

## **EXHIBIT 27**



**MASTER DOCKET CASE NO. 19-CV-01717**

**IN RE: WATTS COORDINATED PRETRIAL PROCEEDINGS**

**DEPONENT:**  
**PHILIP CLINE**

**DATE:**  
**DECEMBER 8, 2023**



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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF  
ILLINOIS EASTERN DIVISION  
JUDGE VALDERRAMA

MAGISTRATE JUDGE SHEILA M. FINNEGAN  
MASTER DOCKET CASE NO. 19-CV-01717

IN RE: WATTS COORDINATED PRETRIAL PROCEEDINGS

DEONENT: PHILIP CLINE  
DATE: DECEMBER 8, 2023  
REPORTER: SYDNEY LITTLE

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1 STIPULATION  
23 The VIDEO deposition of PHILIP CLINE was taken at  
4 KENTUCKIANA COURT REPORTERS, 110 NORTH WACKER DRIVE,  
5 CHICAGO, ILLINOIS 60606, via videoconference in which  
6 all participants attended remotely, on FRIDAY the 8th  
7 day of DECEMBER 2023 at 11:08 a.m. (CT); said VIDEO  
8 deposition was taken pursuant to the FEDERAL Rules of  
9 Civil Procedure. THE OATH IN THIS MATTER WAS SWORN  
10 REMOTELY PURSUANT TO FRCP 30.11  
12 It is agreed that SYDNEY LITTLE, being a Notary Public  
13 and Digital Reporter for the State of ILLINOIS, may  
14 swear the witness and that the reading and signing of  
15 the completed transcript by the witness is not waived.

1 PROCEEDINGS  
2

3 THE REPORTER: We are on record. My name is  
4 Sydney Little. I'm the online video technician and  
5 court reporter today, representing Kentuckiana  
6 Court Reporters, located at 110 North Wacker Drive,  
7 Chicago, Illinois 60606. Today is the 8th day of  
8 December 2023, and the time is 11:08 a.m. Central.  
9 We are convened by videoconference to take the  
10 deposition of Philip Cline in Re: Watts  
11 Coordinated Pretrial Proceedings, pending in the  
12 United States District Court for the Northern  
13 District of Illinois Eastern Division, Master  
14 Docket case number 19CV01717. Will everyone, but  
15 the witness, please state your appearance, how  
16 you're attending, and the location you are  
17 attending from, starting with Plaintiff's Counsel?

18 MS. KLEINHAUS: Morning. Theresa Kleinhaus,  
19 attending remotely from Chicago.

20 MR. FLAXMAN: Morning. Joel Flaxman, remotely  
21 from Chicago.

22 MR. BURNS: Terrence Burns, attending remotely  
23 from Chicago.

24 MR. GAINER: Brian Gainer on behalf of  
25 Defendant Watts, attending remotely from Chicago.

1                   MR. BORKAN: Steve Borkan on behalf of  
2 Defendant, Calvin Riddgell, attending remotely from  
3 Chicago.

4                   MR. PALLES: Eric Palles for Defendant,  
5 Kallatt Mohammed, remotely from Chicago.

6                   MR. SCHALKA: And Michael Schalka on behalf of  
7 Defendants Spaargarn and Cadman, appearing remotely  
8 from Chicago.

9                   MR. ZECCHIN: Anthony Zecchin on behalf of all  
10 other individual defendants, appearing remotely  
11 from Chicago.

12                  THE REPORTER: Thank you. Mr. Cline, will you  
13 please state your name for the record?

14                  THE WITNESS: Sure. Philip Cline, C-L-I-N-E.

15                  THE REPORTER: Thank you. And do all parties  
16 stipulate that the witness is, in fact, Philip  
17 Cline?

18                  MS. KLEINHAUS: Yes.

19                  MR. GAINER: Yes.

20                  MR. BURNS: Yes.

21                  MR. FLAXMAN: Yes.

22                  MR. BORKAN: Yes, on behalf of Calvin  
23 Riddgell.

24                  MR. ZECCHIN: Yes. On behalf --

25                  MR. PALLES: Yes.

1 MR. ZECCHIN: -- of all individual officers.

2 MR. PALLE: Yes.

3 THE REPORTER: Thank you. Mr. Cline, will you  
4 please raise your right hand? Do you solemnly  
5 swear or affirm that the testimony you're about to  
6 give will be the truth, the whole truth, and  
7 nothing but the truth?

8 THE WITNESS: I do.

9 THE REPORTER: Thank you. Counsel, you may  
10 begin.

11 DIRECT EXAMINATION

12 BY MS. KLEINHAUS:

13 Q. Okay. Good morning, sir. Just like the last  
14 time that we were convened for your deposition, because  
15 this is over Zoom, if there's ever any technical  
16 difficulties or if you have any difficulty hearing me,  
17 please try and signal that right away; is that fair?

18 A. Yes.

19 Q. Okay. And if I ask a bad question or a  
20 question that you don't understand, will you let me know  
21 that?

22 THE REPORTER: I'm not hearing --

23 MS. KLEINHAUS: Hear that answer, I'm sorry.

24 THE WITNESS: Yes.

25 BY MS. KLEINHAUS:

1           Q. Okay. And if you answer my question, I'll  
2 assume that you understood my question; is that fair?

3           A. Yes.

4           Q. Are you on any medications at this time that  
5 would prevent you from providing accurate testimony?

6           A. No.

7           Q. Are you aware of any medical conditions that  
8 you have that would prevent you from providing accurate  
9 testimony today?

10          A. No.

11          Q. What did you do to prepare for your testimony?

12          A. Today?

13          Q. At any point preparing for your deposition  
14 testimony in these matters?

15          A. I met with Terry Burns and talked about the --  
16 the case in general and looked at some documents.

17          Q. Okay. What documents did you review?

18          A. I -- this was back in August. I don't  
19 remember exactly what I saw then. I didn't see anything  
20 today.

21          Q. And when you were reviewing documents back in  
22 August, do you remember what types of documents you  
23 reviewed?

24          A. No. I -- it was just like a memo or --

25            MR. BURNS: Tess, if I may. There were

exhibits that you had sent over to us that I did show him at that time, if that helps you at all.

BY MS. KLEINHAUS:

Q. And, excuse me, please. Did you review any of the complaints, the pleadings in these coordinated proceedings as part of your preparation for your deposition?

A. I don't remember doing that.

Q. Okay. I'm going to share my screen and show you a portion of Exhibit 2. We were looking at this last summer during your deposition and I know that your counsel's going to be having hard copies printed out for you. So, if at some point you prefer to look at the hard copy, that's fine, too. Give me one second here.

MS. KLEINHAUS: So, Counsel, this is

Exhibit 2. It's City BG 059013.

(EXHIBIT 2 MARKED FOR IDENTIFICATION)

BY MS. KLEINHAUS:

Q. And I'm at the page that's marked at the bottom, 59052. Are you able to see this on your screen, sir?

A. I -- I can see it, but it's a little bit small. If you could --

Q. Sure.

A. -- make it bigger.

1           Q.    Sure.  How's that?

2           A.    A little bit better.  There, that's better.

3           Q.    Okay.

4           A.    Okay.  I can read it now.

5           Q.    Thanks.  I'm focused here on the section  
6 labeled Roman numeral IV, Department Members Under  
7 Investigation by an Outside Law Enforcement Agency.  Do  
8 you see that part?

