

EXHIBIT 43



Transcript of the Deposition of
Nancy Adduci

Case: In Re: Watts Coordinated Pretrial Proceedings
Taken On: October 21, 2024

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

)
IN RE: WATTS) Case No. 19 CV 1717
COORDINATED PRETRIAL) Judge Frank U.
PROCEEDINGS) Valderrama
) Magistrate Judge
) Sheila M. Finnegan

The videotaped deposition of NANCY ADDUCI, taken via videoconference in the above-entitled cause, called for examination by the Defendants pursuant to the Rules of Civil Procedure for the United States District Courts pertaining to the taking of depositions, taken before Sharon L. Patanella, a Certified Shorthand Reporter in the State of Illinois, on the 21st day of October, 2024, at the hour of 1:03 p.m.

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1 I N D E X

2 Witness: Page

3 NANCY ADDUCI

4 Examination by:

5 MR. PALLES 8

6 MR. BAZAREK 139

7

8 E X H I B I T S

9 Number Referenced for ID

10 1 10

11 17 100

12 19 121

13 20 138

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Page 6	<p>1 THE VIDEOGRAPHER: Good afternoon. We are</p> <p>2 now on the record.</p> <p>3 This is the videotaped deposition of Nancy</p> <p>4 Adduci, being taken on Monday, October 21, 2024.</p> <p>5 The time is now 1:03 p.m. as indicated on the video</p> <p>6 screen.</p> <p>7 We are taking this deposition remotely via</p> <p>8 Zoom. This deposition is being taken on behalf of</p> <p>9 the Defendant in Re: Watts Coordinated Pretrial</p> <p>10 Proceedings. The case number is 19 CV 1717, filed</p> <p>11 in the United States District Court for the</p> <p>12 Northern District of Illinois, Eastern Division.</p> <p>13 My name is Brandon Rackowski, Legal</p> <p>14 Videographer, representing Royal Reporting</p> <p>15 Services, with offices at 161 North Clark Street,</p> <p>16 Suite 3050, Chicago, Illinois.</p> <p>17 The court reporter today is Sharon</p> <p>18 Patanella, also of Royal Reporting Services.</p> <p>19 Will counsel at this time voice-identify</p> <p>20 yourselves for the record, and then the court</p> <p>21 reporter, please swear in the witness.</p> <p>22 MR. PALLES: Well, I'm Eric Palles, and I</p> <p>23 represent Kallatt Mohammed. With me is my</p> <p>24 associate -- I'm sorry -- my paralegal, Toby</p>	Page 8	<p>1 colleague, Israa Alzamli, is also joining me today.</p> <p>2 MR. HENRETTY: Lyle Henretty, on behalf of</p> <p>3 the non-party defendant, the Cook County State's</p> <p>4 Attorney's Office.</p> <p>5 MS. DEMIANCZUK: Maya Demianczuk, on</p> <p>6 behalf of the Flaxman plaintiffs.</p> <p>7 MS. ADDUCI: I'm Nancy Adduci, the</p> <p>8 deponent.</p> <p>9 MR. PALLES: That was a long introduction.</p> <p>10 Sharon, can we swear in Ms. Adduci?</p> <p>11 THE COURT REPORTER: Yes.</p> <p>12 (Whereupon, the witness was</p> <p>13 duly sworn.)</p> <p>14 WHEREUPON,</p> <p>15 NANCY ADDUCI,</p> <p>16 a witness, called for examination, after having</p> <p>17 been first duly sworn or affirmed, was examined and</p> <p>18 testified via videoconference as follows:</p> <p>19 EXAMINATION</p> <p>20 BY MR. PALLES:</p> <p>21 Q. Ms. Adduci, thanks for being here today.</p> <p>22 Let me start out. You have had your</p> <p>23 deposition taken before; correct?</p> <p>24 A. Yes.</p>
Page 7	<p>1 Palles, and we're both appearing remotely from our</p> <p>2 offices in Chicago.</p> <p>3 MR. BATTLE: Good afternoon. I'm Kenneth</p> <p>4 Battle. I represent the deponent, Nancy Adduci.</p> <p>5 MR. BAZAREK: William Bazarek. I</p> <p>6 represent the individual officers/defendants that</p> <p>7 are represented by Hale & Monico.</p> <p>8 MS. MORRISON: Katherine Morrison, on</p> <p>9 behalf of the City of Chicago.</p> <p>10 MR. GAINER: William Gainer, on behalf of</p> <p>11 Ron Watts.</p> <p>12 MR. LEINENWEBER: Tom Leinenweber, on</p> <p>13 behalf of Michael Spaargaren and Matthew Cadman.</p> <p>14 MR. SCAHILL: Timothy Scahill, on behalf</p> <p>15 of Calvin Ridgell.</p> <p>16 I also want to note my associate, Drew</p> <p>17 Wycoff, is going to be joining shortly to pinch-hit</p> <p>18 for me because I've got to step out in the middle</p> <p>19 of this. But, you know, none of you need to be</p> <p>20 concerned about that. But that may be another</p> <p>21 number that comes up.</p> <p>22 MR. STARR: Sean Starr, on behalf of the</p> <p>23 Loevy plaintiffs.</p> <p>24 And I will note for the record that my</p>	Page 9	<p>1 Q. Okay. And you're generally familiar with</p> <p>2 the ground rules?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. And that would include -- would it</p> <p>5 include depositions brought under the Federal Rules</p> <p>6 of Civil Procedure as opposed to the State of</p> <p>7 Illinois?</p> <p>8 A. Yes, both.</p> <p>9 Q. Okay. Good.</p> <p>10 So just as a reminder, let's try not to</p> <p>11 talk over each other. Certainly, I'll be happy to</p> <p>12 rephrase any questions you don't understand.</p> <p>13 Please let us know at any time you want to</p> <p>14 take a break. Let's try to make this as painless</p> <p>15 as possible, kind of like a dentist visit. It may</p> <p>16 be painless, but you may feel numb and woozy when</p> <p>17 you get to the end.</p> <p>18 But, in any event, where are you currently?</p> <p>19 A. I'm at my home.</p> <p>20 Q. Okay. And is that within the city?</p> <p>21 A. It's in the suburbs of the city.</p> <p>22 Q. Okay. All right. And are you currently</p> <p>23 employed?</p> <p>24 A. No.</p>

6 (Pages 6 to 9)

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<p style="text-align: right;">Page 10</p> <p>1 Q. Okay. Until the end of 2023, you were 2 employed by the Cook County State's Attorney's 3 Office; am I correct? 4 A. Yes. 5 Q. Okay. Now, what have you done in 6 preparation for today's deposition? 7 A. I read several COPA reports that I had 8 been given by my attorney. 9 MR. PALLES: Okay. And let me ask Toby if 10 you could share Exhibit No. 1, please. 11 (Exhibit No. 1 referenced 12 for identification.) 13 MR. PALLES: And if you don't mind 14 scrolling slowly through this. I believe this may 15 be, although perhaps not in the same order, those 16 documents that I sent to Ken. 17 Keep scrolling a little bit so she could 18 see it. 19 THE WITNESS: The first one is an email 20 that I did receive. It looks familiar. The second 21 one is a report that I did read. 22 BY MR. PALLES: 23 Q. Yeah, okay. 24 In general, does this seem to be the</p>	<p style="text-align: right;">Page 12</p> <p>1 questions about your public statements in 2 connection with the conviction integrity unit and 3 also the substance of these documents in Exhibit 1. 4 Let me -- I guess, let me begin by -- 5 let's just talk briefly about your background. 6 Am I correct that you spent in excess of 7 20 years at the Cook County State's Attorney's 8 Office? 9 A. That's correct. 10 Q. Okay. And in that period of time, would 11 you agree that your experience was extensive -- 12 both broad, in the sense of different experience; 13 and deep, in the sense that in some of these areas, 14 you've had a lot of experience? 15 A. I would say that's accurate regarding the 16 criminal side of the office. I cannot say the same 17 for the civil side of the office. 18 Q. Okay. And as is typical at the Cook 19 County State's Attorney's Office, at various times 20 you made your way through various, I guess, 21 procedural stages of prosecution -- felony review, 22 preliminary hearing, grand jury, et cetera? 23 A. We call those assignments, but yes. 24 Q. Okay. And culminating -- well, not</p>
<p style="text-align: right;">Page 11</p> <p>1 package that Ken sent you? 2 A. It does so far, yes. 3 Q. All right. If it turns out otherwise 4 during the course of specifics, we can get back to 5 that. 6 MR. PALLES: You can take that down for 7 now if you want. 8 BY MR. PALLES: 9 Q. So now, in addition to that, I had sent 10 Mr. Battle an opinion, a memorandum opinion hot off 11 the press. It just had become unsealed. It was by 12 Judge Finnegan. It had to do with the exercise of 13 deliberative privilege in this case. 14 Did you happen to see that document? 15 A. I did. I did not look at that prior to 16 this deposition, but I did look at it when it was 17 hot off the press, for lack of a better term, and 18 my recollection is regarding some of the elements 19 of it. 20 Q. All right. Now, I may hit on a few points 21 that Judge Finnegan made. 22 I'll just state for the record, so you 23 understand where I'm coming from as a result of 24 that opinion, I'm going to be asking you certain</p>	<p style="text-align: right;">Page 13</p> <p>1 culminating. Let me strike that. 2 You spent a lot of time in the felony 3 trial section trying all sorts of cases, including 4 capital cases; am I correct? 5 A. That's correct. 6 Q. Okay. And ultimately in 2014, you became 7 supervisor in what was then called the conviction 8 integrity unit; am I right? 9 A. That is correct. 10 Q. All right. By the way, it's now known, I 11 understand, as the conviction review unit. 12 Do you know when that nomenclature was 13 changed? 14 A. I do not. 15 Q. Do you know why it was changed? 16 A. I do not. 17 Q. Was it changed during your reign? 18 A. It changed after I left the office, so 19 that's why I don't know. 20 Q. Okay. All right. Now, among the various 21 stops -- among the various assignments you've had 22 over the years, it would not appear to me that you 23 had any significant experience devoted to narcotics 24 prosecutions; am I wrong about that?</p>

7 (Pages 10 to 13)

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<p style="text-align: right;">Page 14</p> <p>1 A. I think that's fair to say. There was a</p> <p>2 narcotics unit. I was never assigned to that, but</p> <p>3 narcotics were part of the criminal justice system</p> <p>4 in every courtroom. I was never assigned to a</p> <p>5 straight narcotics room. I was always assigned to</p> <p>6 rooms with victims, which also had narcotic cases.</p> <p>7 So I think that's fair that I'm not considered an</p> <p>8 expert in narcotics, nor was I assigned specifically</p> <p>9 to that unit or bureau.</p> <p>10 Q. Now, I understand that the CIU was created</p> <p>11 to look at claims of actual innocence from various</p> <p>12 former criminal defendants. I guess, criminal</p> <p>13 defendants/petitioners; am I correct?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. Now, was that always the purpose,</p> <p>16 just to examine claims of actual innocence?</p> <p>17 A. CIU had started in the Cook County State's</p> <p>18 Attorney's Office in 2012. I was not a part of the</p> <p>19 unit then. To my understanding, the unit became</p> <p>20 what it became in 2012 partly due to some grant</p> <p>21 funding for post-trial DNA testing under what is</p> <p>22 now codified in Illinois as 116-3.</p> <p>23 So along with that post-trial DNA testing</p> <p>24 was the construct of let's look at the results of</p>	<p style="text-align: right;">Page 16</p> <p>1 just die. It's not death at the hands of another.</p> <p>2 So we were looking for: Was there a</p> <p>3 crime? And the second question to answer was:</p> <p>4 Is this person legally responsible, actually</p> <p>5 factually responsible for performing the acts that</p> <p>6 lead to the act that was the basis of the conviction?</p> <p>7 So if you can't find actual vindication,</p> <p>8 you could still find, as we did find, as we got</p> <p>9 better at looking and our theories evolved and our</p> <p>10 thought concepts evolved, you could see problems in</p> <p>11 the administration of justice. And so a different</p> <p>12 lower level of interest of justice standard was</p> <p>13 created, for lack of a better term. It sort of</p> <p>14 evolved through the office where we saw something</p> <p>15 that wasn't actual innocence, but we couldn't</p> <p>16 ignore it. And then it caused us concern whether</p> <p>17 we were going to stand behind that conviction.</p> <p>18 Q. In other words -- that was a very</p> <p>19 articulate statement. But you focused somewhat on</p> <p>20 the integrity piece of the conviction integrity</p> <p>21 unit's title; would that be fair to say?</p> <p>22 A. I think that's a fair statement, yes.</p> <p>23 Q. Okay. Now, before -- I may get back to</p> <p>24 this in a second, but I wanted to touch on something</p>
<p style="text-align: right;">Page 15</p> <p>1 these tests, or these possible testings, and see if</p> <p>2 there are claims of actual innocence. So it was</p> <p>3 devoid and distinct from the post-conviction</p> <p>4 hearing unit, which is looking for constitutional</p> <p>5 violations. This was more a fact-based review.</p> <p>6 And that's my understanding of how it began.</p> <p>7 Q. Okay. By the time -- or let me ask you</p> <p>8 this.</p> <p>9 During the time of your -- reign is not --</p> <p>10 what could we call it? Administration?</p> <p>11 A. My assignment.</p> <p>12 Q. Your assignment. Okay. That sounds good.</p> <p>13 All right. During the time of your</p> <p>14 assignment, did those parameters change at CIU?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. How so?</p> <p>17 A. So in looking at claims of actual</p> <p>18 innocence, we also saw claims that fell short</p> <p>19 because that's a very, very, very high standard to</p> <p>20 say someone is factually innocent. They're</p> <p>21 completely vindicated. They have nothing to do with</p> <p>22 the crime or a crime did not occur. Because CIU is</p> <p>23 also looking to see if a crime did occur.</p> <p>24 Sometimes fires are not arsons, and a child can</p>	<p style="text-align: right;">Page 17</p> <p>1 that I noticed in Judge Finnegan's opinion.</p> <p>2 And she cited to a quote, a declaration</p> <p>3 made in a particular case involving certificates of</p> <p>4 innocence.</p> <p>5 So now, do you know, I believe it's</p> <p>6 Jessica Scheller. Do I have that correct?</p> <p>7 A. I'm sorry?</p> <p>8 Q. Do you know who Jessica -- I can't remember</p> <p>9 her first name.</p> <p>10 A. It is Jessica Scheller, if we're talking</p> <p>11 about the same person. I think she is still</p> <p>12 currently an ASA assigned to the civil division.</p> <p>13 She's a supervisor there.</p> <p>14 Q. Okay. And in the course of litigation,</p> <p>15 she stated this about certificates of innocence.</p> <p>16 She said, "The CCSAO decides not to</p> <p>17 intervene on certificates of innocence for many</p> <p>18 reasons oftentimes based on procedural, collateral,</p> <p>19 or evidentiary flaws unrelated to the CCSAO's</p> <p>20 belief in whether the individual is guilty of the</p> <p>21 charged crimes. For these reasons, the CCSAO may</p> <p>22 elect not to contest or pursue a retrial if the</p> <p>23 CCSAO finds that it does not possess sufficient</p> <p>24 evidence to proceed with a new trial regardless of</p>

