, and --</p> <p>18 MR. HILKE: Go ahead.</p> <p>19 MR. NOLAND: He may answer -- go ahead --</p> <p>20 BY MR. HILKE:</p> <p>21 Q Okay. Mr. Holliday, could you give me an 22 example of a time a case was shipped out from 23 confidential investigations?</p> <p>24 A There's a case, the policeman is still in jail 25 right now, he should be getting out shortly, where he</p>	<p style="text-align: center;">Page 36</p> <p>1 and a bunch of other policemen and drug dealers were 2 selling drugs. Because of the case itself and the 3 scope, the department requested help from the FBI, and 4 we jointly worked the case together. That's what I'm 5 talking about.</p> <p>6 Q Okay.</p> <p>7 A It was prosecuted federally.</p> <p>8 Q And --</p> <p>9 COURT REPORTER: I'm sorry, Mr. Holliday, did 10 you say it was crossed federally?</p> <p>11 THE WITNESS: It was prosecuted federally.</p> <p>12 COURT REPORTER: Thank you.</p> <p>13 BY MR. HILKE:</p> <p>14 Q And am I correct that that was a case where 15 the superintendent was involved in making the decision 16 to partner with another agency?</p> <p>17 A Yes.</p> <p>18 Q And what's the reason for bringing that 19 decision to the superintendent level, if -- if you know?</p> <p>20 MR. NOLAND: Objection as to foundation. I 21 think it mischaracterizes about who brought it to 22 the superintendent but go ahead.</p> <p>23 A That's not my pay grade. I don't -- I don't 24 make those decisions.</p> <p>25 BY MR. HILKE:</p>

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<p>1 Q I understand. My question is different. My 2 question is if you know what the reason is for bringing 3 that decision to -- that someone would bring that 4 decision to the superintendent level.</p> <p>5 A No, I do not.</p> <p>6 Q Okay. Did -- were you aware of any policies 7 about decisions in an investigation when you would need 8 a supervisor's approval in confidential investigations?</p> <p>9 MR. NOLAND: Objection, asked and answered, but 10 go ahead.</p> <p>11 A Again, it's -- it's as you worked. I mean, 12 it's just like when you do your own investigations. It's 13 as you go. You might need a higher ups' decision, not 14 one thing today and somebody does the same thing 15 tomorrow, and it doesn't require all that.</p> <p>16 Q I understand. Was that -- to your knowledge, 17 was that documented in written policy when you were at 18 confidential investigations?</p> <p>19 A Repeat that?</p> <p>20 Q To your knowledge, was that -- strike that. To 21 your knowledge, was there written policy about when you 22 needed a supervisor's approval in your investigations?</p> <p>23 A Not that I know of. Or -- not that I know of.</p> <p>24 Q Were there written policies about your 25 investigations that you recall consulting while you</p>	<p>1 conducted investigations in confidential investigations?</p> <p>2 A Internal Affairs has a rule book, and you look 3 at that and if you can prove the rule violation, then -- 4 then that's part of the policy.</p> <p>5 Q Got it.</p> <p>6 A As far as long as your investigation is legal, 7 according to the rules and regulations of the State of 8 Illinois, the constitution, and the written directives 9 of the police department.</p> <p>10 Q Did you work on cases in confidential -- 11 strike that. Were most of the cases you investigated in 12 Confidential Investigations complaints of criminal 13 conduct against police officers?</p> <p>14 A A lot of them were.</p> <p>15 Q Okay. What other kinds of investigations did 16 you investigate in confidential investigations?</p> <p>17 A Stealing time, stealing money, lost guns.</p> <p>18 Q Were the subjects of your investigations 19 always Chicago Police Department employees?</p> <p>20 A Yes.</p> <p>21 Q What kinds of -- what kinds of steps did you 22 have to take in confidential investigations to maintain 23 the confidentiality of those investigations?</p> <p>24 A Ask again?</p> <p>25 Q Sure. What steps did you have to take to keep</p>
<p style="text-align: center;">Page 39</p> <p>1 your investigations confidential?</p> <p>2 A What test did I take?</p> <p>3 Q I'm sorry, sir. What steps? What things did 4 you have to do --</p> <p>5 A Oh --</p> <p>6 Q -- to keep your investigations confidential?</p> <p>7 A I had a file cabinet in my office, and my -- 8 my files were there. The only person that saw them were 9 my partner and myself, or the person that shared my 10 office and myself. Other than the reports that I wrote 11 and signed and turned in that were sent through the 12 chain of command, took them -- handed them to the 13 administrative sergeant, and from there, the -- the 14 commanding officer read them and they were shipped 15 downtown to headquarters. Once they got to 16 headquarters, the only thing I can say is, because I was 17 in the confidential section, that -- that only certain 18 people had access to them and -- which they were read 19 from time to time and filed.</p> <p>20 Q Okay. And in your file cabinet, would you 21 keep -- how -- what kinds of documents did you keep in 22 your file cabinet?</p> <p>23 A Nothing but case files that I was working on.</p> <p>24 Q Okay. And would you add to your case files 25 documents that you collected in your investigations?</p>	<p style="text-align: center;">Page 40</p> <p>1 A Yes.</p> <p>2 Q Okay. Would you add your own notes to the 3 case files?</p> <p>4 A No.</p> <p>5 Q Did you take notes when you did 6 investigations?</p> <p>7 A Yes.</p> <p>8 Q What did you do with your notes?</p> <p>9 A When I got through, when I'd write my report, 10 shred them. The shredder was right next to me.</p> <p>11 Q When you turned in a -- when you finished an 12 investigation, did you turn in everything in your case 13 file?</p> <p>14 A When I finished an investigation, everything 15 they had was in the case file, yes.</p> <p>16 Q Okay. And did -- was that what went to the 17 commander and then to headquarters, the entire case 18 file?</p> <p>19 A Okay. What'd you say?</p> <p>20 Q Yeah. Is it correct that once you finished an 21 investigation you turned it into your commander, who 22 then sent it to headquarters?</p> <p>23 MR. NOLAND: I'm going to -- I'm just going to 24 object to the extent it calls for speculation about 25 what his commander did with the file, but otherwise,</p>

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<p style="text-align: center;">Page 41</p> <p>1 other than, you know, him turning in his reports and 2 information I think is what you're asking.</p> <p>3 BY MR. HILKE:</p> <p>4 Q You can answer. Go ahead.</p> <p>5 A It's -- the way -- the way it goes is when -- 6 you write your reports as you're going along, and then, 7 when the case is finished, I am the one that -- the 8 first one to sum it all up with all the packaging, all - 9 - you know, all documents, supporting documents, 10 pictures and whatever. I write the closing report and 11 submit it to my supervisor, who signs off. He -- then I 12 take it and I give it to the administrative sergeant. He 13 reads it and signs off, gives it to the lieutenant of 14 the unit, who signs off, and it goes downtown.</p> <p>15 Q Okay.</p> <p>16 A And if they accept it, then that's it.</p> <p>17 Q Now --</p> <p>18 A And they -- they (Inaudible) from there.</p> <p>19 Q And the thing you actually give them, is that 20 your case file with all of the documents you've 21 collected over the course of your investigation?</p> <p>22 A What I give them is a complete copy of all the 23 reports that they already have, it's just I put it in a 24 package.</p> <p>25 Q Okay.</p>	<p style="text-align: center;">Page 42</p> <p>1 A And then I write the closing -- closing 2 documents, argument, whatever, validating or disproving 3 whatever the allegation is, and (Inaudible) 4 recommendation, and then that's sent forward, and from 5 that point on, it's out of my hands.</p> <p>6 Q Would you ever -- and am I correct that the 7 case file might include documents you had collected? 8 Like you might get a police report or run a utility bill 9 or any number of things, there are different documents 10 you might collect in your investigation?</p> <p>11 A They would contain all the original documents 12 that were -- that were collected in the investigation.</p> <p>13 Q Got it. All of those would be submitted to 14 your admin sergeant when a case is done; is that right?</p> <p>15 A Yes.</p> <p>16 Q Okay. And -- okay. And were there times you 17 needed to interview police officers who had worked with 18 an accused subject officer in your investigations?</p> <p>19 A Yes.</p> <p>20 Q How did you make sure that information of 21 those interviews wasn't passed along to the accused 22 subject officer?</p> <p>23 MR. NOLAND: Objection. And it's a problem 24 with your hypothetical. It's incomplete. Yeah, so 25 --</p>
<p style="text-align: center;">Page 43</p> <p>1 MR. HILKE: Okay.</p> <p>2 MR. NOLAND: And you're assuming that's not in 3 evidence. Go ahead.</p> <p>4 BY MR. HILKE:</p> <p>5 Q Go ahead.</p> <p>6 A You -- that -- what you try to do is when you 7 -- when you go to -- to interviewing people that are 8 close, or even your subject, you make -- you try and 9 make sure that you have pretty much everything that you 10 need, so just in case things go awry, you can cover it. 11 I mean, you can't always do that. You -- I cannot vouch 12 for anybody else, but if I have to interview some -- 13 another policeman, I can't say what he's going to do or 14 not do. But it's still he has to be interviewed.</p> <p>15 Q Okay. So -- did you have the ability to put a 16 gag order on an officer, that is to instruct an officer 17 you interviewed not to reveal anything about your 18 interview to other officers?</p> <p>19 MR. NOLAND: Objection. Form, foundation, 20 incomplete hypothetical, mischaracterizes his 21 testimony. Go ahead.</p> <p>22 A Did I have the authority? No, but you can 23 inform people that if they hinder their investigation - 24 - they're -- they're cops, you know, they're subject to 25 -- they're subject to discipline also.</p>	<p style="text-align: center;">Page 44</p> <p>1 Q Okay.</p> <p>2 MR. KOSOKO: I'm sorry. Wally, can I get on 3 the record, please?</p> <p>4 MR. HILKE: Sure.</p> <p>5 MR. KOSOKO: Then we go to a little break? Just 6 very briefly, this is Ahmed Kosoko coming in on the 7 deposition now on behalf of former Sergeant Ronald 8 Watts. Thanks.</p> <p>9 MR. HILKE: Yep.</p> <p>10 BY MR. HILKE:</p> <p>11 Q Did -- to your knowledge did anyone in IAD 12 have the authority to place a gag order on an officer 13 who was interviewed in your investigations?</p> <p>14 MR. NOLAND: Object to form, foundation. You 15 may answer.</p> <p>16 A To my knowledge, I will say no.</p> <p>17 Q Sure. And so is that -- and am I -- do I 18 understand correctly that you -- is it correct that you 19 generally would not try to interview officers who were 20 close to an accused suspect officer until near the end 21 of your investigation?</p> <p>22 A Again, this -- we've answered this before. 23 Each investigation stands on its own. You don't know 24 what you're going to do until you get there.</p> <p>25 Q How -- were you ever concerned, when</p>

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<p style="text-align: center;">Page 45</p> <p>1 interviewing a police officer, that they might share 2 that information with the accused subject officer?</p> <p>3 A You're always concerned.</p> <p>4 Q And why are you concerned?</p> <p>5 MR. NOLAND: Objection, incomplete 6 hypothetical. You can answer.</p> <p>7 A He doesn't have to be a police officer, it's 8 just human nature. If -- if I -- if I ask some 9 good friends about you, you don't think he's going to 10 call you?</p> <p>11 Q Okay. Tell me -- when you were in IAD, in 12 confidential investigations, who in that division 13 decided whether to open a new investigation?</p> <p>14 A No, that's not even how it goes.</p> <p>15 Q Okay. Can you explain how it goes?</p> <p>16 A There's a call or a complaint made, even if 17 it's anonymously made, if it's of a criminal nature it's 18 accepted. Anything else is evaluated.</p> <p>19 Q Okay.</p> <p>20 A And --</p> <p>21 Q And -- go ahead.</p> <p>22 A It's evaluated and put on paper. If -- if it 23 meets the criteria, they take it. If it doesn't it's 24 thrown to the side, but anything of a criminal nature is 25 taken.</p>	<p style="text-align: center;">Page 46</p> <p>1 Q And what is the position within the division 2 of the people who'd make that decision, whether it's 3 criminal in nature or not?</p> <p>4 MR. NOLAND: Object to the form. Go ahead.</p> <p>5 A You know the -- the -- the laws of the State 6 of Illinois, there's laws of the United States 7 government. I mean, that -- that -- those are clear. So 8 -- so if somebody says that, you know, "Wally Hilke 9 committed a crime. He -- he -- he shot somebody," they 10 write it in anonymously, there's going to be a complaint 11 registered number against Wally Hilke. More than 12 likely, it's going to be confidential, so it's basically 13 in case -- so that they can go out and investigate it. 14 They assign it to somebody. They hand a folder to 15 someone in the morning and said, "This is yours. Do 16 something with it."</p> <p>17 Q And my question is a little different. Who 18 actually looks at the information that came in to make 19 that determination?</p> <p>20 A Sure. When they take the complaint -- I don't 21 know who takes the complaints, but when they take it, if 22 it's of a criminal nature, there is nothing, it's 23 automatic.</p> <p>24 Q Okay.</p> <p>25 A This -- the way that they tell you, the way --</p>
<p style="text-align: center;">Page 47</p> <p>1 the way that the ruling goes, if there is anything of a 2 criminal nature against a police officer or employee of 3 the Chicago Police Department, it automatically gets a 4 number.</p> <p>5 Q Uh-huh.</p> <p>6 A It doesn't -- I don't know and that's why -- 7 that's why they investigate.</p> <p>8 Q Okay. But in a -- and then once it's been 9 determined that a complaint is criminal in nature who 10 decides -- who, if anyone, decides which investigator 11 will handle it?</p> <p>12 MR. NOLAND: I think this was asked and 13 answered before but go ahead.</p> <p>14 A Well, it comes down the chain, and when it 15 gets to our office, it -- I guess it's -- it's like 16 rotation. Whatever team is up for this case gets it, 17 and -- and whoever the sergeant decides to give it to 18 has got it. That's the best I can answer that question.</p> <p>19 Q Sure. Are -- we've talked about -- well, 20 strike that. Is it correct that it is important to make 21 sure that the subject of an investigation doesn't find 22 out about it?</p> <p>23 A You would like -- that would be ideal.</p> <p>24 Q Well, when you say that would be ideal, was it 25 difficult to stop the subjects of investigations from</p>	<p style="text-align: center;">Page 48</p> <p>1 finding out about them?</p> <p>2 MR. KOSOKO: Object to form, foundation, 3 incomplete hypothetical.</p> <p>4 MR. NOLAND: Yeah. And join in Mr. Kosoko's 5 objection. And I'm sure, just like for all the 6 depositions in this case, if one counsel objects 7 another does not need to join, so we don't need to 8 burden the record, right?</p> <p>9 MR. HILKE: Yes, we agree.</p> <p>10 MR. NOLAND: Thanks. Go ahead, Cal.</p> <p>11 A It's ideal, but again, there -- depending on 12 what you do, you may already know that you're going to 13 be under investigation or feel that way, and also, like 14 I said I can't -- when you're -- when you're -- when 15 you're investigating you don't know what's going to 16 happen. You don't know who the people you're talking - 17 - a lot of them you don't know. You don't know what 18 they know or don't know them, you know, know somebody in 19 common. It's just -- so it's just talking, happened to 20 be in the wrong place at the right time.</p> <p>21 BY MR. HILKE:</p> <p>22 Q Okay. Did any of your supervisors in 23 confidential investigations ever tell you that you 24 should try to make sure that the subjects of 25 investigations don't find out about them?</p>

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<p>1 A Of course.</p> <p>2 Q And other than -- is there anything we haven't</p> <p>3 discussed already that was -- well, strike that. What</p> <p>4 did you do to try to achieve that, to try to make sure</p> <p>5 the subjects of your investigations didn't find out</p> <p>6 about them?</p> <p>7 MR. NOLAND: Objection, asked and answered. Go</p> <p>8 ahead.</p> <p>9 A You just try, to the best of your ability, to</p> <p>10 do what's right, to -- you know, to -- to -- to -- to</p> <p>11 investigate -- with everything that you had, with</p> <p>12 everything you've learned, you just try and do right.</p> <p>13 And even then, you -- you cannot say that it's going to</p> <p>14 come out right.</p> <p>15 Q Were you aware of any written protocols that</p> <p>16 were used in confidential investigations to keep your</p> <p>17 investigations confidential?</p> <p>18 MR. KOSOKO: Object to the form of the</p> <p>19 question, also calls for a legal conclusion</p> <p>20 regarding general orders. Go ahead.</p> <p>21 A Things in the confidential sections stay</p> <p>22 there. They're not for discussion. You get this all</p> <p>23 the time. Written, I -- I -- I can't -- I -- I can't</p> <p>24 say. I -- I'm certain that there's probably something</p> <p>25 written somewhere that says that, but for me, it -- it's</p>	<p>1 just understood.</p> <p>2 BY MR. HILKE:</p> <p>3 Q What -- when you conducted investigations, did</p> <p>4 you try to make sure you had as much information as</p> <p>5 possible about a subject officer?</p> <p>6 A Depends on what the allegation is.</p> <p>7 Q All right. If there were new allegations of</p> <p>8 misconduct against an officer while you were conducting</p> <p>9 an investigation, would you want to have that</p> <p>10 information?</p> <p>11 A If there was an allegation of misconduct</p> <p>12 against an officer, and I could prove the -- and I</p> <p>13 proved the allegation, I wouldn't care personally. No,</p> <p>14 I would not care about anything else. My job is just to</p> <p>15 prove the allegation. Prove or disprove.</p> <p>16 Q Okay. So it -- so is it correct that a</p> <p>17 separate allegation wouldn't be important to you, you</p> <p>18 would only be interested in the allegation you were</p> <p>19 investigating at the time?</p> <p>20 MR. NOLAND: Objection. Form, foundation,</p> <p>21 incomplete hypothetical, mischaracterizes the</p> <p>22 (Inaudible). Go ahead.</p> <p>23 A When -- during the course of an investigation,</p> <p>24 if I have prove what it is, or disprove what it is, but</p> <p>25 something else comes up in the normal course of the</p>
<p style="text-align: center;">Page 51</p> <p>1 investigation, that -- is it good? And if it -- if it</p> <p>2 has to do with my investigation, it's -- it's written.</p> <p>3 If it's bad and it has to do with my investigation, it's</p> <p>4 added. Yes.</p> <p>5 BY MR. HILKE:</p> <p>6 Q Okay. And were you in -- would you be a --</p> <p>7 when you investigated officers, if they received new</p> <p>8 complaints of misconduct during your investigation, were</p> <p>9 you notified of that information?</p> <p>10 MR. NOLAND: Objection to form, foundation,</p> <p>11 incomplete hypothetical. You can answer.</p> <p>12 A Sometimes you were and sometimes it -- it --</p> <p>13 it's somebody else made the decision. But sometimes</p> <p>14 it'd be just another number on the same -- you know, on</p> <p>15 the same individual.</p> <p>16 Q Sure. And do you know who made that decision</p> <p>17 of whether to share information about new complaints</p> <p>18 about officers you were investigating?</p> <p>19 A If it -- if it was just a -- if it were</p> <p>20 another number of it -- all those decisions are made</p> <p>21 higher than me. The deputy has the (Inaudible), but</p> <p>22 it's not me.</p> <p>23 Q Okay. Was it possible at -- well, strike</p> <p>24 that. Did you typically gather information about other</p> <p>25 allegations against officers you investigated?</p>	<p style="text-align: center;">Page 52</p> <p>1 MR. NOLAND: Objet to the form. Go ahead.</p> <p>2 A Again, during the course of your</p> <p>3 investigation, your investigation, according to the</p> <p>4 order is, if I get an allegation that you're stealing</p> <p>5 money, that's the target of my investigation. If during</p> <p>6 the normal course of investigation, I find out that not</p> <p>7 only are you stealing money, but you're -- you're</p> <p>8 killing people, then that's a -- that's an additional</p> <p>9 charge. Do I bring it to my superiors? Yes, but it's an</p> <p>10 -- there is an additional -- there is an additional</p> <p>11 charge, and it gets investigated also.</p> <p>12 Q My question is different. When investigating</p> <p>13 an officer, did you look up other CRs that had been</p> <p>14 filed against them?</p> <p>15 A Not until you close the case.</p> <p>16 Q All right. And when investigating an officer,</p> <p>17 if a new CR -- if a new CR was brought against them,</p> <p>18 would you expect to receive that information?</p> <p>19 MR. NOLAND: Objection. Asked and answered.</p> <p>20 Foundation. I think he just testified that was per</p> <p>21 the supervisor to provide that information a second</p> <p>22 ago.</p> <p>23 BY MR. HILKE:</p> <p>24 Q Well, please -- I'm sorry. You can answer.</p> <p>25 A Again, if they consider it part of what you're</p>

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<p style="text-align: center;">Page 53</p> <p>1 doing, they'll give you the information. If they 2 consider it a separate matter altogether, there's 3 another number, and you probably won't know anything 4 about it.</p> <p>5 Q Okay. Okay. Was it your practice in 6 confidential investigations -- well, strike that. What 7 were the expectations of how you would document your 8 investigations in confidential investigations?</p> <p>9 MR. NOLAND: Object to the form but go ahead.</p> <p>10 A What were the expectations?</p> <p>11 Q How were you expected to --</p> <p>12 A I don't have --</p> <p>13 Q How were you expected to document your 14 investigations?</p> <p>15 A In written form, if it -- if it matters -- a 16 lot of times it would be here. If it's not in writing, 17 then, you know, it doesn't exist.</p> <p>18 Q Okay. And were you expected to write reports 19 over the course of the investigation to show your 20 progress?</p> <p>21 A Yes.</p> <p>22 Q Was it the expectation that any relevant 23 detail you discovered would be documented in a report?</p> <p>24 A Yes.</p> <p>25 Q Were your reports reviewed during the course</p>	<p style="text-align: center;">Page 54</p> <p>1 of your investigation?</p> <p>2 A Yes.</p> <p>3 Q Who reviewed your reports?</p> <p>4 A My supervising sergeant, the administrative 5 sergeant, occasionally the lieutenant of the unit would 6 read them, and then they would go to the headquarters, 7 which time were read by the deputy or someone that's -- 8 someone that's of some importance.</p> <p>9 Q All right. And did the deputy review reports 10 during the course of the investigation, only that the 11 end of the investigation, or in some other way?</p> <p>12 MR. NOLAND: Objection. That lacks 13 speculation. I'm sorry. That call for speculation, 14 lacks a foundation of what the deputy does. Go 15 ahead.</p> <p>16 A The deputy, dependent upon the case, would 17 read certain reports. Yes.</p> <p>18 BY MR. HILKE:</p> <p>19 Q Okay. And when you say, "would read certain 20 reports," would that include both during the 21 investigation and at the end of an investigation?</p> <p>22 A Yes.</p> <p>23 Q Did you find -- do you find your experience 24 working in narcotics was helpful as an IAD investigator?</p> <p>25 A Yes.</p>
<p style="text-align: center;">Page 55</p> <p>1 Q Okay. And how did you -- how did you use your 2 narcotics experience as an IAD investigator?</p> <p>3 MR. NOLAND: Objection to form. Overly 4 brought. You may answer.</p> <p>5 A There a lot of things that you -- first of 6 all, running this, if the complaints that I had were of 7 a (Inaudible) nature, then of course. Anything that 8 I've learned during the narcotics -- my days in 9 narcotics, they were great. My days inside the DEA, 10 there was things that I'd learned. And -- and all of 11 them didn't have to do with drugs. I mean, a lot of 12 them had to do with just how to operate in court. But 13 yes, it just -- it's just all tools. Anything that you 14 learned is a tool. Anything that you use, that can help 15 you during the course of investigations, even if it's 16 just making a friend someplace to get some information, 17 it's a tool.</p> <p>18 Q Was there a -- was there a -- was there a 19 burden of proof you had to meet when you were 20 investigating criminal complaints against police 21 officers?</p> <p>22 MR. NOLAND: I'm going to object to the form of 23 that question. Are you talking about the criminal 24 burden of proof or the administrative burden of 25 proof?</p>	<p style="text-align: center;">Page 56</p> <p>1 MR. HILKE: I'm asking if -- I'm asking if 2 there's a burden of proof of any kind that you had 3 in mind when you did investigations and criminal 4 investigations?</p> <p>5 MR. NOLAND: That's -- it's a completely unfair 6 question. I mean, if it affects the case criminally 7 and it's being prosecuted criminally against an 8 officer? Is that your question? Or are you asking 9 if there (Inaudible) administratively?</p> <p>10 MR. HILKE: I understand your objection, but my 11 question is this --</p> <p>12 MR. NOLAND: And if you don't -- Wally, you're 13 asking a misleading question, because you know, 14 that's the only -- so -- but all right. You -- 15 yeah. I done. Objection, form. Go ahead.</p> <p>16 THE WITNESS: I can answer?</p> <p>17 MR. NOLAND: Yes.</p> <p>18 A It's just if you are -- if you are prosecuting 19 someone, I have to prove that they violated the law. If 20 I don't prove that, then I've wasted all my time. So 21 yes, I have to prove that they violated the law. There's 22 -- there's no way around it. There's -- there's written 23 stuff, statutes. Again, the -- Illinois revised 24 statutes, the Constitution of the United States, they all 25 have to be satisfied.</p>

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<p>1 BY MR. HILKE:</p> <p>2 Q Okay.</p> <p>3 A If I (Inaudible) a crime. And the ordinances</p> <p>4 of the City of Chicago.</p> <p>5 Q Okay. Was it your understanding in criminal</p> <p>6 investigations that, even if you couldn't prove a</p> <p>7 criminal charge, you could have enough evidence to</p> <p>8 reassign an officer or take administrative action?</p> <p>9 A I don't --</p> <p>10 MR. KOSOKO: Objection to the form -- object to</p> <p>11 the form of the question.</p> <p>12 MR. NOLAND: Objection, misstating --</p> <p>13 MR. KOSOKO: And calls for a legal conclusion.</p> <p>14 A I did not have that authority. I couldn't</p> <p>15 reassign anyone.</p> <p>16 BY MR. HILKE:</p> <p>17 Q And my question is different. It's not</p> <p>18 whether you could personally reassign them, but it is</p> <p>19 whether you understood that -- strike that. My question</p> <p>20 --</p> <p>21 MR. NOLAND: I -- you're -- hold on.</p> <p>22 MR. HILKE: No, no. Let me finish my question</p> <p>23 though, please. And then I -- I'll give you a</p> <p>24 chance to object, but I'd like to get my question</p> <p>25 out first.</p>	<p>1 MR. NOLAND: No, you -- sure, and I'm going to</p> <p>2 make a comment. You instruct -- you told the</p> <p>3 witness that your question was different. That was</p> <p>4 incorrect. That was your exact question. You asked</p> <p>5 the witness if he could reassign an officer, and</p> <p>6 that's the question he answered. So I just don't</p> <p>7 want you telling him that he didn't answer your</p> <p>8 question when he answered it directly.</p> <p>9 MR. HILKE: Could I ask the reporter to read</p> <p>10 back my last question, please?</p> <p>11 COURT REPORTER: Yes, Counsel. One moment,</p> <p>12 please.</p> <p>13 MR. HILKE: Thank you.</p> <p>14 (REPORTER PLAYS BACK REQUESTED TESTIMONY)</p> <p>15 BY MR. HILKE:</p> <p>16 Q Okay. So allow me to -- allow me to clarify.</p> <p>17 Understanding that you personally are not making any</p> <p>18 reassignments, was it your understanding that you could</p> <p>19 develop enough evidence so that the appropriate person</p> <p>20 could reassign an officer, even if there was not enough</p> <p>21 evidence to criminally charge them?</p> <p>22 MR. NOLAND: Object to the form of the</p> <p>23 question, but go (Inaudible) --</p> <p>24 A I -- again, you're asking me about the</p> <p>25 decision of someone else, and I don't know what their</p>
<p style="text-align: center;">Page 59</p> <p>1 criteria is for making their decision when they go</p> <p>2 outside the rules that I read, that I know of.</p> <p>3 Q Uh-huh. Was it your understanding that your</p> <p>4 investigations could result in administrative action,</p> <p>5 like reassignment or stripping of duties from police</p> <p>6 officers?</p> <p>7 MR. NOLAND: Object to the form. You may</p> <p>8 answer.</p> <p>9 A Did I know that upon -- if this allegation</p> <p>10 were proven true, that there would be repercussions?</p> <p>11 Yes.</p> <p>12 Q When you say, "if the allegation were proven</p> <p>13 true," what do you mean by proven true?</p> <p>14 A If -- what I mean by proven true is if the</p> <p>15 allegations -- if I do an investigation, or anybody else</p> <p>16 does an investigation, and what the people say, I could</p> <p>17 document with all certainty, and they meet the instance</p> <p>18 of a criminal nature, it meets the criteria of whatever</p> <p>19 crime I'm accusing them of, yeah, that's -- that's what</p> <p>20 I'm saying. Proven true.</p> <p>21 Q Did you receive files that were designated CL</p> <p>22 files, as opposed to CR files?</p> <p>23 A The only thing I ever received was a CR number</p> <p>24 to investigate.</p> <p>25 Q Okay. Let me change topics. Do you remember</p>	<p style="text-align: center;">Page 60</p> <p>1 how you first learned about allegations of misconduct by</p> <p>2 Sergeant Ronald Watts (phonetic)?</p> <p>3 A I received a file.</p> <p>4 Q And do you remember who assigned you the file?</p> <p>5 A Not really. No.</p> <p>6 Q Do you remember who your partner was in -- or</p> <p>7 do you remember who your partner or partners were in the</p> <p>8 year 2004?</p> <p>9 A No.</p> <p>10 Q Do you remember who your supervisor was?</p> <p>11 A I -- no, not -- not with any certainty. No.</p> <p>12 Q Okay. And when you got the Watts file, did</p> <p>13 you receive any instructions about what your next steps</p> <p>14 should be?</p> <p>15 A No.</p> <p>16 Q Okay. And what was -- what's the first thing</p> <p>17 you remember doing with the Watts file?</p> <p>18 A And not -- not try to be factious or anything,</p> <p>19 reading it.</p> <p>20 Q No, that's fine. Do you remember any</p> <p>21 particular impression when you read it? Did it stick</p> <p>22 out in any way?</p> <p>23 MR. KOSOKO: Object to the form --</p> <p>24 MR. NOLAND: Objection -- go ahead.</p> <p>25 A It was just -- it was just another complaint.</p>