9           A.    Yes.

10          Q.    Okay.  Those are the two paragraphs I'm asking  
11 you to review now, please?

12          A.    Okay.  Okay.

13          Q.    Prior to reading this provision, now, were you  
14 previously familiar with this policy regarding reporting  
15 any investigation by an outside law enforcement agency?

16          A.    Yes.

17          Q.    And in your experience with the Chicago Police  
18 Department, are you aware of any instances where an  
19 officer reported an outside investigation pursuant to  
20 this policy?

21          A.    I know it's been done, but I can't give you  
22 any specifics.

23          Q.    Okay.  And am I correct that, in general, CPD  
24 officers would not be aware whether, for example, an  
25 investigation by the FBI was a joint investigation with

1 the CPD confidential section?

2 A. Yeah. I mean, that would be the -- the issue.  
3 Did -- did they share that with the police that would  
4 require them to make out this report?

5 Q. I'm sorry. I'm not sure if I totally  
6 understand your answer. So, would CPD officers know  
7 either way whether an FBI investigation was being  
8 pursued jointly with CPD?

9 A. Not if it was by the confidential section of  
10 the IAD, no.

11 Q. Okay. And do you know what the reasons were  
12 for implementing this policy requiring reporting of  
13 investigation by an outside agency?

14 A. I don't know specifically, but I can guess  
15 that it was because of wanting to make sure that there  
16 wasn't an investigation that the IAD wasn't aware of.

17 Q. And the second paragraph here under Roman  
18 numeral IV requires - I'm sorry. Let me just adjust my  
19 own screen. I'm sorry. Let me start that again. So,  
20 under this procedure, an employee would fill out a form  
21 alerting CPD that there was this outside investigation  
22 and, ultimately, a copy of that would be provided to the  
23 supervisor of the officer being investigated; is that  
24 right?

25 A. Well, it's not a form. It's -- it's a to/from

1 report that says, you know, I learned this, that Officer  
2 Smith isn't [sic] being investigated by the FBI and then  
3 the copy would go to, at that time, it was OPS. Now  
4 it's COPA. IAD is still the same, so they'd get a copy  
5 and a copy would stay in the unit files.

6 **Q. Okay. And then, this would be also submitted  
7 to the unit commanding officer, right?**

8 A. Not necessarily. I mean, it -- it -- it's --  
9 it says in there that they -- they will provide it to  
10 the commanding officer and then, the commanding officer  
11 does the other things with it by giving it to those  
12 other agencies.

13 **Q. Those other agencies, meaning the other  
14 divisions within CPD, like OPS and IAD, right? Okay.**

15 A. Yes.

16 **Q. So, it would be in keeping with this policy  
17 for an officer to tell his commanding supervisor about  
18 an investigation by an outside agency, right?**

19 A. I have to know some specifics about it to see  
20 if it falls underneath this.

21 **Q. Well, isn't that exactly what this policy  
22 requires by its very terms?**

23 A. There again, I mean, I understand what the  
24 order is, but does -- what you're giving me is  
25 hypothetical and I'm not sure that would fit under here,

1 but it should.

2 Q. Okay. We're going to turn to a different part  
3 of Exhibit 2 that relates to the Summary Punishment  
4 Policy. I think it's the last page of this exhibit. It  
5 should be 63. Oops, sorry. First of all, are you  
6 familiar with "summary punishment"?

7 A. Yes.

8 Q. And what is "summary punishment"?

9 A. It's discipline that you can use for minor  
10 offenses.

11 Q. And what would qualify as a minor offense, in  
12 your view?

13 A. Oh, late for roll call, reports being  
14 submitted late. Those types of things.

15 Q. And looking here at page 63 of Exhibit 2, it  
16 looks like there's a revision that you made to this  
17 policy during your tenure as superintendent; is that  
18 correct?

19 A. Yes.

20 Q. And --

21 A. That's which page?

22 Q. I'm sorry.

23 A. Sorry.

24 Q. This is page 63 of Exhibit 2 and I'll give you  
25 the Bates here. It's --

1 A. Yeah.

2 Q. -- Bates City BG059075.

3 A. 5, okay. Thank you.

4 Q. What was the process, sir, for you to make  
5 this revision to the Summary Punishment Policy?

6 A. I don't remember.

7 Q. In general, what was the process that you  
8 would follow as superintendent if you wanted to revise a  
9 CPD general order?

10 A. I would have the unit that's responsible for  
11 that, I can't think of what they are now, and they would  
12 -- I would tell them what I was looking for and they  
13 would write it up and then, if I approved it, then I'd  
14 sign it.

15 Q. Do you recall any other changes to discipline  
16 policy that you made while superintendent, besides this  
17 revision to the Summary Punishment Policy?

18 A. No.

19 Q. If you had wanted to make other changes to the  
20 discipline policy at CPD, you could have done that,  
21 right?

22 MR. BURNS: Objection. Form of the question.

23 I'm sorry. You can answer. Yes. It's my  
24 objection.

25 BY MS. KLEINHAUS:

1           Q. Did you make any changes to the disciplinary  
2 policy at CPD based on any public corruption cases that  
3 came through the confidential section of IAD?

4           A. Not that I remember.

5           Q. Okay. You can put Exhibit 2 the side if you  
6 have it in front of you. I'm going to stop sharing the  
7 screen.

8           THE REPORTER: Tess, was that previously  
9 marked or are we marking that today?

10          MR. BURNS: Believe it's 2, Tess.

11          MS. KLEINHAUS: I believe it was previously  
12 marked as Exhibit 2.

13          THE REPORTER: Okay. Thank you.

14 BY MS. KLEINHAUS:

15          Q. In the prior portion of your deposition  
16 testimony, we talked about instances where Chicago  
17 police officers were indicted and criminally charged  
18 related to their employment. Do you recall generally  
19 talking about that in your last portion of your  
20 deposition?

21          A. Not specifically. No.

22          Q. Okay. Were there instances, while you were  
23 superintendent, where CPD officers were indicted?

24          A. Yes.

25          Q. And on the occasions when that happened, would

1       **there be any further investigation related to the**  
2       **circumstances after the indictment?**

3            MR. BURNS: Objection. Form of the question.

4            Again, you can answer, Phil, I'm sorry.

5            A. I believe that Internal Affairs would -- would  
6        have followed up on those. I don't know any specifics.

7        BY MS. KLEINHAUS:

8            Q. Okay. But, for example, if someone was  
9        indicted, your expectation would be that Internal  
10       Affairs would then conduct further investigation,  
11       including interviews with their colleagues about that?

12           MR. BURNS: Objection. Form. Foundation.

13           A. Not necessarily. In a lot of these cases, I  
14        remember that the prosecutor wanted IAD to hold off any  
15       further investigation until the criminal case was over.

16        BY MS. KLEINHAUS:

17           Q. And what was the reasoning behind that?

18           A. You'd have to ask the prosecutor. I don't  
19        know.

20           Q. Are there ever instances where CPD did further  
21        investigation after the criminal case was concluded?

22           MR. BURNS: Objection. Form. Foundation.

23           A. I don't know any specifics, but, I mean, I  
24        remember it being talked about.

25        BY MS. KLEINHAUS:

1           Q. And who talked about it?

2           A. I don't remember specifically who. I mean, I  
3 can just surmise that it would have been the head of  
4 IAD.

5           Q. Would you agree with me that it would be a  
6 sensible practice, after officers are criminally  
7 convicted, to speak with their supervisors, their direct  
8 reports, their colleagues and find out if anyone knew  
9 about what had been going on?