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Page 18	<p>1 its belief in the individual's innocence. It would</p> <p>2 logically follow that the CCSAO may not have</p> <p>3 sufficient evidence to oppose a certificate of</p> <p>4 innocence."</p> <p>5 Now, first of all, were you at any time</p> <p>6 involved in assessments of whether or not to oppose</p> <p>7 certificates of innocence?</p> <p>8 A. To answer that question, I'd have to go</p> <p>9 back in time a little bit because under the</p> <p>10 Anita Alvarez administration, COIs were handled in</p> <p>11 a different way than they were handled under the</p> <p>12 Foxx administration.</p> <p>13 So for the Foxx administration, the answer</p> <p>14 would be I was not involved. The criteria -- I</p> <p>15 might have been involved in creating or workshoping</p> <p>16 some criteria just based on my knowledge of</p> <p>17 conviction review. But COIs were handled either by</p> <p>18 civil initially, and then later they were handled</p> <p>19 by a unique unit in the post-conviction hearing</p> <p>20 department. So I did not handle those.</p> <p>21 However, under the Alvarez administration</p> <p>22 early on when COIs were new -- they were new to me</p> <p>23 because I was new to conviction review -- I did</p> <p>24 step up on some at the direction of my supervisors.</p>	Page 20	<p>1 there's some parts missing in that statement that</p> <p>2 would not affect the actual conviction review.</p> <p>3 It's a little bit different.</p> <p>4 BY MR. PALLES:</p> <p>5 Q. Okay.</p> <p>6 A. But it's not horribly different, but it is</p> <p>7 different.</p> <p>8 Q. Okay. So you began as a deputy, I</p> <p>9 believe, in -- well, in 2014 in CIU. In 2019, in</p> <p>10 the spring, you became its director; am I correct?</p> <p>11 A. You are.</p> <p>12 Q. Okay. Now, during your time at CIU, it's</p> <p>13 my understanding that you conducted investigations</p> <p>14 resulting in relief in over 200 criminal cases; am</p> <p>15 I correct?</p> <p>16 A. You mean me personally or the unit?</p> <p>17 Q. Well, you tell me.</p> <p>18 Well, would you personally have conducted</p> <p>19 over 200?</p> <p>20 A. No.</p> <p>21 Q. Is it true that the unit -- well, during</p> <p>22 your period of tenure, did the unit grant relief,</p> <p>23 post-conviction relief, in over 200 criminal cases?</p> <p>24 A. I'm not trying to split hairs, but some of</p>
Page 19	<p>1 I was not part of the decision-making process, and</p> <p>2 I don't really remember much, except we were taking</p> <p>3 an initial stance.</p> <p>4 So I did step up, but that changed. It</p> <p>5 was very rare and limited that I had anything to do</p> <p>6 with COIs.</p> <p>7 Q. Okay. Let me ask you.</p> <p>8 From my reading of the quote, is that</p> <p>9 your understanding of the criteria that were being</p> <p>10 used for COIs?</p> <p>11 A. I could say what you just read to me</p> <p>12 sounds familiar. It doesn't sound incorrect. As I</p> <p>13 wasn't part of the decision-making process, I can't</p> <p>14 say if that was the criteria, but I can say that</p> <p>15 that does sound correct as to criteria that was</p> <p>16 related to me just in general regarding COIs.</p> <p>17 Q. Okay. And if it was similar, is it not to</p> <p>18 the criteria that you were using for opposing</p> <p>19 petitions to -- or joining in petitions to reverse</p> <p>20 convictions?</p> <p>21 MR. STARR: Objection to form.</p> <p>22 MR. PALLES: I can't blame him there.</p> <p>23 THE WITNESS: I can't say that they're the</p> <p>24 same, but the spirit is similar. But I think that</p>	Page 21	<p>1 the granting was done by the post-conviction unit</p> <p>2 after a review or work done by CIU. I can't give</p> <p>3 you the exact number. So I can tell you that work</p> <p>4 that CIU contributed to or directly recommended</p> <p>5 reversal or relief, it released over 200 cases.</p> <p>6 But sometimes the relief actually came through the</p> <p>7 post-conviction hearing unit, to make it clear.</p> <p>8 Q. Okay. How many of those 200 reversed</p> <p>9 convictions were related to cases other than those</p> <p>10 involving Ronald Watts or his tactical unit?</p> <p>11 A. I would be speculating to give you a</p> <p>12 number.</p> <p>13 MR. BATTLE: Don't speculate.</p> <p>14 THE WITNESS: Yeah, I'm not going to.</p> <p>15 I can just say that the majority of relief</p> <p>16 granted during my tenure percentage-wise was under</p> <p>17 Watts.</p> <p>18 BY MR. PALLES:</p> <p>19 Q. Not to belabor the point, but would it be</p> <p>20 fair to say that over three-quarters of the cases</p> <p>21 that were overturned were Watts related?</p> <p>22 A. I'm bad at math. I don't want to say. I</p> <p>23 don't, because it could be super close. But I</p> <p>24 could say a majority of the cases, if you</p>

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<p style="text-align: right;">Page 22</p> <p>1 historically look at the numbers for CIU from its</p> <p>2 inception, you're just looking to see the greatest</p> <p>3 percentages, most likely Watts -- I can't say it's</p> <p>4 the greatest in the sense of like percentages. I</p> <p>5 could just say it's probably the biggest.</p> <p>6 Q. Okay. Let me ask you this.</p> <p>7 How many, if you can give me a reasonable</p> <p>8 estimate -- I don't want you to guess, but how many</p> <p>9 of -- how many cases did you review that were</p> <p>10 non-Watts cases where relief was denied?</p> <p>11 A. Oh, I couldn't give you that.</p> <p>12 Q. Okay. Could you give me a percentage, a</p> <p>13 rough percentage, of how many post-conviction</p> <p>14 petitioners other than those Watts-related</p> <p>15 petitioners were granted relief?</p> <p>16 A. I can't.</p> <p>17 Q. Okay. How about with Watts? How many --</p> <p>18 Well, were there individuals who -- for whom you</p> <p>19 opposed granting relief?</p> <p>20 A. Yes.</p> <p>21 Q. And how many were those, if you know?</p> <p>22 A. I can remember there were 21 specific</p> <p>23 cases that I found problematic. And I remember</p> <p>24 that number because it was on a spreadsheet.</p>	<p style="text-align: right;">Page 24</p> <p>1 MR. LEINENWEBER: Okay. My apologies.</p> <p>2 MR. PALLES: I'm sorry. August 20, 2024.</p> <p>3 MR. LEINENWEBER: Thank you.</p> <p>4 MR. PALLES: I'm talking really about the</p> <p>5 protocols now.</p> <p>6 BY MR. PALLES:</p> <p>7 Q. First of all, are those protocols published</p> <p>8 anywhere?</p> <p>9 A. Well, it depends on which ones we're</p> <p>10 talking about.</p> <p>11 Q. Okay. I'll tell you what. For our</p> <p>12 purposes today, I don't want to waste a lot of your</p> <p>13 time.</p> <p>14 So why don't we focus on the protocols</p> <p>15 related to reviewing innocence claims involving</p> <p>16 criminally convicted police officers?</p> <p>17 A. So I think the protocol that that one was</p> <p>18 referencing is the Elizondo-Salgado protocol.</p> <p>19 Q. Okay.</p> <p>20 A. Those were officers that were convicted</p> <p>21 federally, and I did review the protocol to review</p> <p>22 those matters. I think that's the one, I believe,</p> <p>23 you're referencing from that file.</p> <p>24 Q. Okay. And is that protocol published</p>
<p style="text-align: right;">Page 23</p> <p>1 That's what I remember. There were other cases</p> <p>2 that I was opposed to. There were probably more</p> <p>3 than 21 initially during the review because of a</p> <p>4 lack of corroboration. So it was greater than</p> <p>5 that. So the workup cases I was not recommending</p> <p>6 review.</p> <p>7 Q. Okay. Now, in a pleading filed on your</p> <p>8 behalf in the U.S. District Court here within the</p> <p>9 last several months, your attorneys allege that</p> <p>10 "during her tenure in the CIU, Ms. Adduci created</p> <p>11 an overflow of the implementation of a number of</p> <p>12 CIU protocols, many of which are still in effect</p> <p>13 today. These include protocols for reviewing</p> <p>14 innocence claims involving criminally convicted</p> <p>15 police officers in cases involving newly discovered</p> <p>16 medical evidence and forensic findings."</p> <p>17 I take it you'd agree with that?</p> <p>18 A. That's correct.</p> <p>19 MR. LEINENWEBER: Eric, can you just state</p> <p>20 what's the date of that document because I think</p> <p>21 that was like a while ago.</p> <p>22 MR. PALLES: I'm sorry. This is Ms. Adduci's</p> <p>23 federal complaint filed -- I think it was September</p> <p>24 10th; am I correct?</p>	<p style="text-align: right;">Page 25</p> <p>1 someplace?</p> <p>2 A. I do not believe it was published someplace.</p> <p>3 Q. Okay. And so this is an after created --</p> <p>4 when I say "after created," it was created sometime</p> <p>5 after the initial wave of Ronald Watts-related</p> <p>6 post-conviction petitions occurred?</p> <p>7 A. It was.</p> <p>8 Q. Can you give me when you began implementing</p> <p>9 it?</p> <p>10 A. I hate to say it. During COVID. That's</p> <p>11 my recollection.</p> <p>12 Q. That's good enough. That's good enough.</p> <p>13 Okay. And can you -- as best you can, can</p> <p>14 you describe the principal features of that</p> <p>15 protocol?</p> <p>16 A. Sure. Regarding the allegations that they</p> <p>17 were convicted of, there was testimony that they</p> <p>18 had false search warrants or false John Does, and</p> <p>19 so they were entering those without probable cause.</p> <p>20 So what we did is we tried to review cases</p> <p>21 that a conviction was lodged and still existed</p> <p>22 where either Elizondo or Salgado had been assigned</p> <p>23 on the search warrant because we felt that their</p> <p>24 convictions would invalidate the substance or the</p>

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<p style="text-align: right;">Page 26</p> <p>1 credibility that a judge might have heard when</p> <p>2 hearing the search warrant, or there was, in fact,</p> <p>3 no John Doe or there was no CI. It was completely</p> <p>4 fictitious, therefore, although the convicted</p> <p>5 parties might have been factually guilty legally,</p> <p>6 there was no right for the police to be there to</p> <p>7 find the evidence that was used against them.</p> <p>8 Therefore, the case must be dismissed.</p> <p>9 Q. Okay. Did those investigations depend on</p> <p>10 the roles that Elizondo and Salgado played in</p> <p>11 obtaining those warrants?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. So if somebody else on the same</p> <p>14 warrant team would have requested a warrant, that</p> <p>15 would not be subject to scrutiny or subject to less</p> <p>16 scrutiny?</p> <p>17 A. It would be subject to a different level</p> <p>18 of scrutiny, and it would not fall into a category</p> <p>19 of likely automatic relief.</p> <p>20 Q. Were those considerations any different</p> <p>21 than the ones you used in reviewing the allegations</p> <p>22 in these cases involving, obviously, the criminal</p> <p>23 conduct of Ronald Watts and Kallatt Mohammed?</p> <p>24 A. So the evaluations that were used for the</p>	<p style="text-align: right;">Page 28</p> <p>1 Q. Okay.</p> <p>2 A. I mean, I did everything. Yeah.</p> <p>3 Q. Okay. But nonetheless, would you say</p> <p>4 that -- we were talking about your evaluation</p> <p>5 changing over time. Would you say -- would you</p> <p>6 mark it at the time subsequent to the time that</p> <p>7 Mr. Rotert left and you had become the director?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. And can you tell me then in what</p> <p>10 manner this procedure changed or the process changed?</p> <p>11 A. So initially looking at the cases, there</p> <p>12 were several different elements we were looking</p> <p>13 for. And one of the elements we were looking for</p> <p>14 was some type of consistent, contemporaneous outcry</p> <p>15 at the time of the arrest, trial, or conviction</p> <p>16 that was consistent with the allegations that we</p> <p>17 were hearing in the petitions or in the affidavits</p> <p>18 by the plaintiffs. So corroboration was something</p> <p>19 that we were looking for.</p> <p>20 As more and more cases came in, it was</p> <p>21 becoming more and more difficult to find anything</p> <p>22 that would be considered corroboration or</p> <p>23 corroboratory. And that's the nature of the beast,</p> <p>24 the nature of the cases, the nature of the files</p>
<p style="text-align: right;">Page 27</p> <p>1 Watts investigation evolved. So I cannot say that</p> <p>2 at any one time they were lockstep. But I can say</p> <p>3 as they evolved, that definitely what we learned</p> <p>4 from the Watts investigation informed the Elizondo</p> <p>5 and Salgado protocol, and that elements definitely</p> <p>6 of the Elizondo and Salgado protocol were used in</p> <p>7 our Watts evaluation.</p> <p>8 Q. In fact, following along on that same</p> <p>9 point that you just mentioned, you know, my</p> <p>10 codefendants, when they filed their brief</p> <p>11 concerning, you know, the evidence -- what evidence</p> <p>12 could be obtained from your office, they said</p> <p>13 that -- they alleged that the process of deciding</p> <p>14 whether to oppose a petition to vacant conviction</p> <p>15 changed in late 2019 when you replaced Mark Rotert;</p> <p>16 is that correct?</p> <p>17 A. Mark never worked the Watts cases. I was</p> <p>18 the primary ASA assigned to the Watts cases. I</p> <p>19 reported to Mark, but any work regarding and</p> <p>20 recommendations were based on my work. Obviously,</p> <p>21 I reported to Mark. He was my supervisor. So</p> <p>22 anything that changed had nothing to do with the</p> <p>23 change of personnel. But I was -- the ball kind of</p> <p>24 stopped with me with Watts.</p>	<p style="text-align: right;">Page 29</p> <p>1 that remained. It just became more and more</p> <p>2 difficult.</p> <p>3 So there was a decision made that the</p> <p>4 cases that fit the pattern -- so basically an</p> <p>5 element of the pattern was removed, and it wasn't a</p> <p>6 requirement anymore for relief to have that element.</p> <p>7 Q. The outcry?</p> <p>8 A. Corroboration of some type, correct.</p> <p>9 All of these cases had outcries. It's</p> <p>10 obviously some of it is delayed. The first time</p> <p>11 we're hearing about it is in 2018 with Benitez</p> <p>12 (phonetic). We don't see anything prior to that,</p> <p>13 2018.</p> <p>14 So a classic example would be a plea, no</p> <p>15 motion, maybe a preliminary hearing, a plea of</p> <p>16 guilty, maybe sworn to the facts, nothing post, and</p> <p>17 then in 2018, an affidavit.</p> <p>18 Q. Well, a classic example might be the</p> <p>19 Ben Baker case. You're familiar with that case;</p> <p>20 are you not?</p> <p>21 A. Do you mean by a classic example of a</p> <p>22 contemporaneous outcry?</p> <p>23 Q. Correct.</p> <p>24 A. Yes.</p>