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<p>1 Q Same complaint. Yep. What was the next thing 2 you do -- did on the file after you read it?</p> <p>3 MR. NOLAND: Objection to foundation. Form. 4 You can answer.</p> <p>5 A I don't remember.</p> <p>6 Q Okay. And do you recall the FBI becoming 7 involved in the Watts investigation?</p> <p>8 A Yes.</p> <p>9 Q And do you recall what the division -- was 10 there a division of responsibility between the CPD and 11 the FBI in that investigation?</p> <p>12 A This is how I'm going to answer your question. 13 It was a just investigation. There was no division. The 14 FBI was the lead -- the lead in the case. It was 15 theirs. Everything that anybody else did in the case, 16 it probably -- if -- if you've ever worked a case with 17 the FBI, or if you've ever prosecuted one against them, 18 you already know that they were the lead agency. 19 Anything else that they had, people may have been 20 working with them, they weren't privy to what the FBI 21 had. What the FBI had was privy to everything everybody 22 else had. They were the lead, and they were working the 23 case with the U.S. attorney.</p> <p>24 Q Were there multiple CPD employees from the IAD 25 who helped investigate the allegations against Sergeant</p>	<p>1 Watts?</p> <p>2 A There may have been. I don't remember.</p> <p>3 Q Okay. Do you recall a Keith Calloway 4 (phonetic)?</p> <p>5 A Yes.</p> <p>6 Q And did he work on the Watts investigation?</p> <p>7 A Keith was super -- he was the head of the 8 confidential section. He was a lieutenant, though. And 9 when you say, "worked on it," did he -- did he know what 10 was going on? Yes. Was he somewhat supervising? Yes. 11 Did he have occasion to either make meetings or talk 12 about something? Probably so.</p> <p>13 Q And what about Sergeant Bigg (phonetic)? Do 14 you recall Sergeant Bigg being involved in the 15 investigation?</p> <p>16 A Yes. Kenny went with me to one or two of the 17 meetings. Yes, he did.</p> <p>18 Q And what was his role at those meetings?</p> <p>19 A He was just -- he was -- I took Kenny with me 20 to -- I took Kenny with me just to keep him apprised 21 just to what was going on, and also, if there was 22 anything that he could do to help me. You know, 23 anything that -- any thoughts or ideas that he had that 24 I might be overlooking.</p> <p>25 Q Sure. And was this -- was that -- never mind.</p>
<p style="text-align: center;">Page 63</p> <p>1 Let me ask about Sergeant Broderdorf (phonetic). Do you 2 recall Sergeant Broderdorf being involved?</p> <p>3 A Ray Broderdorf, he was my supervising sergeant 4 for a while.</p> <p>5 Q Okay. And do you recall -- do you recall what 6 his involvement was in the Watts investigation?</p> <p>7 A Other than supervising me, I don't -- I don't 8 remember. I'm not going to say he didn't have any 9 direct business, I just don't remember.</p> <p>10 Q Okay. And so was there a Sergeant Joe Barnes 11 who you recall being involved in the investigation?</p> <p>12 A Joe Barnes? I don't remember. I'm not saying 13 it wasn't, I just don't remember right off.</p> <p>14 Q Okay. Was anyone at -- was there anyone at 15 your level in confidential investigations who also 16 worked on the Watts investigation with you?</p> <p>17 A No, not -- not while I was there in that -- 18 not on -- not on anything that I wrote. The people that 19 were -- that went with me when I did certain interviews 20 or meetings, they're documented. But for the private 21 investigations that I was a -- that I was accountable 22 for, no. I was working by myself.</p> <p>23 Q Okay. I'm going to share an exhibit with you 24 now. Let's mark this Exhibit number 1. All right. This 25 is at Plaintiff's 018627. Sir, do you recognize this a</p>	<p style="text-align: center;">Page 64</p> <p>1 report that you wrote -- well, strike that. I - - do 2 you see the date at the upper right, September 17, 3 2004?</p> <p>4 (EXHIBIT 1 MARKED FOR IDENTIFICATION)</p> <p>5 A Yes.</p> <p>6 Q And this is a report from you to the 7 commanding officer of the confidential investigating 8 section?</p> <p>9 A Yes.</p> <p>10 Q And does that mean this is a report to Keith 11 Calloway?</p> <p>12 A Whoever -- this -- okay. Commanding officer, 13 it was -- this was just the format for it, so commanding 14 officer, whoever it was, you know --</p> <p>15 MR. NOLAND: Wally, if you don't mind. You're 16 only showing him -- you're stating on the record 17 that you're showing him the whole page, but you're 18 not. You're showing him the first three lines. If 19 you showed him the bottom of it, you'll see who --</p> <p>20 MR. HILKE: Sure. I'll scroll down. I --</p> <p>21 BY MR. HILKE:</p> <p>22 Q It says at the bottom, "Approved, Lieutenant 23 Juan Rivera, Commanding Officer." Would -- was Juan 24 Rivera the commanding officer of confidential 25 investigations section at this time?</p>

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<p>1 A Yes, sir. He was.</p> <p>2 Q Okay. Is this a report you reviewed in</p> <p>3 preparation for the deposition today?</p> <p>4 A I -- did I see it? Yes.</p> <p>5 Q Okay. And for the record, I find I have to</p> <p>6 zoom in to make this readable, but anytime you want to</p> <p>7 scroll up or down, just ask me. I had wanted you to</p> <p>8 have access to the full document as I'm asking you</p> <p>9 questions about it. Do you see in the first full</p> <p>10 paragraph, where it says -- the first line is, "On</p> <p>11 September 16, 2004, the undersigned agent was made aware</p> <p>12 of unknown public housing officers taking tax money from</p> <p>13 drug dealers, allowing them to sell their product"?</p> <p>14 A Yes.</p> <p>15 MR. NOLAND: You -- you just misread that, that</p> <p>16 -- I'm sorry. No, you didn't. Sorry about that.</p> <p>17 MR. HILKE: It's okay.</p> <p>18 BY MR. HILKE:</p> <p>19 Q And do you see the next line describing a</p> <p>20 Sergeant Henry Harris, who the information was obtained</p> <p>21 from?</p> <p>22 A Yes.</p> <p>23 Q Did you speak with Sergeant Harris in your</p> <p>24 investigation?</p> <p>25 A Yes.</p>	<p>1 Q Okay. And do you recall having that</p> <p>2 conversation with Ms. -- with Sergeant Harris?</p> <p>3 A Honestly, no.</p> <p>4 Q And do you see that it describes a debriefing</p> <p>5 of a cooperating individual? And specifically looking</p> <p>6 at the last line of that first paragraph, do you see</p> <p>7 where it says, "In the debriefing of a cooperating</p> <p>8 individual, this information was obtained"?</p> <p>9 A Yes.</p> <p>10 Q And did -- on the next paragraph, it describes</p> <p>11 a meeting with Rivera, Bigg, you and the CI. Do you see</p> <p>12 that?</p> <p>13 A Yes.</p> <p>14 Q Do you recall having that meeting?</p> <p>15 A Not really.</p> <p>16 Q And does he -- does the name [REDACTED]</p> <p>17 (phonetic) ring a bell to you in terms of your</p> <p>18 investigation?</p> <p>19 A It rings a bell, but it's -- as far as</p> <p>20 somebody that either I was interested in or spoken with,</p> <p>21 yes.</p> <p>22 Q Yeah. And do you see below it, looking at the</p> <p>23 second paragraph, it says that "The CI reported that the</p> <p>24 officers had approached him and requesting paying for</p> <p>25 his doing business selling drugs in their area"?</p>
<p style="text-align: center;">Page 67</p> <p>1 A Okay.</p> <p>2 Q And do you see below that he also alleged that</p> <p>3 one of the officers had shot at him because he ran away?</p> <p>4 A Yes.</p> <p>5 Q And near the bottom, that the CI reported that</p> <p>6 many of the larger drug dealers paid tax money to these</p> <p>7 officers?</p> <p>8 A Yes.</p> <p>9 Q Okay. And do you have any memory of where you</p> <p>10 met with the confidential informant to get this</p> <p>11 information?</p> <p>12 A No. I met with one, I don't even know who he</p> <p>13 was, probably documented. Well, it is documented. I</p> <p>14 met with one person in the -- at 26th and California, in</p> <p>15 the ASA's office. The ASA was present, his attorney was</p> <p>16 present, myself. I don't know who was with me, but</p> <p>17 yeah.</p> <p>18 Q Yeah. And --</p> <p>19 MR. NOLAND: I think he -- no, I'm -- go ahead.</p> <p>20 MR. HILKE: No, that's okay.</p> <p>21 BY MR. HILKE:</p> <p>22 Q Did you or anyone at this meeting ask the</p> <p>23 confidential informant who were the other larger drug</p> <p>24 dealers paying money to these officers?</p> <p>25 A There were many questions asked, to which we</p>	<p style="text-align: center;">Page 68</p> <p>1 got no answers.</p> <p>2 Q So what do you -- what do you remember about -</p> <p>3 - what do you remember about that interaction in terms</p> <p>4 of asking about other larger drug dealers and not</p> <p>5 getting any answers?</p> <p>6 A What I remember about speaking to all of them,</p> <p>7 all the so-called witnesses, they were all drug dealers,</p> <p>8 they were all current drug dealers, and they - - they</p> <p>9 had something to say, and they probably did have</p> <p>10 knowledge, but they didn't want to give it up. They</p> <p>11 said they would cooperate and they -- at later times,</p> <p>12 they still did not cooperate with me.</p> <p>13 Q And when you say they didn't cooperate, what</p> <p>14 do you mean?</p> <p>15 A They did not provide any information for me.</p> <p>16 Q All right. Was there a reason you didn't</p> <p>17 write in this report that this confidential informant</p> <p>18 had not given you information that had been asked for?</p> <p>19 MR. NOLAND: Object to the form. You can</p> <p>20 answer.</p> <p>21 A No.</p> <p>22 Q I'm going to stop sharing this document. I'll</p> <p>23 mark this Exhibit 2, Plaintiff's 18628. So at the top</p> <p>24 of this document, do you see this is dated</p> <p>25 September 21, 2004 and that it's a report from you?</p>

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<p style="text-align: center;">Page 69</p> <p>1 (EXHIBIT 2 MARKED FOR IDENTIFICATION)</p> <p>2 A Yes, sir.</p> <p>3 Q And at the bottom of your report, is that your</p> <p>4 signature?</p> <p>5 A Yes, sir.</p> <p>6 Q And this again is approved by Lieutenant</p> <p>7 Rivera; is that right?</p> <p>8 A Yes, sir.</p> <p>9 Q And in the bottom, do you see there's a</p> <p>10 confidential number connected with this report?</p> <p>11 A Yes.</p> <p>12 Q What is a -- what is a confidential number?</p> <p>13 A It's the number assigned to the case for the</p> <p>14 confidential section. I mean, just -- it's a -- it's an</p> <p>15 identification number.</p> <p>16 Q Okay. And I'm looking at the body of the</p> <p>17 report now. Is it correct that this describes -- this</p> <p>18 report describes a meeting on September 20, 2004?</p> <p>19 A Okay.</p> <p>20 Q Is it -- and was this -- did you write this</p> <p>21 report about a meeting that occurred on September 20,</p> <p>22 2004?</p> <p>23 A Yes.</p> <p>24 Q And do you see that this report describes a</p> <p>25 meeting with representatives from the United States</p>	<p style="text-align: center;">Page 70</p> <p>1 Attorney's Office, Federal Bureau of Investigations,</p> <p>2 Drug Enforcement Administration, Alcohol, Tobacco, and</p> <p>3 Firearms, and the Chicago Police Department?</p> <p>4 A Yes.</p> <p>5 Q Did you attend this meeting?</p> <p>6 A I'm not sure.</p> <p>7 Q Do you know if any --</p> <p>8 A I don't know that -- I don't know whether I</p> <p>9 attended it or I was made aware.</p> <p>10 Q And do -- sitting here today, do you know who</p> <p>11 attended this meeting?</p> <p>12 A No, sir.</p> <p>13 Q And below it, do you see, starting in the</p> <p>14 second sentence, where it's -- in the middle of it,</p> <p>15 where it says, "It was determined this would be a</p> <p>16 federally prosecuted investigation. The cooperating</p> <p>17 individual is to be prosecuted in federal court, and the</p> <p>18 United States Attorney's Office believe they should be</p> <p>19 in control of everything that results from his</p> <p>20 cooperation"?</p> <p>21 A Yes.</p> <p>22 Q Was it -- am I correct that it was the FBI</p> <p>23 specifically that led this investigation?</p> <p>24 A Yes.</p> <p>25 Q Okay. And what was your understanding of</p>
<p style="text-align: center;">Page 71</p> <p>1 what, if anything, you would do to support the</p> <p>2 information after this meeting?</p> <p>3 A So I assume when you say -- and I -- I want</p> <p>4 you to answer. I assume when you say me, you mean the</p> <p>5 Chicago Police Department, or are you just talking about</p> <p>6 me personally?</p> <p>7 Q Thank you for clarifying. I mean you</p> <p>8 personally. What did you understand about what you</p> <p>9 would be doing?</p> <p>10 A If I did anything, it would be in support of</p> <p>11 the case that was being handled by the United States</p> <p>12 government.</p> <p>13 Q Okay. Does that mean that you would need to</p> <p>14 inform the FBI of the -- what steps you planned to take,</p> <p>15 before you took them?</p> <p>16 A That means anything that I see it -- that I</p> <p>17 put on paper, that they had.</p> <p>18 Q Okay. So it -- you mean that they would</p> <p>19 receive a copy of any report you wrote during your</p> <p>20 investigation?</p> <p>21 A Yes.</p> <p>22 Q Were you free still to take whatever steps you</p> <p>23 thought appropriate to investigate this allegation?</p> <p>24 A No, I --</p> <p>25 MR. NOLAND: (Inaudible). Go ahead. That's</p>	<p style="text-align: center;">Page 72</p> <p>1 fine.</p> <p>2 Q I'm sorry, I didn't hear your answer.</p> <p>3 A No.</p> <p>4 Q Okay. Why not?</p> <p>5 A Again, as I stated earlier, once the FBI takes</p> <p>6 a case, they're working with the U.S. attorney, and they</p> <p>7 go according to what they want to do. Anything that you</p> <p>8 do is in line with what they're doing, in line with what</p> <p>9 they say. And furthermore, most of the things that</p> <p>10 you're doing, as a matter of fact, all of them that</p> <p>11 you're doing after they take control of the case, is</p> <p>12 what they say.</p> <p>13 Q Did you receive instructions originating from</p> <p>14 the FBI, about how to investigate this case?</p> <p>15 A No, I did not.</p> <p>16 Q Did you receive any specific instructions</p> <p>17 about steps you should take to investigate this case?</p> <p>18 A No.</p> <p>19 Q Did you make your own plan for what you could</p> <p>20 do to support the investigation of this case?</p> <p>21 A I followed where the information that I was</p> <p>22 getting at the time took me.</p> <p>23 Q And as you followed the information you got,</p> <p>24 did you have to run your next steps by anyone else</p> <p>25 before you continued to investigate?</p>

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<p>1 A I'm hesitating because I'm trying to think of 2 how to answer your question. There was very little 3 done, because the cooperating individuals were either 4 taken by the government, or the persons that I met 5 decided that they didn't want to cooperate for whatever 6 reason. So there was nothing that I did, and once the 7 case was fully under the FBI's control, that was it. 8 Whatever they decided to do, it was -- it was all their 9 lead. And anything that anyone else did, they knew 10 about and did it with the -- with the blessings of the 11 FBI, if you want to say it like that. And the FBI, like 12 I say, has a copy of every piece of paper that anybody 13 did, that had to do with anything with this case.</p> <p>14 Q What did you do to make sure you were 15 following the FBI's lead as you worked on this 16 investigation?</p> <p>17 A Stay out of their way, sir.</p> <p>18 Q What does that mean?</p> <p>19 MR. NOLAND: Object to form, foundation. Go 20 ahead.</p> <p>21 A I spent four and a half years in the federal 22 building, that I knew once you started working a case, 23 and you have a U.S. attorney assigned, that whoever the 24 case agent is that's working hand-in-hand with that 25 person, and they're receiving instructions and thoughts</p>	<p>1 and ideas, they're putting their heads together. So if 2 it's not your case, you don't do anything but go -- go 3 with the flow.</p> <p>4 Q Did you communicate directly with the case 5 agent during the course of the investigation?</p> <p>6 A I did not.</p> <p>7 COURT REPORTER: I'm sorry, Counsel, was that 8 Mr. Kosoko who objected earlier?</p> <p>9 MR. KOSOKO: No, I'm on mute, so I don't -- 10 that might have been --</p> <p>11 MR. NOLAND: That might have been -- the last 12 objection was me, Victoria.</p> <p>13 COURT REPORTER: Thank you, Mr. Noland.</p> <p>14 BY MR. HILKE:</p> <p>15 Q Do you recall attending other -- strike that. 16 Do you recall attending any meetings about the Watts 17 investigation, where federal agents were present?</p> <p>18 A I was -- I was present somewhere where there 19 were a few people present, they talked about it. I 20 think if I was, there's a report on it. It may not be 21 written by me, but I was there.</p> <p>22 Q Okay.</p> <p>23 MR. NOLAND: We've been going about two hours. 24 Perhaps we could take a short break?</p> <p>25 MR. HILKE: I think that's a nice idea. Let's</p>
<p style="text-align: center;">Page 75</p> <p>1 go off the record.</p> <p>2 COURT REPORTER: Okay. We are going off the 3 record. The time is 11:13 Central Standard.</p> <p>4 (OFF THE RECORD)</p> <p>5 COURT REPORTER: We are back on the record for 6 the deposition of Calvin Holliday. My name is 7 Victoria Jadick. Today's date is November 14, 2022, 8 and the time is 11:26 Central Standard.</p> <p>9 BY MR. HILKE:</p> <p>10 Q Okay. Let's mark this next exhibit, Exhibit 11 3. Mr. Holliday, do you see here a complaint registry 12 document, CR number 300778?</p> <p>13 (EXHIBIT 3 MARKED FOR IDENTIFICATION)</p> <p>14 A Okay.</p> <p>15 Q Okay. And do you see at the bottom of this 16 first page that the investigator assigned is you, Calvin 17 Holliday?</p> <p>18 A Yes, that is me assigned, yes --</p> <p>19 Q Why'd you laugh? I'm sorry?</p> <p>20 A Oh, just -- nothing, just looking.</p> <p>21 Q Okay. And going back to the top, do you see 22 the complainant is an M. Skipper?</p> <p>23 A Yes.</p> <p>24 Q Does the name M. Skipper mean anything to you?</p> <p>25 A No.</p>	<p style="text-align: center;">Page 76</p> <p>1 Q Okay. And do you see the received by date is 2 September 17, 2004?</p> <p>3 A Yes.</p> <p>4 Q If your report on this instance says that you 5 learned of the Watts allegations on September 16, 2004, 6 can you think of any reason why you would have learned 7 of the allegations before the CR was received?</p> <p>8 A No, because -- maybe they made a mistake. I 9 don't know.</p> <p>10 Q Sure. And I'm scrolling down within this 11 document. All right. Okay. And down within the 12 document at BG 116119, do you see the complaint 13 register, where it says, "Registered with IAD by Marine 14 Skipper (phonetic)"?</p> <p>15 A Okay.</p> <p>16 Q And so you see that the first -- that the two 17 accused in the complaint are Kallat Mohammed and Ronald 18 Watts?</p> <p>19 A Yes.</p> <p>20 Q Did -- when the investigation started, were 21 those the two officers under investigation?</p> <p>22 A If that's what the paperwork says, those were 23 the two officers, as far as I know. I mean, if that's 24 what I -- if that's what I have a copy of, or -- yeah, 25 according to this, allegedly, although there's a</p>

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<p>1 complaint register number up at the top.</p> <p>2 Q Okay. Do you have -- do you have any memory</p> <p>3 of there being other subject officers, other accused</p> <p>4 officers, at the start of your investigation?</p> <p>5 A I do not remember.</p> <p>6 Q Okay. As the investigation progressed, did</p> <p>7 you learn that other officers may also have been</p> <p>8 involved in the alleged conduct?</p> <p>9 A I may have.</p> <p>10 Q Do you remember one way or another, sitting</p> <p>11 here today?</p> <p>12 A I can't -- I can't say yes or no today. I</p> <p>13 don't remember it.</p> <p>14 Q I've stopped sharing Exhibit 3. Do you have a</p> <p>15 memory of speaking to a Ron Henley (phonetic) about an</p> <p>16 automobile accident that Sergeant Watts became involved</p> <p>17 in?</p> <p>18 A I spoke to someone, yes.</p> <p>19 Q Okay. And -- let's see. Let's mark this</p> <p>20 Exhibit 4. Do you see at the top of this document a</p> <p>21 date of July 21, 2004?</p> <p>22 (EXHIBIT 4 MARKED FOR IDENTIFICATION)</p> <p>23 A Yes, sir.</p> <p>24 Q And at the bottom, do you see a signature from</p> <p>25 Ron Henley?</p>	<p>1 A Yes, sir, I do.</p> <p>2 Q Okay. And have you looked at this document to</p> <p>3 prepare for your deposition?</p> <p>4 A I don't think so.</p> <p>5 Q Okay. So I think I'm going to ask you to read</p> <p>6 the document and tell me when you're done. Will you</p> <p>7 start -- will you start at the top, read the document,</p> <p>8 and tell me when you need me to scroll down?</p> <p>9 A Okay.</p> <p>10 Q And --</p> <p>11 A This one -- okay. Okay. So what -- so what</p> <p>12 is your question?</p> <p>13 Q Would you agree that this report describes</p> <p>14 Mr. Henley seeing a police car crash into his parked</p> <p>15 vehicle and then trying to get -- make a police report</p> <p>16 to get the damages repaired?</p> <p>17 A Yes.</p> <p>18 Q And would you agree that it describes</p> <p>19 Mr. Henley being dissatisfied with the initial officer</p> <p>20 and Sergeant Watts responding to the accident?</p> <p>21 A Yes.</p> <p>22 Q And would you agree that it -- well, and does</p> <p>23 anything strike you as -- does anything strike you as</p> <p>24 improper about Sergeant Watts' actions as described in</p> <p>25 this report?</p>
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<p>1 MR. NOLAND: Object to the form of the</p> <p>2 question. Go ahead.</p> <p>3 A Sergeant Watts' whole -- whole demeanor about</p> <p>4 this thing was improper.</p> <p>5 Q What was improper about it?</p> <p>6 A The -- here, from the way -- from -- here,</p> <p>7 when you take the report, you take the report -- you</p> <p>8 take the words of the person making the report. Doesn't</p> <p>9 matter whether they're right, wrong, indifferent to you.</p> <p>10 You take that person's -- you take that person's word</p> <p>11 and let them fight it out in court. And then all the</p> <p>12 things that follow, especially referring them to other</p> <p>13 people, and your -- you know, especially if you're a</p> <p>14 supervisor of police, and you take this and you go --</p> <p>15 you just send it through the right channels. It's --</p> <p>16 it's just a -- (Inaudible).</p> <p>17 Q All right. Would you agree that it's not</p> <p>18 appropriate to discourage a civilian from making a</p> <p>19 complaint, making an official complaint?</p> <p>20 A That's not appropriate, having -- sending</p> <p>21 someone else over there that -- like I say, the whole</p> <p>22 thing is just -- is just not right. It is not -- it's</p> <p>23 not police procedure, it's not according to the orders,</p> <p>24 it's not according to anything.</p> <p>25 Q Okay. I'm going to show you now Exhibit 5.</p>	<p>1 Okay. And do you see here a report from you dated</p> <p>2 September 27, 2004?</p> <p>3 (EXHIBIT 5 MARKED FOR IDENTIFICATION)</p> <p>4 A Yes.</p> <p>5 Q And do you see that the subject of the report</p> <p>6 is "Possible informant, Quince Campbell"?</p> <p>7 A Yes.</p> <p>8 Q And this is a report describing a conversation</p> <p>9 between you and Mr. Ron Henley on September 20, 2004; is</p> <p>10 that right?</p> <p>11 A Yes.</p> <p>12 Q And then you mentioned that you're interested</p> <p>13 in developing a possible informant from the information</p> <p>14 given; is that right?</p> <p>15 A Yeah, the information. Yes, sir.</p> <p>16 Q Okay. And what were you hoping to find in</p> <p>17 investigating this information?</p> <p>18 MR. NOLAND: Object to the form of the question</p> <p>19 but go ahead.</p> <p>20 A And just -- and just what Mr. Henley said,</p> <p>21 that Quince (phonetic) was -- had information, you know,</p> <p>22 you talk to Quince and you see what does he have to</p> <p>23 corroborate anything at all that's been said. What --</p> <p>24 what can he tell me?</p> <p>25 Q Got you. And did you -- let me share one more</p>

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<p>1 document with you. This will be Exhibit 6.</p> <p>2 (EXHIBIT 6 MARKED FOR IDENTIFICATION)</p> <p>3 MR. NOLAND: Hey, Wally?</p> <p>4 MR. HILKE: Yeah?</p> <p>5 MR. NOLAND: Can you just scroll down so I can</p> <p>6 -- scroll down so I can see the base page on that</p> <p>7 prior piece of paper?</p> <p>8 MR. HILKE: Yeah, of course. It's Plaintiff's</p> <p>9 10877.</p> <p>10 MR. NOLAND: Thank you, sir.</p> <p>11 BY MR. HILKE:</p> <p>12 Q Okay. This is Exhibit 6, Plaintiff's 10861.</p> <p>13 Do you see here a document dated September 22, 2004?</p> <p>14 Have you had a chance to review the document?</p> <p>15 A Yes.</p> <p>16 Q And is this a letter that Ron Henley wrote to</p> <p>17 you?</p> <p>18 A Yes, it is information somebody wrote to me,</p> <p>19 yes.</p> <p>20 Q Okay. And Quincy Campbell and -- is named at</p> <p>21 the top, and Ron is named at the bottom. Do you believe</p> <p>22 them to be the same Ron Henley and Quince Campbell, who</p> <p>23 were described earlier?</p> <p>24 A Yes.</p> <p>25 Q And do you see that Ron mentions -- and do you</p>	<p>1 see that Patrick Neuner (phonetic), the same Patrick who</p> <p>2 Ron Henley described as being brought by Sergeant Watts</p> <p>3 to the scene of the accident, is described here?</p> <p>4 A Yes.</p> <p>5 Q And do you see, Ron says that "Quincy has said</p> <p>6 that Watts forces Patrick and workers to pay him off, in</p> <p>7 order to continue to sell drugs in Ida B. Wells, and</p> <p>8 that he is aware of others in the Wells that can also</p> <p>9 vouch for Watts' behavior"?</p> <p>10 A Yes.</p> <p>11 Q Okay. So did you try to contact Quincy</p> <p>12 Campbell?</p> <p>13 A I probably did. I'm not going to say yes or</p> <p>14 no, but it -- it would be -- I probably did, because I</p> <p>15 had looked him up.</p> <p>16 Q Did you succeed in speaking with him?</p> <p>17 A I don't -- I don't remember.</p> <p>18 Q Okay. And did you -- do you remember how many</p> <p>19 -- do you remember if you spoke to Ron Henley again,</p> <p>20 after you received this letter from him?</p> <p>21 A I don't remember.</p> <p>22 Q Did you ever find out who the other people</p> <p>23 were in the Wells, who Ron said could vouch for Watts'</p> <p>24 behavior?</p> <p>25 A No, because anybody that I got a name on, I</p>
<p style="text-align: center;">Page 83</p> <p>1 tried to run.</p> <p>2 Q Okay. Did you document your efforts to follow</p> <p>3 up with Quincy and Ron?</p> <p>4 A I don't know.</p> <p>5 Q Was it -- were you expected to document</p> <p>6 attempts to contact witnesses like this in your</p> <p>7 investigations?</p> <p>8 MR. NOLAND: Object to the form. Go ahead.</p> <p>9 A I -- no. No one ever said anything.</p> <p>10 Q Did you ever attempt to contact Patrick Neuner</p> <p>11 in your investigation?</p> <p>12 A As I said, everybody -- everybody that had</p> <p>13 something to say about Sergeant Watts, or allegedly, I</p> <p>14 have tried to speak to, or have spoken to.</p> <p>15 Q Do you have a specific recollection of</p> <p>16 attempting to contact Patrick Neuner?</p> <p>17 A I don't have any specific recollection, no.</p> <p>18 Q And do you have any specific recollection of</p> <p>19 actually speaking with Patrick Neuner?</p> <p>20 A No, I do not.</p> <p>21 Q Did you ever get an explanation -- well,</p> <p>22 strike that. Were you ever able to determine whether</p> <p>23 Sergeant Watts had actually tried to get Patrick Neuner</p> <p>24 to pay for the damage to Ron's car?</p> <p>25 A No.</p>	<p style="text-align: center;">Page 84</p> <p>1 Q And -- okay. All right. Okay. All right.</p> <p>2 This is Exhibit 7, Plaintiff 163. Okay. This is</p> <p>3 skipping ahead some months. Do you see this is dated</p> <p>4 May 24, 2005?</p> <p>5 (EXHIBIT 7 MARKED FOR IDENTIFICATION)</p> <p>6 A Yes.</p> <p>7 Q And do you see that this is a request for</p> <p>8 photographs, from you, police agent Calvin Holliday?</p> <p>9 A Yes.</p> <p>10 Q And do you see below a list of six names for</p> <p>11 placement in a photo lineup?</p> <p>12 A Yes.</p> <p>13 Q And do you see that the names are Ronald</p> <p>14 Watts, Kenneth Young Junior, Alvin Jones (phonetic),</p> <p>15 Brian Bolton (phonetic), Robert Gonzalez, and Douglas</p> <p>16 Nichols Junior?</p> <p>17 A Yes.</p> <p>18 Q And do you recall requesting these</p> <p>19 photographs?</p> <p>20 A I don't recall, but you have a report with my</p> <p>21 name on it, so I must have done it.</p> <p>22 Q All right. To your knowledge, were these</p> <p>23 officers who had worked with Ronald Watts?</p> <p>24 A Here, when you request a phone lineup, you</p> <p>25 probably -- you're requesting a lineup of people that</p>