10           MR. BURNS: Objection to the form of the  
11 question. Foundation.

12           A. As long as they had the approval of the  
13 prosecutor.

14 BY MS. KLEINHAUS:

15           Q. What was the process for firing an officer  
16 when you were superintendent?

17           A. Well, I didn't hear the last part of your  
18 question.

19           Q. What was the process for terminating an  
20 officer from employment with CPD when you were  
21 superintendent?

22           MR. BURNS: Objection. Form. Foundation.  
23           A. That would be the responsibility of the police  
24 board at that time.

25 BY MS. KLEINHAUS:

1           Q. And on certain occasions, would the Internal  
2 Affairs Department recommend to you that as a matter of  
3 discipline, a CPD officer should be terminated from CPD  
4 employment?

5           A. Yes.

6           Q. On how many occasions did that occur when you  
7 were superintendent?

8           A. I believe about 100.

9           Q. And do you know, or can you approximate, how  
10 many of those 100 recommendations for termination you  
11 approved or agreed with?

12          A. Not as we sit here today I don't.

13          Q. Do you have any idea how many of those 100  
14 recommendations for termination actually resulted in  
15 officers being terminated from their employment?

16           MR. BURNS: Objection. Asked and answered.

17           Foundation.

18          A. I don't remember, as I sit here today,  
19 exactly, but it was a significant amount of that 100.

20 BY MS. KLEINHAUS:

21          Q. Did you have occasions while you were  
22 superintendent where an officer who was going to be  
23 terminated or imminently going to be terminated, chose  
24 to resign instead?

25           MR. BURNS: Objection. Form of the question.

1 Foundation.

2 A. Yes, but I don't know specifics.

3 BY MS. KLEINHAUS:

4 Q. Okay. And what would the next steps be in the  
5 process after IAD recommended termination? If you  
6 agreed with it, then what would happen next?

7 A. We would go to the police board.

8 Q. Do you have -- or strike that, please. Did  
9 you make recommendations as to termination for any of  
10 the officers involved in the SOS scandal?

11 A. I don't remember because I -- I think the  
12 criminal case was still going and the State's Attorney's  
13 Office didn't want us doing anything on the  
14 administrative side until they were finished.

15 Q. Other than the SOS scandal, do you have any  
16 other -- or strike that, please. Do you remember any of  
17 the instances where IAD recommended termination and you  
18 agreed with that recommendation?

19 A. Not -- not as I sit here today I don't.

20 Q. When did you first learn that Sergeant Watts  
21 was being investigated by IAD?

22 A. I don't know specifically when, but IAD came  
23 and saw me and told me that there was an investigation.

24 Q. And do you have an independent recollection of  
25 IAD coming to talk to you about that?

1 A. No.

2 Q. And who would it have been from IAD that would  
3 have brought you that information?

4 A. Debbie. Deb Kirby.

5 Q. Anyone else?

6 A. Could have been Rowan because that -- they  
7 overlapped. So, it could have been Karen Rowan also.  
8 And then, he would've brought the IAD officers that are  
9 -- were deputized as U.S. Marshals that were working  
10 with the FBI. They would have come into the room with  
11 him.

12 Q. Okay. So, would that have been Tom Chester,  
13 for example?

14 A. Yes.

15 Q. Okay. What about -- I'm sorry, strike that,  
16 please. Do you have any specific recollection of having  
17 any conversation with Tom Chester about the  
18 investigation of Sergeant Watts?

19 A. I remember meeting with him and -- and talking  
20 about it, but I don't remember, as I sit here today,  
21 what the specifics were.

22 Q. How many times did you speak with Tom Chester  
23 about the investigation of Sergeant Watts?

24 A. I'm just going to speculate ten, maybe.

25 Q. Would it have been your practice for the

1       deputy superintendent, either Kirby or Rowan, to be  
2       present for all of those conversations with Tom Chester?

3           A.    Yes.

4           Q.    Okay. And would anyone else be part of the  
5       conversation besides you, the deputy superintendent, and  
6       Tom Chester?

7           A.    There was another sergeant. I don't recall  
8       his name right now.

9           Q.    Does the name Al Boehmer or Boehmer mean  
10       anything to you?

11          A.    Al. That's it. That's who it was.

12          Q.    Okay. And would Sergeant Boehmer and Sergeant  
13       Chester both be present or would it be one or the other?

14          A.    Sometimes it was both. Sometimes it was just  
15       one of them.

16          Q.    So, am I understanding you correctly, you  
17       believe there were probably approximately ten  
18       conversations that you had as superintendent related to  
19       the Watts investigation and those would've included  
20       whoever the deputy superintendent was, and one or two of  
21       the Sergeants from IAD assigned to the FBI Task Force?

22          A.    Then -- the people that you just mentioned,  
23       that's the people that I would've met with. How many  
24       times exactly? I don't recall. I'm -- I'm guessing at  
25       least ten times.

1           Q. Okay. So, it would have been that same  
2 configuration of people each time you met; is that  
3 right?

4           A. No. Because some of them -- one of them might  
5 not have been there and, you know, the meeting was set  
6 up with me, so whoever is available would go up.

7           Q. Okay. And were these conversations part of a  
8 larger briefing with IAD or would they have been  
9 specific to the Watts investigation?

10          A. No. It would've been other cases also that  
11 they were involved in.

12          Q. So, you think the conversations that you had  
13 about the Watts investigation were part of a larger  
14 briefing on confidential investigations; is that right?

15          A. Yes.

16          Q. And how often were you briefed on confidential  
17 investigations?

18          A. I don't recall specifically, but I'm going to  
19 guess around once every six weeks, maybe.

20          Q. Where would the conversations about the  
21 confidential investigations take place?

22          A. In my office.

23          Q. Was there any agenda or meeting minutes  
24 created for these briefings?

25          A. Not that I'm aware of.

1           Q.   Did anyone take any notes during these  
2 briefings?

3           A.   Not that I recall.

4           Q.   Did you ever have any conversations with Al  
5 Boehmer about the SOS scandal?

6           A.   I don't remember hearing -- but I mean, if he  
7 was in that same position, I probably would've, yes.

8           Q.   Did you ever have any conversations with him  
9 about how costly that scandal would be for the City of  
10 Chicago?

11          A.   No.

12          Q.   I know you said you don't remember specifics  
13 of your conversations about the Watts investigations; is  
14 that right?

15           MR. BURNS:   I'm sorry, could you repeat that,  
16 Tess?

17           MS. KLEINHAUS:   Sure.

18 BY MS. KLEINHAUS:

19          Q.   Do you have any independent recollection of  
20 your discussion of the investigation of Sergeant Watts  
21 and his team?

22           MR. BURNS:   Object to the form.   Incomplete.

23          A.   I'm not sure what you're asking.

24 BY MS. KLEINHAUS:

25          Q.   Okay.   What do you remember about the

1 investigation of Sergeant Watts while you were  
2 superintendent?

3 A. Well, I remember that, I believe it was Kirby,  
4 and Boehmer, and Chester would brief me every six weeks  
5 or so on what was going on.

6 Q. Do you remember anything about the allegations  
7 against Sergeant Watts?

8 A. I know that they were taking down -- the  
9 allegation was they were shaking down drug dealers in  
10 the projects.