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<p>1 Q. Yes, right.</p> <p>2 In fact, the Ben Baker case was rather</p> <p>3 unique in that regard, was it not, the specificity</p> <p>4 and the timing of the outcry?</p> <p>5 MR. STARR: Objection to form, foundation.</p> <p>6 THE WITNESS: Well, I didn't review the</p> <p>7 Ben Baker case specifically for relief. I did</p> <p>8 review it as background information for --</p> <p>9 background information for my own knowledge for</p> <p>10 making the assessments and creating a pattern. But</p> <p>11 that case was not reviewed by me, and that decision</p> <p>12 to grant relief was not mine.</p> <p>13 BY MR. PALLES:</p> <p>14 Q. All right. Okay.</p> <p>15 You know, before I -- Well, I want to talk</p> <p>16 with you again about -- I'm pulling this from</p> <p>17 Judge Finnegan's opinion. But there's a discussion</p> <p>18 and citation to certain statements that you made</p> <p>19 publicly either in court or in some other venue --</p> <p>20 I think mostly in court -- where you represented</p> <p>21 that the People have lost confidence in some of the</p> <p>22 evidence that is the foundation for these convictions;</p> <p>23 correct?</p> <p>24 A. Yes.</p>	<p>1 what happened. I wasn't there. There were</p> <p>2 allegations being made, and I could not go back in</p> <p>3 time to have enough evidence to say one way or</p> <p>4 another. And that goes both ways. So I couldn't</p> <p>5 say someone was actually factually vindicated,</p> <p>6 which is the CIU standard, but I also couldn't say</p> <p>7 there wasn't some irregularity that would cause us</p> <p>8 to have concern if under the interest of justice</p> <p>9 standard.</p> <p>10 Q. And in addition to that -- well, let me</p> <p>11 ask you this.</p> <p>12 At some point Joe Magats had put all of</p> <p>13 the officers on the tactical team on a do-not-call</p> <p>14 witness list; do you recall that?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. So aside from any misgivings you</p> <p>17 might have had about whether or not you could in</p> <p>18 good faith call these officers to testify about the</p> <p>19 convictions, you also -- Well, strike that.</p> <p>20 You had the fact -- I'm sorry. Let me</p> <p>21 strike that.</p> <p>22 As a practical matter, if you had chosen</p> <p>23 to oppose any of these convictions, you would as a</p> <p>24 practical -- you would not be able to call any of</p>
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<p>1 Q. Okay. And you also stated that with the</p> <p>2 application of Blackstone's ratio and in the</p> <p>3 interest of justice, there are enough questions</p> <p>4 that we do have issues with some of the credibility</p> <p>5 of some of the evidence supporting the convictions.</p> <p>6 That's also true; right?</p> <p>7 A. It is.</p> <p>8 Q. Okay. Now -- and, of course, Blackstone's</p> <p>9 ratio is simply that it's better to let ten guilty</p> <p>10 people go than to let one suffer -- one innocent</p> <p>11 suffer; correct?</p> <p>12 A. Correct.</p> <p>13 Q. Okay. Now, so again, would you agree that</p> <p>14 the principal thrust of your comments here were not</p> <p>15 so much that these petitioners were actually</p> <p>16 innocent, but that there were at the very least</p> <p>17 logistical problems in retrying their lawsuits; am</p> <p>18 I correct?</p> <p>19 MR. STARR: Objection, form, foundation,</p> <p>20 misstates facts in evidence.</p> <p>21 BY MR. PALLES:</p> <p>22 Q. Go on.</p> <p>23 A. It wasn't an issue of retrial or the</p> <p>24 evidence. I think the crux is that I didn't know</p>	<p>1 the arresting officers because they're on a</p> <p>2 do-not-call list; am I correct?</p> <p>3 A. Well, it depends on the case. But yes.</p> <p>4 If the case only had officers on that list that Joe</p> <p>5 Magats -- I wasn't involved in the thought process</p> <p>6 on that list. But you're correct. Because of the</p> <p>7 list, those officers would not be called.</p> <p>8 Q. Now, when I'm talking about Blackstone's</p> <p>9 ratio for a moment, you were not involved in the</p> <p>10 Ben Baker case in which Mr. Baker was released from</p> <p>11 custody; right?</p> <p>12 A. Correct.</p> <p>13 Q. Okay. Other than Mr. Baker -- Well, let</p> <p>14 me strike that.</p> <p>15 During your time in the CIU, did you grant</p> <p>16 relief to any petitioner who at the time was</p> <p>17 incarcerated?</p> <p>18 A. Not that I recall. The only gentleman I</p> <p>19 recall being incarcerated was -- it was a weapons</p> <p>20 charge, and it was in a PC standpoint. That's the</p> <p>21 only one I recall. If they were -- I'm sorry. Let</p> <p>22 me go back to clarify.</p> <p>23 Do you mean incarcerated for the offense I</p> <p>24 was looking at, or just incarcerated?</p>

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Page 34	<p>1 Q. Yes.</p> <p>2 A. Okay.</p> <p>3 Q. The incarcerated offense you were looking at.</p> <p>4 A. Okay. Let's -- So the only -- I only know</p> <p>5 of one where the person was still serving a sentence</p> <p>6 on a case I was actively reviewing.</p> <p>7 Q. Yeah. We'll talk about him later. That</p> <p>8 would be Anthony McDaniels? In that case?</p> <p>9 A. That is correct, yes.</p> <p>10 Q. Okay. Now, when you first -- when did you</p> <p>11 first interact with Josh Tepfer concerning these</p> <p>12 Watts post-conviction proceedings?</p> <p>13 A. Probably late 2016. No, it wouldn't have</p> <p>14 been 2016. It had to be 2017.</p> <p>15 Q. Okay. And that would include -- Well, may</p> <p>16 I assume you had numerous contacts with him between</p> <p>17 2017 and the end of your stay at CCSAO?</p> <p>18 A. That's correct.</p> <p>19 Q. All right. And in the early stages of</p> <p>20 your relationship, were you aware that Mr. Tepfer</p> <p>21 was associated with the law firm of Loevy & Loevy?</p> <p>22 MR. STARR: Objection to form and</p> <p>23 foundation.</p> <p>24 THE WITNESS: I had seen an email address</p>	Page 36	<p>1 consideration in our review. It's not a factor.</p> <p>2 Q. Okay. But over the period of time, of</p> <p>3 course, you became aware that as these convictions</p> <p>4 were vacated, scores and scores of federal civil</p> <p>5 lawsuits have been filed; right?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. And would you agree with me that</p> <p>8 quite often reversed convictions result in civil</p> <p>9 lawsuits which unjustifiably allege misconduct by</p> <p>10 the police officers or prosecutors?</p> <p>11 MR. STARR: Objection to form and</p> <p>12 foundation, calls for speculation.</p> <p>13 THE WITNESS: That's such a general</p> <p>14 question. It's difficult for me to answer it</p> <p>15 globally because every case has different</p> <p>16 machinations. And yes. Are there cases where</p> <p>17 allegations may be inaccurate or misunderstood or</p> <p>18 unfounded? I think I'd have to speculate where I</p> <p>19 would agree with you on that. But I can't disagree</p> <p>20 with you on that in the sense that, yes, of course,</p> <p>21 myriad facts make up these very complicated matters.</p> <p>22 BY MR. PALLES:</p> <p>23 Q. So quite often --</p> <p>24 MR. PALLES: I'm sorry. Okay.</p>
Page 35	<p>1 for both the exoneration project and Loevy that he</p> <p>2 had sent me, so I did know that.</p> <p>3 BY MR. PALLES:</p> <p>4 Q. Okay. And were you aware during this</p> <p>5 process of overturning the convictions that they</p> <p>6 would inevitably result in petitions for certificates</p> <p>7 of innocence?</p> <p>8 A. By "they," do you mean the claimants or</p> <p>9 the cases?</p> <p>10 Q. Yeah.</p> <p>11 A. Typically, yes.</p> <p>12 Q. Correct. And, in fact, you were aware</p> <p>13 that typically when those convictions were</p> <p>14 reversed, a good number of them result in federal</p> <p>15 civil rights lawsuits; correct?</p> <p>16 A. Are you asking me in general, or did I</p> <p>17 know that some of the Watts matters that were</p> <p>18 reversed eventually led to civil rights lawsuits?</p> <p>19 Q. Well, I want to know, first of all,</p> <p>20 whether or not you knew when you first began</p> <p>21 approving these overturned convictions that they</p> <p>22 would mature into federal civil lawsuits?</p> <p>23 A. So the concept that they would was not</p> <p>24 unknown to me. However, it was never a</p>	Page 37	<p>1 Toby, if you could share your screen,</p> <p>2 Exhibit 1, please, page 13.</p> <p>3 So this document, I will have it moved</p> <p>4 down a little bit. Can you scroll down, please?</p> <p>5 Stop there a minute.</p> <p>6 BY MR. PALLES:</p> <p>7 Q. Have you been able to look at this, Nancy,</p> <p>8 while we're --</p> <p>9 A. I did look at this, yes.</p> <p>10 Q. All right. Well, let's get to the point.</p> <p>11 This looks like a very early meeting that</p> <p>12 you had with members of COPA and Mark Rotert.</p> <p>13 Do you recall the meeting independently?</p> <p>14 A. I recall meeting with them, but I can't</p> <p>15 tell you. I met with them more than once, so no, I</p> <p>16 don't have an independent recollection of this</p> <p>17 meeting.</p> <p>18 Q. Okay. Did reviewing these meeting notes</p> <p>19 in any way refresh your recollection?</p> <p>20 A. It did.</p> <p>21 Q. Okay. Can you just briefly tell me in</p> <p>22 what respects?</p> <p>23 A. Yes. One of the reasons COPA -- when the</p> <p>24 Watts cases first came down, you have to kind of go</p>

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Page 38	<p>1 back in time. There was a request for a special</p> <p>2 master to look at all these allegations in all the</p> <p>3 different Watts cases. And so what had happened is</p> <p>4 that the state's attorney's office had agreed to</p> <p>5 sort of step into -- to speak with the special</p> <p>6 master and take this over. And it became what -- I</p> <p>7 think we thought what was going to be a smaller</p> <p>8 subset of cases became much larger. And COPA, once</p> <p>9 the do-not-call list was created, saw that this was</p> <p>10 going to involve several different officers, not</p> <p>11 only from the Watts team, but then how everything</p> <p>12 sort of branches out. And it became sort of</p> <p>13 overwhelming for both parties.</p> <p>14 And so what we were trying to do was I was</p> <p>15 trying to get more information that I didn't have</p> <p>16 access to, and I was wondering if COPA or the city</p> <p>17 could help me get it. And COPA was trying to get</p> <p>18 an understanding of how to get their arms around</p> <p>19 even looking at these claims. And so we kind of</p> <p>20 were just sharing information and sort of</p> <p>21 workshopping some of the issues together.</p> <p>22 But one of main reasons for me to talk to</p> <p>23 them was they were trying to use our determination</p> <p>24 as a determination for their findings, and our</p>	Page 40	<p>1 things that we may look at where, you know, some</p> <p>2 other memos where that's the case. But this one</p> <p>3 seems to be fairly an accurate account as best as</p> <p>4 you can recall?</p> <p>5 A. Yes, with the caveat, this was not a</p> <p>6 contract. This was not something that was lockstep</p> <p>7 that if A, then B. These were considerations.</p> <p>8 Q. Sure.</p> <p>9 A. And you always have to consider the</p> <p>10 totality. And so if there's something here that</p> <p>11 says, oh, because it was a Class X case and</p> <p>12 so-and-so was there, it automatically is going to</p> <p>13 be this. That's an unfair conclusion. It's not</p> <p>14 one equals two. It's all totality.</p> <p>15 So the fact that we might have been</p> <p>16 saying, hey, Class X is something we have our</p> <p>17 eyeballs on doesn't mean the process is dispositive.</p> <p>18 So everything here is always totality.</p> <p>19 Q. Okay. So let's talk about the factors</p> <p>20 that at least influenced CIU's decision.</p> <p>21 First of all, whether or not Watts or</p> <p>22 Mohammed was present.</p> <p>23 Now, did you determine -- Let me ask you</p> <p>24 this.</p>
Page 39	<p>1 explanations, our burdens were widely different.</p> <p>2 And so in speaking with them, what I was giving</p> <p>3 them was generalities and hypotheticals and ways to</p> <p>4 look at things from both sides, from an investigatory</p> <p>5 perspective, and also, what I had learned from the</p> <p>6 years I had been in CIU and how to review claims</p> <p>7 like these.</p> <p>8 And so what you see in some of these</p> <p>9 exhibits, in some of these writings is sometimes a</p> <p>10 sense of certainty that I did not state to them.</p> <p>11 And so this document specifically, though, seems to</p> <p>12 be a more fair characterization of certain things</p> <p>13 that I did state. But I read other ones where</p> <p>14 they're saying things that I -- things were either</p> <p>15 misconstrued or misunderstood, or I would not have</p> <p>16 stated with such certainty and clarity that they</p> <p>17 have. I just didn't have the forces to say what</p> <p>18 they came to. So --</p> <p>19 Q. Okay.</p> <p>20 A. Did that kind of give you an overview?</p> <p>21 Q. Okay. Well, okay. So I think what you're</p> <p>22 saying, though, is this particular -- the notes</p> <p>23 from this particular meeting, nothing jumps out to</p> <p>24 you as being inaccurate? There may be some other</p>	Page 41	<p>1 Was Watts present in all of the cases that</p> <p>2 you considered for post-conviction relief as far as</p> <p>3 you could tell?</p> <p>4 A. No.</p> <p>5 Q. Okay. Let me ask you a question.</p> <p>6 A lot of times -- Well, frankly from</p> <p>7 looking at it, many times I could not tell whether</p> <p>8 or not Watts was present. Some reports say he is.</p> <p>9 Others, he may have signed off on.</p> <p>10 How did you determine whether or not Watts</p> <p>11 was present at the scene of a particular arrest?</p> <p>12 A. To make sure my last answer was clear,</p> <p>13 there were cases where relief was granted where I</p> <p>14 believe Watts was not there or was not present</p> <p>15 based on other information. Just so we're clear on</p> <p>16 that.</p> <p>17 Q. No. I understand that.</p> <p>18 A. Okay.</p> <p>19 Q. You've talked about the totality. Okay.</p> <p>20 And I appreciate that. But now let's get down to a</p> <p>21 few of the little building blocks along the way.</p> <p>22 A. Certainly.</p> <p>23 So one of the ways, obviously, if he was</p> <p>24 listed in the narrative, right? He entered. He</p>