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<p>1 look like Watts. I don't know if they know Watts or 2 not.</p> <p>3 Q Yeah. One moment. So I'm going to represent 4 to you that this lineup includes people of different 5 races and different looks. I'm going to ask you -- 6 well, actually, I -- strike all that. Do you recall the 7 name Alvin Jones coming up in your investigation?</p> <p>8 A Not really. No, sir.</p> <p>9 Q Okay. I'm going to scroll down to the second 10 page of this document. Actually, I'm sorry, I'm still 11 on page 1. Do you see the reason for the lineup request 12 is "informant unable to enter police facility"?</p> <p>13 A Yes.</p> <p>14 Q Do you believe that you requested these photos 15 to go and show them to an informant?</p> <p>16 MR. NOLAND: Object to the form and foundation. 17 Go ahead.</p> <p>18 A I believe I requested to show it to someone. 19 Whether it was an informant or not, or a possible 20 informant, but no, I don't -- I'm not going to say it 21 was to show an informant.</p> <p>22 Q Okay. Scrolling down to the second page, this 23 is at Plaintiff's 164. Do you see that -- do you see 24 that there are also photos requested of Manuel Leano 25 (phonetic), Ellsworth Smith, Junior (phonetic), and</p>	<p>1 Miguel Cabrales (phonetic)? 2 A Yes.</p> <p>3 Q And then again there's the explanation of 4 informant unable to enter a police facility?</p> <p>5 A Yes. Is that where it says -- okay, there you 6 go.</p> <p>7 Q Yeah. Do you see -- do you see that at the 8 bottom where it says, "other explained"?</p> <p>9 A Yes.</p> <p>10 Q And do you believe you requested these 11 photographs to show them to an informant?</p> <p>12 A I believe I requested just -- again, to 13 someone. I don't know whether they were an informant or 14 not. But just due to the nature of the case, you can't 15 -- you can't have people that are going to give 16 information against someone like this to enter a police 17 facility and then don't expect anybody to answer 18 questions. Or don't -- or don't expect anyone to answer 19 questions. Or even those that are just looking, ask me 20 why are they there, so no. If I was going to show 21 pictures to someone, I would not -- I would not have the 22 people enter a police facility.</p> <p>23 Q I'm going to mark this Exhibit 8. It's a 24 document starting at BG-7777. All right. I'm starting 25 on BG-7779. Do you see here a request to bypass command</p>
<p>1 channel review, relative to this complaint?</p> <p>2 (EXHIBIT 8 MARKED FOR IDENTIFICATION)</p> <p>3 A Yes.</p> <p>4 Q And was that a process you were familiar with 5 in Internal Affairs?</p> <p>6 A Yes.</p> <p>7 Q Is the goal of that process to try to prevent 8 the accused from learning of the investigation?</p> <p>9 A Yes.</p> <p>10 Q Scrolling down again, 7780. Do you see here a 11 complaint against Alvin Jones?</p> <p>12 A Yes.</p> <p>13 Q And this complaint is dated February 27, 2003, 14 right?</p> <p>15 A Yes.</p> <p>16 Q At the bottom of the page, do you see that the 17 allegation is that Officer Jones recovered \$200 from a 18 female heroin dealer and only inventoried \$170?</p> <p>19 A Yes.</p> <p>20 Q Okay. And Alvin Jones was one of the men you 21 requested a photo of for the six pack, right?</p> <p>22 MR. NOLAND: Object to the form, lacks 23 foundation. Go ahead.</p> <p>24 A Yes, I guess. Yes. That was his name.</p> <p>25 Q Okay. Were you aware of this complaint</p>	<p>1 against Al Jones during your investigation?</p> <p>2 A I don't think so, but I'm not sure.</p> <p>3 Q Would you have documented it if you had been 4 aware of it?</p> <p>5 MR. NOLAND: Objection. Foundation.</p> <p>6 A If I was doing something with him or -- yeah, 7 probably. I would have shown cause for that, or 8 whatever I did with him or for him or about him.</p> <p>9 Q If you were looking at other CRs that you 10 thought were relevant in a confidential investigations 11 investigation, would you put a copy of that CR in your 12 case file?</p> <p>13 A Yeah. You really don't know anything about 14 any other CR until you get ready to close your case, 15 when you -- when you call and you ask for a history. 16 This is -- they are used in making decisions, they're 17 not used in doing the investigation.</p> <p>18 Q Okay. Were you prevented from using other CRs 19 during your investigations?</p> <p>20 MR. NOLAND: Objection, asked and answered.</p> <p>21 We've been over this already, but you can answer it 22 again.</p> <p>23 A CR numbers are not provided to you until you 24 get ready to close your case and you're making a 25 recommendation whether to discipline or, you know,</p>

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<p>1 exonerate or not sustain, whatever. But during the 2 course of an investigation, you don't have access to any 3 other CR numbers.</p> <p>4 BY MR. HILKE:</p> <p>5 Q Is that -- did that -- strike that. Were you 6 prevented from viewing any past CRs whatsoever in an 7 investigation, both as to the specific officer you were 8 investigating and as to other officers in the 9 department?</p> <p>10 MR. NOLAND: Objection. Form, foundation, and 11 mischaracterizes prior testimony, but you may go 12 ahead and answer.</p> <p>13 A During the course of an investigation, you are 14 not to use any prior CR investigation if you're 15 answering the allegations there is. Once this is over 16 and you're making your recommendations, you're closing 17 the case, then you -- before you can close, part of the 18 recommendation is -- is past -- is past history, 19 especially when you sustain it. As they go to -- it 20 goes to whatever his -- his penalty is going to be, his 21 or hers. But, up until then, you don't have access to 22 it. Now, whether you recognize the name because it's 23 been around a long time, you've seen it before, you now, 24 in one of your old cases or whatever, I can't say. But 25 as far as -- here, I'm going -- I'm going to Internal</p>	<p>1 Affairs, I'm going to the office, and I want to see what 2 he's like, it's -- yeah. No. That doesn't happen.</p> <p>3 BY MR. HILKE:</p> <p>4 Q Right. Just so I'm under -- just so I 5 understand, if -- this is a hypothetical. If you're 6 investigating Officer Smith, and you happen to know that 7 Officer Jones had a separate investigation with 8 overlapping facts, overlapping information, could you go 9 and get Officer Jones's CR files to support your 10 investigation against Officer Smith?</p> <p>11 A No.</p> <p>12 MR. KOSOKO: Objection. Form.</p> <p>13 MR. NOLAND: Yeah, objection. Form and 14 foundation.</p> <p>15 BY MR. HILKE:</p> <p>16 Q Sorry. Could you repeat your answer for the 17 record?</p> <p>18 A No.</p> <p>19 Q So okay. So this is page 8 in this document, 20 BG-7785. I just want to call your attention to a 21 sentence in the bottom of the second paragraph. Do you 22 see where it says, "It is alleged that Jones has been on 23 the Public Housing South Tactical Team for approximately 24 four months, but no one wants to work with him because 25 it is known he steals money." Do you see that?</p>
<p>1 A Yes.</p> <p>2 Q And this is information that's in a CR file 3 complaining of alleged misconduct against Officer Al 4 Jones, right?</p> <p>5 A Okay?</p> <p>6 Q And did you have any access to this 7 information at the time you investigated the Watts 8 complaint?</p> <p>9 MR. NOLAND: Objection. Form, foundation. You 10 may answer.</p> <p>11 A Did I have access to this? No.</p> <p>12 Q Did you have any ability to find out who were 13 the witnesses involved in this allegation and try to 14 contact them?</p> <p>15 MR. NOLAND: Objection. Form, foundation, 16 calls for speculation. You may answer.</p> <p>17 A I don't have access to the files. I don't 18 know what's in it, so no.</p> <p>19 Q Mark this Exhibit 9, Plaintiff's 18629. Okay.</p> <p>20 Do you see here a report dated March 9, 2005?</p> <p>21 (EXHIBIT 9 MARKED FOR IDENTIFICATION)</p> <p>22 A Yes.</p> <p>23 Q And do you see the subject, "Integrity Check"?</p> <p>24 A Yes.</p> <p>25 Q I'm scrolling down to the body of the report,</p>	<p>1 or at least to the first part of it. Do you recall 2 planning an integrity check in the Sergeant Watts 3 investigation?</p> <p>4 A According to this, I had thought about it, 5 yeah.</p> <p>6 Q Okay. I'd like to give you a minute to read 7 the report. I'm in the top part of the body. Can you 8 tell me when you'd like me to scroll down?</p> <p>9 A Okay, you can scroll down.</p> <p>10 Q And there's a second page. Let me know when 11 you'd like me to move to it.</p> <p>12 A You can go to the second page. You can scroll 13 up. All right, I'm --</p> <p>14 Q Okay. I'll --</p> <p>15 A -- and --</p> <p>16 Q I was going to say also, if you're done with 17 this page, I'll show you the third page, but that's just 18 your signature. Do you see that there?</p> <p>19 A Yes.</p> <p>20 Q Okay. I'm going to scroll up to the first 21 page. At the time you wrote this report on March 9, 22 2005, was an integrity check being planned about 23 Sergeant Watts and Officer Mohammed?</p> <p>24 A One was thought of, and these were the 25 ingredients, yeah.</p>

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<p>1 Q Okay. And when you say one was thought of, do 2 you -- at this time, was CPD -- well, strike that. At 3 this time, did you understand that this plan was 4 actually going to be executed?</p> <p>5 A At this time that it was written up, it was 6 submitted to the -- yes, to see if we could -- if there 7 was something that the office would -- you know, would 8 agree to do. The deputies had to give permission.</p> <p>9 Q And I'm sorry, remind me. When you say the 10 deputy needed to give permission, who was the deputy at 11 this time?</p> <p>12 A The deputy of the Internal Affairs Division. I 13 don't know who it was at the time.</p> <p>14 Q Okay. And how did the idea of doing an 15 integrity check on the two accused officers first come 16 about?</p> <p>17 A It's -- it's what you would call an 18 investigative tool (Inaudible).</p> <p>19 Q Was it your idea?</p> <p>20 A Probably.</p> <p>21 Q And did -- what was involved in -- what was 22 involved in developing this -- strike that. What did 23 you do to develop this plan?</p> <p>24 A This -- this was just a thought of something 25 that had been done times before, not only in Internal</p>	<p>1 Affairs, but other places.</p> <p>2 Q Okay. Do you see that, at the top of the 3 second paragraph of the body, where it says, "The 4 information given suggests the officers know or make it 5 a point to get to know all drug dealers in the area of 6 their assigned duties"?</p> <p>7 A Yes.</p> <p>8 Q Where did that information come from, that 9 Watts and Mohammed knew or made a point to know the drug 10 dealers in the area of their duties?</p> <p>11 A It says suggests. And if you're asking people 12 to pay taxes, then you need to know that they are drug 13 dealers.</p> <p>14 Q Uh-huh. And scrolling down to the fourth 15 paragraph on this page, do you see the second sentence 16 where it says, "The operation will be conducted with set 17 guidelines under the direction of one named, on-the- 18 scene supervisor"?</p> <p>19 A Yes.</p> <p>20 Q Did you have a -- was there a supervisor, a 21 specific supervisor, who was designated to be involved 22 in the operation?</p> <p>23 A No.</p> <p>24 Q I'm looking at the second page now. Do you 25 see this paragraph where it says, "There will be</p>
<p>1 approximately ten persons involved in addition to the 2 undercover officer?</p> <p>3 A Yes.</p> <p>4 Q And at the point you wrote this, had any -- 5 well, let me ask you a different question. At the point 6 you wrote this, who had you engaged? What other 7 officers had you spoken or communicated with about this 8 plan?</p> <p>9 A No one.</p> <p>10 Q Okay. And so is this report the first time 11 you communicated about this plan to anybody?</p> <p>12 MR. NOLAND: Objection. Lacks foundation, 13 calls for speculation. You may answer.</p> <p>14 A This -- if -- this is a written report. What 15 I said and what I done, in a lot of reports, most 16 reports, not only it is something that I write up -- a 17 lot of times, like I say, you're sitting in your office 18 -- either you sitting in your office with another 19 attorney and you're doing something, you just run a 20 thought or idea by them, and they kick back something to 21 you. But when you write up your report, it's got your 22 name on it. So when I wrote up this, it was a plan. 23 Did I get information from other people? Is it 24 something that I've done before or whatever? Yes. But 25 as far as it's just a plan, it's not anything that's</p>	<p>1 been implemented. It's just a plan.</p> <p>2 Q Are you saying that you may have informally 3 discussed some ideas about this before you wrote it?</p> <p>4 A What I'm saying is I may have informally 5 discussed -- I may have informally asked Dan Nolan, 6 "Here, Dan. This is what I plan to do," and -- and you 7 know, and he -- he -- he throws back some information, 8 and then I sit down and I write this report.</p> <p>9 Q Okay. And do you see below that it -- you've 10 written -- you've discussed equipment necessary that the 11 confidential investigation section could provide?</p> <p>12 A That somebody -- that somebody can or will or 13 must supply, yes.</p> <p>14 Q Well, are you reading the paragraph that says, 15 "equipment necessary for the execution of this plan will 16 be furnished by the confidential investigations section 17 of the Internal Affairs Division"?</p> <p>18 A Okay. And also -- I also know that when you 19 go down to where it says, "United States currency 20 amount" yet -- "undetermined," that depending on what it 21 is, sometimes you have to go to other sources other than 22 the police department, people that have money.</p> <p>23 Q Yeah. As written, does this document mention 24 any federal agency?</p> <p>25 A No. (Inaudible) plan. It's not yet -- it's</p>

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<p>1 not yet approved or anything else. Nobody's reviewed 2 it.</p> <p>3 Q Did you -- what was your understanding of the 4 status of the federal investigation when you wrote this 5 report?</p> <p>6 A I have no idea.</p> <p>7 Q Did you have any concerns about proposing an 8 integrity check -- well, strike that. To your 9 knowledge, was a federal agency still leading the 10 investigation at the time you wrote this?</p> <p>11 A I have no idea.</p> <p>12 Q Would you have had any concerns about imposing 13 a CPD-led integrity check if another federal agency were 14 lead on the investigation?</p> <p>15 A If I knew that they were working this case? 16 No, I wouldn't even -- I wouldn't even have said it.</p> <p>17 Q Sure. Just so I understand, is it correct 18 that you wouldn't typically impose an integrity check if 19 you know that another federal agency is leading point on 20 an investigation?</p> <p>21 MR. NOLAND: Objection. Form, foundation, 22 calls for speculation. You may answer.</p> <p>23 A If I did it, it would be with their complete 24 knowledge and -- and -- and cooperation. And -- yeah, 25 it would be with their complete knowledge and</p>	<p>1 cooperation. I would not do anything to jeopardize 2 their case. Nothing. And if they said no, that's it.</p> <p>3 Q And did you work with anyone from a federal 4 agency as you developed this proposed plan?</p> <p>5 A I had contacted with others from criminal -- 6 from the other agencies, and we talked about a few 7 things, but as you know, I was transferred out of the 8 confidential section, and I -- this case was left 9 behind. I was no longer involved.</p> <p>10 Q When were you transferred out of confidential 11 investigations?</p> <p>12 A Sometime during 2000, I believe. Late 2005 or 13 middle 2005. I don't remember the exact date.</p> <p>14 Q Sure. I'm going to quickly show you another 15 exhibit. Okay. This is Plaintiff 10947. I just want 16 to direct you to the top of this exhibit. Do you see 17 here another report from you, dated June 28, 2005?</p> <p>18 A Yes.</p> <p>19 Q So in June 2005, you were still assigned to 20 the confidential investigations section; is that right?</p> <p>21 A Yes, sir.</p> <p>22 Q I'm going to take us back to Exhibit -- that 23 was Exhibit 10. I'm taking us back to Exhibit 9 now. 24 Going back to your integrity check report, did you talk 25 to any federal employees specifically about doing an</p>
<p style="text-align: center;">Page 99</p> <p>1 integrity check before you wrote this report?</p> <p>2 (EXHIBIT 10 MARKED FOR IDENTIFICATION)</p> <p>3 A No.</p> <p>4 Q And by my math, this report dated 5 March 9, 2005 would be about six months after you got 6 assigned the case in September 2004; is that right?</p> <p>7 A If that's when, I -- it has to be correct.</p> <p>8 Q Okay. And one thing you did in-between that 9 time was speak with Ron Henley and try to contact 10 witnesses coming from your evidence from Ron Henley; is 11 that right?</p> <p>12 A Yes, sir.</p> <p>13 Q Do you remember any investigative steps that 14 you took -- any other investigative steps that you took 15 between September and -- September 2004 and March 2005?</p> <p>16 A No, sir.</p> <p>17 Q What prompted you to propose an integrity 18 check?</p> <p>19 MR. NOLAND: Objection. Foundation that he has 20 a memory of that, form, calls for speculation. You 21 may answer.</p> <p>22 A You know, you have cases, and because you 23 don't have information does not mean that you're not 24 thinking about how to work it. And so this was just 25 something else.</p>	<p style="text-align: center;">Page 100</p> <p>1 BY MR. HILKE:</p> <p>2 Q Okay. And do you recall anything that led you 3 to the writing of this report other than that you had 4 continued to think about how to move the investigation 5 forward?</p> <p>6 A That's about it, sir, that I can think of.</p> <p>7 Q During those six months, did you receive other 8 information about how the federal investigation was 9 progressing?</p> <p>10 MR. NOLAND: Objection. Form, foundation, 11 calls for speculation. You may answer.</p> <p>12 A I may or may not have. I -- like I said, this 13 -- I did not -- I don't remember.</p> <p>14 Q Was -- what response did you get to this 15 report?</p> <p>16 MR. NOLAND: Objection. Foundation. You may 17 answer.</p> <p>18 A I don't remember.</p> <p>19 Q Do you remember taking any follow-up actions 20 to further plan an integrity check?</p> <p>21 A Not that I can remember, no sir.</p> <p>22 Q Do you remember taking any actions to execute 23 an integrity check?</p> <p>24 A No.</p> <p>25 Q All right. This is Exhibit 11. Starting at</p>

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<p>1 Plaintiff 18618, do you see here an ATF report of 2 investigation?</p> <p>3 (EXHIBIT 11 MARKED FOR IDENTIFICATION)</p> <p>4 A Yes, sir.</p> <p>5 Q And do you see that it was submitted by [REDACTED] 6 [REDACTED] (phonetic)?</p> <p>7 A Yes.</p> <p>8 Q Is [REDACTED] someone you worked with on the 9 Watts investigation?</p> <p>10 A [REDACTED] was somebody that I met.</p> <p>11 Q When did you meet her?</p> <p>12 A Whatever the date of this meeting is, that was 13 the date that I met her.</p> <p>14 Q Okay.</p> <p>15 A I may have met her before at other times, but 16 this -- the date of this meeting is the one that I'm 17 going to claim.</p> <p>18 Q Okay. And then do you see that the 19 description of activity is an interview of Wilbert Moore 20 (phonetic)?</p> <p>21 A Yes.</p> <p>22 Q I'm going to zoom in on the synopsis a little 23 bit. Will you take just a second to read the synopsis 24 paragraph here? And the -- take as long as you need -- 25 as you need. I don't mean to suggest just a second.</p>	<p>1 A Okay.</p> <p>2 Q Do you see Sergeant Gorman (phonetic), 3 Sergeant Christifono (phonetic), and Gang Specialist 4 Alonso Harris (phonetic) mentioned here?</p> <p>5 A That's -- I see the names, yes.</p> <p>6 Q Do you recognize any of those people?</p> <p>7 A No, sir. I mean, [REDACTED] I think I've met 8 before. Warren, William Warren, Junior, I know him. He 9 was a Chicago police officer transferred DEA that's 10 recently retired. The rest of them I might know by 11 sight.</p> <p>12 Q Okay. But sitting here today, Joseph Gorman, 13 Tony D. Christifono, and Alonso Harris, they don't evoke 14 any specific memories; is that fair?</p> <p>15 A That is correct?</p> <p>16 Q And were any of those three men involved? Did 17 you interact with any of those three men in the course 18 of the Watts investigation?</p> <p>19 A No, sir.</p> <p>20 Q And --</p> <p>21 A Not other than this.</p> <p>22 Q I'm sorry. Say that last bit again, please.</p> <p>23 A No, sir. Other than at this meeting talking 24 about whatever we were talking about, that's it.</p> <p>25 Q And your name is not listed in the synopsis</p>
<p style="text-align: center;">Page 103</p> <p>1 here. Do you have a memory of actually attending this 2 meeting?</p> <p>3 A I may not have. It might -- it might have 4 just -- this report may have just contained some 5 information that I needed, and I got a copy of it. I 6 don't know. I don't remember.</p> <p>7 Q Okay. I'm scrolling down. And this is 8 Plaintiff 18625. So I'm going to point your attention 9 to paragraph 53. Can I ask you to read paragraph 53 and 10 let me know when you're done?</p> <p>11 MR. NOLAND: Hey, Wally?</p> <p>12 MR. HILKE: Yeah.</p> <p>13 MR. NOLAND: So the right side of the document 14 is covered up by the (Inaudible) squares, photos of 15 all of us, so he can't see like a right inch of it, 16 maybe.</p> <p>17 MR. HILKE: Sure.</p> <p>18 BY MR. HILKE:</p> <p>19 Q Is that better? Do you need more?</p> <p>20 A No, that's good.</p> <p>21 Q Okay. Yeah. Please let me know if you have 22 any trouble reading it, and we'll fix it.</p> <p>23 A Okay. I've read it.</p> <p>24 Q Okay. So this paragraph mentions Watts and 25 Mohammed, who were both the subjects of your</p>	<p style="text-align: center;">Page 104</p> <p>1 investigation; is that right?</p> <p>2 A This subject -- this paragraph was written by 3 somebody else about some -- some information that they 4 got, and that they're doing the same thing as I. They're 5 just documenting what they heard. That's what this is. 6 And if I can use it, I can use it. But as far as me 7 personally as -- that's it.</p> <p>8 Q And do you see that paragraph 53 also mentions 9 Al Jones and a Kenny involved with Watts and Mohammed?</p> <p>10 MR. KOSOKO: Objection, form.</p> <p>11 A Yes.</p> <p>12 Q And if you had received information that other 13 officers were involved in the same alleged misconduct as 14 Watts and Mohammed, would you have sought to expand the 15 investigation to include those other officers?</p> <p>16 A If I had that information when I went out on 17 the street to do something, yes, I would definitely be 18 --</p> <p>19 Q And if you had received this information, 20 would that have been enough for you to expand the 21 investigation?</p> <p>22 MR. KOSOKO: Objection, form.</p> <p>23 A I did receive this information, and it -- it 24 gave me something to think about, yes.</p> <p>25 Q Did you ultimately seek to expand the</p>

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<p>1 investigation beyond Watts and Mohammed?</p> <p>2 A I submitted this information to the police</p> <p>3 department, and, you know, it was -- whatever they did</p> <p>4 is what they did.</p> <p>5 Q Did you in any way bring that question to</p> <p>6 their attention? Did you ask them for input as to</p> <p>7 whether to expand or not?</p> <p>8 MR. KOSOKO: Objection, form.</p> <p>9 MR. NOLAND: Yeah. Objection, form,</p> <p>10 foundation, kind of creating a misleading record.</p> <p>11 But go ahead.</p> <p>12 A I submitted it. What they did with it, I</p> <p>13 don't know.</p> <p>14 BY MR. HILKE:</p> <p>15 Q Okay. When you say you submitted it, what did</p> <p>16 you submit?</p> <p>17 A A copy of this report.</p> <p>18 Q Other than submitting this report -- well,</p> <p>19 strike that. Yeah. Other than submitting this report,</p> <p>20 did you do anything else to seek to expand the</p> <p>21 investigation to include other officers?</p> <p>22 MR. NOLAND: Objection. Form, foundation,</p> <p>23 mischaracterizes. Go ahead.</p> <p>24 A From the paperwork that I have, no, but that</p> <p>25 does not mean I would not have. It's just -- remember,</p>	<p>1 I got transferred out.</p> <p>2 Q Did you ever participate in any conversations</p> <p>3 about expanding the scope of the investigation to</p> <p>4 include other officers?</p> <p>5 MR. NOLAND: Objection. Form, foundation,</p> <p>6 mischaracterizes the record. Go ahead.</p> <p>7 A No.</p> <p>8 Q When you received materials from federal</p> <p>9 agencies about your investigations, did you put those</p> <p>10 materials in your case files?</p> <p>11 A Yes, depending.</p> <p>12 Q When you say "depending," is there a reason</p> <p>13 you would not include the information in your case file?</p> <p>14 A Some of it is information that's already</p> <p>15 known, that others already have, and I -- I'm just</p> <p>16 getting a copy of it to be made aware.</p> <p>17 Q And when you say information you already had,</p> <p>18 does that mean if a federal agency sent you a document</p> <p>19 that overlapped with a separate document with the same</p> <p>20 information, you might not keep what they sent you?</p> <p>21 MR. NOLAND: Objection, mischaracterizes, form.</p> <p>22 Go ahead.</p> <p>23 A What I said was information that others</p> <p>24 already have and that I don't have. And so they just</p> <p>25 sent me a copy of it to make me aware, to know what's</p>
<p style="text-align: center;">Page 107</p> <p>1 being said, and see -- you know, whatever I can do with</p> <p>2 it is I can do with it. There's no need for me to put</p> <p>3 it in my file. That's what I'm saying.</p> <p>4 Q When you say, "information that others already</p> <p>5 had," who is others, or what -- what do you mean when</p> <p>6 you say others?</p> <p>7 MR. NOLAND: Objection to this whole</p> <p>8 discussion. It is completely hypothetical and lacks</p> <p>9 foundation, and I don't even know what we're talking</p> <p>10 about. But go ahead.</p> <p>11 A Other sources of information, other people</p> <p>12 above me. It could be just about anybody.</p> <p>13 BY MR. HILKE:</p> <p>14 Q And was this something that actually happened?</p> <p>15 Did federal agencies send you information about cases</p> <p>16 you were investigating?</p> <p>17 A If they don't --</p> <p>18 MR. NOLAND: Objection to the form of the</p> <p>19 question. Are we talking about this document? I</p> <p>20 mean, obviously we have this document, and he's</p> <p>21 testified it was sent to him, and you have it.</p> <p>22 MR. HILKE: Yeah.</p> <p>23 MR. NOLAND: I don't even -- what are you</p> <p>24 talking you about? Are you talking about completely</p> <p>25 fictional (Inaudible) now?</p>	<p style="text-align: center;">Page 108</p> <p>1 MR. HILKE: I -- I think that's in a -- well,</p> <p>2 for the record, I think that's in an -- what do I</p> <p>3 think? I think I can clarify.</p> <p>4 BY MR. HILKE:</p> <p>5 Q I'm asking you about your practice when you</p> <p>6 worked in confidential investigations. Did you work on</p> <p>7 multiple investigations where federal agencies were</p> <p>8 involved?</p> <p>9 A Yes.</p> <p>10 Q Okay. And when you worked with those agencies</p> <p>11 -- well, strike that. Is this the only document you</p> <p>12 ever received from federal agents, working on an</p> <p>13 investigation that overlapped with yours?</p> <p>14 A No.</p> <p>15 Q Okay. And am I correct that your testimony</p> <p>16 was there is some circumstances where you wouldn't</p> <p>17 include in -- a document you got from a federal agency</p> <p>18 in the connected case file?</p> <p>19 MR. NOLAND: Objection, form. You may answer.</p> <p>20 A Well, that's -- yeah, because of the fact that</p> <p>21 if the -- if the information is already known and it's</p> <p>22 just I didn't know it, if it's already out there and</p> <p>23 they already have a -- I just -- I -- then yes. I'll</p> <p>24 say, "Well, here, just send me a copy of that. Let me -</p> <p>25 - let me have it so I can refer to it." Would I stick</p>