11 Q. Did you ever meet with Calvin Holliday to  
12 discuss the investigation of Ronald Watts?

13 A. I don't remember. I mean, I may have.

14 Q. Were you informed of allegations that Sergeant  
15 Watts, or members of his team, would arrest people who  
16 refuse to pay them?

17 MR. BURNS: Objection. Incomplete.

18 Hypothetical.

19 A. I don't remember specifically what -- that was  
20 alleged.

21 BY MS. KLEINHAUS:

22 Q. Okay. So, you may have been told that or may  
23 not have been told that, you just don't know either way?

24 MR. BURNS: Objection to the form of the  
25 question.

1 A. Like I said, I don't recall.

2 BY MS. KLEINHAUS:

3 Q. Were you informed that there were allegations  
4 that Sergeant Watts would falsely arrest individuals for  
5 narcotics crimes they hadn't committed?

6 A. There again, I don't remember specifics from  
7 what I was told.

8 Q. And as a general matter when the deputy  
9 superintendent and the Sergeant assigned to the Joint  
10 Task Force would brief you on these confidential  
11 investigations, what type of information did you expect  
12 them to give you?

13 MR. BURNS: Objection. Form of the question.

14 You can answer.

15 A. A briefing on -- on what was the allegations,  
16 what was going on, where they were in their  
17 investigation, plus there was a federal investigation.  
18 So, what the FBI and the US Attorney were doing, what  
19 their ideas were.

20 BY MS. KLEINHAUS:

21 Q. Did you ever have any conversations with  
22 Kirby, or Rowan, or Boehmer, or Chester about  
23 potentially transferring Watts to a different position?

24 A. I don't remember that specific conversation.

25 No.

1           Q. In your view, would it have been a sensible  
2 move to consider moving Watts out of his role as the  
3 sergeant of a tactical team operating in Ida B. Wells?

4           MR. BURNS: Objection. Form of the question.

5           A. The problem with that is that the chances of  
6 him finding out that he was under investigation would be  
7 much greater if he got moved somewhere because you now  
8 have to tell people why are you moving him. So, it  
9 wouldn't be -- it would be a -- probably an issue of  
10 keeping it confidential versus it getting out there.

11 BY MS. KLEINHAUS:

12           Q. During your career at CPD, did you ever have  
13 any transfers or new job assignments for which you  
14 weren't given a reason?

15           MR. BURNS: I'm sorry, may I hear that  
16 question again, Tess?

17           MS. KLEINHAUS: Sure.

18           MS. KLEINHAUS: During your career at CPD, did  
19 you ever have transfers into different positions,  
20 roles within the organization without being given  
21 an explanation?

22           MR. BURNS: You're talking about him,  
23 personally, rather than just as a general, you're  
24 directing this to him?

25           MS. KLEINHAUS: Yeah. Uh-huh.

1 THE WITNESS: Yes.

2 BY MS. KLEINHAUS:

3 Q. And would you agree with me that actually  
4 happens quite frequently to members of CPD, right?

5 MR. BURNS: Objection. Form of the question.

6 A. It depends on the individual and what type of  
7 unit it's going to and from.

8 BY MS. KLEINHAUS:

9 Q. Other than the concern that you mentioned that  
10 moving Watts would reveal to him that he was being  
11 investigated, is there any other reason you know of why  
12 he couldn't have been moved to a different role?

13 A. Well, when you work on a joint investigation  
14 with the FBI and the U.S. Attorney, you can't do  
15 anything without running it by them first.

16 Q. And you never asked them about moving Watts to  
17 a different position, correct?

18 A. I didn't. No.

19 Q. Do you have an opinion about how many years a  
20 police officer who's engaged in with extortion or false  
21 arrests should be committed to remain in the same role  
22 that allows them to do that?

23 MR. BURNS: Objection. Form. Foundation.

24 A. They should be moved as quickly as possible  
25 where it doesn't jeopardize the criminal case.

1 BY MS. KLEINHAUS:

2 Q. Yes, sir. We're going to turn to what we'll  
3 call Exhibit 3. It's PL Joint 10946. This is a memo  
4 from Calvin Holliday and I'll share it on the screen as  
5 well.

6 (EXHIBIT 3 MARKED FOR IDENTIFICATION)

7 MR. BURNS: Tess, you have 2. What was then  
8 Exhibit 1?

9 MS. KLEINHAUS: Exhibit 1 was the Memorandum  
10 of Understanding between the FBI and the CPD.

11 MR. BURNS: Okay. Thank you.

12 MS. KLEINHAUS: Sure.

13 MR. BURNS: Okay. Thank you.

14 MS. KLEINHAUS: Uh-huh.

15 BY MS. KLEINHAUS:

16 Q. Okay sir, are you able to see Exhibit 3?

17 A. I can see it.

18 Q. Okay. Please take a minute to review it. Let  
19 me know if you need me to scroll down, okay?

20 A. Can you scroll down, please?

21 Q. Okay. Have you had a chance to review  
22 Exhibit 3?

23 A. I -- I've read it.

24 Q. And this is one of the documents that you  
25 reviewed in preparation for your deposition; is that

1 correct?

2 A. I don't remember seeing this.

3 Q. And this is a to/from memo from Calvin  
4 Holliday, correct?

5 A. Yes.

6 Q. Would this type of document have been provided  
7 to you as part of your briefings with IAD on  
8 confidential investigations?

9 A. May have, may not. I mean, they could tell me  
10 verbally same information that's in this report.

11 Q. Okay. Do you have any recollection of being  
12 told this information verbally?

13 A. Not as I sit here today. No.

14 Q. Okay. Do you have any recollection of having  
15 any conversations about the Watts investigation with  
16 Juan Rivera?

17 A. (No verbal response.)

18 Q. Sorry. Did you answer?

19 A. No. I don't recall.

20 Q. Okay. And this memo also makes reference to a  
21 Sergeant Henry Harris. Do you know Sergeant Harris?

22 A. Yes.

23 Q. Do you recall having any conversations with  
24 Sergeant Harris related to the investigation of Ronald  
25 Watts?

1 A. No.

2 Q. Okay. You can put Exhibit 3 to the side. I  
3 know that you don't have a recollection of ever having  
4 been shown Exhibit 3 before, but you would expect that  
5 the confidential section at IAD would've let you know  
6 that they were beginning this investigation of Watts,  
7 correct?

8 A. Yes.

9 Q. Approximately how many joint investigations  
10 between IAD and the FBI were ongoing while you were  
11 superintendent?

12 A. I don't recall the numbers, but I mean, there  
13 was not only the IAD and the FBI, but IAD and -- and  
14 ATF, and IAD and IRS. I mean, we worked with all the  
15 federal agencies when there was allegations of  
16 corruption.

17 Q. When there were ongoing joint investigations  
18 with IAD and a federal agency, would you be provided  
19 copies of reports from the federal agencies with regard  
20 to those investigations?

21 A. No. The -- the briefings were verbally.

22 Q. Okay. I'm going to show you what we'll mark  
23 as Exhibit 4. This is PL Joint 2088.

24 (EXHIBIT 4 MARKED FOR IDENTIFICATION)

25 MR. BURNS: Tess, what is the number again,

1 please?