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Page 42	<p>1 went to the second floor. He was actively</p> <p>2 participating in the narrative would be one way I</p> <p>3 would know he was there. And that would be in the</p> <p>4 CB narrative summary or the vice case report. So</p> <p>5 that would be one way I would know he had been</p> <p>6 present.</p> <p>7 Or I could tell from the preliminary</p> <p>8 hearing or grand jury transcript that he was</p> <p>9 present. He rarely testified in those, if ever.</p> <p>10 I don't really recall if he ever did. But other</p> <p>11 people did who would say I was there with officer</p> <p>12 so-and-so and Sergeant Watts. So that would be one</p> <p>13 way I could infer that he was, in fact, present.</p> <p>14 Other than that, a lot of the cases just</p> <p>15 had him as a signatory, which could mean he was</p> <p>16 back at the station and had nothing to do with that</p> <p>17 arrest or the observations that led to that arrest</p> <p>18 and simply signed the paperwork, as sergeants do.</p> <p>19 I would have no way of knowing without any</p> <p>20 more specificity in the vice case report, the</p> <p>21 central booking report, or either the grand jury</p> <p>22 transcript, the preliminary hearing transcript, or</p> <p>23 if it were to go to trial or a motion, those</p> <p>24 transcripts as well, or a plea, or swearing to the</p>	Page 44	<p>1 from?</p> <p>2 A. So there were three things that were</p> <p>3 happening when this first started.</p> <p>4 The first one was I was given -- and I</p> <p>5 don't know where. April Perry was my supervisor at</p> <p>6 the time. She was the deputy chief, and she was --</p> <p>7 I don't know if it was before Mark came in or</p> <p>8 before Mark really -- I don't remember. But I know</p> <p>9 she got me this list of CB numbers that had to</p> <p>10 do -- I think Chicago generated it. Basically any</p> <p>11 Watts-related arrest CB number. And so I started</p> <p>12 to pull all those files. And a lot of those were</p> <p>13 victim cases. A lot of those cases where Watts</p> <p>14 would just put the bracelets on someone for a PSMV,</p> <p>15 or he was responding to a robbery or a burglary in</p> <p>16 progress. Regular police work, for lack of a</p> <p>17 better term, not narcotics things.</p> <p>18 And then in doing that, I would try to</p> <p>19 look at CBs in that same area and era, if you will,</p> <p>20 with the help of someone from MIS to search just</p> <p>21 narcotics cases around --</p> <p>22 Q. I'm going to stop you. I gotta stop you.</p> <p>23 MI what?</p> <p>24 A. MIS.</p>
Page 43	<p>1 facts.</p> <p>2 Q. What about Mohammed for a moment?</p> <p>3 Now, would it make a difference to you</p> <p>4 whether or not Mohammed was the arresting officer</p> <p>5 or say a member of a two-person arresting team, as</p> <p>6 opposed to somebody who was at -- whose presence</p> <p>7 was known in, say, the vice case reports?</p> <p>8 A. So that would depend on the time frame</p> <p>9 that we were reviewing the case. Initially,</p> <p>10 obviously, being box 1 and box 2, which means the</p> <p>11 arresting or the second arresting officer.</p> <p>12 Mohammed or Watts were in box 1 or box 2. That put</p> <p>13 it into a category of a high level of scrutiny.</p> <p>14 If Mohammed was not box 1 or box 2, and he</p> <p>15 was just an assisting officer, that would be a</p> <p>16 different level of scrutiny. However, later on</p> <p>17 Mohammed being an assisting officer did become more</p> <p>18 dispositive.</p> <p>19 Q. Now, there was discussion about your</p> <p>20 investigation of their narcotics-related cases. Do</p> <p>21 you recall that? You were looking for some sort of</p> <p>22 baseline.</p> <p>23 A. Of the control group, exactly, yes.</p> <p>24 Q. Okay. Where did you get the control group</p>	Page 45	<p>1 Q. Which is?</p> <p>2 A. The IT people. You know, like information</p> <p>3 services. So the technical guys.</p> <p>4 Q. For your office?</p> <p>5 A. For my office, and then -- and also from</p> <p>6 the -- and I was not directly involved in this.</p> <p>7 This was going -- this went through a supervisor</p> <p>8 who talked with CPD to help us get some information.</p> <p>9 And I don't remember how I got the control group,</p> <p>10 except I needed help getting it, and I think I</p> <p>11 found it. I found cases that were similar through</p> <p>12 searching through these files. In some cases I</p> <p>13 think I would randomly just order different</p> <p>14 consecutive case numbers and see what came from the</p> <p>15 files, and a lot of them were drug cases. And so</p> <p>16 that's kind of how I created controlled cases. I</p> <p>17 put those to the side. I had non-Watts. There</p> <p>18 were similar districts, but they were all around</p> <p>19 the same time frame, and it was a little bit sort</p> <p>20 of an experiment just to see if I could locate</p> <p>21 cases that didn't involve.</p> <p>22 Then there was a lawsuit or something else</p> <p>23 with other officers in a different team. And then</p> <p>24 we figured out the different team designations,</p>

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<p style="text-align: right;">Page 46</p> <p>1 because we had 215 and 7 -- 264 and 715. And so</p> <p>2 then we did searches. MIS did an algorithm, I</p> <p>3 believe, for me to get those beat assignments to</p> <p>4 get CBs for those. And then once I got the CB, I</p> <p>5 could get the case number from the court system.</p> <p>6 So it was kind of -- I was kind of feeling around</p> <p>7 in the dark a little bit, so I don't remember</p> <p>8 exactly. And I don't remember exactly, but that's</p> <p>9 kind of what we did.</p> <p>10 Q. Let me ask you this.</p> <p>11 Were the cases, the control group cases,</p> <p>12 were they derived from the Ida B. Wells housing</p> <p>13 project?</p> <p>14 A. Some were. Some weren't. The initial</p> <p>15 ones were not. And then more and more -- as I</p> <p>16 found more and more cases that were related, they</p> <p>17 tended to focus in that area, correct. But initially,</p> <p>18 it was more citywide.</p> <p>19 Q. What about when you're looking for a</p> <p>20 control group, were you looking for drug busts</p> <p>21 essentially in similar areas, for example, the</p> <p>22 various housing projects where drug operations were</p> <p>23 known to transpire?</p> <p>24 A. No. I don't think it was that specific.</p>	<p style="text-align: right;">Page 48</p> <p>1 A. No. I tried to stay away from those</p> <p>2 because I figured that's not going to be as good as</p> <p>3 metrics.</p> <p>4 Q. Okay. But now, you were aware, were you</p> <p>5 not -- I mean, Ida B. Wells -- the drug -- the</p> <p>6 extent of drug sales in the Ida B. Wells Homes was</p> <p>7 pervasive; would you agree?</p> <p>8 A. I -- just so you know where I'm getting it</p> <p>9 from. I was never there, obviously, during this</p> <p>10 time, and I don't have any recollection from that</p> <p>11 as a prosecutor. I did background work. I did go</p> <p>12 and talk to former drug dealers. And I have to say</p> <p>13 based on those interviews, yes, it was.</p> <p>14 Q. Okay.</p> <p>15 A. It was very pervasive.</p> <p>16 Q. Yeah, okay. And I ask because you seem</p> <p>17 during the course of your investigation somewhat</p> <p>18 skeptical about on-site observations --</p> <p>19 A. I have to disagree.</p> <p>20 Q. -- of people in possession; correct?</p> <p>21 A. No. I think you're getting that from the</p> <p>22 COPA report, and I think there's a misunderstanding</p> <p>23 there.</p> <p>24 Q. Oh, okay. Would you mind telling me what</p>
<p style="text-align: right;">Page 47</p> <p>1 It was more -- actually, what initially -- what I</p> <p>2 was looking for is I remember in the old days from</p> <p>3 prosecuting narcotics cases, they had what I would</p> <p>4 call the Maglin vice case report, where it was</p> <p>5 already typed out, and they'd just insert those</p> <p>6 kind of things in it. I was looking to see if</p> <p>7 that's what this team did because that -- I always</p> <p>8 thought that was just a little bit, wow, to insert</p> <p>9 the right stuff. So I was looking for that. I was</p> <p>10 looking for those formatic, formulaic sort of "they</p> <p>11 all sound the same" sort of reports that there's no</p> <p>12 real substantive detail. It could have been this</p> <p>13 guy. It could have been that guy. They were all</p> <p>14 fungible. I was looking for that.</p> <p>15 I was also looking to take out of this any</p> <p>16 narcotics missions because those would have had</p> <p>17 in-depth surveillance. They probably would have</p> <p>18 had videotapes. They probably would have been -- I</p> <p>19 didn't feel like I needed to be looking at those</p> <p>20 because those would have their own corroboration</p> <p>21 and their own integrity because of just the idea of</p> <p>22 what a narcotics mission is.</p> <p>23 Q. So you didn't look at, for example, the</p> <p>24 Sin City arrests?</p>	<p style="text-align: right;">Page 49</p> <p>1 that misunderstanding was?</p> <p>2 A. When I was talking to COPA and trying to</p> <p>3 give them sort of the headspace on how to begin</p> <p>4 looking at these, I went back to my skill set as a</p> <p>5 prosecutor, and I talked about what defense</p> <p>6 attorneys might do to question because it's all</p> <p>7 about seeking the truth, right? So we're going to</p> <p>8 voir dire. And a lot of questions that you would</p> <p>9 see defense attorneys ask at a prelim is how were</p> <p>10 you able to see that? How did you know it was a</p> <p>11 small white object? It was green paper? How did</p> <p>12 you know it was money from that distance? Did you</p> <p>13 have binoculars?</p> <p>14 So one of the things I would say is that's</p> <p>15 something you guys could consider. Is this</p> <p>16 possible that they could have seen this? Is it</p> <p>17 detailed enough that they could say where they were</p> <p>18 standing? I didn't mean to say that any</p> <p>19 hand-to-hand transaction is impossible. What I was</p> <p>20 saying is you can be skeptical if you want of those</p> <p>21 things. Think about the ability to observe. Think</p> <p>22 about the lighting. Think about the distance.</p> <p>23 Think about how the person is dressed. Think about</p> <p>24 the ability for, you know, people to tell that</p>

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<p>1 that's a police officer. Think about all the</p> <p>2 questions you need to be asking. And I think there</p> <p>3 may have been some misunderstanding because I don't</p> <p>4 think I've ever thought, oh, an officer could never</p> <p>5 see a hand-to-hand transaction, or the officers</p> <p>6 don't happen upon people dealing drugs as they turn</p> <p>7 a corner.</p> <p>8 So I think if you see those things in</p> <p>9 those COPA reports, it's a one-sided view of</p> <p>10 something I was trying to give them all sides of.</p> <p>11 Q. Okay. Now, one of things that I</p> <p>12 understand you looked at was that you would focus</p> <p>13 on the quantity of the drug sales. And am I</p> <p>14 correct that in general your view was that you were</p> <p>15 concerned about those sales that involved in excess</p> <p>16 of 5 grams?</p> <p>17 A. 15.</p> <p>18 Q. 15 grams. Okay. Let me go back a second.</p> <p>19 You mentioned some drug dealers that you</p> <p>20 had interviewed as part of your investigation.</p> <p>21 Do you recall who?</p> <p>22 A. No. Actually, you know what? If I'm</p> <p>23 incorrect about this, I apologize.</p> <p>24 I remember one woman's name is Karen</p>	<p>1 protection, what he would do is -- and this is the</p> <p>2 way someone described it to me, is that</p> <p>3 Ida B. Wells would have two separate like hallways</p> <p>4 or stairways on either side of the building. And</p> <p>5 one line, one drug line, let's say they called it</p> <p>6 the Gatorade line would be running, and the other</p> <p>7 line, let's say they were the Batman line would be</p> <p>8 running. And the Gatorade line had paid Watts for</p> <p>9 protection. So when Watts came into the building</p> <p>10 with his crew, the Gatorade line got to walk out,</p> <p>11 but they didn't get to keep their drugs. Watts</p> <p>12 would take their drugs, and then to incentivize the</p> <p>13 Batman line to play ball and get protection, they</p> <p>14 put the extra bags on them.</p> <p>15 And we actually tried to corroborate that</p> <p>16 by doing evidence evaluations of the recovered</p> <p>17 drugs to see if I could see that there was</p> <p>18 different packaging or different lines in the same</p> <p>19 package. And I was never able to find the</p> <p>20 different packaging. But that was something I was</p> <p>21 told had been happening and something that</p> <p>22 petitioners were saying that happened. It seemed</p> <p>23 like a plausible, possible method to coerce someone</p> <p>24 to pay for protection if we know as Watts was doing</p>
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<p>1 Diamond. And I don't know why I remember that, but</p> <p>2 I just remember she was lovely. And I think her</p> <p>3 name was Karen Diamond, and we just had a really</p> <p>4 great conversation. She had been a drug user and a</p> <p>5 drug pitcher, and she talked about how she turned</p> <p>6 her life around and how great Ida B. Wells was,</p> <p>7 even though there was a drug trade, and all the</p> <p>8 good people that lived there. And I just remember</p> <p>9 how warm and open she was to me. And I could</p> <p>10 remember her. And if I have her name wrong, I'd</p> <p>11 feel terrible.</p> <p>12 Q. But, well, you just put a target on her</p> <p>13 back. That's okay.</p> <p>14 A. Yeah. She was lovely.</p> <p>15 Q. Okay. Good.</p> <p>16 So now -- and then, let me ask you this.</p> <p>17 Why would a drug amount in excess of 15</p> <p>18 grams raise red flags for you?</p> <p>19 A. So it was my understanding based on lots</p> <p>20 of different things that we read, including stuff</p> <p>21 from the federal investigation, that Watts had a</p> <p>22 motivation that was financial. It was a fiduciary</p> <p>23 interest in doing what he did. And that to</p> <p>24 incentivize drug dealers to pay him for perhaps</p>	<p>1 nefarious illegal things. That would be in line.</p> <p>2 And so that's why that amount always concerned me.</p> <p>3 Q. Okay. You know, look, I've always been</p> <p>4 wondering where these drugs that were so-called</p> <p>5 planted came from. And you're saying that they</p> <p>6 came from friendly drug dealers who paid a certain</p> <p>7 amount over to Watts so that he could use those to</p> <p>8 plant on competing drug dealers; is that your</p> <p>9 hypothesis?</p> <p>10 A. I don't think he took them to plant them.</p> <p>11 I just think he was, like, all right. You paid, so</p> <p>12 what do you get for your money? You don't get to</p> <p>13 go -- you're not going to jail. You're not going</p> <p>14 to get locked up. I'm not going to charge you.</p> <p>15 I interviewed a guy, and I don't remember</p> <p>16 his name, who used to get really mad. He's like,</p> <p>17 hey, you see the line walk out. All their workers</p> <p>18 went home, and we got busted because our guy -- our</p> <p>19 shorty wasn't, you know, paying them off, and so we</p> <p>20 all had to go to jail. And I saw them walk right</p> <p>21 out.</p> <p>22 I think later that Mohammed -- one of the</p> <p>23 officers, Watts or Mohammed, I don't know which</p> <p>24 one, had given a radio to the drug dealers. So</p>