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<p>1 it in my file? Maybe, maybe not. And the reason that I 2 might -- might not is because it's already known. It's 3 well known, it's just I didn't know.</p> <p>4 Q When you say, "it's already known," do you 5 mean by the federal agency that sent it to you, do you 6 mean within CPD, or do you mean something else?</p> <p>7 A It means -- I -- I said -- everybody knows but 8 me. For whatever reason, I did not know.</p> <p>9 Q By everybody, do you mean both people in the 10 agency that sent it and people within CPD?</p> <p>11 MR. NOLAND: Seems like it, everybody. 12 Objection, asked and answered.</p> <p>13 MR. HILKE: I -- that's a totally improper 14 speaking objection to answer for the witness. And I 15 think the objection on form is fine, but I really 16 think that's inappropriate, and I'm going to note 17 that for the record. You can answer.</p> <p>18 MR. NOLAND: Well, it's just that you're being 19 -- I mean, Wally, my frustration is that I got a 20 plane to catch, and I just can't believe we're down 21 this rabbit hole. But go ahead. I disagree with 22 your characterization but go ahead and answer the 23 question again.</p> <p>24 A Everybody that has -- that has anything to do 25 with this case knows I, for whatever reason, was either</p>	<p>1 not present, not privy to it at the time, and you're 2 bringing it up now or whatever. But everyone knows but 3 me. And so therefore I asked, "If it's all right, can I 4 have a copy so that I can, you know, have something to 5 refer to, to work with?"</p> <p>6 MR. HILKE: Dan, remind me, when do you need to 7 leave for your plane?</p> <p>8 MR. NOLAND: 2:45.</p> <p>9 MR. HILKE: Okay.</p> <p>10 MR. STEFANICH: Can I interject? Is there any 11 chance that you're going to be done by 2:45, and 12 assume that nobody else has questions?</p> <p>13 MR. HILKE: I don't think I'm going to finish 14 by 2:45.</p> <p>15 MR. KOSOKO: Is there like a -- Wally, just in 16 the interest of all the parties involved and Dan's 17 time crunch, is there a natural stopping point? And 18 let's -- can we go off the record so we're not 19 burning his time, please? Real quick.</p> <p>20 COURT REPORTER: Yes, counsel, I'm sorry. Going 21 off the record. The time is 12:34 Central Standard.</p> <p>22 (OFF THE RECORD)</p> <p>23 COURT REPORTER: We are back on the record for 24 the deposition of Calvin Holliday being conducted by 25 video conference. My name is Victoria Jadick.</p>
<p style="text-align: center;">Page 111</p> <p>1 Today's date is November 14, 2022, and the time is 2 12:43 p.m. Central Standard.</p> <p>3 BY MR. HILKE:</p> <p>4 Q Mr. Holliday, were you ever instructed that 5 every document you should get from a federal agency 6 should go to the case file?</p> <p>7 A No.</p> <p>8 Q I'm turning your attention back to Exhibit 11. 9 You had just read paragraph 53. Do you remember a -- 10 someone with the nickname Shock being mentioned in that 11 paragraph?</p> <p>12 A I see it, yes.</p> <p>13 Q Did you ever try to make contact with Shock in 14 your investigation?</p> <p>15 A I tried to make contact with all of the 16 witnesses, people that could help me, not the police 17 officers, that I could.</p> <p>18 Q Do you remember any specific steps you took to 19 try to contact Shock?</p> <p>20 A You -- you know, then you -- when you're 21 looking for somebody, you go, you pull their record, see 22 if you can find it. You -- if you can identify them, 23 you pull their records, you get addresses, pull old 24 reports, and you see if you can find phone numbers. The 25 -- you do what you can.</p>	<p style="text-align: center;">Page 112</p> <p>1 Q And do you have a specific memory of taking 2 those steps with regards to Shock?</p> <p>3 A I took that -- I took those steps in regards 4 to most everyone that I was looking for, that was -- 5 that had a criminal record.</p> <p>6 Q Okay. So that's something you specifically 7 remember doing for Shock?</p> <p>8 A That's something I specifically remember doing 9 as an investigator. Whether I did for him or not, if - 10 - if he was part of my case, I did something to try and 11 find him. I just did not let it go.</p> <p>12 Q And did you document the steps you took, if 13 any, to contact Shock?</p> <p>14 A No.</p> <p>15 Q And scrolling down, do you see that Mr. Neuner 16 is described again in paragraph 55, that -- and I've -- 17 I've got more related that Watts pulled over Neuner, and 18 him in the Navigator. And when Watts come up and saw 19 Neuner, Watts said, "Oh, it's you, Pat," and let them go 20 immediately. Did you make any -- do you remember making 21 any additional efforts to contact Patrick Neuner after 22 you received this report?</p> <p>23 A I made an effort to try and identify and 24 contact all of these people.</p> <p>25 Q So you -- my question is, after you received</p>

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<p>1 this report from the ATF, did you make -- do you 2 remember making any extra efforts, after getting this 3 report, to contact Mr. Neuner --</p> <p>4 A (Inaudible). I don't remember.</p> <p>5 Q Did you document any such efforts?</p> <p>6 MR. NOLAND: Objection. Foundation. Go ahead.</p> <p>7 A I don't remember.</p> <p>8 Q Do you see in paragraph 57, "Moore related 9 that it is known that Watts has a gambling problem?"</p> <p>10 A Yes, sir.</p> <p>11 Q Did you do anything to investigate whether 12 Watts was spending money gambling?</p> <p>13 A I did a -- I did a -- yes, I did some sort of 14 investigation into this.</p> <p>15 Q And were you aware in your investigation that 16 the Moore who is mentioned in this report was later shot 17 and killed?</p> <p>18 A I don't remember.</p> <p>19 Q We've already marked this. This is Exhibit 20 10, at Plaintiff 10947. And this is your report dated 21 June 28, 2005; is that right?</p> <p>22 A Yes, sir.</p> <p>23 Q And do you see that -- looking at the second 24 paragraph on this page, the undersigned in May 2005 -- 25 actually, will you go ahead and take a minute to read</p>	<p>1 the paragraph beginning "the undersigned," please?</p> <p>2 A Scroll up some.</p> <p>3 Q Sure. There's a second page, which I can show 4 you when you're ready.</p> <p>5 A Scroll up. Can you scroll up just little bit?</p> <p>6 All right.</p> <p>7 Q Okay. So I'm going to scroll you back to the 8 first page. So at the beginning it mentions Assistant 9 State's Attorney David Navarro and private attorney 10 Matthew Mahoney, and Matthew Mahoney's client, gang 11 member and drug dealer Ben Baker. Am I right that -- is 12 it your recollection that Assistant State's Attorney 13 David Navarro, that's a county prosecutor? That this is 14 about a case that's at the state level?</p> <p>15 MR. NOLAND: Hold -- hold on. About a case at 16 the state level? I -- I object to that.</p> <p>17 MR. HILKE: That's fine.</p> <p>18 BY MR. HILKE:</p> <p>19 Q Do you know -- do you know who David Navarro 20 worked for?</p> <p>21 A He was an assistant state's attorney.</p> <p>22 Q Okay. And so, other than you and Sergeants 23 Broderdorf and Kenneth Bigg, were any other law 24 enforcement agents present at this meeting?</p> <p>25 A I don't remember, but I don't think so. If</p>
<p style="text-align: center;">Page 115</p> <p>1 they were, I probably would've put them in this report.</p> <p>2 Q Yeah. And 2650 South California, that's the 3 Cook County Criminal Courthouse, right?</p> <p>4 A Yes, sir.</p> <p>5 Q Okay. And so is it your recollection that 6 there were no federal agents present at this meeting?</p> <p>7 A That is my recollection.</p> <p>8 Q And do you have any idea why they wouldn't 9 have been involved?</p> <p>10 MR. NOLAND: Object to the form. You mean not 11 present at this particular meeting?</p> <p>12 MR. HILKE: Yeah.</p> <p>13 MR. NOLAND: Is that the question?</p> <p>14 MR. HILKE: Yeah.</p> <p>15 BY MR. HILKE:</p> <p>16 Q Do you have any idea why they weren't at this 17 meeting?</p> <p>18 A Yeah. I was called here -- so -- here -- if 19 they -- they weren't there, it was because Dave Navarro 20 didn't invite them. It had nothing to do with me.</p> <p>21 Q Okay. Do you see the sentence in this 22 paragraph where -- in this first paragraph, where it 23 says, "Baker pledged his cooperation in our 24 investigation and to work as a CI"?</p> <p>25 A Where does it say that?</p>	<p style="text-align: center;">Page 116</p> <p>1 Q I'm sorry. It says it right about -- sorry, 2 starting here and through there, that "Baker pledged his 3 cooperation in our investigation and to work as a 4 CI"?</p> <p>5 A Yes, sir.</p> <p>6 Q Okay. And do you remember anything about what 7 Baker said in that interaction?</p> <p>8 MR. NOLAND: Object to the form. Besides 9 what's in this memo?</p> <p>10 Q You can answer.</p> <p>11 A Nothing.</p> <p>12 Q Nothing? And do you remember anything you 13 said at this meeting, other than -- strike that. Do you 14 have an independent memory of anything you said at this 15 meeting?</p> <p>16 A At that meeting, I was there to get some 17 information. I mostly listened. Baker said nothing 18 other than what you read here. And if you read further, 19 you see he never -- he nor his attorney ever tried to 20 reach out for us, and we tried to reach out for him.</p> <p>21 Q What efforts did you make to follow up with 22 Baker and his attorney, if any?</p> <p>23 A Other than call them, there's nothing I can 24 do. I can't go and snatch him off the street. So I 25 tried to call him. I tried to make contact with him.</p>

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<p>1 That's the best I could do, sir.</p> <p>2 Q Okay. And who specifically did you call? Did</p> <p>3 you call Mr. Baker, his attorney, or both?</p> <p>4 A Both.</p> <p>5 Q Both? And do you see at the bottom of this</p> <p>6 page, leading with, "Previously, the undersigned had</p> <p>7 interviewed drug dealer [REDACTED] [REDACTED]</p> <p>8 A Yes, sir.</p> <p>9 Q And do you recall that conversation of</p> <p>10 personally interviewing [REDACTED] [REDACTED]</p> <p>11 A I went to HIDTA. That's where I met him. And</p> <p>12 I believe they were at 55 West Washington then.</p> <p>13 Q And let's see. Other than this report, are</p> <p>14 you aware of any other location where you documented</p> <p>15 your interview with [REDACTED]</p> <p>16 A No, sir.</p> <p>17 MR. NOLAND: Objection. Foundation, form.</p> <p>18 Q Sorry, sir, what was your answer?</p> <p>19 A No, sir.</p> <p>20 Q Okay. And do you see -- I'm on the second</p> <p>21 page now, the bottom of that paragraph, where it says,</p> <p>22 "[REDACTED] was never able to assist the undersigned, as he</p> <p>23 was being worked by the narcotic and gang investigation</p> <p>24 section"?</p> <p>25 A Yes, sir.</p>	<p>1 Q And why was -- what was a -- why was -- why</p> <p>2 did being worked by the narcotic and gang investigation</p> <p>3 section prevent him from assisting you?</p> <p>4 A He had to satisfy whatever he was doing for</p> <p>5 them before he could do anything for me. And that --</p> <p>6 that was just -- here -- they're not -- they -- for</p> <p>7 whatever reason -- well, you already know what reason,</p> <p>8 but they are not going to let him do anything for</p> <p>9 anybody else before he finishes up with them.</p> <p>10 (Inaudible).</p> <p>11 Q How did you learn that he couldn't help you</p> <p>12 because he was helping them?</p> <p>13 MR. NOLAND: Objection, foundation.</p> <p>14 A That was -- I was informed by members of HIDTA</p> <p>15 that he was working on the case.</p> <p>16 Q Which -- who specifically informed you?</p> <p>17 A I don't remember.</p> <p>18 Q Do you remember if it was someone in IAD?</p> <p>19 A There was -- I was the only person there from</p> <p>20 IAD.</p> <p>21 Q Do you remember what --</p> <p>22 A No, it was --</p> <p>23 Q Go ahead.</p> <p>24 A It was -- it was someone from HIDTA right</p> <p>25 there at the meeting. It was not anyone from IAD.</p>
<p style="text-align: center;">Page 119</p> <p>1 Q All right. And going to the next paragraph,</p> <p>2 do you see the paragraph begins, "On April 7, 2004,</p> <p>3 Wilbert Moore, a.k.a. Big Shorty, was interviewed by</p> <p>4 H-I-D-T-A and N-A-G-I-S personnel. The undersigned also</p> <p>5 had a conversation with Moore"? All right. Do you see</p> <p>6 that part of the paragraph?</p> <p>7 A Yes, sir.</p> <p>8 Q Do you have an independent recollection of</p> <p>9 interviewing Wilbert Moore?</p> <p>10 A No.</p> <p>11 Q And do you know where you were when you</p> <p>12 interviewed Wilbert Moore?</p> <p>13 A No.</p> <p>14 Q Okay. Scrolling down to the middle of the</p> <p>15 paragraph, do you see where it reads, "Moore was unable</p> <p>16 to assist the undersigned"?</p> <p>17 A Yes, sir.</p> <p>18 Q What does that mean, that Moore was unable to</p> <p>19 assist you?</p> <p>20 A When you have these conversations with people</p> <p>21 that have information, and then they say, "I'll get in</p> <p>22 touch with you," or they give you a number and you can't</p> <p>23 reach them, then they're unable to assist you.</p> <p>24 Q So does this mean that he couldn't help you</p> <p>25 because he chose not to come back in contact with you?</p>	<p style="text-align: center;">Page 120</p> <p>1 MR. NOLAND: Objection. Form, foundation,</p> <p>2 calls for speculation.</p> <p>3 A He couldn't help me for whatever reason he</p> <p>4 chose, or whatever reason, or whatever his circumstances</p> <p>5 were. But he could not help me. He did -- he did not</p> <p>6 help me. I won't say he could not. He did not.</p> <p>7 Q Okay. And going to the next sentence, do you</p> <p>8 see where it says, "He was identified by an officer who</p> <p>9 worked for Sergeant Watts on his tactical team, who was</p> <p>10 detailed to NAGIS"?</p> <p>11 A Yes.</p> <p>12 Q What officer who worked for Sergeant Watts --</p> <p>13 who was the officer who worked for Sergeant Watts who</p> <p>14 had identified Mr. Moore?</p> <p>15 MR. NOLAND: Objection, foundation, calls for</p> <p>16 speculation. You may answer.</p> <p>17 A I have no idea.</p> <p>18 Q Do you know where that information comes from?</p> <p>19 A No, sir.</p> <p>20 Q And then do you see the next sentence, "This</p> <p>21 officer told Sergeant Watts of Moore's cooperation"?</p> <p>22 A Yes.</p> <p>23 Q Does that mean that the officer told Sergeant</p> <p>24 Watts that Moore was potentially giving information</p> <p>25 about him?</p>

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<p>1 MR. NOLAND: Objection. Form, foundation. Go 2 ahead.</p> <p>3 A I -- I would think it as that. That's not -- 4 I'm just reporting the --</p> <p>5 Q Sure. And to your knowledge, working in 6 Internal Affairs, was that a violation of policy, to 7 tell an officer that they're the subject of a 8 confidential investigation?</p> <p>9 MR. NOLAND: Oh, objection to form, foundation, 10 assumes facts not in evidence, misleading, taking 11 this out of context. Go ahead. Research it -- or 12 is the question whether someone in Internal Affairs 13 told Watts that?</p> <p>14 MR. HILKE: No, I -- my question is just what I 15 asked.</p> <p>16 BY MR. HILKE:</p> <p>17 Q Do you need to -- me to repeat the question, 18 Mr. Holliday?</p> <p>19 MR. NOLAND: It -- to me, it's completely 20 improper questions because it is trying to create a 21 misleading record, like a lot of these questions. 22 But go ahead and answer, Cal.</p> <p>23 A Okay. NAGIS and HIDTA are government 24 agencies. They consist of police officers and federal 25 agents. Now, if -- if this is -- if this is true, if</p>	<p>1 what is said is true, then there's probably an internal 2 investigation going on. I don't know. I don't have 3 privilege to this. Like I told you, when I got this 4 information, a lot of it -- when I was at HIDTA, the 5 office, I was the only DEA agent there. I mean, not 6 DEA. I was the only the IAD agent there. 7 BY MR. HILKE:</p> <p>8 Q Do you see the next sentence is, "Moore said 9 that when he was in Ida B. Wells, Sergeant Watts would 10 see him and not speak. Moore stated if he were there 11 with other persons, Sergeant Watts would make the others 12 get out of the car and go through them, but Moore had to 13 remain in the vehicle. Moore would not be searched."</p> <p>14 A I see it.</p> <p>15 Q What is that -- are you able to make sense of 16 -- are you able to draw any conclusions from those 17 sentences about the relationship or the dynamic between 18 Moore and Watts?</p> <p>19 MR. KOSOKO: Objection to the form -- objection 20 to the form of the question. It's ambiguous or 21 argumentative, assumes facts not in evidence, asking 22 a lay witness to opine. Go ahead.</p> <p>23 COURT REPORTER: I'm sorry. Was that you, Mr. 24 Kosoko?</p> <p>25 MR. KOSOKO: It -- indeed, it was.</p>
<p style="text-align: center;">Page 123</p> <p>1 COURT REPORTER: Thank you.</p> <p>2 A So you want me -- you want me to answer this? 3 Is that what you're saying?</p> <p>4 BY MR. HILKE:</p> <p>5 Q Yes, sir.</p> <p>6 A This is -- this is just thinking for someone 7 else. This is not -- I mean, to me, it looks like he 8 has -- he has made up in his mind that Moore is -- is 9 either wearing a wire or something about him that he 10 doesn't want to be bothered with him. And, you know, 11 something about Moore would put him where he doesn't 12 want to be, so he doesn't associate in any, way, form, 13 or fashion.</p> <p>14 Q Based on this information, were you concerned 15 that the confidentiality of your investigation had been 16 breached?</p> <p>17 A No.</p> <p>18 Q Why not?</p> <p>19 A Yeah. We -- well, if -- if you -- if you 20 doing things to me -- you -- you asked me why not. If 21 you're doing things to me as -- as -- as poorly as -- as 22 he's doing, you -- you have to feel that somewhere along 23 the line somebody's going to look at you one day or 24 another, whether it's this day or tomorrow or yesterday.</p> <p>25 Q Who are you referring to?</p>	<p style="text-align: center;">Page 124</p> <p>1 A Sergeant Watts.</p> <p>2 Q Were you worried that Wilbert Moore could be 3 harmed, based on a potential breach in the 4 investigation?</p> <p>5 MR. NOLAND: Object to the form the question. 6 Go ahead.</p> <p>7 A Yeah. This information was brought to me, so 8 I'm the wrong person to ask.</p> <p>9 Q Did you tell anyone that you thought a breach 10 of confidentiality might have occurred?</p> <p>11 A My superiors are reading these reports that I 12 submit.</p> <p>13 Q Did you believe it would be obvious to your 14 superiors that a breach of confidentiality had occurred 15 based on the report you wrote?</p> <p>16 MR. NOLAND: Objection, foundation. Go ahead.</p> <p>17 A I believe I put some information in the report 18 that if it were of any importance to them, they would 19 act on it.</p> <p>20 Q Was there -- at the time you wrote this report 21 -- well, strike that. Did your supervisors and 22 confidential investigations ever tell you that there was 23 any steps you should take if you thought confidentiality 24 had been breached in one of your investigations?</p> <p>25 MR. KOSOKO: Objection. Form, foundation,</p>

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<p>1 incomplete, hypothetical. You can answer.</p> <p>2 A If I felt that there was any compromise of</p> <p>3 myself or my case -- you're -- you're always to inform</p> <p>4 your superiors immediately, let them know.</p> <p>5 Q Is that what you did here?</p> <p>6 MR. NOLAND: Objection, asked and answered, and</p> <p>7 -- and foundation. Go ahead.</p> <p>8 A I was not compromised here. This is</p> <p>9 information that was brought to me. These people didn't</p> <p>10 know that -- as far as I know, they did not know that</p> <p>11 there was a -- a CR number against them, against Moore</p> <p>12 or anybody else. Just -- they probably took it to their</p> <p>13 superiors, that is possibly, and they probably mentioned</p> <p>14 me, or I got information, and because it was a</p> <p>15 policeman, I was there.</p> <p>16 Q Okay. Was it your opinion that, if Ronald</p> <p>17 Watts knew that a civilian was cooperating in an</p> <p>18 investigation against him, so long as it wasn't a</p> <p>19 civilian you were working with, that would -- would not</p> <p>20 compromise your investigation?</p> <p>21 MR. KOSOKO: Object to the form of the</p> <p>22 question, argumentative, causing the witness to give</p> <p>23 a speculative response, assuming a number of facts</p> <p>24 not in an evidence.</p> <p>25 BY MR. HILKE:</p>	<p>1 Q Go ahead.</p> <p>2 MR. NOLAND: Go ahead.</p> <p>3 A Would you ask a question again, please?</p> <p>4 Q I would. Was it your opinion that if Sergeant</p> <p>5 Watts knew that a civilian was cooperating in an</p> <p>6 investigation against him, as long as that civilian</p> <p>7 wasn't someone you were working with, such knowledge</p> <p>8 would not compromise your investigation?</p> <p>9 MR. KOSOKO: In addition to my prior</p> <p>10 objections, I'll lay another objection that this is</p> <p>11 asking a lay witness to opine. Lay witness opinion.</p> <p>12 BY MR. HILKE:</p> <p>13 Q Go ahead.</p> <p>14 A My -- my opinion is that anybody that Sergeant</p> <p>15 Watts knew was -- was -- was speaking against him,</p> <p>16 especially to put him possibly in jail or cause him to</p> <p>17 be fired, he would be concerned about.</p> <p>18 Q And were you concerned that if Sergeant Watts</p> <p>19 knew he was being investigated, that could make it more</p> <p>20 difficult for your investigation to succeed?</p> <p>21 A I will say this. If Sergeant Watts knew, or</p> <p>22 anybody else knew that they were being investigated,</p> <p>23 they would take steps to do something to -- to hinder</p> <p>24 the investigation.</p> <p>25 Q Okay. Do you see the paragraph at the bottom</p>
<p>1 describing, you spoke -- speaking with Commander Walter</p> <p>2 Green?</p> <p>3 A Yes.</p> <p>4 Q And do you see in your report that -- is it</p> <p>5 the content of your -- man. One moment, please. And</p> <p>6 you -- strike. Did you discuss with Commander Green his</p> <p>7 decision to assign Sergeant Watts to work with the</p> <p>8 tactical unit in the Second District?</p> <p>9 A No.</p> <p>10 Q No? What was your discussion with Commander</p> <p>11 Green?</p> <p>12 A Stopped in. Commander Green was the new</p> <p>13 Commander, a friend that worked together in the house --</p> <p>14 in -- in the narcotic section. We went back a ways. And</p> <p>15 so I just stopped in to say hello. I was passing</p> <p>16 through the Second District, and I just, you know, just</p> <p>17 mentioned it, just threw it out there for him, you know,</p> <p>18 that other -- other people's been transferred in and out</p> <p>19 and things like that and just conversation, but I was</p> <p>20 fishing.</p> <p>21 Q And did you receive any information from</p> <p>22 Commander Green that was helpful to your investigation?</p> <p>23 A No, other than -- Commander Green -- we didn't</p> <p>24 spend -- he just said that -- that he thought he had a</p> <p>25 good choice, a good officer, that Watts came from Public</p>	<p>1 Housing, and he knew it, and -- and we talked about</p> <p>2 other things.</p> <p>3 Q Sure. And do you see at the bottom of that</p> <p>4 paragraph, it says, "Commander Green said there was no</p> <p>5 negative information received when he contacted the</p> <p>6 Internal Affairs Division as to the history of Sergeant</p> <p>7 Watts"?</p> <p>8 A There -- most commanders -- no, I won't say</p> <p>9 that. A lot of people, you know, do things that they</p> <p>10 want to know who's working for them. And so they have</p> <p>11 friends, they do a lot of things, and they -- they call</p> <p>12 around. I don't know if he called -- he called, you</p> <p>13 know, straight out and asked, or if -- if he had a</p> <p>14 friend working there and they called and got the</p> <p>15 information. I have no idea. But most commanders did -</p> <p>16 like, when I went to the narcotics section, when I</p> <p>17 first got there, they knew who I was. I didn't know who</p> <p>18 they were. Everybody there knew who I was, where I came</p> <p>19 from.</p> <p>20 Q And do you have any knowledge of whether or</p> <p>21 not confidential investigations can be shared with</p> <p>22 commander-level staff when they call IAD for</p> <p>23 information?</p> <p>24 A You don't want my opinion of that.</p> <p>25 Q I -- sir, I do want your -- I do want to know</p>

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<p>1 what you have to say about that, please.</p> <p>2 MR. NOLAND: Objection. Form, foundation. Go</p> <p>3 ahead and answer his question. And the question is</p> <p>4 whether or not -- ask that again, will you?</p> <p>5 MR. HILKE: Yeah, I'll ask again. That was a</p> <p>6 statement, not a question.</p> <p>7 BY MR. HILKE:</p> <p>8 Q My question is if you have any knowledge of</p> <p>9 whether information about confidential investigations</p> <p>10 was shared with commander-level staff from IAD.</p> <p>11 MR. KOSOKO: Objection to the form question,</p> <p>12 vague. Are we talking about every single commander</p> <p>13 in the Chicago Police Department or just commanders</p> <p>14 and IAD?</p> <p>15 BY MR. HILKE:</p> <p>16 Q Go ahead and answer.</p> <p>17 MR. NOLAND: I would simply object based on</p> <p>18 just anything beyond his personal knowledge. And</p> <p>19 that's, you know, to don't speculate. But go ahead</p> <p>20 and answer the question.</p> <p>21 A My personal knowledge -- my personal knowledge</p> <p>22 is no. It's the rules.</p> <p>23 BY MR. HILKE:</p> <p>24 Q And when you say, "by personal knowledge" --</p> <p>25 let me ask you this. Do you have any reason whatsoever</p>	<p>1 to believe that information about confidential</p> <p>2 investigations was shared with commanders, personal or</p> <p>3 otherwise?</p> <p>4 MR. KOSOKO: Object to the form of question.</p> <p>5 A No.</p> <p>6 Q No? Okay. Why did you -- why did you say</p> <p>7 that I -- what was the reason for answering earlier,</p> <p>8 "You don't want my opinion on that"?</p> <p>9 MR. NOLAND: I object to the form question. Go</p> <p>10 ahead.</p> <p>11 A I have an opinion about a lot of things. That</p> <p>12 doesn't make it right, it doesn't make it wrong. It's</p> <p>13 just I have an opinion. But --</p> <p>14 Q Well, what's --</p> <p>15 A -- my knowledge is -- my knowledge is no, they</p> <p>16 don't share information like this.</p> <p>17 Q Sir, what is your opinion on whether</p> <p>18 information like that is shared?</p> <p>19 MR. KOSOKO: Object to the form of the</p> <p>20 question, as it's asking for a lay witness's</p> <p>21 opinion.</p> <p>22 MR. NOLAND: Objection. Lacks foundation. It's</p> <p>23 been asked and answered. We're down one of those</p> <p>24 rabbit holes again but go ahead and answer.</p> <p>25 A I'll keep my answer to myself.</p>
<p style="text-align: center;">Page 131</p> <p>1 BY MR. HILKE:</p> <p>2 Q Are you --</p> <p>3 A Am I refusing to answer that question? Yes.</p> <p>4 Q All right.</p> <p>5 THE WITNESS: We good? Are we still here?</p> <p>6 MR. NOLAND: I --</p> <p>7 MR. KOSOKO: I'm still here.</p> <p>8 MR. NOLAND: (Inaudible).</p> <p>9 BY MR. HILKE:</p> <p>10 Q This is Exhibit 12. So do you (Inaudible)</p> <p>11 Illinois State Police report?</p> <p>12 (EXHIBIT 12 MARKED FOR IDENTIFICATION)</p> <p>13 A Yes, sir.</p> <p>14 Q And this is at Plaintiff 10911, Exhibit 12. Do</p> <p>15 you see that this documents you requesting an inquiry</p> <p>16 regarding Ronald Watts from the Illinois State Police?</p> <p>17 A Yes, sir.</p> <p>18 Q And scrolling down, do you see that a currency</p> <p>19 transaction report by a casino was given to you in</p> <p>20 response to this report?</p> <p>21 A Yes, sir.</p> <p>22 Q Okay. And did you learn that Sergeant Watts</p> <p>23 had had a reportable cash transaction at a casino from</p> <p>24 the Illinois State Police?</p> <p>25 A That's -- that's what this report is.</p>	<p style="text-align: center;">Page 132</p> <p>1 Q Okay. Did you take any other steps to</p> <p>2 investigate evidence of gambling by Sergeant Watts?</p> <p>3 A Not that I know of. I mean, we -- at -- at</p> <p>4 this point, I -- I hadn't had time to put -- you know,</p> <p>5 like, follow him or anything like this. I mean, these</p> <p>6 are -- these are some of the things that we found out</p> <p>7 and, you know, we -- we checked.</p> <p>8 Q All right. And when you say you didn't have</p> <p>9 time to follow him, what was -- I guess could you</p> <p>10 explain why you didn't have time to follow him?</p> <p>11 MR. NOLAND: Object to the form, foundation.</p> <p>12 You can answer.</p> <p>13 A There were -- there were other cases going on</p> <p>14 that required manpower, and -- and that they were --</p> <p>15 they were there before Watts' case came in, and that's</p> <p>16 what we were doing. Or they were up first. And we --</p> <p>17 you know, I did a lot of wire taps and -- that -- that -</p> <p>18 - for a time. It just depended on the time. And still,</p> <p>19 I had my regular case load to carry that -- you know,</p> <p>20 other cases that you have to -- that you have to</p> <p>21 investigate.</p> <p>22 Q Did anyone ever tell you how much time you</p> <p>23 should be spending on the Watts investigation?</p> <p>24 MR. NOLAND: Objection, form, foundation.</p> <p>25 Q Go ahead.</p>

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1	A	No.	from the Secretary of State; is that right?
2	Q	Exhibit 13.	A Yes.
3	MR. KOSOKO:	Wally, what was that 07-19-2005.	Q And you and Sergeant Bigg also went to 5510
4	What was that marked as?	West Flournoy, and you talked to a guy who told you	she'd moved two to three months ago and he didn't know
5	MR. HILKE:	Exhibit 12, Plaintiff 10911.	where she was now; is that right?
6	BY MR. HILKE:		A Yes.
7	Q	But now this is Exhibit 13, Plaintiff 206. Do	Q Did you make any additional efforts to locate
8	you see here a report from you dated August 11, 2005?	Ms. Jackson?	
9		(EXHIBIT 13 MARKED FOR IDENTIFICATION)	A Yes, we did. What they were, I cannot tell
10	A	Yes.	you. But yes, we did.
11	Q	And the subject is "Search For Melissa	Q And did you document those additional efforts?
12	Jackson"; is that right?	A Jackson?	A No, sir.
13	A	Yes.	Q Okay. And scrolling to the bottom, I'm
14	Q	And am I correct that this report documents	zooming in the bottom left a little here. Are you able
15	that Sergeant Watts had reported a loss of \$12,400 in	to read the signature?	
16	United States currency from his residence?	A Right.	A No.
17	A	Right.	Q Okay. This is Exhibit 14 at EG 23980. And
18	Q	And he had said that the alleged defender was	did you see here a Chicago Police Department case
19	Melissa Jackson, his -- and this report describes her as	supplementary report of the complainant refusing to	prosecute?
20	his alleged girlfriend; is that right?	(EXHIBIT 14 MARKED FOR IDENTIFICATION)	A Yes.
21	A	Yes.	Q And scrolling down, we see that this is a
22	Q	And below you noted that Ms. Jackson is a	complaint with the victim of Ronald Watts and the
23	possible witness against Sergeant Watts; is that right?		
24	A	Yes.	
25	Q	And Sergeant Bigg requested a photo from her	
		Page 135	Page 136
1	offender of Melissa Jackson; is that right?	Q Was there any reason you did not contact that	
2	A Yes, sir.	detective to try to get in touch with Melissa Jackson?	
3	Q And I'm now on the second page here. Do you	MR. NOLAND: Objection. Argumentative,	
4	see that looking at the full paragraph below in	foundation. Go ahead.	
5	investigation and starting in the middle, it says, "The	A No, there was no reason for -- that I did not	
6	responding Detective then contacted victim by phone,	reach out to him. No, none whatsoever.	
7	victim relayed that he is not interested in" pursing --	Q All right. So we talked a little bit about a	
8	"should be pursuing this matter any further. Victim	meeting you were -- attended with Ben Baker and his	
9	further relayed that most of his property has been	attorney. Was it your understanding that there were	
10	returned."	continuing criminal charges against Mr. Baker?	
11	A Okay.	A Yes.	
12	Q And were you aware that Watts had refused to	Q Okay. And were you aware that there was a	
13	prosecute Melissa Jackson?	subpoena for information held by Internal Affairs that	
14	MR. NOLAND: Objection, foundation.	Mr. Baker's attorney had sought?	
15	A Yes, I was.	MR. NOLAND: Objection. Foundation.	
16	Q Okay. While you were still in confidential	A No.	
17	investigations, did you receive a copy of this report?	Q Did you ever gather materials to respond to a	
18	MR. NOLAND: Objection, foundation.	subpoena regarding the Watts investigation?	
19	A I do not remember, but I was aware.	MR. NOLAND: Objection. Foundation, calls for	
20	Q Did you ever speak to the detective who	speculation.	
21	investigated this reported offense?	A I did -- I did not.	
22	A No, I did not.	Q Okay. Did you receive information about	
23	Q Did -- to your knowledge, did anyone ask that	Sergeant Watts getting into an altercation with another	
24	detective to help contact Melissa Jackson?	officer during your investigation of him?	
25	A Not -- I don't know.	A I do not remember.	