2 MS. KLEINHAUS: Sorry. It looks like it  
3 starts at 2086. My bad.

4 MR. BURNS: And what page are we going to  
5 Tess?

6 MS. KLEINHAUS: We'll start on the first page  
7 of that exhibit.

8 MR. BURNS: All right.

9 BY MS. KLEINHAUS:

10 Q. Okay. Are you able to see Exhibit 4 on the  
11 screen, sir?

12 A. You can make it just a little bit bigger.

13 Q. Sure. How's that?

14 A. Yeah. That's better.

15 Q. Okay. Please review Exhibit 4 and let me know  
16 when you want me to scroll down.

17 A. Okay. You can scroll down. Scroll down  
18 again. And again. Go ahead again, please.

19 Q. The majority of this page is redacted, so let  
20 me know when I can continue on.

21 A. Go ahead. Okay.

22 Q. Okay. So, the portion that you just read  
23 through in paragraph 11 includes information that  
24 Sergeant Watts was running the drug lines out of one of  
25 the buildings. Is that the type of information you

1 would expect that the IAD Confidential Section would've  
2 shared with you when you were superintendent?

3 A. Yes.

4 Q. And am I correct that, although you might not  
5 have been given a copy of this ATF report, you would  
6 expect whatever information was gathered from the ATF  
7 related to the investigation of Watts, you would've  
8 wanted to know about that during your briefings, right?

9 A. Yes.

10 Q. And as you sit here today, you have no reason  
11 to doubt that the deputy superintendents would've told  
12 you this type of information as well about the Watts  
13 investigation, right?

14 MR. BURNS: Are you talking about IAD or the  
15 deputy superintendent, Tess?

16 MS. KLEINHAUS: Let me rephrase it.

17 MR. BURNS: Okay.

18 BY MS. KLEINHAUS:

19 Q. You have no doubt that when you were a  
20 superintendent, if there are allegations that Sergeant  
21 Watts was running a building, controlling drug sales in  
22 that building, you would have been informed of that,  
23 correct?

24 A. Yes.

25 Q. Okay. You can put Exhibit 4 to the side. Was

1 there ever an occasion with any confidential  
2 investigation while you were superintendent where you  
3 told the deputy superintendent or someone from IAD that  
4 they needed to conclude the investigation, wrap it up,  
5 finish it up, move more quickly?

6 MR. BURNS: Objection. Form of the question.

7 A. I would discuss with them that, you know, we  
8 -- we got to finish this as quickly as possible, but  
9 there, again, it would be based on what the U.S.  
10 Attorney and the FBI, what they wanted because once  
11 you're working a case with them, they're in charge of  
12 the prosecution.

13 BY MS. KLEINHAUS:

14 Q. Well, it's a prosecution of employees who  
15 worked for you, correct, sir?

16 A. Yes.

17 Q. Okay. And so, if employees of CPD were  
18 routinely involved in criminal activity on the job, you  
19 would want to bring an end to that as soon as possible,  
20 right?

21 MR. BURNS: Objection. Form of the question.

22 A. Yes.

23 BY MS. KLEINHAUS:

24 Q. And as the head of CPD, it was within your  
25 authority to do whatever you needed to do to control and

1 discipline those officers, whether or not the FBI  
2 decided to prosecute, correct?

3 MR. BURNS: Objection. Form. Foundation.

4 A. Well, the problem with that is that they agree  
5 to work with us on a case. You would -- for you to go  
6 behind their backs and try and make an arrest or fire  
7 somebody, it wouldn't -- wouldn't work.

8 BY MS. KLEINHAUS:

9 Q. Well, not behind their backs, but there was  
10 never an occasion where you went to the FBI and said,  
11 "This is taking way too long and it's hurting way too  
12 many civilians. We have to wrap it up." Right? That  
13 never happened, correct?

14 MR. BURNS: Form. Foundation.

15 A. I don't recall that.

16 BY MS. KLEINHAUS:

17 Q. And, in fact, the outcome when someone finally  
18 would be publicly indicted, that wasn't actually good  
19 for the reputation of CPD, was it?

20 MR. BURNS: Objection to the form of the  
21 question.

22 A. I don't understand.

23 MR. BURNS: Objection.

24 A. I think -- I think the opposite. I think it  
25 shows that we are taking serious any corruption.

1 BY MS. KLEINHAUS:

2 Q. Okay. So, there was no reason that you would  
3 be trying to avoid the exposure of this scandal to the  
4 public, right?

5 MR. BURNS: Objection. Form of the question.

6 A. No.

7 BY MS. KLEINHAUS:

8 Q. Okay. I'm going to show you what we'll mark  
9 as Exhibit 5. Okay. And this is marked PL Joint 002103  
10 and 04.

11 (EXHIBIT 5 MARKED FOR IDENTIFICATION)

12 MR. BURNS: You said that filing is -- can you  
13 give me the number again, Tess, please?

14 MS. KLEINHAUS: Sure.

15 MR. BURNS: I don't know that I got this  
16 one --

17 MS. KLEINHAUS: Sure. This is an FBI report  
18 dated September 24, 2004. At the bottom, it's  
19 2103.

20 MR. BURNS: Okay. There we go. Thank you.

21 BY MS. KLEINHAUS:

22 Q. Should I make that a little bit bigger, sir?

23 A. Oh, I'm fine with this one.

24 Q. Okay. Just let me know when you'd like me to  
25 scroll down, okay?

1 A. Okay.

2 Q. Have you had a chance to review all of  
3 Exhibit 5?

4 A. Yes.

5 Q. Have you ever seen this FBI report before?

6 A. (No verbal response.)

7 Q. Sorry. Did you answer?

8 MR. BURNS: The answer. She said she didn't  
9 hear your answer.

10 THE WITNESS: No. No.

11 BY MS. KLEINHAUS:

12 Q. Okay. Would any FBI or other federal agents  
13 ever attend the briefings that you had regarding IAD  
14 Confidential Investigations?

15 MR. BURNS: These are his staff meetings,  
16 Tess? We're not going outside of that right now.

17 MS. KLEINHAUS: That's right.

18 THE WITNESS: I -- I don't recall. I mean,  
19 they could've been there, but I just don't recall  
20 as I'm sitting here today.

21 BY MS. KLEINHAUS:

22 Q. If you had wanted federal agents working on  
23 any of the joint investigations to be part of the  
24 briefing, you could have requested that, right?

25 MR. BURNS: Form. Foundation.

1 THE WITNESS: Yes.

2 BY MS. KLEINHAUS:

3 Q. And outside of your regular meetings with the  
4 deputy superintendents and sergeants from the IAD  
5 Confidential Investigation Section, were there any other  
6 meetings that you relied on to get information about the  
7 IAD Confidential Investigations?

8 MR. BURNS: Objection. Form.

9 A. Not that I recall.

10 BY MS. KLEINHAUS:

11 Q. Am I correct in saying the only source of  
12 information that you had about the confidential  
13 investigations came from these periodic briefings,  
14 correct?

15 A. I would meet with the SACS of the different  
16 federal agencies and we might talk about something  
17 there, but not that I recall as I sit here today, 30  
18 years later or whatever it is.

19 Q. Am I understanding you correctly, you recall  
20 that you would sometimes meet with staff from the  
21 federal agencies, but you don't recall ever meeting with  
22 them and discussing the Watts investigation?

23 A. That's correct.

24 Q. Okay. In Exhibit 5, at the end here, it says,  
25 "Watts receives weekly payments from drug dealers. These

1 payments are typically in the amount of \$5,000." Do you  
2 see that part?

3 A. Yes.

4 Q. And is that the type of information that you  
5 would expect your staff to make you aware of in terms of  
6 the breadth of the corruption allegations against Watts?