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Page 54	<p>1 when the rest of the crew wasn't in on it came in, 2 they would be warned so they could get out because 3 that's why they were paying protection. Well, 4 these were theories and things I was trying to 5 corroborate and figure out. So when I saw the big 6 amounts, it raised a concern for me. I was never 7 able to find any recovered drugs that were mixed 8 symbols, however, in looking at the drug packaging. 9 Q. Okay. Do you recall any specific sources 10 for these accounts of Watts taking these drugs -- 11 Well, let me be clear on something. 12 The information you received is merely 13 that he took the drugs, not that they planted them 14 somewhere else? Are you just kind of making that 15 jump in this case? 16 MR. STARR: Objection, form, foundation, 17 misstates prior testimony and facts in evidence. 18 THE WITNESS: I'm just saying from a lot 19 of different sources -- from talking to people, 20 from reading reports, from reading between the 21 lines, from trying to put things together, from 22 reading the 302s, from looking at the very long 23 federal investigation, from lots of different 24 moving parts, and that is something I had heard of.</p>
Page 55	<p>1 But your specific question was why 15 was a red 2 flag. It was because of that possible scenario -- 3 that if you don't want to play, you're going to 4 pay, you're going to going go to jail, and you're 5 going to get a Class X amount, and maybe next time 6 you won't ignore my phone call, kind of like that. 7 BY MR. PALES: 8 Q. I gotcha. And all I'm asking now is do 9 you recall any specific sources? 10 A. The 302s are one of the biggest sources, 11 and then speaking with people, and then reading a 12 lot of prelims and a lot of trials and a lot of 13 pleas and a lot of CRs and a lot of OPS reports. 14 Q. And again, I'm interested in the people 15 you recall speaking to. 16 A. We went out. I remember it was August. 17 It was hot. And it was me, and we just hit the 18 street. And we had a bunch of CBs where people had 19 been arrested for solicitation, but they were out 20 there at the same time. 21 Q. Yeah. 22 A. And then I remember just talking, trying 23 to get background from people. I'm like what was 24 really going on? Can you tell me? These people's</p>
Page 56	<p>1 memories weren't the greatest of a lot of people I 2 found. So a lot of it was taken with a grain of 3 salt. So I can't say that everything I got from 4 background was something I relied on. Again, it's 5 a totality of all the information I had in making 6 the best possible decision I could regarding 7 recommendations. 8 Q. Would it be fair to say that your 9 conclusion is in part based on interviews that you 10 conducted with not plaintiffs, but concerned 11 citizens? 12 A. Yeah. I mean, I don't -- Well, "concerned 13 citizens" have a specific meaning in the police 14 reports. I was never able to determine who any of 15 the concerned citizens were in the reports, so I 16 can't say it was anyone from the reports. But I 17 could say it was people who lived or worked in that 18 area during the time and had knowledge what things 19 were like back then. 20 Q. When we talked about the criteria of 21 contemporaneous outcry, you had indicated, am I 22 correct, that a contemporaneous outcry such as that 23 witness in the Baker case was more of a determining 24 factor in the early cases that you reviewed rather</p>
Page 57	<p>1 than the later cases. 2 A. So I think the best way for me to answer 3 that is that I wasn't able to find that kind of 4 corroboration of contemporaneous outcry in some of 5 the later cases whereas it existed in the earlier 6 cases. 7 Q. Right. Okay. 8 So, I mean, there was an overwhelming 9 surge of these cases once there was a relative 10 amount of publicity about -- Well, say by the time 11 that the 15 cases were overturned at the same time; 12 am I correct? 13 A. The first -- I think there were 18, 14 correct. Then the media -- Yes. There was 15 publicity after that fact, and that was taken into 16 consideration. 17 Q. And that became -- There was a deluge -- 18 Well, you may question the use of the term for 19 vagueness, but there was a significant amount of 20 cases that followed that event; correct? 21 A. There was a steady stream. How's that? 22 Yes. 23 Q. Yes, okay. That's good enough. 24 Now, when you looked at outcry, though,</p>

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<p style="text-align: right;">Page 58</p> <p>1 were there -- I mean, what events would you 2 consider to be outcry? For example -- Well, what 3 events would you consider to be more or less 4 contemporaneous outcry? 5 A. So, obviously, if there was testimony at 6 trial by the defendant. That could be something 7 saying something consistent with what the claims 8 are now. 9 Q. An OPS complaint; right? 10 A. Exactly. And, again, consistent, not just 11 the complaint, but something consistent with what 12 we're seeing now. Because if there were OPS 13 reports -- whatever the code was at the time, but I 14 saw reports that even though there was a complaint, 15 it wasn't consistent with what the allegations are 16 now, or motion practice where I saw somebody 17 testify to something that's now inconsistent with 18 what they're saying. 19 Q. Excuse me. I'm sorry. 20 How did you treat those? 21 A. Well, if there was a inconsistency 22 initially, those cases were not a recommendation 23 for relief because of those inconsistencies. 24 Q. And that would be initially. Did that</p>	<p style="text-align: right;">Page 60</p> <p>1 and Mohammed; correct? 2 A. Yes. 3 MR. STARR: Objection to form. 4 BY MR. PALLES: 5 Q. Okay. Now, on the other hand, Mark 6 Rotert, you may recall this, but he apparently said 7 that he wanted to avoid actions that could harm the 8 reputation of career officers not involved in 9 misconduct especially based on nonspecific 10 allegations or association with Watts or Officer 11 Mohammed. 12 What -- how would you rate the priority of 13 that consideration in the ultimate decisions on 14 overturning the convictions? 15 A. I was in line with Mark on that. I agreed 16 with Mark on that. 17 Q. Okay. So did concern about the reputations 18 of these career officers ever cease to become a 19 concern of yours? 20 A. No. 21 Q. Okay. So, then, I mean, as we sit here 22 today, only my client and Mr. Watts have been 23 convicted or really alleged -- well, charged with 24 any particular crimes.</p>
<p style="text-align: right;">Page 59</p> <p>1 ever change? 2 A. It did on several, yes. 3 Q. Okay. So originally you had reservations 4 about a number of these convictions and then 5 reversed yourself and said that you would go along 6 with their overturning? 7 A. I didn't -- 8 MR. BATTLE: You're talking personally 9 about Nancy? 10 MR. PALLES: Let me strike the question. 11 BY MR. PALLES: 12 Q. A motion to suppress, is that -- would you 13 consider that to be an outcry? 14 A. Absolutely. 15 Q. Let me ask you a question. 16 Do you know, do you have any idea how 17 many -- what percentage of drug cases involved a 18 preliminary motion to suppress? 19 A. Very few. 20 Q. Few. Okay. Of course, one of the 21 criteria that was mentioned during your meeting 22 here was the interest of justice; correct? I mean, 23 you had less confidence about any of these 24 convictions as a result of the convictions to Watts</p>	<p style="text-align: right;">Page 61</p> <p>1 How is it that you determined, say, for 2 example, that Officer Lamonica Lewis was somehow -- 3 her involvement somehow taints these convictions? 4 A. I didn't determine that. 5 Q. Did somebody else? 6 A. I can't answer for other people. 7 Q. Okay. And Mark also said -- again, we've 8 kind of been over this. He said he could live with 9 vacating convictions that may actually be legitimate 10 if the interest of justice is served. 11 You guys were on the same page with that; 12 correct? 13 A. Yes, we were. 14 MR. PALLES: Do you feel you need to take 15 a break? Otherwise, we can go for a while longer. 16 Okay. We roll. 17 Okay. So now let's go back to page 3 for 18 a moment, Toby. 19 BY MR. PALLES: 20 Q. On that page I believe there was some 21 discussion about the fact that you guys had a 22 spreadsheet, and you -- and Mark said that he would 23 let COPA review the memorandum and spreadsheet, but 24 he didn't want them to either photograph it or make</p>

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Page 62	<p>1 copies. Why was that?</p> <p>2 A. I don't remember this because I think they</p> <p>3 eventually did. All that spreadsheet is -- I think</p> <p>4 that's what they're referencing here. I'm not 100</p> <p>5 percent sure, but I think it's what I used to call</p> <p>6 the cheat sheet. It was just a rundown in a nice</p> <p>7 clear form of the facts of the case, and then you</p> <p>8 could do an easy comparison. So if you look on one</p> <p>9 page versus another, you could see location, time,</p> <p>10 date, amount of drugs; location, time, date. It</p> <p>11 was sort of a cheat sheet.</p> <p>12 Q. You know, I'll tell you. We were looking</p> <p>13 for that a little bit earlier. Can you give me any</p> <p>14 help in finding it? Not for today, but how would I</p> <p>15 go about looking for it?</p> <p>16 A. If you look at Alvin Waddy's dep, I think</p> <p>17 there was one in Alvin Waddy's dep. It's a</p> <p>18 landscaped piece of paper with columns. It's just</p> <p>19 a factual rendition.</p> <p>20 MR. PALLES: Okay. All right. I'll take</p> <p>21 a look at that. Thank you.</p> <p>22 You know, we don't have to share the</p> <p>23 screen. We can take it down.</p> <p>24 Let me just look at a document for a</p>	Page 64	<p>1 turpitude, if they have burglaries or thefts, you</p> <p>2 know, that goes to their credibility. You're</p> <p>3 allowed to weigh that among other factors.</p> <p>4 And so that was a discussion of how you</p> <p>5 could take somebody's background. It could be</p> <p>6 significant in that they choose to look at it for</p> <p>7 someone's credibility, or it could be completely</p> <p>8 insignificant like it was for CIU. We</p> <p>9 didn't care about anybody's background. We looked at</p> <p>10 each case in a vacuum and based on its facts. So</p> <p>11 that is not what I meant when I said that to them.</p> <p>12 I think what I was saying is that since</p> <p>13 this person had these kind of crimes, they had</p> <p>14 credibility, perhaps, issues under the Montgomery</p> <p>15 standard, and with nothing else, their word alone</p> <p>16 probably wouldn't be enough for COPA to make</p> <p>17 recommendations regarding a specific officer. I</p> <p>18 can't recall the conversation specifically, but I</p> <p>19 know that is not a true statement that I would not</p> <p>20 grant relief to somebody where they had a number of</p> <p>21 felonies because their backgrounds are irrelevant</p> <p>22 to CIU. That was regarding some of these credibility</p> <p>23 assessments.</p> <p>24 Q. All right. And their backgrounds wouldn't</p>
Page 63	<p>1 moment. I'm wondering if this is on page 3. Okay.</p> <p>2 Yeah. It's actually on -- I wanted to ask you a</p> <p>3 question about page 4.</p> <p>4 If you could shoot up page 4 for Nancy.</p> <p>5 BY MR. PALLES:</p> <p>6 Q. So there's a discussion on page 4 in the</p> <p>7 penultimate paragraph that says that you described</p> <p>8 certain occasions where you would not agree. And</p> <p>9 you cite the example of Leonard Gipson, who has</p> <p>10 another conviction, but hadn't sought to have that</p> <p>11 conviction overturned.</p> <p>12 Now, do you recall ultimately how that</p> <p>13 other conviction was handled?</p> <p>14 A. I think it remains.</p> <p>15 Q. Okay. You also said you would not grant</p> <p>16 relief in one case where the petitioner has a</p> <p>17 significant number of felony convictions, including</p> <p>18 narcotics and prostitution.</p> <p>19 A. I think that's a great example of a</p> <p>20 misunderstanding of what I was telling COPA.</p> <p>21 Q. Okay. Let's explain it. Please explain.</p> <p>22 A. I was trying to get them to understand the</p> <p>23 concept of a credibility determination. And,</p> <p>24 obviously, if somebody has crimes of moral</p>	Page 65	<p>1 be relevant to CIU even in the event that they had,</p> <p>2 say, numerous drug-related convictions both before</p> <p>3 and after the subject Watts arrest?</p> <p>4 A. Correct, because they could have had a</p> <p>5 legitimate -- a completely fine conviction prior.</p> <p>6 They could have had a meeting with Watts that was</p> <p>7 something that was concerning, and they could then</p> <p>8 have committed crimes after, as many did, that are</p> <p>9 completely fine, and there's no reason to touch</p> <p>10 those. So that wasn't the factor. Obviously,</p> <p>11 someone's credibility, you always weigh a person's</p> <p>12 ability to perceive and their bias.</p> <p>13 So that was a discussion about moral</p> <p>14 turpitude. That's a discussion about the</p> <p>15 Montgomery factors because not all these</p> <p>16 investigators were lawyers. That was something</p> <p>17 that maybe went over their heads. But, obviously,</p> <p>18 that statement, that sentence is incorrect. It's</p> <p>19 just not correct. I would never not grant relief</p> <p>20 because of somebody's convictions.</p> <p>21 I looked at Mr. Gipson as an example</p> <p>22 because he had three cases reversed, right?</p> <p>23 Q. Yes.</p> <p>24 A. It was just those facts fell into the</p>