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<p>1 Q Mark this Exhibit 15, City-BG 12432. Okay. Do 2 you see here a CR with the names Raymond Punicke 3 (phonetic) and Ronald Watts? 4 (EXHIBIT 15 MARKED FOR IDENTIFICATION) 5 A Yes. 6 Q And do you see above that the date of 7 incident, October 12, 2005? 8 A Okay. 9 Q And I'm going to scroll down a little bit. 10 Sure. So this is the third page of the document at BG 11 12434. Can I ask you to just take a minute and read 12 what's in the allegation section here, under "Accused 1" 13 and "Accused 2"? 14 A Okay. 15 Q Do you recall any information at all like this 16 coming up during the course of your investigation? 17 A Not to me, no, sir. 18 Q Mark this Exhibit 16, Plaintiff 9959. Do you 19 see here a document with the heading CL Report? 20 (EXHIBIT 16 MARKED FOR IDENTIFICATION) 21 A Yes. 22 Q Does that mean anything to you? 23 A Nothing. 24 Q Okay. And do you see that there's an ASA 25 listed here, Dave Navarro?</p>	<p>1 A Yes. 2 Q And the source there is Matthew Mahoney, a 3 private attorney? 4 A Yes. 5 Q And I just want to point you to the first 6 paragraph. Do you see where it reads, "Source of case, 7 Attorney Matthew Mahoney, contacted our office, stating 8 that over the past one and a half years he has 9 represented several clients in narcotics cases, all of 10 whom independently state that they have been victimized 11 by the target in a similar fashion"? 12 A All right. 13 Q Let's see. And do you see lower in the 14 document there's one subject listed, and that subject is 15 Sergeant Ronald Watts? 16 A Yes, sir. 17 Q Was any information ever provided to you that 18 Mr. Mahoney had multiple clients who alleged misconduct 19 by Sergeant Watts? 20 A Not to me, that I can remember it, no, sir. 21 Q Okay. And do you -- is it -- have you ever 22 seen this document before? 23 A No, sir. 24 Q Exhibit 17 at BG 23849. Do you see in front 25 of you a document that starts with the heading,</p>
<p style="text-align: center;">Page 139</p> <p>1 "Sergeant Ronald Watts" and then purports to give a 2 timeline? 3 (EXHIBIT 17 MARKED FOR IDENTIFICATION) 4 MR. NOLAND: Hey, Wally? 5 MR. HILKE: Yeah? 6 MR. NOLAND: I've got to make a call with 7 respect to my flight. Can we take a five-minute 8 break? 9 MR. HILKE: Let's take a five-minute break. 10 Yeah, let's go off the record. 11 COURT REPORTER: Okay. We are going off the 12 record. The time is 1:37 p.m. Central Standard 13 (OFF THE RECORD) 14 COURT REPORTER: We are back on the record for 15 the deposition of Calvin Holliday being conducted by 16 video conference. My name is Victoria Jadick. The 17 date is November 14, 2022, and the time is 1:49 18 Central Standard. 19 BY MR. HILKE: 20 Q Okay. Mr. Holliday, when we left off we were 21 just looking at Exhibit 17, and I'm now going to take 22 you to the second page of that document. Do you see at 23 the bottom -- sorry, this is BG 23850. Do you see where 24 there's the date October 21, 2005 in this timeline? 25 A Yes.</p>	<p style="text-align: center;">Page 140</p> <p>1 Q And it describes you preparing a two from 2 report, documenting an interview with [REDACTED] 3 who's in the United States Marshal's custody. Do you 4 see that? 5 A Yes, sir. 6 Q And do you have an independent memory of this 7 conversation with [REDACTED] 8 A No. 9 Q Okay. And it says the purpose of the current 10 interview was to determine if there's any personal 11 knowledge or information regarding Sergeant Watts, but 12 that [REDACTED] refused to be interviewed. Is that what 13 happened when you tried to speak to [REDACTED] that time, 14 that he refused to be interviewed? 15 A Yes, sir. 16 Q Okay. And do you remember why he wouldn't 17 talk to you? 18 A No, sir. 19 Q And below that, do you see the date October 20 31, 2005? 21 A Yes. 31 October, '05? Yes, sir. 22 Q Yes. And do you see that it describes you 23 taking a statement from Ben Baker in Courtroom 400 at 24 26th and California? 25 A Yes.</p>

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<p>1 Q And it states that "Baker stated that he was 2 constantly being framed by Sergeant Watts for PCS." Do 3 you see that?</p> <p>4 A It's blocked off, but I see the P.</p> <p>5 Q I'm sorry. One second. Is that better?</p> <p>6 A Yes.</p> <p>7 Q Okay. What does PCS stand for?</p> <p>8 A Possession of controlled substance.</p> <p>9 Q And what did you understand Baker to mean when 10 he told you that he was being framed for possession of 11 controlled substance?</p> <p>12 MR. NOLAND: Objection. Foundation, calls for 13 speculation. Go ahead.</p> <p>14 A I understood him to be saying that either 15 Watts was planting those -- planting drugs on him or 16 arresting him for substances that he was holding that 17 were not narcotics.</p> <p>18 Q Okay. Was that the first time that you heard 19 that Watts was planting -- was framing people for drug 20 crimes?</p> <p>21 MR. NOLAND: Objection. Object to the form of 22 the question.</p> <p>23 A I do not remember, sir.</p> <p>24 Q Did you hear multiple times during the 25 investigation that Sergeant Watts was framing people for</p>	<p>1 drug crimes?</p> <p>2 MR. NOLAND: Objection, foundation.</p> <p>3 A I heard -- yes.</p> <p>4 Q Do you see at the bottom where it says, "Baker 5 stated that he has seen Watts and other police officers 6 running a narcotics sales operation"?</p> <p>7 A Yes, sir.</p> <p>8 Q What did that mean -- what does it mean to you 9 to be running a narcotics sales operation?</p> <p>10 MR. KOSOKO: Object to the form of the 11 question.</p> <p>12 A You're asking me what does it mean to me. What 13 it means to me is that he was -- either he had people on 14 the street selling drugs, or he himself was selling 15 drugs.</p> <p>16 Q And do you remember any additional details 17 from this conversation about why Baker believed that 18 what he saw was Watts and other police officers running 19 a narcotics sales operation?</p> <p>20 MR. KOSOKO: Object to the form of the 21 question, asking the witness to speculate about 22 another witness's mind state.</p> <p>23 A Are you -- ask your question again, please.</p> <p>24 BY MR. HILKE:</p> <p>25 Q Yeah, did Baker tell you anything else about</p>
<p style="text-align: center;">Page 143</p> <p>1 why he believe Watts and other police officers were 2 running a narcotics sales operation?</p> <p>3 A He didn't state anything other than what he 4 had previously stated, that -- you have to understand, 5 these are all drug dealers talking about each other. So 6 if it's drug products, they know. And they're -- 7 they're all saying the same thing, that Watts is taking 8 drugs from them and, you know -- or making them pay -- 9 pay for the privilege of selling the drugs in his area.</p> <p>10 Q Okay. Mark this Exhibit 18, City BG 12903. 11 Scrolling to the top of the document, do you see that 12 this is a CR Report dated November 3, 2005?</p> <p>13 (EXHIBIT 18 MARKED FOR IDENTIFICATION)</p> <p>14 A Yes, sir.</p> <p>15 Q And the accused is Ronald Watts?</p> <p>16 A Yes, sir.</p> <p>17 Q And the complainant is Clarissa Glenn (phonetic). Do you see that?</p> <p>18 A Oh, yes, sir.</p> <p>19 Q Okay. And do you recognize Clarissa Glenn as 20 Ben Baker's wife?</p> <p>21 A No, I do not.</p> <p>22 Q And the assigned -- the -- from investigator - 23 - well, strike that. I'm scrolling down in the 24 document. Okay. I'm on the third page of the document.</p>	<p style="text-align: center;">Page 144</p> <p>1 Do you see that the investigator assigned is Kenneth 2 Mann (phonetic)?</p> <p>3 A Yes, sir.</p> <p>4 Q Is that someone you knew?</p> <p>5 A I do know Kenny Mann. Not all that well, but 6 I do know him. If I -- if he saw me and I saw him, we 7 would speak.</p> <p>8 Q Okay. And do you see above that in the 9 narrative of allegations, the allegation is that an 10 accused officer -- the allegation is that the accused 11 officer threatened Ms. Glenn with bodily harm and arrest 12 for no reason.</p> <p>13 A Yes.</p> <p>14 Q Okay. Was this allegation ever brought to 15 your attention?</p> <p>16 A No --</p> <p>17 MR. NOLAND: Objection, foundation.</p> <p>18 Q Did you and Kenneth Mann ever speak about this 19 allegation?</p> <p>20 MR. NOLAND: Objection, foundation.</p> <p>21 A No.</p> <p>22 Q Just one moment, please. Okay. Mark this 23 Exhibit 19 at BG 23842. Do you see here an application 24 for a pen register and caller identification trap and 25 trace device by Sergeant Joe Barns?</p>

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<p style="text-align: center;">Page 145</p> <p>1 (EXHIBIT 19 MARKED FOR IDENTIFICATION)</p> <p>2 A Yes, sir.</p> <p>3 Q And were you familiar with a -- well, strike</p> <p>4 that. When you were involved in the investigation, did</p> <p>5 you do any work on doing a pen register application on</p> <p>6 Sergeant Watts?</p> <p>7 A No, sir.</p> <p>8 Q And have you ever seen this document before?</p> <p>9 A No, sir.</p> <p>10 Q Okay. And so is it -- and I'm going to scroll</p> <p>11 down to the bottom of this document. Do you see that</p> <p>12 this document has the year 2006 at the bottom but</p> <p>13 doesn't have a date written in on it?</p> <p>14 A Yes, sir.</p> <p>15 Q And is it correct that if this was done in</p> <p>16 2006, it could have been after you left the confidential</p> <p>17 investigation section?</p> <p>18 A Yes, sir.</p> <p>19 Q I'm going to stop sharing. Do you remember</p> <p>20 the month when you left confidential investigations and</p> <p>21 moved to general investigations?</p> <p>22 A No, sir, I do not.</p> <p>23 Q What is -- do you remember any investigative</p> <p>24 actions you took in the Watts investigation that we</p> <p>25 haven't discussed today already?</p>	<p style="text-align: center;">Page 146</p> <p>1 A No, sir.</p> <p>2 Q Okay. Do you remember what the last thing you</p> <p>3 did was in the Watts investigation?</p> <p>4 A No, sir, I do not.</p> <p>5 Q Was there a time in your investigation where</p> <p>6 you became aware that the Cook County State's Attorney's</p> <p>7 Office was investigating Sergeant Watts's misconduct?</p> <p>8 MR. NOLAND: Objection, beyond -- are you</p> <p>9 asking him besides what you talked about earlier?</p> <p>10 MR. HILKE: I -- no, overall. Just the -- I'm</p> <p>11 interested in what --</p> <p>12 BY MR. HILKE:</p> <p>13 Q Yeah. My question is, was there a time in</p> <p>14 your investigation where you became aware that the Cook</p> <p>15 County State's Attorney's Office was investigating</p> <p>16 misconduct by Sergeant Watts?</p> <p>17 MR. NOLAND: I -- hold on. That's a confusing</p> <p>18 and unfair question when you previously discussed</p> <p>19 the interview with Navarro. So are you telling him</p> <p>20 to exclude that? I don't understand -- I don't</p> <p>21 understand what you're --</p> <p>22 MR. HILKE: I clarify. That's fair.</p> <p>23 BY MR. HILKE:</p> <p>24 Q We discussed earlier a meeting that you</p> <p>25 attended with Assistant State's Attorney Navarro; is</p>
<p style="text-align: center;">Page 147</p> <p>1 that right?</p> <p>2 A Yes, sir.</p> <p>3 Q And in that meeting, did you receive</p> <p>4 information that the Cook County State's Attorney's</p> <p>5 Office was investigating Sergeant Watts?</p> <p>6 A I don't remember, but if I -- here, let me say</p> <p>7 this.</p> <p>8 THE WITNESS: Is that okay?</p> <p>9 MR. NOLAND: Oh, yeah, answer the -- I mean,</p> <p>10 don't speculate.</p> <p>11 THE WITNESS: No, I'm not going to speculate.</p> <p>12 MR. NOLAND: But if you -- if you have --</p> <p>13 A I don't remember. I don't remember.</p> <p>14 BY MR. HILKE:</p> <p>15 Q You don't remember? Okay. And other than</p> <p>16 that meeting, was there any time that you learned about</p> <p>17 an investigation into Sergeant Watts by the Cook County</p> <p>18 State's Attorney's Office?</p> <p>19 MR. NOLAND: Objection to the extent it calls</p> <p>20 for speculation, foundation.</p> <p>21 A I don't remember.</p> <p>22 Q Okay. Would you have documented any</p> <p>23 information you learned about -- if you learned any</p> <p>24 information, about the State's Attorney's Office</p> <p>25 investigating Watts?</p>	<p style="text-align: center;">Page 148</p> <p>1 MR. KOSOKO: Object to the form of the</p> <p>2 question. And I'm somewhat confused. I thought IAD</p> <p>3 -- if -- okay.</p> <p>4 BY MR. HILKE:</p> <p>5 Q Go ahead.</p> <p>6 MR. NOLAND: You can answer. Go ahead.</p> <p>7 A I -- were I made aware, yes, I would have -- I</p> <p>8 would have -- I would have put that in the report. I</p> <p>9 would have made a little one-liner report.</p> <p>10 Q Okay. And were you aware that the US</p> <p>11 Attorney's Office closed its investigation into Sergeant</p> <p>12 Watts in February of 2006?</p> <p>13 A No, I was not.</p> <p>14 Q Do you have a recollection of whether you were</p> <p>15 still in confidential investigations in February 2006?</p> <p>16 A I -- if -- if I remember correctly, I think</p> <p>17 there was a report that had my signature on it that was</p> <p>18 dated, what, August of 2006. I'm not sure. And if that</p> <p>19 -- if that'd be the case, then I would have still been</p> <p>20 in confidential at this time.</p> <p>21 MR. NOLAND: My report showing --</p> <p>22 THE WITNESS: Didn't he have a report showing</p> <p>23 me August of 2006?</p> <p>24 MR. NOLAND: No.</p> <p>25 THE WITNESS: Then I -- I don't know.</p>

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<p>1 MR. NOLAND: Oh, I see what he's referring --</p> <p>2 MR. HILKE: Yeah, I -- you -- oh, sorry.</p> <p>3 BY MR. HILKE:</p> <p>4 Q You would defer, of course, to the reports in</p> <p>5 terms of showing when you definitely were in</p> <p>6 confidential investigations; is that fair?</p> <p>7 A In the report that -- that had Confidential on</p> <p>8 it, the confidential investigations section that has my</p> <p>9 signature, I was still in the confidential section.</p> <p>10 Q Okay. And after you -- were transferred out</p> <p>11 of confidential investigations, did you receive any</p> <p>12 further information about the investigation into</p> <p>13 Sergeant Watts?</p> <p>14 A No, sir.</p> <p>15 Q Did you ever receive any information about a</p> <p>16 Beauregard Brown (phonetic) in relation to the Watts</p> <p>17 investigation?</p> <p>18 A I don't remember the name, sir.</p> <p>19 Q What about an Alan Jackson (phonetic)?</p> <p>20 A Don't remember the name.</p> <p>21 Q Dewayne Holmes (phonetic)?</p> <p>22 A Don't remember the name.</p> <p>23 Q Do you ever remember any specific officers</p> <p>24 being identified who transferred away to avoid working</p> <p>25 with Watts?</p>	<p>1 MR. KOSOKO: Object to the form of the</p> <p>2 question, assumes facts not in evidence.</p> <p>3 A No, sir, I do not.</p> <p>4 Q And did you ever receive any information about</p> <p>5 officers other than Watts and -- strike that.</p> <p>6 MR. NOLAND: Hey, Wally?</p> <p>7 Q Did you ever receive --</p> <p>8 MR. HILKE: Yeah.</p> <p>9 MR. NOLAND: Could we take another five-minute</p> <p>10 break, please?</p> <p>11 MR. HILKE: We could.</p> <p>12 MR. NOLAND: Thank you very much.</p> <p>13 COURT REPORTER: Okay. We are going off the</p> <p>14 record. The time is 2:07 Central Standard.</p> <p>15 (OFF THE RECORD)</p> <p>16 COURT REPORTER: We are back on the record for</p> <p>17 the deposition of Calvin Holliday, being conducted</p> <p>18 by video conference. My name is Victoria Jadick.</p> <p>19 Today's date is November 14, 2022, and the time is</p> <p>20 2:15 Central Standard.</p> <p>21 BY MR. HILKE:</p> <p>22 Q Okay. Mark this Exhibit 20, City BG 10303.</p> <p>23 All right. Whoops, I'm sorry. I'm actually on the</p> <p>24 third page of this Exhibit. It starts two up, but this</p> <p>25 is the page I want. Sir, do you see a complaint</p>
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<p>1 Register dated March 12, 2004 here?</p> <p>2 (EXHIBIT 20 MARKED FOR IDENTIFICATION)</p> <p>3 A Yes.</p> <p>4 Q And below, do you see the accused officers</p> <p>5 named Brian Bolton and Robert Gonzalez?</p> <p>6 A Yes.</p> <p>7 Q And do you recognize those as two of the</p> <p>8 officers who you requested photos from in your request</p> <p>9 for photographs we looked at earlier?</p> <p>10 A The names look familiar. I don't remember.</p> <p>11 Q Sure. Okay. Do you recognize them as</p> <p>12 officers who'd previously worked with Sergeant Watts?</p> <p>13 A I recognize the names. I don't remember who</p> <p>14 they worked for, no.</p> <p>15 Q Okay. Scrolling down to the allegations, do</p> <p>16 you see that the allegation is that the witnesses found</p> <p>17 14 small bags of suspected crack/cocaine in beat 4512's</p> <p>18 vehicle, number 2627, which accused officers were</p> <p>19 previously assigned on December 31, 2003?</p> <p>20 A Yes.</p> <p>21 Q And did you -- have you ever seen this CR</p> <p>22 before?</p> <p>23 A Never.</p> <p>24 Q And did you ever receive any information that</p> <p>25 officers who had worked with Watts had been accused of</p>	<p>1 misconduct involving drugs?</p> <p>2 MR. NOLAND: Objection to -- yeah, objection to</p> <p>3 form. Go ahead. I --</p> <p>4 COURT REPORTER: I'm sorry. Who was that</p> <p>5 objection?</p> <p>6 MR. NOLAND: Dan Noland said objection to form,</p> <p>7 and I believe the witness answered the question.</p> <p>8 BY MR. HILKE:</p> <p>9 Q I'm sorry, sir. I did not hear your answer.</p> <p>10 A I don't remember.</p> <p>11 Q Okay. Was it your understanding that any</p> <p>12 information from your investigation of Sergeant Watts</p> <p>13 reached the superintendent?</p> <p>14 MR. NOLAND: Objection. Calls for speculation.</p> <p>15 A Sure. Yes.</p> <p>16 Q And --</p> <p>17 MR. NOLAND: And lack of foundation.</p> <p>18 Q Sure. Why was that your understanding?</p> <p>19 MR. NOLAND: You're asking -- objection --</p> <p>20 MR. HILKE: Well, he said yes. I'm entitled to</p> <p>21 ask him why he --</p> <p>22 MR. NOLAND: All right, you're right.</p> <p>23 Objection. Calls for speculation. Go ahead.</p> <p>24 A Any complaint against -- any complaint of</p> <p>25 misconduct by a policeman, especially, you know, one of</p>

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<p>1 this magnitude, would be brought to the attention of the 2 superintendent. How -- how is he going -- if someone 3 asks him out of the mayor's office or anyplace else, and 4 he's standing up there saying, "I don't know," I mean, 5 no. You know it's brought to his attention.</p> <p>6 BY MR. HILKE:</p> <p>7 Q Was there anything -- when you were 8 transferred out of confidential investigations, was 9 there anything still on your agenda, anything you were 10 still planning to do to continue investigating Sergeant 11 Watts?</p> <p>12 MR. NOLAND: Objection. Calls for speculation, 13 foundation.</p> <p>14 A Yes.</p> <p>15 Q What did you want to do next?</p> <p>16 A I have no idea.</p> <p>17 Q Was there ever a time during your 18 investigation when you wanted to take a step in the 19 investigation, but you were unable to?</p> <p>20 MR. NOLAND: Objection to the form. Besides 21 what we previously talked about, with respect to 22 Mr. Mahoney and Mr. Baker?</p> <p>23 BY MR. HILKE:</p> <p>24 Q Sure, but besides anything you've mentioned 25 already.</p>	<p>1 A I'm not quite sure what you mean.</p> <p>2 Q Okay. Well, did you ever propose an action in 3 the investigation that was rejected by anyone else?</p> <p>4 A No.</p> <p>5 Q Just one second, please. Did you ever try to 6 interview a CPD officer in regards to your 7 investigation?</p> <p>8 A No.</p> <p>9 MR. HILKE: Okay. Those are all the questions 10 I have, sir. Thank you for your time today.</p> <p>11 THE WITNESS: Thank you.</p> <p>12 MR. HILKE: Some other attorneys will have 13 questions for you, I think starting with Mr. 14 Flaxman.</p> <p>15 MR. NOLAND: Yeah. Let's do -- if Mr. Flaxman 16 could, that'd probably make sense to go next.</p> <p>17 MR. FLAXMAN: I didn't hear what you said, but 18 I assume it was complimentary.</p> <p>19 MR. NOLAND: It was --</p> <p>20 MR. HILKE: Yes, it --</p> <p>21 MR. NOLAND: I just said that I thought that, 22 Mr. Flaxman, it would make sense for you to go next.</p> <p>23 MR. FLAXMAN: Okay. Thank you.</p> <p>24 EXAMINATION</p> <p>25 BY MR. FLAXMAN:</p>
<p style="text-align: center;">Page 155</p> <p>1 Q Good afternoon, sir. Are you okay without 2 lunch?</p> <p>3 A I'm great without it.</p> <p>4 Q Good. What'd you do before you joined the 5 Chicago Police Department?</p> <p>6 A Worked for Orkin, worked at the CPA, worked at 7 an insurance company.</p> <p>8 Q Okay. You told us that you wanted to get into 9 IAD because you had had an unpleasant experience there, 10 or something to that effect. I'm not putting words in 11 your mouth, I'm just getting the frame. Were you being 12 -- had you been investigated by IAD?</p> <p>13 A I was not being investigated, I was one of the 14 witnesses.</p> <p>15 Q And what were you -- what was the nature of 16 the investigation?</p> <p>17 A Honestly, I do not remember.</p> <p>18 Q Well, do you remember what your knowledge of - 19 - what you had allegedly witnessed?</p> <p>20 A Sir, no disrespect, it was a long time ago. It 21 was -- there -- like I said, the reason I went is, it 22 wasn't the allegation itself, it was the officers that - 23 - that did the investigation that really rubbed me the 24 wrong way.</p> <p>25 Q Well, did you get warnings before you gave a</p>	<p style="text-align: center;">Page 156</p> <p>1 statement?</p> <p>2 A Probably.</p> <p>3 Q Did you have --</p> <p>4 A I mean, I -- they didn't violate my rules. I 5 mean, I'm -- I've been around the block once or twice.</p> <p>6 Q Have you ever been arrested?</p> <p>7 A No.</p> <p>8 Q Have you ever been the subject of a CR 9 complaint?</p> <p>10 A Of course.</p> <p>11 Q Ever been the subject of a CR complaint that 12 involved planting narcotics on people?</p> <p>13 A No.</p> <p>14 Q When -- you talked about NAGIS, N-A-G-I-S. 15 Could you tell us what that is?</p> <p>16 A I'm not -- I'm not certain, and I don't -- I 17 don't want to throw the wrong thing out there. I'm -- 18 I'm -- I'm thinking that it's an information gathering 19 agency, but I'm not sure.</p> <p>20 Q Did you ever hear of something called the 21 Narcotics and Gang Intelligence Section?</p> <p>22 A Yes, and that may be it.</p> <p>23 Q Is that a part of the Chicago Police 24 Department?</p> <p>25 A I'm not certain, sir. It could be.</p>

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<p>1 Q Are there federal agents in the -- in NAGIS?</p> <p>2 A I don't know.</p> <p>3 Q Okay. You also talked about HIDTA.</p> <p>4 A Yes.</p> <p>5 Q Could you tell us what that is?</p> <p>6 A High Intensity Drug something. They're police officers, they're federal agents.</p> <p>7 Q I'm trying to get this right. You -- you testified that you came from an investigative background. Do you remember that?</p> <p>8 A That I -- yeah. Once I left patrol, yes.</p> <p>9 Q Did you have an investigative background before you joined the Chicago Police Department?</p> <p>10 A No.</p> <p>11 Q And when did you acquire your investigative background?</p> <p>12 A Oh, mine was on the job.</p> <p>13 Q Did you ever attend classes in conducting investigations?</p> <p>14 A There were in-house classes, and both with the police department and with the Drug Enforcement Administration.</p> <p>15 Q Were you ever a Detective?</p> <p>16 A Never.</p> <p>17 Q A lot of -- some -- several of these reports</p>	<p>1 refer to you as a police agent. Could you tell us what a POLICE AGENT is?</p> <p>2 A That's the title in Internal Affairs. It just -- because you did investigative work, it was just a pay grade.</p> <p>3 Q Did you get paid more in Internal Affairs than you did in patrol?</p> <p>4 A Yes.</p> <p>5 Q Okay. You talked about keeping your supervisors apprised of your progress in investigations. Do you remember that area of testimony?</p> <p>6 A Yes, sir.</p> <p>7 Q Would you inform your supervisor of your progress orally?</p> <p>8 A Yes, I would tell them different things. I would -- it's -- it's like if you -- on the reports where you saw that I went to a meeting and I had taken Juan or Kenny Bigg or Kenny and Rick Rugador (phonetic), you know, and that -- that -- that way -- or just, you know, conversation, yeah.</p> <p>9 Q But when you went to a meeting about -- well, when you went to a meeting about the Watts allegations, would you prepare a report immediately after the meeting?</p> <p>10 MR. NOLAND: Object to the form. Go ahead.</p>
<p>1 A When I went to meetings about Watts, I -- I prepared a report, and I -- I believe they were timely, yes.</p> <p>2 Q Okay. At one point in your earlier examination, this happened at 10:42 a.m., you stated that, "Outside the rules that I know of." Do you remember talking about that?</p> <p>3 A I remember vaguely something like that.</p> <p>4 Q Well, do you remember what rules you were talking about, referring to?</p> <p>5 A No, sir, I don't.</p> <p>6 Q Okay.</p> <p>7 A You could refresh --</p> <p>8 Q Well, are there rules that you followed as a Chicago police officer or police agent in Internal Affairs?</p> <p>9 A The rules that I followed were the general -- the guidelines for the police department, the general orders. General orders and special orders, those are the only rules I had, other than the laws of the state of Illinois and, you know, the government. That's all I had to do.</p> <p>10 Q You were asked about whether you had the power to get an officer reassigned from a particular assignment, and you said no. Do you remember that?</p>	<p>1 A Yes, sir.</p> <p>2 Q Do you know if anybody in the Chicago Police Department had that power?</p> <p>3 MR. NOLAND: Objection, extent it calls for speculation. You may answer.</p> <p>4 A I mean, the superintendent can do what he wants to do. And there -- I -- I suppose people up -- up around his pay grade can -- you know, they have the power to have somebody reassigned.</p> <p>5 Q Did you ever -- and did -- you didn't report directly to the superintendent, did you?</p> <p>6 A No, sir.</p> <p>7 Q You reported to someone who reported to someone who eventually reported to the superintendent; is that -- is that correct?</p> <p>8 A Correct.</p> <p>9 Q Did you ever report to your supervisor a recommendation that Sergeant Watts should be reassigned from working in the projects?</p> <p>10 A No, sir.</p> <p>11 Q You -- did you have the power to strip an officer of police powers?</p> <p>12 A My super -- sergeants did. I don't think TAs had that power. I'm not certain.</p> <p>13 Q Did you ever strip an officer of police -- of</p>