7 A. Whatever else they had, too. I mean, yeah,  
8 that would be something I'd want to know.

9 Q. Okay. You can put Exhibit 5 to the side. Are  
10 you familiar with the term "integrity check"?

11 A. Yes.

12 Q. And what's an "integrity check"?

13 A. Well, it's -- it's pretty broad, but I mean,  
14 it would be putting the officer in position to do maybe  
15 what's alleged to him to see if he does it. Stop a car  
16 with drugs in it, cash in it, those type of things.

17 Q. Okay. And I think I heard your attorney just  
18 say cash, but so --

19 MR. BURNS: I didn't say a word.

20 MS. KLEINHAUS: Oh, okay.

21 MR. BURNS: He said cash. I haven't said a  
22 word.

23 MS. KLEINHAUS: Oh, okay. I -- then I  
24 misheard.

25 BY MS. KLEINHAUS:

1           Q. I'm sorry. Can you explain then, an integrity  
2 check would be putting the officer in the position  
3 similar to the allegations; is that right?

4           A. Yes.

5           Q. Okay. And in order to conduct an integrity  
6 check on a CPD officer, for example, putting an officer  
7 in a position to seize drugs or money, would the IAD  
8 staff or the deputy superintendents make you aware that  
9 they were going to do that?

10          A. Yes.

11          Q. And why was it important to you that they let  
12 you know when they were going to conduct an integrity  
13 check?

14          A. Well, because usually those things resulted in  
15 arrest and it would become public knowledge.

16          Q. If there were multiple integrity checks of a  
17 particular officer and he failed each one of those,  
18 would you expect that an arrest would be imminent?

19           MR. BURNS: Objection. Form of the question.

20           Complete hypothetical.

21          A. There again, it would be up to the prosecutor  
22 if they wanted this to go further or did they want to  
23 cut it off right here?

24          BY MS. KLEINHAUS:

25          Q. And I'm correct that there was no point in the

1 investigation of Watts and Mohammed when you requested  
2 to move either one of them because of an integrity check  
3 that they failed, right?

4 MR. BURNS: Objection to the form of the  
5 question.

6 A. No. I never was in a position to talk about  
7 that.

8 BY MS. KLEINHAUS:

9 Q. Okay. I'll show you what we'll mark as  
10 Exhibit 6. Is that right, Sydney? We're on 6?

11 (EXHIBIT 6 MARKED FOR IDENTIFICATION)

12 THE REPORTER: Yes.

13 MS. KLEINHAUS: Thank you.

14 BY MS. KLEINHAUS:

15 Q. Okay. Exhibit 6 is marked PL Joint 10850.  
16 Okay. Can you see that okay, sir?

17 A. Yes.

18 Q. Okay. Take a moment to review Exhibit 6 and  
19 let me know when you want me to scroll down, okay?

20 A. Okay.

21 Q. Have you had a chance to review all of  
22 Exhibit 6?

23 A. Yes.

24 Q. And this is from Sergeant Maureen Kennedy on  
25 the administrative side of IAD, correct?

1 A. Yes.

2 Q. Do you know whether you ever had any  
3 conversations with Sergeant Kennedy about the Watts  
4 investigation?

5 A. Not that I recall.

6 Q. Would you -- well, strike that, please. Have  
7 you seen this document before?

8 A. No.

9 Q. And would you have expected your staff to  
10 inform you that the State's Attorney's Office was also  
11 receiving information related to Sergeant Watts?

12 A. Yes.

13 Q. And why would that be important?

14 A. Because it's part of the whole investigation  
15 that he's not only doing something at one location,  
16 maybe at another location. You'd have to debrief this  
17 complainant to find out what information he has.

18 Q. Okay. You can put that exhibit to the side.  
19 I'm going to show you what we'll mark as Exhibit 7. It's  
20 labeled PL Joint 10947 and 48.

21 (EXHIBIT 7 MARKED FOR IDENTIFICATION)

22 A. Okay. Okay again.

23 BY MS. KLEINHAUS:

24 Q. Can I go onto the next page?

25 A. Yeah, please. Go ahead.

1 Q. Have you reviewed all of Exhibit 7?

2 A. (No verbal response.)

3 Q. I'm sorry. Did you say yes?

4 A. Yes.

5 Q. Okay. Have you seen this document before?

6 A. No.

7 Q. This is another memo from Calvin Holliday.

8 It's dated 28th of June 2005, correct?

9 A. (No verbal response.)

10 Q. Is that correct?

11 A. Yes.

12 Q. And is the information contained in this memo  
13 information you would've expected your staff to brief  
14 you on when you were superintendent?

15 A. Yes.

16 Q. There's a sentence here on the first page  
17 where it says, "Baker's allegations against Sergeant  
18 Watts are essentially the same as those told by two  
19 other known drug dealers at the Ida B. Wells housing  
20 projects, [REDACTED] and Wilbert Moore. These three  
21 men had no knowledge the other was talking to law  
22 enforcement agents." Do you see that part?

23 A. Yes.

24 Q. And with that fact, the fact that three  
25 different individuals were making similar allegations

1 without knowing that the other two were talking to law  
2 enforcement, have been the type of information you  
3 would've expected your staff to share with you?

4 A. Yes.

5 Q. And would that have indicated to you that  
6 there was some merit or corroboration to the  
7 allegations?

8 A. Yes.

9 Q. Okay. At the bottom of this document, it  
10 talks about a conversation with Commander Walter Green  
11 of the Second District. Do you recall this part?

12 A. Yes.

13 Q. At this point, given that there were multiple  
14 allegations from different sources about the same type  
15 of misconduct by Watts, it's about 17 or 18 months. Or  
16 I'm sorry, let me recalculate. No, maybe nine months  
17 since the start of this joint investigation. Would this  
18 have been an appropriate time to transfer Sergeant Watts  
19 out of the Ida B. Wells housing project?

20 A. There again, I would rely on the prosecutor  
21 saying, "Would this screw up the prosecution of this  
22 case?"

23 Q. And again, there was never any discussion  
24 among your staff about what the options even would be  
25 for where to transfer him, right?

1 MR. BURNS: Objection. Form. Foundation.

2 A. I'm not aware of any conversation.

3 BY MS. KLEINHAUS:

4 Q. Okay. This document also mentions Sergeant  
5 Broderdorf and Sergeant Bigg. Do you have any  
6 recollection of having any conversations with either of  
7 them with regard to the Watts investigation?

8 A. (No verbal response.)

9 Q. You can put that exhibit to the side, please.  
10 I am going to turn to Exhibit 8 and, actually, I'm not  
11 sure if this was in the link that was sent. So, this is  
12 PL Joint 9959 and I'll share it on the screen so you-all  
13 can see it. Are you able to see that okay?

14 (EXHIBIT 8 MARKED FOR IDENTIFICATION)

15 A. Need it a little bit bigger.

16 BY MS. KLEINHAUS:

17 Q. Sure. How's that?

18 A. One more time?

19 Q. Sure.

20 A. Okay.

21 Q. How's that? Can you see that okay?

22 A. Yes.

23 Q. Okay. Please review that and let me know when  
24 you're through.

25 A. Okay. If you can move it down? Okay. That

1 section's really small. If you could raise that?