20 (Pages 62 to 65)

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Page 66	<p>1 pattern, and he was granted relief.</p> <p>2 So that sentence bothers me because it was</p> <p>3 such -- and again, those things came out of my</p> <p>4 mouth. I just didn't mean it the way they put it</p> <p>5 in this memo. So I'm not saying that it didn't</p> <p>6 happen or I didn't say it. It's just been</p> <p>7 misconstrued.</p> <p>8 Q. Bear with me one second. I apologize.</p> <p>9 Something you said triggered the case of</p> <p>10 an individual who I saw -- oh, yeah. I believe it</p> <p>11 was -- Now, Bruce Powell, okay, he has -- his</p> <p>12 criminal history indicates that he was arrested 63</p> <p>13 times with 25 convictions. He was arrested 6 times</p> <p>14 for theft, both before -- 3 times before and 3</p> <p>15 times after this particular arrest.</p> <p>16 Did that factor weigh into whether his</p> <p>17 claims against Watts were credible?</p> <p>18 MR. STARR: Objection to form.</p> <p>19 THE WITNESS: That would go to his</p> <p>20 credibility, but again, it would not preclude if I</p> <p>21 saw other factors that fit the pattern. So it was</p> <p>22 more of a pattern review in some ways than that.</p> <p>23 However, if it came down to a credibility problem,</p> <p>24 that's something that we would factor in.</p>
Page 67	<p>1 BY MR. PALLES:</p> <p>2 Q. Okay. Well, what about, say, for example,</p> <p>3 and there are -- there have been petitioners we've</p> <p>4 looked at who had user amounts and yet were</p> <p>5 arrested for possession.</p> <p>6 In the event that their criminal history</p> <p>7 showed, say, eight to ten arrests also drug</p> <p>8 related, wouldn't you assume that that person might</p> <p>9 be a drug addict and more likely have been in</p> <p>10 possession of narcotics at the time of the Watts</p> <p>11 arrest?</p> <p>12 MR. STARR: Objection to form, foundation,</p> <p>13 calls for speculation, vague.</p> <p>14 THE WITNESS: I think you can assume or</p> <p>15 speculate and make educated guesses regarding a lot</p> <p>16 of different factors and things. Each case was</p> <p>17 again reviewed in its individual matter. I don't</p> <p>18 like to make assumptions that just because somebody</p> <p>19 uses drugs that they necessarily are dealing in</p> <p>20 drugs. But, obviously, drug possession is a crime.</p> <p>21 And obviously, you can't use drugs if you don't</p> <p>22 possess them. So ergo, they're committing a crime.</p> <p>23 But I think the bigger issue was looking</p> <p>24 at all the factors, the totality of the factors;</p>
Page 68	<p>1 the idea that there were things we didn't know, the</p> <p>2 idea of other people being granted relief, and the</p> <p>3 idea of fundamental fairness, which became more of</p> <p>4 an issue later on than it was initially.</p> <p>5 BY MR. PALLES:</p> <p>6 Q. I see. You're saying once you started the</p> <p>7 ball rolling, it would be difficult to differentiate</p> <p>8 one case from the other?</p> <p>9 A. It did become more difficult. It did.</p> <p>10 Q. You also stated that -- let's see. It</p> <p>11 says here you were not willing to agree to vacate a</p> <p>12 conviction where the facts were not consistent with</p> <p>13 other Watts-related complaints. She noted one case</p> <p>14 involved a gun and it did not occur within the</p> <p>15 Ida B. Wells housing projects.</p> <p>16 Again, we're talking about Anthony McDaniels;</p> <p>17 right?</p> <p>18 A. There was another gentleman named Joseph</p> <p>19 Roberts also that fit that, so I can't tell you</p> <p>20 which one they were talking about.</p> <p>21 Q. Okay. Forget about him.</p> <p>22 Okay. In any event, you're aware that</p> <p>23 both of those gentlemen did ultimately get relief?</p> <p>24 A. I believe they did, correct.</p>
Page 69	<p>1 Q. During the course of your assignment?</p> <p>2 A. Yes.</p> <p>3 MR. PALLES: Page 6, please, Toby. I want</p> <p>4 to make sure that this is all very visible</p> <p>5 particularly, I guess, the paragraphs that relate</p> <p>6 to the three arrests. Let's make sure.</p> <p>7 BY MR. PALLES:</p> <p>8 Q. So do you want to take a quick look at</p> <p>9 those three paragraphs to refresh your memory?</p> <p>10 A. I would, yes.</p> <p>11 Q. All right. So in dealing with January</p> <p>12 2003, Deputy Adduci noted the lack of detail as to</p> <p>13 the surveillance tactics in the various police</p> <p>14 reports.</p> <p>15 Now, what exactly do you mean by the "lack</p> <p>16 of detail"?</p> <p>17 A. So, remember, I was trying to get COPA</p> <p>18 sort of -- as I called them, rubber duckies on the</p> <p>19 bottom of the tub to give them some grit to be able</p> <p>20 to look at these cases. So this, again, would be a</p> <p>21 suggestion where some reports had more detail and</p> <p>22 that gives you more to work with. And perhaps this</p> <p>23 report was written in a more generalized way;</p> <p>24 therefore, we don't know as much because we don't</p>

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<p style="text-align: right;">Page 70</p> <p>1 have that detail in the report.</p> <p>2 Q. At this point do you feel, at least</p> <p>3 generally, familiar with the background of that</p> <p>4 January 4th arrest? You know, there were six other</p> <p>5 co-arrestees. Do you recall that at all?</p> <p>6 A. No. These cases were all very similar. I</p> <p>7 cannot. I'm sorry.</p> <p>8 Q. Okay. All right. Let me -- Okay. Let me</p> <p>9 try it this way.</p> <p>10 According to the reports, it's alleged</p> <p>11 that officers were hiding in a vacant apartment,</p> <p>12 heard some people setting up downstairs to conduct</p> <p>13 drug business, came down and en masse arrested</p> <p>14 about five people, including Leonard Gipson, who</p> <p>15 was in the parking lot area near a car, and then</p> <p>16 the car that left with Bobby Coleman was also</p> <p>17 detained.</p> <p>18 Let me ask you this.</p> <p>19 This event seems to have been the result</p> <p>20 of a very detailed surveillance. What about those</p> <p>21 tactics suggested to you that there was a lack of</p> <p>22 detail?</p> <p>23 MR. STARR: Objection to form, foundation,</p> <p>24 assumes facts not in evidence.</p>	<p style="text-align: right;">Page 72</p> <p>1 it face west? Does it face north? Does it face</p> <p>2 south? Okay. What does the report say regarding</p> <p>3 the direction of the car? Okay. It doesn't have a</p> <p>4 lot of details here, so you're going to have to</p> <p>5 kind of like guess a little bit, but this could be</p> <p>6 something where you could challenge the officers'</p> <p>7 rendition based on actual facts. What was the</p> <p>8 setup of the Ida B. Wells? Where was apartment --</p> <p>9 I'm using 302 as an example. I don't know what</p> <p>10 apartment it was. So that's what I was talking to</p> <p>11 COPA about.</p> <p>12 Q. Gotcha.</p> <p>13 A. So if I know that the factual situation</p> <p>14 wasn't this factual situation, was this an example</p> <p>15 of the factual situation that this could fit into?</p> <p>16 Q. Okay. I think I'm starting to get it.</p> <p>17 A. Okay.</p> <p>18 Q. Would it be fair to say that from your</p> <p>19 standpoint this meeting on April 24, 2018, was for</p> <p>20 in your view to give COPA some guidance in how to</p> <p>21 analyze the underlying allegations against the</p> <p>22 officers?</p> <p>23 A. Not how they should do it. How I did it,</p> <p>24 because they were asking me for how I did it.</p>
<p style="text-align: right;">Page 71</p> <p>1 BY MR. PALLES:</p> <p>2 Q. If you recall.</p> <p>3 A. Again, I was giving them an overview. And</p> <p>4 so the way this report is written is a little bit</p> <p>5 of a mischaracterization of the conversation that I</p> <p>6 recall.</p> <p>7 Q. Okay.</p> <p>8 A. Just slightly a misunderstanding.</p> <p>9 I think I made note of this earlier, that</p> <p>10 they say things with certainty that I did not speak</p> <p>11 with. I don't think I've ever said in any factual</p> <p>12 situation strength agility. I would say that every</p> <p>13 factual situation can have, like I said earlier,</p> <p>14 the ability to voir dire regarding how this would</p> <p>15 happen. And if I recall this case, there was an</p> <p>16 observation issue regarding the car and the</p> <p>17 sightline. And I'm straining right now to remember</p> <p>18 this.</p> <p>19 Q. Okay.</p> <p>20 A. But I could have said here's things you</p> <p>21 guys could look at. I know that Ida B. Wells isn't</p> <p>22 there anymore, but what number apartment was this?</p> <p>23 You could probably get a plot of survey. They were</p> <p>24 hiding in apartment 302. Does it face east? Does</p>	<p style="text-align: right;">Page 73</p> <p>1 Q. Oh, okay.</p> <p>2 A. I was trying to be helpful. Like, again,</p> <p>3 in that same paragraph that we're talking about,</p> <p>4 there's something here that I'm sure I did say;</p> <p>5 that the fact that he had told me or he had stated</p> <p>6 that he does deal drugs made it more credible</p> <p>7 because, again, the theory was that Watts was not</p> <p>8 going to be going after people who were underemployed</p> <p>9 or unemployed. He's going to be going after</p> <p>10 people -- because his motive is fiduciary. It's</p> <p>11 for financial gain. He's going to go after people</p> <p>12 who would have money. And in that area, that would</p> <p>13 have been someone who was dealing in narcotics. So</p> <p>14 that factor would be something that, yes, he could</p> <p>15 have been a victim of Watts because that was the</p> <p>16 type of victim Watts would select. So that</p> <p>17 statement was probably made by me, but the rest of</p> <p>18 them are a little bit too, like I said, clear when</p> <p>19 I couldn't make these determinations.</p> <p>20 Q. Well, I could understand you're saying</p> <p>21 that Gipson's statement that he was a drug dealer</p> <p>22 supplies some motivation for a corrupt police</p> <p>23 officer. But on the other hand, do you really mean</p> <p>24 that his candor made it more credible to you in</p>

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Page 74	<p>1 your eyes?</p> <p>2 A. No, I don't know if I would have said</p> <p>3 that. I might have said candor is always a good</p> <p>4 thing. You know, if we could find people, you</p> <p>5 know, admitting to wrongs, that's always something</p> <p>6 good. I might have made an overgeneralization like</p> <p>7 that. I can't recall. I just know that, again,</p> <p>8 it's the certainty. I would just say you could</p> <p>9 look at it this way. You could look at it this</p> <p>10 way.</p> <p>11 MR. STARR: I would have an objection to</p> <p>12 the form of that question.</p> <p>13 BY MR. PALLES:</p> <p>14 Q. Now, you'd agree, would you not, that the</p> <p>15 vast majority of those petitioners who have gotten</p> <p>16 relief from the Watts cases did not contend that</p> <p>17 they were extorted because of their position as</p> <p>18 drugs dealers; did they?</p> <p>19 A. I don't recall any of the petitioners --</p> <p>20 their affidavits stating that they were committing</p> <p>21 that offense when this happened. The narrative is</p> <p>22 that they were doing nothing wrong.</p> <p>23 Q. Yeah. No, I understand that, but you</p> <p>24 take, for example, Ben Baker was a self-described</p>	Page 76	<p>1 worried about it, or I'm just going to open the</p> <p>2 door because I'm going to see what happens. It's</p> <p>3 something to consider. I said it could be a thing</p> <p>4 where you won't believe it because they said they</p> <p>5 didn't open the door or you will.</p> <p>6 And I think this is when I got into the --</p> <p>7 and I don't know if I used this analogy, but I do</p> <p>8 use this now. The 6s and 9s, where a 6 or 9,</p> <p>9 depending on what way you're looking at it, it</p> <p>10 could be a 6 or a 9, but an 8 is an 8 no matter</p> <p>11 which way we look at it. So this is an example of</p> <p>12 how do we weigh that they let the officers in.</p> <p>13 It's a 6 or 9. It's kind of irrelevant. It's not</p> <p>14 an 8. We don't know what's in their mind. And I</p> <p>15 think that's what I meant, which is it's not a</p> <p>16 great determination factor if someone decides to do</p> <p>17 something. It doesn't mean the officer did</p> <p>18 something wrong or the person did something right.</p> <p>19 Q. Okay. But it goes further and says you</p> <p>20 had some concern about whether the officers</p> <p>21 violated Mr. Gipson's Fourth Amendment rights.</p> <p>22 A. There's two things going on in that</p> <p>23 sentence. The first one is officers simply walked</p> <p>24 into an apartment without knocking is incredibly a</p>
Page 75	<p>1 drug dealer as well; correct?</p> <p>2 A. I can't say that I recall him saying that.</p> <p>3 I don't remember him saying that. I apologize. I</p> <p>4 don't know.</p> <p>5 I think I recall an affidavit where he</p> <p>6 said he wasn't. I remember reading that.</p> <p>7 Q. Okay. All right.</p> <p>8 So now regarding the May 8, 2003, arrest,</p> <p>9 it says here that you found it incredible that the</p> <p>10 tenant allowed the officers into the apartment.</p> <p>11 Do you know as you sit here today whether</p> <p>12 or not that was ever checked up on by you?</p> <p>13 A. So my recollection when talking about this</p> <p>14 issue, which is a lot of the reports would have</p> <p>15 that they just walked in, or the person let them</p> <p>16 in, I said something you want to consider is if a</p> <p>17 person has drugs in their home, why are they</p> <p>18 letting someone in their house?</p> <p>19 Now, it could be lots of reasons. One,</p> <p>20 they know they're going to kick down the door.</p> <p>21 They know they're going to get in more trouble</p> <p>22 later. They just want to comply and get it over</p> <p>23 with. Because they think they're not going to find</p> <p>24 it because they're like it's hidden so well and I'm</p>	Page 77	<p>1 safety issue. And I just -- I do have -- Sure,</p> <p>2 it's done. Maybe you get a little comfortable.</p> <p>3 You've worked there a lot. But that whole idea of</p> <p>4 them not knowing what they're walking into just</p> <p>5 seems reckless and something most trained officers</p> <p>6 wouldn't do.</p> <p>7 The Fourth Amendment issue is an issue for</p> <p>8 me because I do think that a lot of these cases --</p> <p>9 Again, I wasn't there. I don't know. Did they see</p> <p>10 what they saw? I don't know. Could they have just</p> <p>11 walked up on someone without probable cause in</p> <p>12 violation of the Fourth Amendment? Possibly. Does</p> <p>13 that mean they're legally innocent? Yes. Does</p> <p>14 that mean they're factually innocent? No.</p> <p>15 Q. That's the point I was looking for. We're</p> <p>16 looking again at procedural and/or constitutional</p> <p>17 flaws, but not necessarily actual innocence;</p> <p>18 correct?</p> <p>19 A. I just don't know. Right.</p> <p>20 Q. Okay. All right. Let me ask you then</p> <p>21 about the last one, the August 28, 2007. I guess</p> <p>22 the question I have is because it involved my</p> <p>23 client, it turns out Kallatt Mohammed was not</p> <p>24 present that day. He was off work.</p>