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<p>1 his or her police powers?</p> <p>2 A Was I there when he was -- I was present when</p> <p>3 one -- when some were stripped. I mean, I -- that was</p> <p>4 my whole purpose of going, yes.</p> <p>5 Q Okay. And did you ever recommend to any -- to</p> <p>6 your supervisor that Sergeant Watts be stripped of his</p> <p>7 police powers?</p> <p>8 A No, sir.</p> <p>9 Q Did that integrity investigation ever take</p> <p>10 place?</p> <p>11 A No, sir. It was -- it was just a plan of</p> <p>12 thought at the time, and it never came to fruition.</p> <p>13 MR. NOLAND: I should have objected. I'm</p> <p>14 sorry, Ken. I should have objected. I just -- the</p> <p>15 form of the question. I think you mean the timing</p> <p>16 when he was working on it.</p> <p>17 MR. FLAXMAN: I'll come back to that.</p> <p>18 BY MR. FLAXMAN:</p> <p>19 Q You -- well, you told us about a meeting with</p> <p>20 the FBI and an assistant U.S. attorney and some other</p> <p>21 people, and then I think you told us that they took over</p> <p>22 the investigation, and you would just do what they told</p> <p>23 you to do. Am -- I don't want to be misstating that or</p> <p>24 putting words in your mouth, but is that -- do you</p> <p>25 remember that -- testimony like that?</p>	<p>1 A I remember like that, and what I was saying</p> <p>2 was once the FBI steps in and takes over the -- takes</p> <p>3 charge of an investigation, especially one like this</p> <p>4 that was juicy and promising, then it's a done deal for</p> <p>5 anybody that's doing business with them, and there was -</p> <p>6 - even when you're working in the federal building,</p> <p>7 people do not like them because of things like this.</p> <p>8 Q Well, when you met with Attorney Mahoney and</p> <p>9 his client and the assistant state's attorney Navarro,</p> <p>10 was that after the federal government took over the</p> <p>11 investigation?</p> <p>12 MR. NOLAND: Objection, asked and answered,</p> <p>13 previously established, but go ahead, answer again.</p> <p>14 A Actually, I don't remember.</p> <p>15 Q Okay. Did you ever know Sergeant Watts before</p> <p>16 you started working in IAD? You have to answer</p> <p>17 verbally.</p> <p>18 A No.</p> <p>19 Q Did you know Officer Kallat Mohammed before</p> <p>20 you started working in IAD?</p> <p>21 A Don't believe so.</p> <p>22 Q Have you ever spoken to Mr. Watts after you</p> <p>23 retired from the Chicago Police Department?</p> <p>24 A I don't think so. I don't think I would know</p> <p>25 him if he was standing here next to me.</p>
<p style="text-align: center;">Page 163</p> <p>1 Q You -- well, you were asked about whether you</p> <p>2 had access to other complaint register investigations</p> <p>3 during the course of your investigation, and I think you</p> <p>4 said you don't -- you did not have access to other CR</p> <p>5 files; is that right?</p> <p>6 MR. NOLAND: Object to the form of the</p> <p>7 question. I think it mischaracterizes but go ahead.</p> <p>8 A You don't -- I -- if I -- if I'm correct the</p> <p>9 question was, if I have a complaint against you, do I</p> <p>10 have -- do I have access to other complaints against you</p> <p>11 from the past, and the answer is no, I get access to</p> <p>12 those once I finish the investigation and I'm doing the</p> <p>13 summary and I'm proposing that you get this, this, this,</p> <p>14 or this, whether you -- whether you stay or go, or get</p> <p>15 disciplinary action.</p> <p>16 Q Now, when you worked in patrol, you made</p> <p>17 arrests, didn't you?</p> <p>18 A Yes, sir.</p> <p>19 Q And after making an arrest, would you check</p> <p>20 the arrestee's criminal history?</p> <p>21 A No.</p> <p>22 Q Would you check the rap sheet of the arrestee?</p> <p>23 A Working in patrol, unless things have changed,</p> <p>24 back then, no. Now, did you get a copy of it? Yes. It</p> <p>25 came afterwards. You would get it in the mail and --</p>	<p style="text-align: center;">Page 164</p> <p>1 but not -- unless you was doing something -- working in</p> <p>2 patrol, you know, you're reaction, not -- not proaction</p> <p>3 [sic].</p> <p>4 Q Well would you get information about whether</p> <p>5 there were any outstanding warrants for the arrestee?</p> <p>6 A Yes.</p> <p>7 Q Okay. Exhibit 9 was the report that you</p> <p>8 signed about the integrity check. Do -- did you -- was</p> <p>9 that a recommendation you made to someone for an</p> <p>10 integrity check?</p> <p>11 A That was a recommendation that I was making</p> <p>12 prior -- an investigator tool. What can we do to see if</p> <p>13 this allegation is true?</p> <p>14 Q And the first integrity check was on --</p> <p>15 recommendation or request was dated March 9, 2005. Do</p> <p>16 you remember that, or do I need to find the exhibit, or</p> <p>17 ask someone to put it on to share the screen with you?</p> <p>18 MR. NOLAND: Can we have --</p> <p>19 A Yeah. If it's got my signature and the dates,</p> <p>20 then that's when I did it.</p> <p>21 Q Okay --</p> <p>22 MR. NOLAND: (Inaudible) you got the date</p> <p>23 right, Mr. Flaxman.</p> <p>24 Q Thank you. Thank you. I think you said that</p> <p>25 it -- it wasn't approved. Am I correct that page 5 of</p>

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<p>1 that report, of Exhibit 9, has the signature of your 2 commanding officer? Do you have that in front of you 3 or...?</p> <p>4 MR. NOLAND: I got it right here.</p> <p>5 MR. FLAXMAN: Well, would you show it to the --</p> <p>6 MR. NOLAND: He did not say -- he never said it 7 wasn't approved --</p> <p>8 MR. FLAXMAN: Okay.</p> <p>9 MR. NOLAND: -- so I don't know what you're --</p> <p>10 MR. FLAXMAN: All right. Well, I'll withdraw 11 that question.</p> <p>12 BY MR. FLAXMAN:</p> <p>13 Q Was Exhibit 9, the document about the 14 integrity check that you prepared, signed by your 15 commanding officer?</p> <p>16 A Yes.</p> <p>17 Q Could you tell us the date of that memo, for 18 the integrity check?</p> <p>19 A You mean the date -- the date that it was 20 written?</p> <p>21 Q Well is that the March 9, 2005?</p> <p>22 A What you're saying -- what you're asking me is 23 was the integrity check implemented? Is that what 24 you're asking?</p> <p>25 Q Well, I asked you several questions. Let me</p>	<p>1 start over and do one at a time. Was the integrity 2 check report, Exhibit 9, signed by your commanding 3 officer?</p> <p>4 A Juan Rivera, yes.</p> <p>5 Q And is there a date when Commander Rivera 6 signed it?</p> <p>7 A No, I don't believe so.</p> <p>8 Q Could you look at the document?</p> <p>9 A Yeah. No.</p> <p>10 Q Okay. And what's the date of the document?</p> <p>11 A The date of the document is 9th of March 2005.</p> <p>12 Q And was that after your meeting with the FBI 13 in November of 2004?</p> <p>14 A Yes, sir.</p> <p>15 Q Okay. Why were you waiting -- let's -- 16 directing your attention to your report about the 17 meeting with Attorney Mahoney and Mr. Baker, which I 18 think was in May of 2005 in Exhibit 10, did you write in 19 the report that you were waiting for Baker, that Baker 20 was going to call you to provide you with more 21 information?</p> <p>22 A I think -- I -- matter of fact, I wrote in the 23 report that he offered to help, he was going to help, he 24 and his attorney, and I never received any information 25 from either one of them. I reached out to them. They -</p>
<p style="text-align: center;">Page 167</p> <p>1 - they never responded.</p> <p>2 Q Well, do you have the report in front of you, 3 or should I put it on the screen? I think it's Exhibit 4 10.</p> <p>5 MR. HILKE: Ken, do you want me to put that up?</p> <p>6 MR. FLAXMAN: Yeah, that would be good. Well, 7 let's -- oh, okay. Let's stop. Let's stop.</p> <p>8 BY MR. FLAXMAN:</p> <p>9 Q You wrote -- well, did you prepare this 10 report?</p> <p>11 A I prepared this, yes.</p> <p>12 Q Okay. And let me direct your attention to the 13 paragraph which starts, "The undersigned," comma. Do 14 you see that?</p> <p>15 A Yes, sir.</p> <p>16 Q And then you say, "Matthew Mahoney, his 17 client, gang member, and drug dealer, Ben Baker," and 18 then you have IR number 901905. Could you tell us what 19 an IR number is?</p> <p>20 A Identification record number.</p> <p>21 Q Does that allow you to access Mr. Baker's 22 criminal history?</p> <p>23 A Yes, sir.</p> <p>24 Q Was there -- was there any rule, regulation, 25 or policy of the Internal Affairs Division which</p>	<p style="text-align: center;">Page 168</p> <p>1 prevented you from checking the criminal history of a 2 cooperating witness?</p> <p>3 A No.</p> <p>4 Q Okay. Then you refer to -- then you state, 5 "His wife." Is -- whose wife did you mean?</p> <p>6 A Ben Baker.</p> <p>7 Q Did she have a name?</p> <p>8 A Yes, sir. She did.</p> <p>9 Q There a reason why you didn't write her name?</p> <p>10 A Gross mistake on my part. That's the only 11 thing I can tell you.</p> <p>12 Q Now, in this report, you didn't mention that 13 any federal agents were present, did you?</p> <p>14 A No --</p> <p>15 MR. NOLAND: Asked and answered but go ahead.</p> <p>16 Q Okay.</p> <p>17 A No, sir, I did not.</p> <p>18 Q Okay. And then the report, at the end, 19 relates to your conversation with Commander Green; is 20 that right?</p> <p>21 A Yes, sir. He can scroll down but yeah.</p> <p>22 Q And -- okay. And -- all right. And you told 23 us that -- before that Commander Green was -- you had 24 known him for a long time; is that right?</p> <p>25 A Yes.</p>

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<p>1 Q Did you give Commander Green a heads up that 2 maybe Watts shouldn't be working the projects?</p> <p>3 A No.</p> <p>4 Q Why not?</p> <p>5 A I did not because -- well, number one, because 6 it was a confidential investigation, and then, secondly, 7 I didn't want him doing anything which I would consider 8 give away and, you know, here I walked out the door and 9 he takes a man out, you know, and people that know me 10 know where I come from. So therefore, no. That -- 11 here, let things be just as they are. Have a casual 12 conversation and let him say what he's saying and move 13 on, we'll talk about something else. We talked about a 14 lot of things.</p> <p>15 Q And you said -- you just said that "people 16 know me, know where I come from." Where do you come 17 from?</p> <p>18 A Well those -- after I went to the confidential 19 section of Internal Affairs I stopped speaking, and -- 20 and the friends that I already had that were policemen, 21 they knew what I -- most of them knew what I did, and 22 those that didn't, I -- I told them I was still in the - 23 - in the Narcotics section. And those that -- that had 24 -- the few that had CR numbers or whatever that -- that 25 come by me or -- then they knew what I did. But I</p>	<p>1 stopped talking for what I did, where I worked.</p> <p>2 Q Exhibit 12 is this Illinois State Police 3 Statewide Terrorism and Intelligence Center Report, and 4 then I -- you said you were too busy with other cases, 5 and I'm not sure what you were too -- what were you too 6 busy to do?</p> <p>7 A I'm here. I'm never too busy to work my 8 cases. I -- and -- and if -- I did say that, otherwise 9 you wouldn't quote me. So what I'm saying is I was 10 busy, I was working. I did not disregard any 11 information. None. If I didn't include it in the 12 report, it was -- it was either oversight or -- of the 13 fact that -- it was like I told you. There were other 14 reports that people had that I just did not have. They 15 already knew. There was no reason to put it in a 16 report.</p> <p>17 Q Well, Exhibit 13 relates to the Watts Report 18 about the alleged theft of U.S. currency and other items 19 from his dwelling. Do you remember that document?</p> <p>20 A I remember the document, yes.</p> <p>21 Q Was it -- were you surprised that Mr. Watts 22 had \$12,400 in United States currency in his dwelling?</p> <p>23 MR. NOLAND: Objection to form, foundation. You 24 may answer.</p> <p>25 A I thought it was an exorbitant amount of money</p>
<p style="text-align: center;">Page 171</p> <p>1 to have. Being surprised, in all honesty, from where I 2 came from, no.</p> <p>3 Q Did you ever do any investigation to determine 4 whether or not that \$12,400 was in \$5 and \$10 bills?</p> <p>5 MR. NOLAND: Object to the form of the 6 question. Go ahead.</p> <p>7 A I wasn't able to determine anything because 8 you can't ask Watts, you -- I could not find the people 9 -- the lady that knew that took the money and if -- if 10 anybody else knows that would indicate that they had 11 something to do with the money. No.</p> <p>12 Q Could you tell us, as best you can, what it 13 was that you did to find Ms. Jackson?</p> <p>14 MR. NOLAND: Objection, that's -- I think 15 that's been asked and answered, but go ahead and 16 answer again, if you remember.</p> <p>17 A One of the things I did was I -- according to 18 the address that was on the police report and her 19 driver's license, go over there and get a -- you know, 20 get a picture of her from her driver's license and go 21 over there and see if we can find her. Aside from that, 22 I do not know. I do not remember.</p> <p>23 BY MR. FLAXMAN:</p> <p>24 Q Okay. Did you prepare any reports about your 25 efforts to find Ms. Jackson?</p>	<p style="text-align: center;">Page 172</p> <p>1 MR. NOLAND: It's been asked and answered. 2 Answer again.</p> <p>3 A There's a -- I believe there's a report saying 4 that I went to 55 whatever it is and she was not there, 5 and there was information given by the person that was 6 there that she had moved and left no forwarding address.</p> <p>7 Q Exhibit 16 includes that timeline. Do you 8 remember -- do you remember that, or should we show it 9 to you?</p> <p>10 A You can show it to me.</p> <p>11 Q Do you have it in front of you, or should we 12 put it on the screen?</p> <p>13 MR. NOLAND: I got it here.</p> <p>14 MR. FLAXMAN: Okay. Why don't you just --</p> <p>15 MR. NOLAND: I think it might -- it may be --</p> <p>16 BY MR. FLAXMAN:</p> <p>17 Q Just take a look at it, so you -- go ahead.</p> <p>18 MR. NOLAND: It may be 17. I've got some 19 scribble on here. I'm going to ask the witness to 20 disregard it, so this is not the official exhibit.</p> <p>21 MR. FLAXMAN: Okay. Well, I --</p> <p>22 MR. NOLAND: You know, if you want --</p> <p>23 MR. FLAXMAN: -- I just want to frame what it 24 is I'm talking about.</p> <p>25 MR. NOLAND: Yeah.</p>

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<p>1 BY MR. FLAXMAN:</p> <p>2 Q Do you know who --</p> <p>3 MR. NOLAND: Fair enough.</p> <p>4 Q Do you know who prepared it?</p> <p>5 A No, sir, I do not.</p> <p>6 Q Did -- you didn't prepare it, did you?</p> <p>7 A No, sir.</p> <p>8 Q In your work at IAD, did you prepare timelines</p> <p>9 like -- of that form?</p> <p>10 A No, sir.</p> <p>11 Q The timeline has some parentheticals, I think,</p> <p>12 what I would call them. Let me find it on mine. Well,</p> <p>13 page 2 on the third bullet point has a sentence that</p> <p>14 reads, "The purpose of the current interview was to</p> <p>15 determine if there was any personal knowledge or</p> <p>16 information regarding Sergeant Watt that was admitted in</p> <p>17 the first interview." And then in parentheses, italics,</p> <p>18 "Where is this interview documented?" Did you conduct</p> <p>19 an interview of Sergeant Watt? Watts?</p> <p>20 A I -- I did not --</p> <p>21 Q Excuse me?</p> <p>22 A I never spoke to Sergeant Watts.</p> <p>23 Q Okay. Let's -- and there's another one, which</p> <p>24 on page 1 refers to, "The cooperating individual is to</p> <p>25 be prosecuted in federal court," and the parenthetical</p>	<p>1 is, "Who is this cooperating individual?" That's the</p> <p>2 fourth bullet point on page 1 of the timeline. Do you</p> <p>3 know who -- did you ever learn who the cooperating</p> <p>4 individual was?</p> <p>5 MR. NOLAND: Objection. I think it's been gone</p> <p>6 over before in other documents but go ahead.</p> <p>7 A If it's not in this report, no.</p> <p>8 Q Okay. Then there were a lot of questions, or</p> <p>9 at least -- one or more questions in which your response</p> <p>10 was, "I don't recall. I don't remember." Is there</p> <p>11 anything that you could think -- as you sit here now,</p> <p>12 anything you can look at, any document, any report, any</p> <p>13 object, anything that would refresh your recollection?</p> <p>14 MR. NOLAND: I think he's asking you -- or are</p> <p>15 you -- are you asking about this particular same</p> <p>16 question, Mr. Flaxman?</p> <p>17 MR. FLAXMAN: No, I'm asking about -- let me --</p> <p>18 I'll rephrase the question, so it's clear to your</p> <p>19 counsel.</p> <p>20 BY MR. FLAXMAN:</p> <p>21 Q You have been -- we've been asking you</p> <p>22 questions today about stuff that happened almost 20</p> <p>23 years ago; is that right?</p> <p>24 A That is correct.</p> <p>25 Q Okay. And it's fine that you don't have a</p>
<p style="text-align: center;">Page 175</p> <p>1 crystal-clear vivid recollection of everything that</p> <p>2 happened. Is there anything, as you sit here today,</p> <p>3 that you can think of that you could look at that would</p> <p>4 refresh your recollection of what you did in IAD in this</p> <p>5 confidential investigation involving Sergeant Watts?</p> <p>6 A I have reviewed my reports, and I can -- I</p> <p>7 pretty much answered your questions about what I did.</p> <p>8 But when you ask me about other people, I cannot -- I</p> <p>9 cannot tell you what their mindset was or why they did</p> <p>10 or did not do what they did. As far as this -- this CI</p> <p>11 that you just asked me about, it's a government --</p> <p>12 that's a government CI. I mean, you -- you've been</p> <p>13 around long enough to know that they're not going to</p> <p>14 tell you, if you're working with them, and you don't</p> <p>15 have any reason to know, who he is. You know this.</p> <p>16 Q Directing your -- focusing your attention on</p> <p>17 what you did, is there anything that you can sit here,</p> <p>18 as you sit here today, that would give you a better</p> <p>19 recollection of what you did in this confidential</p> <p>20 investigation involving Sergeant Watts?</p> <p>21 A Other than sitting around with the people that</p> <p>22 were there with me, no.</p> <p>23 Q And who were the people who were there with</p> <p>24 you?</p> <p>25 A Throughout -- throughout the time Ray</p>	<p style="text-align: center;">Page 176</p> <p>1 Broderdorff (Inaudible) --</p> <p>2 Q I'm sorry, I missed that.</p> <p>3 A Kenneth Bigg, B-I-G-G.</p> <p>4 Q Okay.</p> <p>5 A Juan Rivera. Who else? You know they -- they</p> <p>6 were there -- they were walking through this. They --</p> <p>7 they kept up with it, they were supervising a bunch of</p> <p>8 meetings, so...</p> <p>9 Q All right.</p> <p>10 A Dave Navarro -- these are all people that was</p> <p>11 there at the time, and if we were sitting around</p> <p>12 talking, we could probably put a better timeline</p> <p>13 together for you, but, you know, as far as -- as you</p> <p>14 say, it's been a while. I'm surprised I remember the</p> <p>15 little bit that I do remember.</p> <p>16 Q Did you ever apply to be a detective?</p> <p>17 A No.</p> <p>18 Q Did you ever apply to be a sergeant?</p> <p>19 A Yes.</p> <p>20 Q What year or years?</p> <p>21 A I -- I blew my own chance (Inaudible) just --</p> <p>22 and I guess after that I was working in places where I</p> <p>23 said I -- when I was assigned to -- to the government, I</p> <p>24 liked that, I -- I said, "I could stay here for the rest</p> <p>25 of my career." And so I -- I sort of did not try very</p>

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<p>1 hard.</p> <p>2 MR. FLAXMAN: All right. I have nothing</p> <p>3 further. Thank you.</p> <p>4 MR. NOLAND: Anybody else have any questions?</p> <p>5 MR. RAVITZ: I have some questions.</p> <p>6 CROSS EXAMINATION</p> <p>7 BY MR. RAVITZ:</p> <p>8 Q This is Gary. So Mr. Holliday, my name's Gary</p> <p>9 Ravitz. I represent Kallat Mohammed. I want to go over</p> <p>10 some of -- I know you've been shown a lot of exhibits</p> <p>11 here, and perhaps Mr. Hilke could accommodate and put</p> <p>12 Exhibit 1 up on the big board?</p> <p>13 MR. HILKE: Okay. One second.</p> <p>14 MR. RAVITZ: Thank you.</p> <p>15 MR. HILKE: Here you go.</p> <p>16 BY MR. RAVITZ:</p> <p>17 Q Now, Mr. Holliday, do you recall being shown</p> <p>18 this exhibit earlier today by Mr. Hilke?</p> <p>19 A Yes, sir.</p> <p>20 Q This is your case initiation report; would</p> <p>21 that be correct?</p> <p>22 A Yes, sir.</p> <p>23 Q And what date was that report prepared? It</p> <p>24 purports to be prepared on September 17, 2004; is that</p> <p>25 correct?</p>	<p>1 A Yes, sir.</p> <p>2 Q And it refers to an interview or information</p> <p>3 you obtained one day earlier, on September 16th. Do you</p> <p>4 see that?</p> <p>5 A Yes.</p> <p>6 Q All right. So let me ask you, did you take</p> <p>7 any notes of your conversation, either with Sergeant</p> <p>8 Henry Harris or with Sergeant Harris' informant, apart</p> <p>9 from this typed report?</p> <p>10 A Here, can you scroll up -- scroll down so I</p> <p>11 can see the rest of it?</p> <p>12 Q Yeah, it's just the one page --</p> <p>13 A Because I -- that's good.</p> <p>14 Q I'm sorry about that. Here's my question to</p> <p>15 you, this typed report, you -- would it be correct that</p> <p>16 you weren't typing this contemporaneously with talking</p> <p>17 to Mr. -- Sergeant Harris or the informant?</p> <p>18 A That is correct.</p> <p>19 Q Is this report based on notes that you took</p> <p>20 during those conversations with Mr. Harris and/or the</p> <p>21 informant?</p> <p>22 A Okay. The informant, never met. That was</p> <p>23 Henry's informant. The notes, it's just -- this is just</p> <p>24 a -- a synopsis of what Henry said. If I had any notes,</p> <p>25 they're destroyed.</p>
<p style="text-align: center;">Page 179</p> <p>1 Q Okay. And is that -- and was that a fair --</p> <p>2 your regular practice when you were assigned to IAD, to</p> <p>3 take notes of interviews and then incorporate that, or</p> <p>4 other materials, into a formal report like this one</p> <p>5 we're looking at?</p> <p>6 A Basically.</p> <p>7 Q Okay. And was it important to you to make</p> <p>8 sure that when you prepared these typed reports that</p> <p>9 they contained all of the information you had deemed</p> <p>10 relevant to an investigation?</p> <p>11 A And sometimes even -- even information that I</p> <p>12 did not deem relevant that I thought might come up later</p> <p>13 or, you know, just mean something later, yes.</p> <p>14 Q I -- so it would be your practice to be, if</p> <p>15 anything, over inclusive in terms of the formal reports</p> <p>16 you prepared?</p> <p>17 A Sometimes. Most of the time.</p> <p>18 Q All right. Now, with respect to Exhibit 1, it</p> <p>19 states in the first sentence there, "On September 16,</p> <p>20 2004 the undersigned agent was made aware of unknown</p> <p>21 public housing unit officers taking tax money from drug</p> <p>22 dealers," you see that?</p> <p>23 A Yes, sir.</p> <p>24 Q And so as of the 17th, when this report was</p> <p>25 prepared, the identities of these officers who</p>	<p style="text-align: center;">Page 180</p> <p>1 purportedly were taking tax money from unknown -- from</p> <p>2 drug dealers was not known; is that right?</p> <p>3 MR. NOLAND: Objection. Foundation. You may</p> <p>4 answer.</p> <p>5 A I did not have it at that time.</p> <p>6 Q Okay. If someone had said to you -- if either</p> <p>7 Sergeant Harris or the informant had told you -- and</p> <p>8 incidentally let's -- let me back up one second. The</p> <p>9 second paragraph of this report says that "The CI," I</p> <p>10 assume that stands for confidential informant, "told</p> <p>11 Lieutenants Rivera, Sergeant Kenneth Bigg, and Police</p> <p>12 Agent Calvin Holliday," so it would appear that you did</p> <p>13 interview the CI?</p> <p>14 MR. NOLAND: I think we've gone over that</p> <p>15 report, form.</p> <p>16 Q Did you interview the CI? I'm asking it</p> <p>17 directly.</p> <p>18 A Okay. I see what you're saying.</p> <p>19 Q And I know this was a long time ago. If you</p> <p>20 recall --</p> <p>21 A No, no, no, no. I'm -- I'm not -- I'm not</p> <p>22 disputing, I'm not arguing with you. I -- I --</p> <p>23 Q Okay.</p> <p>24 A -- see exactly what you're --</p> <p>25 Q You would agree --</p>

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<p>1 A And so if that -- I wrote it, then that's what 2 I did.</p> <p>3 Q Okay. All right. But in any event, if either 4 the CI or Sergeant Henry Harris had told you that 5 Officer Kallat Mohammed was taking tax money from drug 6 dealers, allowing them to sell their product, that's 7 information you would have included in this report dated 8 September 17, 2004. Would that be correct?</p> <p>9 A Yes, sir. Definitely.</p> <p>10 Q All right. And you prepared a report -- bear 11 with me one second. You prepared another report that's 12 dated --</p> <p>13 MR. RAVITZ: I think this is Exhibit 5, 14 Mr. Hilke, the September 27, 2004 report?</p> <p>15 MR. HILKE: Pulling it up.</p> <p>16 MR. RAVITZ: Yeah, please. Can't expect this 17 to -- All right, thank you.</p> <p>18 BY MR. RAVITZ:</p> <p>19 Q Okay. So take a look at this one second, 20 Mr. Holliday. This looks like this is a reference to a 21 conversation you had with this fellow Ron Henley who's 22 been mentioned, right?</p> <p>23 A Okay.</p> <p>24 Q And do you know who (Inaudible) Mr. Henley is? 25 He was involved in an auto accident of some kind; is</p>	<p>1 that right?</p> <p>2 MR. NOLAND: Objection, asked and answered. You 3 may answer again.</p> <p>4 Q Did you actually talk to or interview 5 Mr. Henley at any point in time?</p> <p>6 MR. NOLAND: Objection, asked and answered. You 7 may answer again.</p> <p>8 A The undersigned agent spoke with a Ron Henley, 9 yes.</p> <p>10 Q All right.</p> <p>11 MR. HILKE: And I'm sorry to interrupt, but 12 Dan, Mr. Holliday is no longer on video over there.</p> <p>13 COURT REPORTER: Thank you. I was trying to 14 get a word in. Mr. Holliday's video has gone.</p> <p>15 THE WITNESS: Not unplugged.</p> <p>16 MR. NOLAND: He's plugged in. All right. Tell 17 you what, I'm going to give him my computer if that 18 works?</p> <p>19 COURT REPORTER: Yes, one moment, please.</p> <p>20 MR. HILKE: That works.</p> <p>21 COURT REPORTER: Let me see. There we go.</p> <p>22 THE WITNESS: Okay.</p> <p>23 COURT REPORTER: Okay. Bear with me, everyone, 24 just one moment, please. Could we cease to share 25 the document for a moment, please? Thank you. Bear</p>
<p>1 with me one moment. All righty. Okay. There. 2 Counsel, you may proceed.</p> <p>3 MR. RAVITZ: Thanks.</p> <p>4 BY MR. RAVITZ:</p> <p>5 Q And just -- Mr. Henley I think also sent you a 6 letter that was marked as an exhibit here. I believe 7 it's maybe -- let's see.</p> <p>8 MR. NOLAND: Number -- got it.</p> <p>9 Q The letter, it's September 22nd, I believe?</p> <p>10 A Yes.</p> <p>11 Q All right. And -- let me ask you this. Did 12 Mr. Henley, in his letter to you, identify Kallat 13 Mohammed as someone who was taxing or taking money from 14 drug dealers?</p> <p>15 A I do not see Kallat Mohammed's name on here. 16 Sergeant Watts, Frederick -- okay. No.</p> <p>17 Q Okay. But Mr. Henley told you that he was 18 aware of other individuals who could confirm that there 19 were corrupt police officers operating in the area; is 20 that right?</p> <p>21 A Yes.</p> <p>22 Q Who are the -- what are the names of those 23 individuals that Mr. Henley identified as being 24 potential witnesses?</p> <p>25 MR. NOLAND: I think -- I thought that was</p>	<p>1 answered but go ahead again.</p> <p>2 A Sergeant Watts' name is in there.</p> <p>3 Q Did Mr. Henley identify any civilian witnesses 4 who could corroborate this claim that there were corrupt 5 police officers taking money?</p> <p>6 MR. NOLAND: Objection, asked and answered. Go 7 ahead.</p> <p>8 A He mentioned a couple, yes.</p> <p>9 Q Who'd he mention? What were their names? If 10 you recall.</p> <p>11 A Here, I don't recall, but I do recall reaching 12 out for them.</p> <p>13 Q So are you saying you don't know who they are, 14 their identities, as you sit here today?</p> <p>15 MR. NOLAND: It's been asked and answered. It's 16 the same topic. Go ahead.</p> <p>17 MR. RAVITZ: I'm sorry. I don't think it has, 18 Dan. Respectfully, I don't think it's been asked 19 specifically at all. He's been asked very general 20 and broad questions. I want to get down to cases. 21 I want to name names. Let's see what we -- let's 22 see how specific we can get here. So if you want to 23 object, make your objection.</p> <p>24 MR. NOLAND: He answered this exact question, 25 Gary, but go ahead. Go after it.</p>