2 Q. Whoops. Hang on one second. Okay. How's  
3 that? Let me see if I can center it.

4 A. Okay.

5 MR. BURNS: Tess, this is, you say, PL Joint  
6 9959?

7 MS. KLEINHAUS: Yes.

8 THE WITNESS: Okay. I'm through.

9 BY MS. KLEINHAUS:

10 Q. Okay. Have you seen this document before,  
11 sir?

12 A. No.

13 Q. And this is a report from ASA Dave Navarro  
14 from October of 2005 related to Sergeant Watts, correct?

15 A. Yes.

16 Q. And if this information from the Cook County  
17 State's Attorney's Office was provided to the IAD  
18 Confidential Section, this is the type of information in  
19 the investigation that you would expect the deputy  
20 superintendents and sergeants in IAD to tell you about,  
21 right?

22 A. Yes.

23 Q. And included here --

24 MR. BURNS: What's the date, Tess?

25 MS. KLEINHAUS: I'm sorry. This is from

1                   October 17, 2005.

2                   MR. BURNS: Thank you.

3                   BY MS. KLEINHAUS:

4                   Q. Included here in Exhibit 8 are allegations  
5                   that Sergeant Watts was putting cases on innocent  
6                   individuals, correct?

7                   A. That's what they got in -- in their memo.

8                   Q. And you would have expected your staff to tell  
9                   you about those allegations as well, right?

10                  A. Yes.

11                  Q. All right. You can put Exhibit 8 to the side.

12                  MR. BURNS: Tess, whenever you're ready, if  
13                  you could take a five-minute break?

14                  MS. KLEINHAUS: Sure.

15                  MR. BURNS: For a bathroom break and be right  
16                  back?

17                  MS. KLEINHAUS: Sure. Yep. Let's take a  
18                  break now and go off the record for five minutes.

19                  THE REPORTER: Off the record. The time is  
20                  12:18.

21                  (OFF THE RECORD)

22                  THE REPORTER: We are back on the record for  
23                  the deposition of Philip Cline, being conducted by  
24                  videoconference. My name is Sydney Little. Today  
25                  is December 8, 2023. The time is 12:26 p.m.

1 Central.

2 BY MS. KLEINHAUS:

3 Q. Sir, if during the course of the investigation  
4 of Sergeant Watts being conducted by the Confidential  
5 Section of IAD, there were also civilian complaints  
6 coming in making similar allegations, for example,  
7 planting drugs on people, or falsely arresting people.  
8 Would you expect the Confidential Section of IAD to  
9 incorporate that information into its investigation?

10 A. Yes. I would -- I would expect them to --  
11 they're working with the FBI to exchange that  
12 information to the FBI until there's enough evidence to  
13 make the arrest and they should do that as quickly as  
14 possible

15 Q. Okay. And your expectation would be that IAD  
16 would coordinate, however necessary, to obtain any  
17 relevant complaints from OPS as well, correct?

18 A. Yes.

19 Q. And was it your expectation that thorough  
20 investigations of civilian complaints also be conducted  
21 on the administrative side?

22 A. No. Not -- I'd want them to finish the  
23 criminal case because that's what the U.S. Attorney  
24 wanted and the State's Attorney wanted.

25 Q. Right. I think I understand, but let me make

1 sure. If there were similar allegations, for example,  
2 planting drugs on people, falsely arresting people,  
3 coming into CPD in the form of civilian complaints, you  
4 would want those complaints thoroughly investigated as  
5 well, correct?

6 MR. BURNS: Asked and answered. Excuse me.

7 THE WITNESS: It's part of the criminal  
8 investigation, yes.

9 BY MS. KLEINHAUS:

10 Q. What do you mean when you say, "As part of the  
11 criminal investigation"?

12 A. Well, that information they got should be  
13 shared with whoever they're working with towards  
14 obtaining enough evidence to make an arrest.

15 Q. Sure, but my question's a little bit  
16 different. Is there any reason when a civilian  
17 complains, "I was falsely arrested by Sergeant Watts.  
18 They charged me with a narcotics crime I didn't commit."  
19 Is there any reason why you wouldn't expect a thorough  
20 investigation of that CR -

21 MR. BURNS: Objection. Asked and answered.

22 BY MS. KLEINHAUS:

23 Q. -- whether or not there's a simultaneous  
24 criminal investigation going on?

25 MR. BURNS: Objection. Asked and answered.

1           A. I would want them to make that part of the  
2 criminal investigation.

3 BY MS. KLEINHAUS:

4           Q. **And why is that?**

5           A. I'm sorry. I didn't hear your question.

6           Q. **Why is that?**

7           A. Because I wouldn't want them doing something  
8 that would jeopardize the criminal investigation.

9           Q. **Well, why would going to a police officer and**  
10 **saying, "I need you to answer some questions about your**  
11 **arrest of this individual and whether it was**  
12 **legitimate." Why would that do anything to compromise**  
13 **the criminal investigation?**

14           MR. BURNS: Objection. Form. Foundation.

15           A. Because you don't know if the police officer  
16 that is providing that information to other members of  
17 his organization or his team and making sure that we're  
18 doing everything that the prosecutors want so that we  
19 can obtain enough evidence to make an arrest.

20 BY MS. KLEINHAUS:

21           Q. **So, am I understanding you correctly, if while**  
22 **the criminal investigation is ongoing, dozens of**  
23 **civilian complaints are coming in with the same**  
24 **allegations that are the subject of the criminal**  
25 **investigation, your position is, don't investigate those**

1 civilian complaints until you've finished up this IAD  
2 confidential investigation?

3 MR. BURNS: Objection. Mischaracterizes his  
4 testimony. Form.

5 A. No. I'm saying make that part of the criminal  
6 investigation.

7 BY MS. KLEINHAUS:

8 Q. Okay. How would CPD make that part of the  
9 criminal investigation?

10 A. Well, the same agents and officers that are  
11 conducting the investigation should include this  
12 information as part of their investigation.

13 Q. What do you mean by, "Include this  
14 information"?

15 A. Well, if this person is saying that they were  
16 shook down, well then that should be part of the  
17 criminal investigation to conduct the investigation to  
18 determine whether this occurred or not and if it did  
19 occur, how can we make it evidence to be used in a later  
20 criminal investigation.

21 Q. Okay. Were you ever informed, in the Watts  
22 investigation, that any civilian complaints were used in  
23 the manner that you just described?

24 A. Not that I recall.

25 Q. Do you know how many civilian complaints came

1 in to CPD about Watts framing people?

2 A. No.

3 Q. Do you have any opinion about the quality of  
4 those investigations?

5 MR. BURNS: Objection. I'm sorry, may I hear  
6 that question again?

7 MS. KLEINHAUS: Sure.

8 BY MS. KLEINHAUS:

9 Q. Do you have any opinion about the quality of  
10 the investigations CPD did into civilian complaints that  
11 they were being framed by Sergeant Watts?

12 MR. BURNS: Objection. Form. Foundation.

13 A. Well, I know that the -- the case was indicted  
14 and he was sent to the penitentiary. So, I'm assuming  
15 it was a good investigation.

16 BY MS. KLEINHAUS:

17 Q. Do you have any idea how much time people  
18 spent incarcerated because they were framed by Watts  
19 while this investigation was ongoing?

20 MR. BURNS: Objection. Form. Foundation.

21 Argumentative.

22 A. No. I don't.

23 BY MS. KLEINHAUS:

24 Q. Does it matter to you how much time people  
25 spent behind bars while this investigation was ongoing?

1 MR. BURNS: Objection. Form. Foundation.

2 Argumentative.

3 A. Well, as I said earlier, it's the prosecutor's  
4 call when to wrap up the investigation. You know, like  
5 I said, this investigation was done well enough that it  
6 resulted in the arrest of the two officers and their  
7 conviction, but as far as why care about that, of course  
8 I care if a truly innocent person is falsely imprisoned.