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<p style="text-align: right;">Page 78</p> <p>1 Did that at all play into your</p> <p>2 determination concerning this August 28, 2007,</p> <p>3 arrest?</p> <p>4 A. Is your question that it was only when I</p> <p>5 had the two gentlemen, Watts and Mohammed,</p> <p>6 together, that one was just without the other? Is</p> <p>7 that the question?</p> <p>8 Q. Yes. Mohammed was not there, yeah. Does</p> <p>9 that matter?</p> <p>10 A. No.</p> <p>11 MR. STARR: Objection to form.</p> <p>12 MR. PALLES: Okay. Toby, we can skip to</p> <p>13 page 7. Okay. And we're going to Paragraph 3</p> <p>14 about Jamar Lewis.</p> <p>15 BY MR. PALLES:</p> <p>16 Q. Do you recall anything in particular, or</p> <p>17 do you have any independent recollection of Jamar</p> <p>18 Lewis' petition?</p> <p>19 A. No.</p> <p>20 Q. Okay.</p> <p>21 A. No, not this. I'm trying to pull it out.</p> <p>22 It's not there.</p> <p>23 Q. As we -- Well, at the time you considered</p> <p>24 Jamar Lewis' petition, were you aware of the fact</p>	<p style="text-align: right;">Page 80</p> <p>1 had this discussion with COPA that Jamar Lewis had</p> <p>2 been the subject of a federal criminal complaint</p> <p>3 for drug possession that had been filed in April?</p> <p>4 A. I think I did know that.</p> <p>5 Q. Okay. Well, at the time, however, you had</p> <p>6 already granted Jamar Lewis' petition, right, at</p> <p>7 the time we're talking about in April 2018?</p> <p>8 A. I don't know the dates. I just know that</p> <p>9 there were definitely gentlemen that we granted</p> <p>10 relief to that later on, including Mr. Baker, that</p> <p>11 they had subsequent arrests or convictions. So</p> <p>12 that wasn't --</p> <p>13 Q. I'm sorry. I was going to ask you whether</p> <p>14 or not -- does that -- Upon reflection, does that</p> <p>15 arrest have any impact on your view of the action</p> <p>16 you took regarding Jamar Lewis?</p> <p>17 MR. STARR: Objection to form.</p> <p>18 THE WITNESS: No, it doesn't.</p> <p>19 BY MR. PALLES:</p> <p>20 Q. Okay. We're kind of going down the page a</p> <p>21 little bit. Frank Saunders.</p> <p>22 Now, one of the points that you raise</p> <p>23 about the Saunders arrest is that Saunders</p> <p>24 articulated that Watts and his team used the first</p>
<p style="text-align: right;">Page 79</p> <p>1 that he had been engaged by the FBI to approach</p> <p>2 Kallatt Mohammed?</p> <p>3 A. I remember reading about that, and I don't</p> <p>4 remember that was Mr. Lewis, but I do remember that</p> <p>5 fact situation.</p> <p>6 Q. Okay. Now, you stated that -- Well, you</p> <p>7 noted that he did not plead and he elected to have</p> <p>8 a trial. Now, is that -- how does that play? I</p> <p>9 mean, how do you evaluate that one way or another?</p> <p>10 A. You have more to deal with because you</p> <p>11 have testimony. That's it. It doesn't mean</p> <p>12 anything because you pled guilty, you are guilty,</p> <p>13 or you went to trial and you were not guilty. That</p> <p>14 means nothing. That's not an 8.</p> <p>15 But when you go to trial, I have</p> <p>16 testimony. I have evidence that I can use and</p> <p>17 evaluate against other evidence. That's why going</p> <p>18 to trial or going to motion was relevant, not</p> <p>19 because he said he didn't do it. That wasn't it.</p> <p>20 Because a lot of people plead guilty when they're</p> <p>21 innocent, and lot of people go to trial when</p> <p>22 they're guilty. So that's a 6 and a 9 to me. An 8</p> <p>23 was what did he say at trial.</p> <p>24 Q. All right. Were you aware at the time you</p>	<p style="text-align: right;">Page 81</p> <p>1 and second floor as a way to simultaneously entrap</p> <p>2 and steal from Ida B. Wells residents.</p> <p>3 Now, first of all, do you specifically</p> <p>4 recall Frank Saunders alleging that the officers</p> <p>5 had stolen money from him?</p> <p>6 A. Specifically, no, but those allegations</p> <p>7 had been made by many of the petitioners.</p> <p>8 Q. Okay. Did Saunders express that he had</p> <p>9 either witnessed or heard from others from whom the</p> <p>10 Watts group had stolen money?</p> <p>11 A. Specifically for Mr. Saunders, no, I don't</p> <p>12 recall that, but the whole "word on the street"</p> <p>13 thing, I heard of that.</p> <p>14 Q. Let's talk about the stairway for a</p> <p>15 moment.</p> <p>16 Why is it significant to you that these</p> <p>17 arrests took place in the stairway between the</p> <p>18 first and second floor?</p> <p>19 A. I was able to determine that a lot of</p> <p>20 times Sergeant Watts and Officer Mohammed would be</p> <p>21 alone together in those locations. So let's say</p> <p>22 they're part of a conspiracy. We know that they've</p> <p>23 been convicted of some type of acts, and they're</p> <p>24 acting in concert together in a criminal</p>

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Page 82	<p>1 enterprise. There would be no other officers or</p> <p>2 witnesses there, just them and the offenders. And</p> <p>3 that situation seemed and it was hard to glean</p> <p>4 again from the lack of details in the reports, but</p> <p>5 it seemed that the other officers would have been</p> <p>6 at a different level and not maybe perhaps able to</p> <p>7 see certain things that were going on. And these</p> <p>8 things would be happening very quickly. So that to</p> <p>9 me was one of the things I was looking for. Did</p> <p>10 Watts and Mohammed peel off occasionally together</p> <p>11 and they'd go off together to clear, or someone</p> <p>12 else would be downstairs, whatever, but you had a</p> <p>13 separation between the two parties that I felt were</p> <p>14 probably most likely involved in a conspiracy and</p> <p>15 the other officers that I wasn't sure whether they</p> <p>16 were or not.</p> <p>17 Q. Let me ask you this.</p> <p>18 Where were the drugs in the Ida B. Wells</p> <p>19 complex being sold from? Out in front of the</p> <p>20 street, in the lobby, or in the stairwells or in</p> <p>21 the hallways? Where?</p> <p>22 MR. STARR: Form, foundation, speculation.</p> <p>23 THE WITNESS: Just about everywhere</p> <p>24 really. But the doorways. You could see it from</p>
Page 83	<p>1 outside the building. They'd come in. They'd be</p> <p>2 in the lobby. They'd be up at the second stairs,</p> <p>3 high up. But usually it was in the first level, in</p> <p>4 that area, typically.</p> <p>5 BY MR. PALLES:</p> <p>6 Q. Okay. So the first and second floor</p> <p>7 stairwells would have been a source of drug</p> <p>8 activity?</p> <p>9 A. Yes. Imagine just that someone would come</p> <p>10 in, and you can't see because the stairs turn,</p> <p>11 right, where you're not going to be seen from afar.</p> <p>12 You've got a little privacy. So that's kind of why</p> <p>13 the stairs. And then, they'd run up to the top of</p> <p>14 the stairs. But now Watts and Mohammed are</p> <p>15 flanking, and they're at the top of the stairs, but</p> <p>16 the other team is just coming in. That's how you</p> <p>17 would have that separation between the officers.</p> <p>18 And so that's why that first and second floor --</p> <p>19 that's kind of what I meant by that. And I don't</p> <p>20 know if they clearly say it in this report, but</p> <p>21 that's not terribly inaccurate the way they state</p> <p>22 it.</p> <p>23 Q. Okay. What about this? Is this accurate?</p> <p>24 They say that Deputy Adduci theorized that</p>
Page 84	<p>1 Sergeant Watts was looking for Catrina Bonner</p> <p>2 because Ms. Bonner was a drug dealer who crossed</p> <p>3 Big Shorty in some way.</p> <p>4 A. I don't know how that came into play. I</p> <p>5 remember Ms. Bonner. She was -- she was one of the</p> <p>6 players you'd read about, you know, being involved</p> <p>7 with the drug trade in Ida B. Wells. Watts knew</p> <p>8 everybody. So he's looking for somebody because he</p> <p>9 wants to talk to her about stuff. He wants to ask</p> <p>10 her about stuff. I don't remember the facts of the</p> <p>11 case. But it wouldn't have been a crazy theory</p> <p>12 that he might have been looking for her.</p> <p>13 Q. Okay. What about that she crossed</p> <p>14 Big Shorty? Where did that come from?</p> <p>15 A. I might have gotten that from the 302s.</p> <p>16 But I don't think I had the 302s yet when I saw</p> <p>17 this, so I don't know where I got that.</p> <p>18 Q. And do you recall the source for Catrina</p> <p>19 Bonner being a well-established drug dealer?</p> <p>20 A. That's just something I came across the</p> <p>21 more and more I read about her, the more cases, the</p> <p>22 more I read about it in the 302s, et cetera,</p> <p>23 et cetera.</p> <p>24 Q. Okay.</p>
Page 85	<p>1 A. Because we're talking to the other officers.</p> <p>2 When I did the other officers' interview, they knew</p> <p>3 her.</p> <p>4 Q. Okay. And so these police officers are</p> <p>5 looking for Catrina Bonner. They asked Frank</p> <p>6 Saunders to turn her over. He says -- So that's</p> <p>7 why they decide to plant a substantial amount of</p> <p>8 drugs on him and arrest him.</p> <p>9 A. I think that was the theory of the</p> <p>10 petitioner, correct.</p> <p>11 Q. And a theory that you found credible?</p> <p>12 A. Not necessarily.</p> <p>13 Q. Okay. Now, let's go to page 8.</p> <p>14 I'm talking about this paragraph now that</p> <p>15 says investigators asked Deputy Adduci the various</p> <p>16 steps. And it says here Deputy Adduci indicated</p> <p>17 that she did not conduct any interviews of</p> <p>18 officers, petitioners, or witnesses in undertaking</p> <p>19 her review. Deputy Adduci did not interview or</p> <p>20 attempt to interview the assistant state's</p> <p>21 attorneys or defense counsel involved in the</p> <p>22 underlying criminal litigation. Deputy Adduci did</p> <p>23 not receive any facts or information from the</p> <p>24 petitioners' attorneys beyond what was contained in</p>

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<p style="text-align: right;">Page 86</p> <p>1 the court filings. And Deputy Adduci did not</p> <p>2 review the motion or trial exhibits in the Leonard</p> <p>3 Gipson motion hearing and the Jamar Lewis bench</p> <p>4 trial.</p> <p>5 All true?</p> <p>6 A. I believe so. The only thing is I thought</p> <p>7 I looked at the trial exhibits in the Leonard</p> <p>8 Gipson case if we had them, but maybe it was a</p> <p>9 different case.</p> <p>10 Q. Okay.</p> <p>11 A. That's substantially true, correct.</p> <p>12 Everything there is substantially true.</p> <p>13 Q. Okay.</p> <p>14 MR. PALLES: You can take that down.</p> <p>15 I'm sorry. Let's go to page 29. Page 29</p> <p>16 deals with petitioner Lionel White, Sr.</p> <p>17 BY MR. PALLES:</p> <p>18 Q. Now, obviously, if you read it, you</p> <p>19 indicated that you really weren't involved in</p> <p>20 Lionel White's petition. It preceded you;</p> <p>21 correct?</p> <p>22 A. Correct.</p> <p>23 Q. Okay. Now, that was made by Fabio</p> <p>24 Valenti. We haven't really discussed him today,</p>	<p style="text-align: right;">Page 88</p> <p>1 evaluated by Fabio and Joe, and the decisions to</p> <p>2 grant relief were done by them. And those were the</p> <p>3 initial cases under the Watts. That's my</p> <p>4 understanding. Those were the first ones.</p> <p>5 Q. Okay. What about Celeste Stack?</p> <p>6 A. What about her?</p> <p>7 Q. What about her? She was the head of CIU,</p> <p>8 was she not?</p> <p>9 A. No. Well, okay. She was the head of</p> <p>10 special lit. She was the head of PC. So when CIU</p> <p>11 first started in 2012, when I wasn't there, it was</p> <p>12 sort of part of that unit. And then what we</p> <p>13 realized is -- because it was new. CIU was really</p> <p>14 new conceptually in the criminal justice system.</p> <p>15 It was something new. Just a couple jurisdictions</p> <p>16 were doing it. And so it was sort of figuring out</p> <p>17 how it was going to fit into the state's attorney's</p> <p>18 office, and they fit it in with post-conviction.</p> <p>19 And then they decided that it should sort of be</p> <p>20 separated. And then when I got on, they separated</p> <p>21 it even more. So that's why you had -- Fabio was</p> <p>22 also Celeste's boss, too. So he would have been</p> <p>23 over everybody, but instead of having to go</p> <p>24 through -- because Jim Papa was the first CIU</p>
<p style="text-align: right;">Page 87</p> <p>1 but what was his position?</p> <p>2 A. He was the chief of criminal.</p> <p>3 Q. Okay. And what was Joe Magats' position?</p> <p>4 Is that how you pronounce it?</p> <p>5 A. It's Magats.</p> <p>6 Q. Magats. Okay.</p> <p>7 A. He was the deputy chief of criminal.</p> <p>8 Q. Okay. How was it that they came to be</p> <p>9 involved in the Lionel White petition?</p> <p>10 A. So prior to -- so in the Anita Alvarez</p> <p>11 administration, CIU originally was part of special</p> <p>12 litigation and reported to the post-conviction</p> <p>13 hearing supervisor. But then that changed a little</p> <p>14 bit, and the direct report became Fabio Valenti and</p> <p>15 Joe Magats. So even though I still was under the</p> <p>16 post-conviction woodwork as a supervisor, I was --</p> <p>17 there was a shift when we were separated from</p> <p>18 post-conviction. So I reported to Fabio.</p> <p>19 My understanding is that there were three</p> <p>20 cases brought to Fabio's attention. I believe it</p> <p>21 was by Josh Tepfer, although I'm not 100 percent</p> <p>22 sure, but it was by a defense attorney, and it was</p> <p>23 three cases. It was Ben Baker, Clarissa Glenn, and</p> <p>24 Lionel White, Sr. And those cases were then</p>	<p style="text-align: right;">Page 89</p> <p>1 supervisor. Instead of going Jim to Celeste to</p> <p>2 Fabio, at some point it changed from Jim just to</p> <p>3 Fabio and Joe. And I don't know when that happened</p> <p>4 or how it worked in the beginning. I wasn't there.</p> <p>5 Q. Have you -- Okay. So now it says here</p> <p>6 that you don't -- Well, you don't believe a CIU</p> <p>7 file exists for Lionel White.</p> <p>8 Do you know why not?</p> <p>9 A. Lionel White, Sr.?</p> <p>10 Q. Yeah, Sr.</p> <p>11 A. Yeah. Because I didn't review it, and I</p> <p>12 didn't create one.</p> <p>13 Q. Okay. And Valenti nor Magats did?</p> <p>14 A. They gave me whatever they had, which was</p> <p>15 part of the special master file, that I made into a</p> <p>16 working background material file for the Watts</p> <p>17 review.</p> <p>18 Q. Okay. By the way, did you ever review a</p> <p>19 memo that Celeste Stack wrote about Ben Baker's</p> <p>20 March of 2005 arrest?</p> <p>21 A. I'm sorry. If I did, I don't recall.</p> <p>22 Q. Was -- is it your understanding that</p> <p>23 Valenti's process in reviewing Lionel White, Sr.,</p> <p>24 was somewhat more informal than yours at CIU?</p>