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<p style="text-align: center;">Page 185</p> <p>1 BY MR. RAVITZ:</p> <p>2 Q Did he identify any specific individuals who 3 he said had been approached by police officers seeking 4 to take money from them or tax them for drug activities?</p> <p>5 A In this same letter that -- that you mentioned 6 it says, Watts -- Sergeant Watts forces Patrick and 7 workers to pay him off in order to continue to sell 8 drugs in Ida B. Wells. I am aware of others in the 9 Wells that can also vouch for Mr. Watts' behavior.</p> <p>10 Q And did he give you the names of others in the 11 Wells?</p> <p>12 A Well not in this letter.</p> <p>13 Q Did he give the names of others in the Wells 14 at any time?</p> <p>15 A I don't remember. And that -- that's a -- 16 that's just because there's so many reports here. I 17 don't remember.</p> <p>18 Q Okay. You also wrote a report that is dated 19 June 28, 2005. This would be -- this would be your 20 interview with Ben Baker and his attorney and 21 Mr. Navarro. Do you recall that?</p> <p>22 A Yes, sir.</p> <p>23 Q I think that's -- I don't have the number 24 right in front of me, but Mr. Hilke, I'll ask you to put 25 that on the board, too.</p>	<p style="text-align: center;">Page 186</p> <p>1 MR. HILKE: This would be Exhibit 10.</p> <p>2 MR. RAVITZ: 10. You're right. Okay. My bad.</p> <p>3 There it is. And would you show that to 4 Mr. Holliday so he could see if he could take a look 5 at that?</p> <p>6 A Yes, sir. I see it.</p> <p>7 BY MR. RAVITZ:</p> <p>8 Q You saw that earlier today? Mr. Hilke showed 9 that to you, I think?</p> <p>10 A Yes, sir.</p> <p>11 Q All right. And you've -- and I know this has 12 been brought up, that you mentioned this already, that 13 Mr. Baker -- I think you state he was a gang member and 14 drug dealer in your report.</p> <p>15 A Did I say he was a gang member and drug 16 dealer?</p> <p>17 Q Right. The very first -- under -- the very 18 first sentence, "Including the undersigned," in May 19 2005.</p> <p>20 A All right. "David Navarro. (Inaudible) only 21 his client, a gang member and drug dealer." Okay.</p> <p>22 Q Okay. So then I want to ask you a little bit 23 about your experiences in law enforcement before you 24 went to work for IAD. I think you told us that at one 25 time you were a member of the Narcotics and Organized</p>
<p style="text-align: center;">Page 187</p> <p>1 Crime section of the Chicago Police Department.</p> <p>2 A Yes, sir.</p> <p>3 Q And you worked there for several years; is 4 that correct?</p> <p>5 A Yes, sir.</p> <p>6 Q Did you receive any kind of training in 7 conducting narcotics investigations as a member of that 8 unit?</p> <p>9 A Like -- as I stated before, they had -- they 10 had in-house classes. A lot of it was on the job. But 11 then when I went to the government, there were also 12 classes, in-house classes, training, so yes.</p> <p>13 Q Okay. And so in addition to these classes, 14 you stated you had classes with DEA when you went to 15 work there for 4.5 years?</p> <p>16 A Yes.</p> <p>17 Q And in addition, you had on-the-job 18 experience, you're conducting investigations? Would 19 that be correct?</p> <p>20 A Yes, sir. Yes, sir.</p> <p>21 Q I think at one point you told us that when you 22 went to D -- the DEA was always looking for people, I 23 think -- I don't want to misquote you, or people "higher 24 up the food chain." Do you remember that?</p> <p>25 A I did say that.</p>	<p style="text-align: center;">Page 188</p> <p>1 Q What'd you mean when you said, "people higher 2 up the food chain"? What were you referring to?</p> <p>3 A We were looking for the bigger than normal 4 drug dealers. We were trying to get as high as possible 5 as to -- as far as drugs coming into the country being 6 distributed.</p> <p>7 Q And in your experience, were drug operations 8 in a place like the Ida B. Wells or all the Chicago 9 Housing-type facilities controlled by organized crime, 10 namely street gangs?</p> <p>11 A You don't consider them organized?</p> <p>12 Q No, no. I was asking you. I mean, would you 13 consider the Disciples or other Chicago street gangs to 14 be organized crime?</p> <p>15 A I would consider them highly organized, and 16 they were crime syndicates, so I mean, if you want to 17 play with words, yes.</p> <p>18 Q Well, I guess my real question to you is this: 19 Were independent -- were the drugs being controlled by 20 gangs, or were they being controlled by independent 21 operators, in your experience?</p> <p>22 A In my experience, depends on where you're 23 selling drugs. You were not an independent operator.</p> <p>24 Q I'm sorry. You said they were not?</p> <p>25 A I said, in my experience, depending on where</p>

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<p style="text-align: center;">Page 189</p> <p>1 you were selling drugs, it was not -- you were not an 2 independent operator. 3 Q But let's take -- 4 A You were responsible for what (Inaudible). 5 Q So let's take, for example, Chicago Housing -- 6 a facility that are so-called Chicago Housing Projects. 7 In your experience, were drug activities in such places 8 typically controlled by street gangs? 9 A Yes. 10 Q If you weren't -- without permission, were you 11 able to operate a drug business without the -- being 12 under the auspices of a street gang? And again -- 13 MR. KOSOKO: Objection -- 14 Q -- in your experience. 15 MR. HILKE: Objection. Foundation. 16 A There's always exceptions to the rule, but 17 basically, I would say to you that most of those selling 18 drugs in -- in projects or whatever -- projects or 19 places like it, I -- it just -- it's an organized thing. 20 You just don't stand out there and sell on your own. 21 Q Now, in this -- 22 A But however, there are exceptions to the 23 rules. 24 Q Okay. In your conversation with Mr. Baker, 25 was it your impression that he operated as a drug dealer</p>	<p style="text-align: center;">Page 190</p> <p>1 as an exception to that rule? 2 A In my conversations with Mr. Baker, I listened 3 to what he had to say, and it -- it was -- whether he 4 was in the street gang or not would come up during the 5 investigation if it got that good or got that far. But 6 I was basically interested in -- when he said police, 7 that -- that was what I was basically interested in. I 8 wasn't so much concerned about anything else. Although, 9 it did make a difference. 10 Q Okay. 11 COURT REPORTER: And I'm sorry, Counsel. Was 12 that Mr. Kosoko who objected earlier? 13 MR. HILKE: I -- 14 MR. KOSOKO: Yeah, I haven't made an objection. 15 MR. HILKE: Yeah, this is Wally. I made a 16 foundation objection earlier. 17 COURT REPORTER: Thank you. 18 BY MR. RAVITZ: 19 Q Now, again, referring you to this report, this 20 Exhibit 10, the report of June 28, 2005, you refer 21 therein to an individual who you have interviewed named 22 [REDACTED] you remember that? 23 A Yes, sir. 24 Q And in fact, you did interview Mr. [REDACTED] at 25 some point?</p>
<p style="text-align: center;">Page 191</p> <p>1 A Yes, sir. 2 Q Did Mr. [REDACTED] make any allegation against 3 Kallat Mohammed? 4 A I don't think so. No. 5 Q If he had done so, would you have reported 6 that in one of your formal reports in this matter? 7 A If Kallat Mohammed's name had come up with 8 anybody with me, in any form of wrongdoing, yes, it 9 would have been in one of my reports. 10 Q Okay. You're also shown -- and we were -- 11 well, let's stay with this report. On the second page 12 of this report, if we could scroll down, it refers to, 13 oh, this fellow, Wilbur Moore, also known as Big Shorty. 14 A Okay. 15 Q He's another individual that you had an 16 opportunity to talk to. 17 A Yes, sir. 18 Q And again, with respect to Kallat Mohammed, 19 what, if anything, did Wilbur Moore, also known as Bog 20 Shorty, tell you? 21 A He -- he mentioned Officer Kallat Mohammed's 22 star 14122, but he -- but did not accuse him of taking 23 money. 24 Q All right. Now, we're done with that report, 25 but one of the things Mr. Hilke showed you was a report</p>	<p style="text-align: center;">Page 192</p> <p>1 by an individual, an ATF agent named [REDACTED] You 2 know her? 3 A Yes. 4 Q And -- 5 A Vaguely, but -- 6 Q And in the -- 7 A I know of her, and I have met her, yes. 8 Q Okay. And I believe that's Exhibit 11. 9 MR. RAVITZ: If you would put that one up 10 there. 11 MR. HILKE: Sure. 12 A That's her report; is that correct? 13 BY MR. RAVITZ: 14 Q Yes. 15 A Okay. 16 Q Now, this was a report of an interview that 17 she conducted, with others, of the same fellow, Wilbur 18 Moore, also known as Big Shorty; is that right? 19 A Yes, sir. 20 Q You weren't present for that interview, were 21 you? 22 A I don't -- I don't remember being there. 23 Q Okay, but with respect to -- did you have -- 24 you were -- you have seen this report before? 25 A I've seen it before, yes.</p>

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<p>1 Q All right. And Mr. Hilke asked you a number 2 of questions relating to paragraph 53 of that report, 3 which -- so I would ask if we could scroll down to 4 paragraph 53. Now, Moore told Agent █ it appears, 5 that Sergeant Watts -- that he paid money to Sergeant 6 Watts. Is that what it says in 53?</p> <p>7 A Yes, sir.</p> <p>8 Q All right. But Moore did no claim he paid 9 money to Kallat Mohammed when he spoke to you; is that 10 right?</p> <p>11 A That is correct.</p> <p>12 Q And he also -- strike that. In Ms. █ 13 report, Moore apparently also related that someone named 14 Shock also paid Sergeant Watts. Do you see that in 15 paragraph 53?</p> <p>16 A Okay.</p> <p>17 Q Is that a yes?</p> <p>18 A I see it.</p> <p>19 Q All right.</p> <p>20 A Yes.</p> <p>21 Q There's no allegation you were aware of that 22 this person known as Shock paid money to Kallat 23 Mohammed?</p> <p>24 A No, sir.</p> <p>25 Q Okay. You also were shown an Exhibit number</p>	<p>1 18.</p> <p>2 MR. RAVITZ: If we could put that up there for 3 Mr. Holliday.</p> <p>4 MR. HILKE: Yeah, just one sec.</p> <p>5 BY MR. RAVITZ:</p> <p>6 Q And do you recall being shown this CR by 7 Mr. Hilke earlier today?</p> <p>8 A Yes, sir.</p> <p>9 Q And I believe this was a complaint filed by 10 Clarissa Glenn, who we know is Mr. Ben Baker's wife.</p> <p>11 A Yes, sir.</p> <p>12 Q And would it be correct that Clarissa Glenn, 13 in this complaint to the police in November of -- 14 November 3, 2005, did not allege any misconduct by 15 Kallat Mohammed?</p> <p>16 MR. NOLAND: Yeah, he can only see --</p> <p>17 MR. RAVITZ: I'm sorry.</p> <p>18 MR. NOLAND: I don't have names on this CR, and 19 he can only see the first -- like half of the first 20 page.</p> <p>21 MR. RAVITZ: Okay.</p> <p>22 MR. NOLAND: So I -- you know, I -- yeah.</p> <p>23 MR. RAVITZ: I'm sorry. I'm sorry. Well, I 24 don't have ability to scroll this either. I get it.</p> <p>25 BY MR. RAVITZ:</p>
<p style="text-align: center;">Page 195</p> <p>1 Q Well, who are -- can you tell us who the 2 accused were, who Ms. Clarissa Glenn was accusing in the 3 CR that's Exhibit 18?</p> <p>4 A Accused? They -- well, actually, the -- the 5 accused's name is blocked out.</p> <p>6 Q Okay.</p> <p>7 MR. RAVITZ: Can you scroll down a bit, 8 Mr. Hilke? Keep scrolling.</p> <p>9 MR. HILKE: Just let me know --</p> <p>10 MR. KOSOKO: Yeah, I think you got to go to the 11 top of the first page.</p> <p>12 MR. RAVITZ: Yeah, okay. There you go.</p> <p>13 BY MR. RAVITZ:</p> <p>14 Q So you see in box 1?</p> <p>15 A Okay, here. Ronald Watts.</p> <p>16 Q Is there anyone -- is there -- are there any 17 other accused, according to Ms. Glenn?</p> <p>18 A Just Ronald Watts, box 1.</p> <p>19 Q All right. She didn't accuse Kallat Mohammed 20 of any misconduct in this complaint dated 21 November 3, 2005; would that be correct?</p> <p>22 MR. HILKE: Objection. Foundation.</p> <p>23 A That is correct.</p> <p>24 COURT REPORTER: I'm sorry. Was that you 25 again, Mr. Hilke?</p>	<p style="text-align: center;">Page 196</p> <p>1 MR. HILKE: Yes, it was. Thank you.</p> <p>2 COURT REPORTER: Just checking. Thank you.</p> <p>3 BY MR. RAVITZ:</p> <p>4 Q Mr. Hilke also showed you Exhibit 20.</p> <p>5 MR. RAVITZ: If we -- if you please, Mr. Hilke.</p> <p>6 MR. HILKE: Sure.</p> <p>7 BY MR. RAVITZ:</p> <p>8 Q All right. This is another CR, it appears, 9 date March 3, 2004. Do you see that?</p> <p>10 A Yes, sir.</p> <p>11 Q All right. Who --</p> <p>12 A March 12th?</p> <p>13 MR. HILKE: Yeah, just to --</p> <p>14 Q And who -- March -- I see. You're right. I'm 15 sorry, my bad. March 12, 2004. And the accused in this 16 CR are -- who were the -- is the accused in this 17 CR?</p> <p>18 A Brian Bolton and Robert Gonzalez.</p> <p>19 Q All right. Would it be correct that Kallat 20 Mohammed is not accused of any misconduct in this CR?</p> <p>21 A His name does not appear.</p> <p>22 Q If I may just have one moment, please. Oh, 23 let me back up. One other thing. When you interviewed 24 Ben Baker, he didn't accuse Kallat Mohammed of any 25 misconduct, did he?</p>

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<p>1 A No, sir.</p> <p>2 MR. RAVITZ: All right. Thank you. I have</p> <p>3 nothing further.</p> <p>4 MR. KOSOKO: All right. I have a few</p> <p>5 questions.</p> <p>6 EXAMINATION</p> <p>7 BY MR. KOSOKO:</p> <p>8 Q Mr. Holliday, does IAD work in conjunction</p> <p>9 with the Cook County State's Attorney's Office Public</p> <p>10 Integrity Unit?</p> <p>11 A No, they're -- IAD is independent of Cook</p> <p>12 County Public Integrity Unit.</p> <p>13 Q Okay. When IAD finishes a -- and specifically</p> <p>14 talking about the confidential unit, when you do a</p> <p>15 criminal investigation, who do you submit the results of</p> <p>16 that criminal investigation to?</p> <p>17 MR. NOLAND: Object to -- objection, incomplete</p> <p>18 hypothetical, form, foundation. Go ahead.</p> <p>19 A But I submit mine -- or I -- I submitted mine</p> <p>20 to my superiors, and which, as far as I was concerned,</p> <p>21 they submitted them to the -- to the deputy. And where</p> <p>22 they went after that, I have no idea.</p> <p>23 Q Okay. Did you ever work with a person named</p> <p>24 Matt Mahoney, that worked in the Public Integrity Unit</p> <p>25 of the State's Attorney's Office?</p>	<p>1 A I think Matt and I had a case together a</p> <p>2 couple of times, yes.</p> <p>3 Q Okay. When you say you had a case together,</p> <p>4 what case? What do you mean by that?</p> <p>5 A Well, Matt -- Matt was an ASA in the -- the</p> <p>6 State's Attorney's Office, and he had been there for a</p> <p>7 while, and I think that we had prosecuted some drug</p> <p>8 cases together. But I -- do I know who he was? Yes.</p> <p>9 Q Okay. Did -- when you worked with Matt</p> <p>10 Mahoney, he -- you weren't prosecuting a police officer; is that correct?</p> <p>11 A Well, when -- when I -- when I went to see</p> <p>12 Matt Mahoney, it was because he had information against</p> <p>13 -- regarding a police officer. We weren't doing</p> <p>14 anything together at that time.</p> <p>15 Q Okay. My question, Mr. Holliday, is at any</p> <p>16 point in your career during your time with the Internal</p> <p>17 Affairs Division of the Cook County State -- of the</p> <p>18 Chicago Police Department, did you work with an</p> <p>19 assistant by the name of Matthew Mahoney that worked for</p> <p>20 the Public Integrity Profession Standards Unit?</p> <p>21 MR. HILKE: Objection, form.</p> <p>22 A No.</p> <p>23 Q Okay. At any point in your career at IAD, have you worked in conjunction with the Cook County</p>
<p style="text-align: center;">Page 199</p> <p>1 State's Attorney's Office?</p> <p>2 A Now -- now, here, before I answer this and --</p> <p>3 and say the wrong thing, when you say, "in conjunction,"</p> <p>4 what do you mean?</p> <p>5 Q With the expectation that that body, that</p> <p>6 governmental body would be prosecuting the results of</p> <p>7 your investigation?</p> <p>8 MR. NOLAND: And I would just object to the</p> <p>9 extent some of this has already been gone over but</p> <p>10 go ahead.</p> <p>11 A Okay. With that being said, it's yes. It's</p> <p>12 yes. If I tell you -- so you're saying if I take a case</p> <p>13 over there -- if I arrest somebody and I -- my case goes</p> <p>14 over there, then I'm working in conjunction with them?</p> <p>15 Is that what you're saying?</p> <p>16 BY MR. KOSOKO:</p> <p>17 Q In part, yes.</p> <p>18 A Okay. So yes, I've arrested many people,</p> <p>19 taken them over there, and yes, the State's Attorney's</p> <p>20 Office has prosecuted. So yes, I've worked in</p> <p>21 conjunction.</p> <p>22 Q Okay. Have you ever been part of a proffer</p> <p>23 with the State's Attorney's Office and another -- and a</p> <p>24 police officer?</p> <p>25 A I don't remember.</p>	<p style="text-align: center;">Page 200</p> <p>1 Q Okay. During the investigative stage of a</p> <p>2 confidential investigation, have you worked in</p> <p>3 conjunction with the Cook County State's Attorney's</p> <p>4 Office?</p> <p>5 MR. NOLAND: Again, objection to the extent a</p> <p>6 lot of this was gone over and incorporated in the</p> <p>7 question. Go ahead.</p> <p>8 A Ask your question again, please.</p> <p>9 BY MR. KOSOKO:</p> <p>10 Q Okay. When you were -- during the</p> <p>11 investigative stage of one of your confidential</p> <p>12 investigations, have you worked in direct conjunction</p> <p>13 with the Cook County State's Attorney's Office?</p> <p>14 MR. HILKE: Objection, form.</p> <p>15 MR. NOLAND: Objection, asked and answered</p> <p>16 previously. It incorporates what he's previously</p> <p>17 answered. But go ahead, answer.</p> <p>18 A Yes.</p> <p>19 BY MR. KOSOKO:</p> <p>20 Q Okay. Now, you ran a finCEN against my</p> <p>21 client, Ronald Watts, correct?</p> <p>22 A Yes.</p> <p>23 Q And did you corroborate evidence of a gambling</p> <p>24 addiction?</p> <p>25 A A gambling addiction? Is that what you said?</p>

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1	Q Yes. Yes, sir.	1 Q Okay. Do patrolmen have their own separate
2	A No.	2 sergeant?
3	Q Okay. Did you corroborate any evidence that	3 A Yes, in -- in most occasions.
4	there was a -- that he was receiving an extra \$260,000 a	4 Q Okay. Did you acquire the A & As from
5	year?	5 January 19, 2004 to figure out if there was a shortage
6	A No, sir.	6 of sergeants that would involve a tactical sergeant
7	Q Let's talk about Mr. Henley's claims. If we	7 supervising a patrol officer?
8	could bring up -- let's see. I believe the letter from	8 MR. HILKE: Just objection. You mean June
9	Mr. Henley is dated 7-21-04 as the exhibit. I'm not	9 19th, I'm sure.
10	sure what exhibit that is.	10 Q June 19th 2004. If I misspoke, I apologize.
11	MR. KOSOKO: Could you bring that up for me,	11 A I did not, but I -- I saw some A & As in the
12	please, Wally?	12 file, but I did not -- I did not get them.
13	MR. HILKE: Yep. I believe that's Exhibit 4.	13 Q Okay. And just for the record, could you
14	BY MR. KOSOKO:	14 explain to us what an A & A is?
15	Q Okay. In regards to Exhibit 4, Mr. Holliday,	15 A Attendance and assignment sheet, saying
16	does a tactical -- does a tactical sergeant supervise	16 whether an officer's working and what he's working.
17	patrol officers?	17 Q Did you speak with the officer that completed
18	A On rare occasions.	18 the crash report of this alleged June 19, 2004 crash?
19	Q Okay. And what occasion would that occur?	19 A I did not.
20	A Lack of supervisors in the district.	20 Q What, if anything, did we -- did you do to
21	Q Okay. Have you at any point retrieved the	21 corroborate that in fact the sergeant referred to
22	alleged crash report that was completed in this	22 Mr. Henley was Sergeant Ronald Watts, star number 264 of
23	allegation from January 19th of 2004?	23 the Chicago Police Department?
24	A I don't remember, but I -- I don't recall	24 MR. NOLAND: Objection. Foundation, but go
25	seeing a copy of it.	25 head.
	Page 203	Page 204
1	A Hold on now. I tried to get in touch with --	1 corroborate that Mr. Henley actually went to the Second
2	was it Mr. Campbell? I'm not sure.	2 District to have the crash report amended/corrected?
3	Q Oh. That's the only thing you did that you're	3 A I -- ask your question again.
4	-- is that what you're saying? Is that your -- that you	4 Q Did you ever go to the Fifth -- the Second
5	just tried to get in touch with Mr. Campbell?	5 District to corroborate that Mr. Henley tried to have
6	MR. HILKE: Objection, form.	6 the crash report amended or corrected?
7	MR. NOLAND: Foundation. Also, I think a lot	7 A I did not.
8	of this has been asked and answered but go ahead.	8 Q Did you try to obtain the records that would
9	A I'm -- I don't remember.	9 show if Mr. Henley actually tried to get the crash
10	BY MR. KOSOKO:	10 report amended?
11	Q What, if anything, did you do to corroborate	11 A No, sir, I did not.
12	that in fact -- and if we refer back to the final	12 Q Okay. Would it be unusual for the substation
13	sentence of the first paragraph, that the crash report	13 at 38th and Cottage to handle a crash report, strictly a
14	was in fact false?	14 vehicle crash report?
15	A Now, I heard that's -- if he's -- if they took	15 A If they have -- if they have a desk, the desk
16	the report the way that they said it, it is false,	16 sergeant, I don't see why they would not. It's a police
17	but...	17 facility. But --
18	Q But you didn't -- you never acquired the crash	18 Q What, if anything, did -- I'm sorry,
19	report to figure out if in fact it was false?	19 Mr. Holliday. Go ahead.
20	MR. NOLAND: Objection, foundation. I think he	20 A But this is -- this is what I will say and --
21	said he didn't recall.	21 and I'm -- if you went to the desk to amend the report
22	A I do not know.	22 and they turned you away, there is no record.
23	Q Okay. What, if anything, did you do if we go	23 Q Okay. So how would we corroborate any of the
24	back -- if we go now to paragraph number 2, after the	24 -- any of the allegations thus far that we've reviewed
25	bullet points there? What, if anything, did you do to	25 in this letter?

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<p>1 MR. HILKE: Objection. Form.</p> <p>2 A Yeah. Now -- now is when you have to find</p> <p>3 people that can -- that can validate what you said.</p> <p>4 Q Okay. Mr. Henley -- is it clear to you that</p> <p>5 Mr. Henley actually witnessed the crash?</p> <p>6 A If Mr. Henley said it, and someone else said,</p> <p>7 it and -- am I going to take their word? Not really.</p> <p>8 No, I'm not, but I'm not going to discount their word</p> <p>9 either.</p> <p>10 Q I understand that. If we go to this</p> <p>11 highlighted section -- or I'll see if I can highlight</p> <p>12 it. But where it starts with, "Upon going there and</p> <p>13 talking to officers that report to Sergeant Watts," do</p> <p>14 you see that sentence?</p> <p>15 A No, I don't see that.</p> <p>16 Q It is in the second paragraph.</p> <p>17 MR. NOLAND: It's highlighted.</p> <p>18 A Okay. All right. "I was told that the Ida B.</p> <p>19 Wells police were handed -- were handled out of 38th and</p> <p>20 Cottage. Upon going there and talking to officers that</p> <p>21 report to Sergeant Watts, I was told that I should just</p> <p>22 file a claim with my insurance company for the damages."</p> <p>23 Q Okay. What, if anything, Mr. Holliday, did</p> <p>24 you do to confirm the identity of these alleged report -</p> <p>25 - officers that report to Sergeant Watts?</p>	<p>1 A The only thing you can do to -- to identify</p> <p>2 who was working with Sergeant Watts that day is to -- is</p> <p>3 to pull the A & A sheets for whatever day that was and</p> <p>4 see who was working with him and for him.</p> <p>5 Q And Mr. Holliday, what I'm trying to get at</p> <p>6 here is, what if -- what independent evidence do we have</p> <p>7 that the person Mr. Henley is reporting to is actually</p> <p>8 Sergeant Ronald Watts?</p> <p>9 A We don't, not now, not until we show Mr. --</p> <p>10 not until we show Henley a picture of Watts and then see</p> <p>11 if he was working the day that they're talking about,</p> <p>12 unless he's -- unless he's got some -- some mark with,</p> <p>13 like, the license plates to the car. He's got to have</p> <p>14 something that -- that nails down it was Watts.</p> <p>15 Q Okay. And we never acquired that evidence,</p> <p>16 correct?</p> <p>17 A I never acquired that evidence.</p> <p>18 Q Does this officially become a CR?</p> <p>19 MR. NOLAND: Objection.</p> <p>20 A Yes.</p> <p>21 Q Okay. What were the findings of the CR?</p> <p>22 A Well, this is -- because this is the entire</p> <p>23 CR. See, it doesn't come out until -- until they take</p> <p>24 him and they do him. Here, this -- this investigation,</p> <p>25 once it was taken over -- as I said earlier, once it's</p>
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<p>1 taken over by the FBI, it no longer -- I don't care what</p> <p>2 you find out between now and the time they decide to do</p> <p>3 it, you can't do anything until they say so, because</p> <p>4 this is between them and the U.S. attorney.</p> <p>5 Q So we don't have an outcome of this</p> <p>6 individual investigation regarding Ron Henley; is that</p> <p>7 correct?</p> <p>8 A We don't have --</p> <p>9 MR. HILKE: Objection, form.</p> <p>10 A Just looking if it's got the same number,</p> <p>11 which it -- I believe it does, no, you're not going to</p> <p>12 get anything until this thing is done.</p> <p>13 Q Okay. Wally, you can take that exhibit down.</p> <p>14 Thank you. There's an exhibit regarding your</p> <p>15 conversation with Mr. Baker. Give me just a moment. Do</p> <p>16 you remember that conversation where Mr. Baker said it</p> <p>17 appeared that Sergeant Watts was running a drug</p> <p>18 operation?</p> <p>19 A Yes, sir.</p> <p>20 Q Are you familiar with what a reverse sting is?</p> <p>21 A Yes, sir.</p> <p>22 Q What is a reverse sting?</p> <p>23 A A reverse sting is when the police go out and</p> <p>24 pose as drug dealers.</p> <p>25 Q Okay. And is it common for tactical teams to</p>	<p>1 conduct reverse stings?</p> <p>2 A They do -- they did. They have done it. That</p> <p>3 is not -- here, when a reverse sting is done, they get</p> <p>4 permission from somebody. They -- you know, you have</p> <p>5 policemen selling drugs. But somebody here -- somebody</p> <p>6 above the rank of sergeant knows. It's not he just</p> <p>7 walked out there.</p> <p>8 Q Okay. And when a tactical team gets</p> <p>9 permission by someone higher up to do a reverse sting,</p> <p>10 it's as if it -- they are operating a drug operation; is</p> <p>11 that correct?</p> <p>12 A Yes.</p> <p>13 Q Other than Mr. Baker's allegation that</p> <p>14 Sergeant Watts was running a drug operation, is there</p> <p>15 any other evidence to show that they're -- they weren't</p> <p>16 reverse stings that he's talking about?</p> <p>17 A There's nothing that's in the report that I</p> <p>18 have written or read that says anything about any</p> <p>19 reverse stings.</p> <p>20 Q I want to talk about briefly -- and I'm trying</p> <p>21 to hurry up for you, Dan. I want to talk about CR</p> <p>22 number 309282, which --</p> <p>23 MR. KOSOKO: If you could bring that exhibit</p> <p>24 up, Wally.</p> <p>25 MR. HILKE: Yup, one sec.</p>