9 BY MS. KLEINHAUS:

10 Q. Right. That would be immensely troubling to  
11 you if a truly innocent person was falsely imprisoned  
12 for something they didn't do, right?

13 MR. BURNS: Objection. Form.

14 A. Yes.

15 BY MS. KLEINHAUS:

16 Q. And if that happened dozens of times, that  
17 would be even more disturbing to you, right?

18 MR. BURNS: Objection. Form. Foundation.

19 A. Yes.

20 BY MS. KLEINHAUS:

21 Q. If it was part of an IAD Confidential  
22 Investigation, the IAD sergeants wanted to conduct some  
23 type of surveillance of a CPD employee, like a wire or a  
24 pen register, or something like that, is that something  
25 that would've been brought to your attention as

1 superintendent?

2 MR. BURNS: Objection. Form of the question.

3 A. Probably, but not for sure.

4 BY MS. KLEINHAUS:

5 Q. Is there any other information about the Watts  
6 investigation that was provided to you as superintendent  
7 that we haven't talked about yet, that you independently  
8 recall?

9 A. Not that I recall.

10 Q. Why did your tenure as superintendent end?

11 A. I'm sorry. What?

12 Q. Why did your tenure as superintendent of CPD  
13 end?

14 A. I retired.

15 Q. And why did you retire when you did?

16 A. Because I had 37 years on the job. I had a  
17 full pension.

18 Q. And you continue to receive that pension,  
19 correct?

20 A. (No verbal response.)

21 Q. Sorry, I just couldn't hear you.

22 A. Yes.

23 Q. Okay. And did you leave as superintendent of  
24 CPD related to the Obrycka incident?

25 MR. BURNS: Tess, I thought you asked him some

1                   questions during the first session, the depth.

2                   Object. He's been asked and answered.

3 BY MS. KLEINHAUS:

4                   **Q. Go ahead, sir.**

5                   **A. No.**

6                   **Q. Are you familiar, as you sit here today, with**  
7 **the Obrycka incident?**

8                   **A. Yes.**

9                   **Q. And what happened?**

10                  **A. Off-duty police officer assaulted a bartender.**

11                  **Q. And subsequently, there was a coverup of that,**  
12 **correct?**

13                  MR. BURNS: Objection.

14                  **A. No.**

15                  MR. BURNS: Form. Foundation.

16 BY MS. KLEINHAUS:

17                  **Q. No. There was no coverup of that?**

18                  **A. Not that I believe.**

19                  **Q. Okay. At the time, you referred to that**  
20 **incident as "disheartening and embarrassing". What was**  
21 **disheartening and embarrassing about it?**

22                  MR. BURNS: Objection. Form of the question.

23                  **A. That a police officer would conduct himself in**  
24 **that manner.**

25 BY MS. KLEINHAUS:

1           Q. Okay. None of your embarrassment or  
2 disappointment had to do with to a code of silence  
3 within CPD?

4           MR. BURNS: Objection. Form of the question.

5           A. Not in my opinion. The information that --  
6 that night was passed on to detectives, they were  
7 looking for that officer that night. I mean, if there  
8 was a coverup, we wouldn't have had his name and his  
9 identifiers.

10          BY MS. KLEINHAUS:

11          Q. And at the end of your tenure as  
12 superintendent, did you provide any briefing or  
13 information to the incoming superintendent about pending  
14 IAD Confidential Investigations?

15          A. No.

16          Q. And why not?

17          A. Because IAD was -- was going to give him a  
18 briefing on all those things.

19          Q. After you left as superintendent of CPD, did  
20 you have any further conversations with anyone about the  
21 Watts investigation?

22          A. Not that I recall.

23          Q. Okay.

24          MS. KLEINHAUS: Let's take another short break  
25 and go off the record, please. Let's do five

1 minutes.

2 THE REPORTER: Off the record. The time is  
3 12:39.

4 (OFF THE RECORD)

5 THE REPORTER: We are back on the record for  
6 the deposition of Philip Cline, being conducted by  
7 video conference. My name is Sydney Little. Today  
8 is December 8, 2023. The time is 12:44 p.m.

9 Central.

10 BY MS. KLEINHAUS:

11 Q. Sir, during your time as superintendent of  
12 CPD, did you ever take any steps to reduce the cost of  
13 police misconduct to the taxpayers of the City of  
14 Chicago?

15 MR. BURNS: Tess, we had difficulty hearing  
16 that question. We were just --

17 MS. KLEINHAUS: Okay.

18 MR. BURNS: -- audio. We didn't hear the  
19 beginning of it.

20 MS. KLEINHAUS: Sure. I'll try it again.

21 MR. BURNS: Okay.

22 BY MS. KLEINHAUS:

23 Q. During your time as superintendent, did you  
24 take any steps to try to reduce the cost of police  
25 misconduct for the taxpayers in Chicago?

1           A. I know there was meetings with the corp  
2 counsel, but I don't recall what was discussed.

3           **Q. And you don't know whether or not that topic**  
4 **was discussed, correct?**

5           A. No.

6           **Q. Okay.**

7           MS. KLEINHAUS: I don't have any other  
8 questions for you right now. Thank you for your  
9 time.

10           MR. BURNS: Anyone else have any questions?

11           MR. PALLE: I only have about an hour or so.  
12 Yeah. I'm joking. I have no questions.

13           MR. FLAXMAN: Nothing. Thank you.

14           MR. GAINER: I don't have any questions. Thank  
15 you very much.

16           MR. BORKAN: No questions on behalf of Officer  
17 Riddgell. Thank you.

18           MR. ZECCHIN: No questions on behalf of the  
19 individual Defendant Officers. Thanks.

20           MR. SCHALKA: And no questions. I have no  
21 questions.

22           THE REPORTER: Okay. How do you want to  
23 handle signature?

24           MR. BURNS: I have no questions at this time  
25 and signature, we'll reserve it, Sydney. I'll take

1 care of it if you send the complete transcript to  
2 me.

3 THE REPORTER: Sounds good. Tess, would you  
4 like a copy of the transcript?

5 MS. KLEINHAUS: Not at this time. Thank you.

6 THE REPORTER: Okay. And then, instead of  
7 going through everyone else individually, if you  
8 would like a copy, you can just speak up now.  
9 There's a lot of people here.

10 MR. BURNS: Not at this time. I'll tell you  
11 though, Sydney, if you let me know if it's ordered,  
12 we'll go from there.

13 THE REPORTER: Of course.

14 MR. BURNS: Thank you.

15 THE REPORTER: All right. Let me get us off  
16 the record.

17 (DEPOSITION CONCLUDED AT 12:46 P.M. CT)

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## 1 CERTIFICATE OF DIGITAL REPORTER

2 STATE OF ILLINOIS

3

4 I do hereby certify that the witness in the foregoing  
5 transcript was taken on the date, and at the time and  
6 place set out on the Title page hereof by me after first  
7 being duly sworn to testify the truth, the whole truth,  
8 and nothing but the truth; and that the said matter was  
9 recorded digitally by me and then reduced to typewritten  
10 form under my direction, and constitutes a true record  
11 of the transcript as taken, all to the best of my skills  
12 and ability. I certify that I am not a relative or  
13 employee of either counsel, and that I am in no way  
14 interested financially, directly or indirectly, in this  
15 action.