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<p style="text-align: center;">Page 209</p> <p>1 MR. KOSOKO: It's Bates number 12 -- CPD- 2 12903.</p> <p>3 BY MR. KOSOKO:</p> <p>4 Q Mr. Holliday, what were the results -- the 5 findings of this CR?</p> <p>6 A I don't know. Was this -- I don't know.</p> <p>7 MR. KOSOKO: Wally, if you could go to Bates 8 stamp 129904.</p> <p>9 A Okay. Here it says, "findings unfounded."</p> <p>10 Q And could you explain to us what that means, 11 please?</p> <p>12 A Okay. Unfounded means that the incident did 13 not happen.</p> <p>14 Q All right. You can take that exhibit down. 15 Thank you. During your investigation of Ronald Watts, 16 did you ever analyze any arrest reports -- any arrest 17 reports for a violation of the Illinois Controlled 18 Substances Act that were drafted by Ronald Watts?</p> <p>19 A No, sir.</p> <p>20 Q During your investigation of Ronald Watts, did 21 you ever analyze a vice case report for violation of the 22 Illinois Controlled Substance Act drafted by Ronald 23 Watts?</p> <p>24 A No, sir.</p> <p>25 Q During your investigation of Ronald Watts, did</p>	<p style="text-align: center;">Page 210</p> <p>1 you ever review any grand jury transcripts, wherein 2 Ronald Watts testified regarding -- regarding a 3 violation of the Illinois Controlled Substances Act?</p> <p>4 A No, sir.</p> <p>5 Q Okay. What independent evidence do we have 6 regarding these allegations that Ronald Watts framed 7 people for drug cases?</p> <p>8 A That I know of, none.</p> <p>9 MR. KOSOKO: And if we could finish up, I'm 10 going to -- I don't know if Mr. Wolke used this 11 exhibit, but if -- Wally, could you bring up the 12 21006 FBI Report?</p> <p>13 MR. HILKE: Yup. This will be a new exhibit.</p> <p>14 MR. KOSOKO: All right. We'll mark this as 15 Watts Exhibit number 1. Actually, don't bring it up 16 yet. I'm going to bring up -- if you could bring up 17 ████████ report, please.</p> <p>18 (WATTS EXHIBIT 1 MARKED FOR IDENTIFICATION)</p> <p>19 MR. HILKE: Yep, one sec.</p> <p>20 BY MR. KOSOKO:</p> <p>21 Q Mr. Holliday, this report from Agent █████ is 22 regarding a April 7, 2005 interview of Wilbert "Big 23 Shorty" Moore; is that correct? I believe you testified 24 earlier to that.</p> <p>25 A Yes, sir.</p>
<p style="text-align: center;">Page 211</p> <p>1 Q Okay. The contents of this relate what 2 allegations Wilbert Moore made regarding the drug trade 3 at the Wells, alleged misconduct by my client and other 4 Chicago police officers; is that correct?</p> <p>5 A If I -- let's see. Watts particularly --</p> <p>6 Q It mentions Kenny Young also and Al Jones, 7 correct?</p> <p>8 A Yes.</p> <p>9 Q Okay. If we could bring up Watts Exhibit 10 number 1, please. Mr. Holliday, have you -- by any 11 chance, have you come across this FBI report?</p> <p>12 A Never seen it.</p> <p>13 Q Okay. Do you see the date on here?</p> <p>14 A 1-20-06.</p> <p>15 Q Okay. Were you still with confidential in 16 January of 2006?</p> <p>17 A I believe I was.</p> <p>18 Q Okay. Wally, could you please scroll down to 19 page 2 of 2 of this document, please? Okay. Do you see 20 that paragraph that starts with, "Surely after the 21 investigation," Mr. Holliday?</p> <p>22 A Yes, sir.</p> <p>23 Q Okay. What were the findings of this 24 investigation as of the drafting of this report?</p> <p>25 A The unit to which Watts was -- was disbanded,</p>	<p style="text-align: center;">Page 212</p> <p>1 Public Housing Unit, and transferred to another area. 2 During the course of the investigation, allegations 3 against Watts were never able to be substantiated or 4 collaborated.</p> <p>5 Q Okay. Is this consistent with your 6 investigation?</p> <p>7 A In that I found nothing during the times that 8 I was investigating? Yes.</p> <p>9 Q Correct. Correct. Yes, what's your answer?</p> <p>10 A Yes.</p> <p>11 Q And do you have -- as you sit here today, do 12 you have any evidence to change this finding that you're 13 --</p> <p>14 A I do not.</p> <p>15 MR. KOSOKO: All right. That's it for me. 16 Thank you.</p> <p>17 MR. NOLAND: Mr. Stefanich, do you have any 18 questions?</p> <p>19 MR. STEFANICH: Yeah, I got maybe three or four 20 questions.</p> <p>21 EXAMINATION</p> <p>22 BY MR. STEFANICH:</p> <p>23 Q Mr. Holliday, my name's Brian Stefanich. Let 24 me start my video for you. My name is Brian Stefanich. 25 I represent some of the defendant officers in this case.</p>

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<p>1 Do you recall your PC number?</p> <p>2 A No, I do not.</p> <p>3 MR. STEFANICH: And Wally, if you could pull up</p> <p>4 Agent [REDACTED] interview again, Exhibit Number 11.</p> <p>5 MR. HILKE: Sure. One sec.</p> <p>6 MR. STEFANICH: Sure.</p> <p>7 BY MR. STEFANICH:</p> <p>8 Q If you could go to the first page.</p> <p>9 A Okay.</p> <p>10 Q And Mr. Holliday, this report by Agent [REDACTED]</p> <p>11 was submitted on April 14, 2005. Do you see that?</p> <p>12 A Yeah.</p> <p>13 Q Okay. And you have no personal knowledge of</p> <p>14 whether Agent [REDACTED] accurately summarized Mr. Moore's</p> <p>15 interview in this report; is that correct?</p> <p>16 A That is correct.</p> <p>17 MR. STEFANICH: I don't have any further</p> <p>18 questions. Thanks.</p> <p>19 MR. NOLAND: Okay. I -- oh, Megan, do you have</p> <p>20 any questions? McGrath? While we're waiting for</p> <p>21 her, I'll -- I just have a couple of questions.</p> <p>22 EXAMINATION</p> <p>23 BY MR. NOLAND:</p> <p>24 Q This is Dan Noland. So Mr. Holliday, I just</p> <p>25 want to talk for a second about when you left the</p>	<p>1 confidential investigations section. You recall earlier</p> <p>2 in the deposition it was your recollection you left in</p> <p>3 the second half of 2005, right?</p> <p>4 A Right.</p> <p>5 MR. HILKE: Objection to the extent it</p> <p>6 misstates.</p> <p>7 Q And then you were shown a document, Mr. Hilke</p> <p>8 showed you a document, Exhibit 17 -- Exhibit 17, you're</p> <p>9 looking at it right now, correct?</p> <p>10 A Yes.</p> <p>11 Q This is not drafted by you, correct?</p> <p>12 A Correct.</p> <p>13 Q And on Exhibit 17, you had mentioned you saw</p> <p>14 something from 2006, and so you -- that led you to</p> <p>15 believe that possibly you were still at the confidential</p> <p>16 section in 2006, correct?</p> <p>17 A That is correct.</p> <p>18 Q I'm showing you now page 3 of Exhibit 17, and</p> <p>19 the paragraph on page 3 from 2006, in fact, does not</p> <p>20 contain your name; does it?</p> <p>21 A No. No, sir.</p> <p>22 Q Okay. So would that then lead you to your</p> <p>23 original recollection, which is that you left the</p> <p>24 Confidential Section in late 2005?</p> <p>25 MR. HILKE: Objection, leading.</p>
<p style="text-align: center;">Page 215</p> <p>1 A Yes. I can't say that because we -- we -- the</p> <p>2 reason you can't say that is because you don't write</p> <p>3 across -- across the board. In other words, if you're</p> <p>4 assigned confidential, when you write a report, it's a</p> <p>5 confidential report. It doesn't go anywhere else, it's</p> <p>6 confidential. And you don't -- you don't -- you don't -</p> <p>7 - you're not working in general writing a confidential</p> <p>8 report.</p> <p>9 Q Right.</p> <p>10 A So that's why I say I must have still been in</p> <p>11 Confidential when I did it.</p> <p>12 Q But we don't have -- no, my point to you is</p> <p>13 that we do not have any reports in front of us here that</p> <p>14 you signed in 2006. None. Nobody showed you any. So if</p> <p>15 we don't have any reports that you've seen that you</p> <p>16 signed in 2006, would it be -- your recollection be that</p> <p>17 you left confidential in late 2005?</p> <p>18 A I don't remember when I left confidential.</p> <p>19 Q Okay. And we'd have to check with -- all</p> <p>20 right, then. Okay. I will show you that there's a --</p> <p>21 this same exhibit, Exhibit 17, page 2 of 3, not drafted</p> <p>22 by you, the last paragraph reflects an interview that</p> <p>23 you did a second interview of Ben Baker. Do you see</p> <p>24 that?</p> <p>25 A Yes.</p>	<p style="text-align: center;">Page 216</p> <p>1 Q And that was covered before in the deposition,</p> <p>2 right?</p> <p>3 A Yes.</p> <p>4 Q I can represent to you that Mick -- somebody</p> <p>5 on this call or this deposition could correct me if I'm</p> <p>6 wrong, but I'm not aware of any other document with your</p> <p>7 name on it in connection with this investigation that's</p> <p>8 been produced in this case, okay? So that's -- as of</p> <p>9 October 31, 2005, just that we found. And I can't --</p> <p>10 I'm not 100 percent. You know, we could always have</p> <p>11 missed something. But with that representation that you</p> <p>12 don't have your name on any other document for this</p> <p>13 Watts investigation, and that the Watts investigation</p> <p>14 was open when you left, would that lead you to believe</p> <p>15 that you left the confidential section somewhere in the</p> <p>16 weeks after October 31, 2005?</p> <p>17 A Possible. I -- like I said, I don't -- I do</p> <p>18 not remember.</p> <p>19 Q Okay. Okay. You were asked some questions</p> <p>20 about a subpoena. Was it your job at the confidential</p> <p>21 section to copy paperwork in response to the subpoenas</p> <p>22 that came in?</p> <p>23 A No.</p> <p>24 Q But there was somebody that would handle when</p> <p>25 subpoenas that would come in, that the material called</p>

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<p>1 for, and the subpoena would be copied and sent out to 2 whoever asked for it?</p> <p>3 A That was a headquarters, yes.</p> <p>4 Q And then headquarters would of course have 5 people that would get in contact with confidential, and 6 the materials called for so that DPD would fully respond 7 to the subpoena, right? To your knowledge.</p> <p>8 A Yeah, they had them at headquarters already. 9 They had copies of all reports.</p> <p>10 Q So you would -- the practice would be that you 11 would write a report and submit it for your supervisor; 12 is that right?</p> <p>13 A Yes.</p> <p>14 Q You supervisor would then review it and 15 approve it if he or she approved?</p> <p>16 A Yes.</p> <p>17 Q And then that report and any documents 18 supporting it would be submitted into the confidential 19 file, right?</p> <p>20 A Yeah. It would be submitted. They had a 21 confidential package that they sent downtown. Like I 22 said, the deputy would read most of them, and then they 23 had a confidential -- confidential section of records 24 where they --</p> <p>25 Q That's after the case was closed, correct?</p>	<p>1 A No. This is during the process. Each and 2 every report, there's a copy of it. Once you write it 3 and it goes through channels, they have the confidential 4 section of records at -- at 11th Street -- I mean at 5 headquarters, 35th Street.</p> <p>6 Q But those documents are still maintained 7 confidential separate apart from other internal affairs 8 files?</p> <p>9 A Yes, yes. They're not open to everybody.</p> <p>10 Q Got it. So the materials you had in files, 11 when you were working on a case, would simply be 12 duplicates of the material that had been submitted for 13 inclusion in that file?</p> <p>14 A Yes.</p> <p>15 MR. HILKE: Objection, leading.</p> <p>16 Q And so that, for instance, if a subpoena came 17 in -- okay. Yeah, that's it. You were asked some 18 questions about notes. From time to time you might 19 interview a witness on a case, correct?</p> <p>20 A Yes.</p> <p>21 Q And you might take notes of that interview, 22 correct?</p> <p>23 A Correct.</p> <p>24 Q And then you would at some point memorialize 25 those notes onto a report, all the information on those</p>
<p style="text-align: center;">Page 219</p> <p>1 notes, submit the report for approval by your 2 supervisor, and then you could discard the notes because 3 all the information from them was submitted on the 4 report?</p> <p>5 A Right.</p> <p>6 MR. HILKE: Objection. Form and leading.</p> <p>7 Q You were asked questions about whether or not 8 if you got -- well, first of all, Exhibit 11, which is 9 the ATF Agent █ Report, you -- this report was 10 submitted for inclusion in the confidential file for 11 this case, right?</p> <p>12 A Yes.</p> <p>13 Q And you were asked some questions. In 14 general, could there be a scenario in the world where is 15 it possible that you might get a report from somebody, 16 even the Fed, that you would not submit the report for 17 inclusion, and -- you remember that discussion?</p> <p>18 A Yes.</p> <p>19 Q Would that be -- would the only time you'd not 20 submit a report for inclusion in the file when it was 21 simply a duplicate, and you knew that others within IAD 22 already had the report and it was already in the file?</p> <p>23 A Correct. Any--</p> <p>24 MR. HILKE: Objection. Form and leading.</p> <p>25 A Anything that they did not already give us --</p>	<p style="text-align: center;">Page 220</p> <p>1 like I said, from time to time, there was information 2 that would come up, I just did not have, and I would ask 3 them for a copy of it so I could refer to it from time 4 to time. But if it was something I knew was not in the 5 file, nobody had, it was -- it became an official part 6 of the copy because I would submit it.</p> <p>7 Q The superintendent of police -- did you have 8 any conversations with the superintendent of police on 9 this investigation?</p> <p>10 A No.</p> <p>11 Q Did you personally have conversations on any 12 of your investigations with the superintendent?</p> <p>13 A No.</p> <p>14 Q And so when you testified earlier that the 15 Superintendent would be advised of -- might be advised 16 of investigations, was that based on -- upon your 17 speculation?</p> <p>18 MR. HILKE: Objection, form.</p> <p>19 Q That was based on -- well, explain what you 20 mean by that. Well, let me -- hold on. Let me ask it 21 this way. You're not saying that the superintendent of 22 police has -- is knowledgeable about the details of 23 every single CR investigation that's ongoing at the 24 police department, are you?</p> <p>25 A No.</p>

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<p>1 Q Okay. So explain what you mean.</p> <p>2 A On cases that are high profile and have --</p> <p>3 have all sorts of attachments of anything could happen,</p> <p>4 make the police department look bad, or if it makes the</p> <p>5 police department look good, it doesn't matter. If it's</p> <p>6 a high-profile case, the superintendent is kept aware.</p> <p>7 It's -- it's just -- it's just --</p> <p>8 Q So it's your understanding that, as a general</p> <p>9 matter, that the superintendent would be informed that</p> <p>10 there is this investigation of Watts?</p> <p>11 A Right.</p> <p>12 Q But he might not know the -- every nuance and</p> <p>13 detail of the investigation?</p> <p>14 A No, right.</p> <p>15 Q Okay.</p> <p>16 A But he -- but he knows there's one ongoing,</p> <p>17 because like I say, anything could happen and when they</p> <p>18 ask him, he can't stand up there looking like a fool, "I</p> <p>19 don't know what's going on."</p> <p>20 Q Okay. Okay. You were shown some questions --</p> <p>21 I'm going to show you Exhibit 7, which were the</p> <p>22 photographs that you pulled for Officer -- or Sergeant</p> <p>23 Watts and some others, page -- exhibit -- so why did you</p> <p>24 -- why did you pull these photos?</p> <p>25 A So if you know who you're looking for, you</p>	<p>1 know what you're looking at when you see it.</p> <p>2 Q And that -- would this be also some</p> <p>3 preparatory work in the event there's going to be some</p> <p>4 surveillance of individuals?</p> <p>5 A Yes.</p> <p>6 Q And I'm going to show you what I'm going to</p> <p>7 mark --</p> <p>8 MR. NOLAND: And I apologize to Wally and</p> <p>9 everybody. I can show you what it is. It's Bates</p> <p>10 stamped Baker Glen 10942 and 10943. We'll mark this</p> <p>11 as City Exhibit 1.</p> <p>12 (CITY EXHIBIT 1 MARKED FOR IDENTIFICATION)</p> <p>13 MR. KOSOKO: If you give me just a second, I</p> <p>14 might be able to pull it up for everybody. I was --</p> <p>15 go ahead.</p> <p>16 MR. HILKE: Same here, thanks.</p> <p>17 MR. KOSOKO: What's the Bates again real quick?</p> <p>18 MR. NOLAND: Baker Glen 10942.</p> <p>19 MR. KOSOKO: Okay.</p> <p>20 MR. NOLAND: 43. Wally, are you good?</p> <p>21 MR. HILKE: I'm sorry. If you'll give me just</p> <p>22 one second to make sure I'm actually looking at it</p> <p>23 while you ask your questions. And I found it, but</p> <p>24 it is going to take me a few seconds to load it.</p> <p>25 MR. NOLAND: That's fine, Wally.</p>
<p style="text-align: center;">Page 223</p> <p>1 MR. HILKE: I'm sorry. I'm not -- I'm not --</p> <p>2 it's about to load, but I'm on a remote server, and</p> <p>3 it's in a big bunch of other documents, so it will</p> <p>4 take me a second still.</p> <p>5 MR. KOSOKO: I got it, Wally. I can just -- we</p> <p>6 can --</p> <p>7 MR. HILKE: Yeah. If you're able to share it,</p> <p>8 that'll work.</p> <p>9 MR. KOSOKO: Dan, is this the document? This</p> <p>10 clear?</p> <p>11 MR. NOLAND: Yeah. Yeah, great. Thanks.</p> <p>12 MR. KOSOKO: I can scroll down for everybody.</p> <p>13 Go ahead, Dan.</p> <p>14 BY MR. NOLAND:</p> <p>15 Q Okay, yeah. So Mr. Holliday, is your</p> <p>16 handwriting shown on this document?</p> <p>17 MR. NOLAND: Can you go to the second half of</p> <p>18 it, Ahmed?</p> <p>19 A Yeah.</p> <p>20 MR. KOSOKO: Right there.</p> <p>21 A Yeah, that's fine.</p> <p>22 Q And what -- what did you write on there?</p> <p>23 A Beat that he's working, 264, his day off,</p> <p>24 route 2. Just -- I don't know what the third day is or</p> <p>25 the other -- but all that's my writing.</p>	<p style="text-align: center;">Page 224</p> <p>1 Q And did this appear to be preparatory work for</p> <p>2 you for possible surveillance?</p> <p>3 A Yes.</p> <p>4 Q So I know that you were asked some questions</p> <p>5 about whether or not there was surveillance -- or you</p> <p>6 personally did surveillance of Sergeant Watts, and you</p> <p>7 said something about not having enough time. Would you</p> <p>8 agree, was that poor choice of words that you used?</p> <p>9 A It was not what I meant, not having enough</p> <p>10 time or not having time. This is what you do. You</p> <p>11 always have time. It's just you're involved in a whole</p> <p>12 lot of things, working in the office. I mean, there are</p> <p>13 other investigations going on, and some of them require</p> <p>14 additional manpower, and you work those, too. You're not</p> <p>15 -- you're not always working your own investigations.</p> <p>16 Q And after all these years -- and we just</p> <p>17 looked at some documents showing you were doing some</p> <p>18 preparatory work for possible surveillance -- after all</p> <p>19 these years, can you possible whether or not you</p> <p>20 conducted surveillance of Sergeant Watts?</p> <p>21 A I know that I went out one time to look -- to</p> <p>22 just -- just -- to just see him working to see who he</p> <p>23 was, what he looked like. I think I had already pulled</p> <p>24 a picture of him. I didn't see anything. I have -- you</p> <p>25 know, I have various police radios and everything else.</p>

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<p>1 So you just -- our radio's tuned into every zone, every 2 zone and every- -- everything the police department has. 3 So you just know what zone he's on and you listen. You 4 know he's working by pulling stuff like that.</p> <p>5 Q And we looked at the integrity check plan you 6 prepared earlier, right?</p> <p>7 A Yes.</p> <p>8 Q And -- but you don't have any recollection of 9 actually implementing -- of that plan ever being 10 effectuated while you were working this case, correct?</p> <p>11 A Not while I was working, right.</p> <p>12 Q Okay. So it -- would it be fair that when it 13 came time, and when the Feds and your supervisors -- 14 when it came time to actually conduct such an operation 15 that that's when the heavy surveillance and other 16 activity would have been conducted, when you got -- when 17 the investigation got to that point?</p> <p>18 A Yes, sir.</p> <p>19 MR. HILKE: Objection. Form and foundation.</p> <p>20 MR. NOLAND: I think that's all I have. Thank 21 you.</p> <p>22 MR. HILKE: Okay. Megan, I don't know if you 23 have any, but I have a few follow-ups. It'll just 24 take a minute.</p> <p>25 MS. MCGRATH: I don't have any questions. Thank</p>	<p>1 you.</p> <p>2 REDIRECT EXAMINATION</p> <p>3 BY MR. HILKE:</p> <p>4 Q Okay. Mr. Holliday, you were asked a few 5 questions about responding to subpoenas while you worked 6 in confidential investigations. Do you remember that?</p> <p>7 A Yes, sir.</p> <p>8 Q And was it your understanding that if a case 9 you were investigating was -- the documents were 10 subpoenaed, that you would have to turn over your 11 handwritten notes?</p> <p>12 A No, that's not -- no.</p> <p>13 MR. NOLAND: Hold on. Objection. That's -- 14 that is an incomplete hypothetical, whether his 15 notes existed when a subpoena came in.</p> <p>16 A Not only that. When the subpoena comes in, it 17 doesn't come to me.</p> <p>18 BY MR. HILKE:</p> <p>19 Q Did you ever turn over handwritten notes in 20 response to a subpoena?</p> <p>21 A I was never subpoenaed for any handwritten 22 notes. I never knew -- I never knew when subpoenas came 23 in.</p> <p>24 Q If -- did anyone other than you have access to 25 your handwritten notes?</p>
<p style="text-align: center;">Page 227</p> <p>1 A No.</p> <p>2 Q I want to ask you about Exhibit number 4 3 again. Do you -- just showing you the top of this. Do 4 you see here this is a July 21, 2004 document from 5 Mr. Henley?</p> <p>6 A Yes, sir.</p> <p>7 Q I want to call your attention to the paragraph 8 starting "Sergeant Watts." Do you see where it says, 9 "Sergeant Watts told me that everything would work out, 10 and if I had any problems getting reimbursed to contact 11 him."?</p> <p>12 A Yes, sir.</p> <p>13 Q And looking at the bottom of that paragraph, 14 do you see where it says, "I have not heard (Inaudible) 15 records for both Sergeant Watts and Patrick will prove 16 that these communications have taken place"?</p> <p>17 A Hold on. Okay. Yes.</p> <p>18 Q And do you see the bullet below where it says, 19 "I have the sheet of paper with the handwriting of both 20 Sergeant Watts and Patrick Neuner with their cellphone 21 numbers. See attached"?</p> <p>22 A Yes.</p> <p>23 Q Would you with me that a sheet of paper with 24 Sergeant Watts's handwriting -- with Sergeant Watts's 25 cellphone number is evidence that Mr. Henley actually</p>	<p style="text-align: center;">Page 228</p> <p>1 had an interaction with Sergeant Watts?</p> <p>2 MR. KOSOKO: Objection to the form of the 3 question. Incomplete hypothetical, draws in, again, 4 opinion testimony regarding handwriting, and is 5 argumentative. Go ahead, Mr. Holliday.</p> <p>6 A That's -- that's hard to answer. I don't know 7 them, and I don't know their handwriting. For me, it 8 would just be a piece of paper with some writing on it 9 --</p> <p>10 BY MR. HILKE:</p> <p>11 Q And sir, would you have any ability to get a 12 sample of Sergeant Watts's handwriting?</p> <p>13 A I did not. I don't think it would have been 14 that hard.</p> <p>15 Q When you say it -- that it wouldn't have been 16 that hard, could you have done that if you had wanted 17 to?</p> <p>18 A If I had been thinking of something like that, 19 I could have done it, yes.</p> <p>20 Q Okay. And I want to ask a clarifying 21 question. You've testified that, in your investigations 22 and confidential investigations, you would not receive, 23 and you could not receive, the CRs of an officer you 24 were investigating until the end of your investigation; 25 is that correct?</p>

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<p style="text-align: center;">Page 229</p> <p>1 MR. KOSOKO: Object. Found -- form, 2 foundation, mischaracterize. Go ahead.</p> <p>3 A You don't -- you -- there's a form you fill 4 out, you don't receive it -- you don't send it in until 5 the end of your investigation, when you have -- when you 6 put your findings down.</p> <p>7 Q All right. I'm showing your Exhibit 20 one 8 more time. Do you remember this complaint where Brian 9 Bolton and Robert Gonzalez were the accused officers?</p> <p>10 A Yes, sir.</p> <p>11 Q And Mohammed and Watts were not the accused 12 officers to the CR number; is that right?</p> <p>13 A Yes, sir.</p> <p>14 Q And just to clarify, were you prohibited from 15 looking at a CR like this, a CR about a different 16 officer in your investigation of Sergeant Watts and 17 Mohammed?</p> <p>18 MR. NOLAND: Objection --</p> <p>19 MR. KOSOKO: Objection, asked and answered.</p> <p>20 MR. NOLAND: Yeah. Form, foundation, calls for 21 speculation. Go ahead.</p> <p>22 A I would not even know about it, because if -- 23 if they don't give it to me, how would I even know that 24 one exists? No.</p> <p>25 BY MR. HILKE:</p>	<p style="text-align: center;">Page 230</p> <p>1 Q And -- so I understand that you wouldn't know 2 about it --</p> <p>3 A If it were not my case, I would not know about 4 it.</p> <p>5 Q Sure. Was there -- were you aware of any rule 6 that you couldn't look at something like this?</p> <p>7 MR. NOLAND: Objection. Form, foundation, 8 calls for speculation.</p> <p>9 A I'm not saying there is or is not. I don't 10 know.</p> <p>11 Q Okay. And am I correct that it was not your 12 practice to seek information from other CRs when 13 conducting a confidential investigation?</p> <p>14 MR. NOLAND: Same objection. Go ahead.</p> <p>15 A It was not my practice.</p> <p>16 MR. HILKE: I don't have anything else. Thank 17 you.</p> <p>18 MR. NOLAND: Okay. We'll reserve signature.</p> <p>19 COURT REPORTER: Okay.</p> <p>20 MR. NOLAND: Ken?</p> <p>21 MR. FLAXMAN: I have nothing else. Thank you.</p> <p>22 COURT REPORTER: Thank you.</p> <p>23 MR. NOLAND: Thank you. I'm going to take off, 24 if everybody doesn't mind.</p> <p>25 COURT REPORTER: Okay. Counsel, please stay</p>
<p style="text-align: center;">Page 231</p> <p>1 with me.</p> <p>2 MR. NOLAND: See you back in Chicago, bye.</p> <p>3 MR. KOSOKO: I'm confused. We're done, right?</p> <p>4 COURT REPORTER: Well, I -- I need to get 5 orders on the record.</p> <p>6 MR. HILKE: Yeah. We can give you orders.</p> <p>7 MR. NOLAND: See you later. I'm going to go 8 catch a flight. Bye-bye. We're going to need to go 9 off the record, because I go to leave.</p> <p>10 COURT REPORTER: Yes. Okay, then. I will -- 11 Mr. Noland, I will e-mail you.</p> <p>12 MR. NOLAND: Victoria, I'd be -- Victoria, 13 could we just do this later by e-mail? It would be 14 very much appreciated, ma'am.</p> <p>15 COURT REPORTER: Yes. That's --</p> <p>16 MR. NOLAND: Thank you very much. Bye. We're 17 off the record, right?</p> <p>18 MR. HILKE: Yes. You can go off the record.</p> <p>19 COURT REPORTER: Okay. Okay, we are going off 20 the record. This concludes the deposition. The 21 time is 4:10 p.m. Central Standard.</p> <p>22 (DEPOSITION CONCLUDED AT 4:10 P.M. (CT))</p>	<p style="text-align: center;">Page 232</p> <p>1 CERTIFICATE OF REPORTER 2 STATE OF ILLINOIS</p> <p>3</p> <p>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 7 first being duly sworn to testify the truth, the whole 8 truth, and nothing but the truth; and that the said 9 matter was recorded digitally by me and then reduced to 10 typewritten form under my direction, and constitutes a 11 true record of the transcript as taken, all to the best 12 of my skill and ability. I certify that I am not a 13 relative or employee of either counsel and that I am in 14 no way interested financially, directly or indirectly, 15 in this action.</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22 VICTORIA JADICK, 23 COURT REPORTER/NOTARY 24 MY COMMISSION EXPIRES:11/29/2023 25 SUBMITTED ON: 12/12/2022</p>