26 (Pages 86 to 89)

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<p style="text-align: right;">Page 90</p> <p>1 A. Oh, I don't think I can characterize it</p> <p>2 that way only because Fabio tends to be very</p> <p>3 thorough. I don't think it was formalized in the</p> <p>4 sense of a pattern being created, but I just don't</p> <p>5 know. I wasn't part of it, so I really -- I can't</p> <p>6 really testify to that.</p> <p>7 Q. Okay. Page 21, please.</p> <p>8 This deals with William Carter. Do you</p> <p>9 remember him at all?</p> <p>10 A. No.</p> <p>11 Q. Okay. Now, he had three -- he was a Joel</p> <p>12 Flaxman client. He had three convictions</p> <p>13 overturned.</p> <p>14 In the third paragraph, it says here there</p> <p>15 was a memo by Nancy Adduci, the CCSAO leadership,</p> <p>16 summarizing some specifics of the case, including</p> <p>17 the 2-1401 filing by Joel Flaxman, procedural</p> <p>18 history of the case, et cetera, et cetera.</p> <p>19 My question is did you share that</p> <p>20 memorandum -- I'm sorry. Did you share that</p> <p>21 memorandum with COPA?</p> <p>22 A. I don't know. I just don't remember. Is</p> <p>23 this the case where he went to buy an Italian beef?</p> <p>24 Q. He went to buy an Italian beef? Gee, I</p>	<p style="text-align: right;">Page 92</p> <p>1 A. Well, it was an abbreviation because there</p> <p>2 was a do-not-call list. And so we used to call</p> <p>3 them DD. And it was just -- it was designated desk</p> <p>4 duty. It just became DD, and then someone said</p> <p>5 that means dirty dozen, and I think it stuck. But</p> <p>6 yeah, unfortunately, I used that phrase.</p> <p>7 Q. All right. Okay. So I mean, that dirty</p> <p>8 dozen, I guess, that includes, obviously, others</p> <p>9 than Watts and Mohammed?</p> <p>10 A. Correct. No. It was anyone that ended up</p> <p>11 on desk duty. That's how it started. The DD</p> <p>12 started with that, and then DD went from desk duty</p> <p>13 to dirty dozen somehow.</p> <p>14 Q. Okay. So have you -- Just so I'm clear,</p> <p>15 have you made any conclusions that these</p> <p>16 officers -- and I'm talking about officers like</p> <p>17 Brian Bolton, Robert Gonzalez, Lamonica Lewis, Al</p> <p>18 Smith, Alvin Jones. Have you made a determination</p> <p>19 that those officers are dirty?</p> <p>20 A. I have not.</p> <p>21 MR. STARR: Objection, form.</p> <p>22 THE WITNESS: Was there an objection? I'm</p> <p>23 sorry.</p> <p>24 MR. STARR: Yeah. I made an objection to</p>
<p style="text-align: right;">Page 91</p> <p>1 don't remember.</p> <p>2 Bill Bazarek, please.</p> <p>3 A. Because here's the thing. I think if it's</p> <p>4 this case, he went to buy -- like, she made beef,</p> <p>5 and then he went to go get it. He came back down.</p> <p>6 And I think there was a 2-1401 pending. Because I</p> <p>7 typically didn't write memos, except if I had to</p> <p>8 let another ASA know what was going on. So that</p> <p>9 would have been an internal document. So I don't</p> <p>10 think we shared a lot of those internal documents</p> <p>11 with COPA, but I don't remember.</p> <p>12 MR. BAZAREK: Yes. One of his arrests I</p> <p>13 can add was the Italian beef occurrence that</p> <p>14 Mr. Carter claimed.</p> <p>15 MR. PALLES: The Italian beef caper.</p> <p>16 BY MR. PALLES:</p> <p>17 Q. Okay. On page 22, at the very end, you</p> <p>18 say that the arrests almost exclusively happened in</p> <p>19 Ida B. Wells and involved the same "dirty dozen"</p> <p>20 officers.</p> <p>21 Is that your phrase?</p> <p>22 A. Yeah, it was. Sorry.</p> <p>23 Q. And you're literally talking about a dozen</p> <p>24 of them?</p>	<p style="text-align: right;">Page 93</p> <p>1 the form of the question.</p> <p>2 THE WITNESS: Okay. No. I don't have any</p> <p>3 evidence to support that. Again, it was just a</p> <p>4 little bit of a liberation, a little bit of gallows</p> <p>5 humor, perhaps. But no, it was not based on any</p> <p>6 findings. It was just an easy way to characterize</p> <p>7 it because if you recall, from looking at some of</p> <p>8 these other reports, we were talking about other</p> <p>9 officers, so it would be a non-DD officer, right,</p> <p>10 would be -- so that's how that came up. So that's</p> <p>11 an officer, perhaps, if we wanted to call them, we</p> <p>12 could. So that's how that came up.</p> <p>13 BY MR. PALLES:</p> <p>14 Q. All right. We're going to go on to</p> <p>15 page 24, which is an April 26, 2018, meeting with</p> <p>16 COPA and yourself.</p> <p>17 And you guys dealt with nine cases at the</p> <p>18 time, or at least they've indicated that they've</p> <p>19 discussed these nine arrests with you.</p> <p>20 I'm skipping to the paragraph after the</p> <p>21 numbers, you know, the first real paragraph.</p> <p>22 A. The pattern.</p> <p>23 Q. I beg your pardon?</p> <p>24 A. It's the pattern.</p>

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Page 94	<p>1 Q. Yeah. The pattern, yeah. Let's talk</p> <p>2 about that.</p> <p>3 Well, I think we've been over this before.</p> <p>4 I just want to confirm that this is an accurate</p> <p>5 statement of the six criteria that you were using</p> <p>6 to judge these cases.</p> <p>7 A. It's missing some details, and it has --</p> <p>8 Like I said, none of these -- these are</p> <p>9 generalizations, right? So, obviously, the cases</p> <p>10 typically involved narcotics in excess of 5.</p> <p>11 Obviously, something less than 5 could still fit.</p> <p>12 The one thing that's missing on B is that</p> <p>13 I was specifically looking for 715 or 264 officers</p> <p>14 as far as beat goes. So it wasn't just the</p> <p>15 Ida B. Wells complex. It was that specific beat or</p> <p>16 that specific team. So that's missing from B.</p> <p>17 D isn't really a factor at all. It's just</p> <p>18 that's how they tended to go down, so that's just</p> <p>19 something we thought. Again, I think D is just to</p> <p>20 distinguish it. I think I said that's to distinguish</p> <p>21 it from missions or old-school narcotics surveillance</p> <p>22 where they're, you know, setting up shop or a buy</p> <p>23 bust or undercover. Perhaps, that's that</p> <p>24 distinction. It's not really a factor. It's just</p>	Page 96	<p>1 complaint, you know, by his client that he was</p> <p>2 framed?</p> <p>3 MR. STARR: Objection, form, foundation,</p> <p>4 assumes facts not in evidence.</p> <p>5 THE WITNESS: So here's the thing with</p> <p>6 this. I don't remember the facts of this case, but</p> <p>7 could it be as simple as a question that the public</p> <p>8 defender might ask during a prelim? That would</p> <p>9 have been enough for me to say, okay, he told his</p> <p>10 lawyer something. I don't remember the facts of</p> <p>11 this case. So it's not like I had someone say, oh,</p> <p>12 gosh, he told me that, and, look, I wrote it in</p> <p>13 stone. If it was just a simple question, like, it</p> <p>14 fit, that would be indicative of that, perhaps, he</p> <p>15 did tell his attorney this and that there is</p> <p>16 possibly some truth to that point.</p> <p>17 BY MR. PALLES:</p> <p>18 Q. Okay. In any event, Shaun James was</p> <p>19 granted relief; correct?</p> <p>20 A. I believe he was, correct.</p> <p>21 Q. Yeah. And then if we go to the next one,</p> <p>22 Taurus Smith, he also claims to have made a</p> <p>23 contemporaneous outcry, but, in fact, your</p> <p>24 investigation couldn't corroborate that he actually</p>
Page 95	<p>1 not those other things. And, again, D would be</p> <p>2 more specific to 715 or 264.</p> <p>3 Outcry would be an important corroborating</p> <p>4 factor, and then that Watts was -- Watts being</p> <p>5 there or being involved was important as well.</p> <p>6 Q. Okay. Well, we go down a little bit to</p> <p>7 talk about Shaun James here.</p> <p>8 A. You just scrolled past it.</p> <p>9 MR. PALLES: Can you scroll down a little</p> <p>10 bit?</p> <p>11 THE WITNESS: There it is right there</p> <p>12 (indicating).</p> <p>13 BY MR. PALLES:</p> <p>14 Q. So the statement at the end is finally</p> <p>15 there was a contemporaneous outcry by the</p> <p>16 defendant. In his affidavit, he complained to the</p> <p>17 public defender attorney that he'd been framed by</p> <p>18 Watts.</p> <p>19 Now, I think I know the answer to this</p> <p>20 question. Did you ever talk to Shaun James' public</p> <p>21 defender?</p> <p>22 A. I don't know.</p> <p>23 Q. That's a pretty serious allegation, isn't</p> <p>24 it, that, you know, a public defender ignored a</p>	Page 97	<p>1 did make a contemporaneous outcry; correct?</p> <p>2 A. Just from what you said, my answer would</p> <p>3 be that's not accurate. Because, again, if I read</p> <p>4 an OPS report, and his mom says my son came home</p> <p>5 and said this guy put drugs on him because he</p> <p>6 wouldn't pay protection, or he put drugs on him</p> <p>7 because he was the fourth guy in line, and he was</p> <p>8 just in line, and they had four bags, or whatever</p> <p>9 it was --</p> <p>10 Q. Yeah.</p> <p>11 A. -- that's enough to read in that report.</p> <p>12 That's enough.</p> <p>13 Q. Yeah. And I think -- I don't know whether</p> <p>14 or not it's intentional or not, but that seems very</p> <p>15 reminiscent of the Alvin Waddy case that he</p> <p>16 testified about, if you recall.</p> <p>17 But let me ask you this.</p> <p>18 You say here it should be noted that</p> <p>19 efforts to locate this complainant proved negative.</p> <p>20 So, in fact, if he made an OPS complaint,</p> <p>21 you would find it; correct?</p> <p>22 MR. STARR: Objection to form.</p> <p>23 THE WITNESS: I don't understand your</p> <p>24 question. Are you talking about -- I don't know.</p>

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Page 98	<p>1 Okay. Let me just say what I don't know.</p> <p>2 I don't know what that means. I didn't</p> <p>3 write this report. If the complaint -- they</p> <p>4 couldn't find the complainant back then when they</p> <p>5 tried to sustain it or deem it unfounded, or that I</p> <p>6 couldn't find him. I don't know what that means,</p> <p>7 that little parentheses. Was that me?</p> <p>8 BY MR. PALLES:</p> <p>9 Q. You know, that is an excellent point.</p> <p>10 It's a little unclear whether or not they couldn't</p> <p>11 find it or you couldn't find it.</p> <p>12 So let me go on.</p> <p>13 A. Yeah.</p> <p>14 Q. Let's talk about the Phillip Thomas case.</p> <p>15 The Phillip Thomas case, according to</p> <p>16 this, is that he's trying to hide drugs in a hole</p> <p>17 in the doorway. It was apparently too small.</p> <p>18 Now, one concern was the amount of drugs</p> <p>19 seized, which was 15.2 grams of heroin and 1.5</p> <p>20 grams of cocaine.</p> <p>21 Have you ever heard in the drug trade what</p> <p>22 they call "cleanup"?</p> <p>23 A. Yes.</p> <p>24 Q. And in general, do you have an</p>	Page 100	<p>1 the defendant's argument at trial. The jury didn't</p> <p>2 buy it. But that was a way to test the officer's</p> <p>3 credibility. How big is the hole?</p> <p>4 MR. PALLES: Okay. Toby, can you find us</p> <p>5 Phillip Thomas' vice case report? It's Exhibit 17.</p> <p>6 Let's go to page 2 for a minute.</p> <p>7 (Exhibit 17 referenced for</p> <p>8 identification.)</p> <p>9 BY MR. PALLES:</p> <p>10 Q. You know what? I'm not going to find it</p> <p>11 here. Let me ask you.</p> <p>12 Do you have any idea what the retail</p> <p>13 price -- or what the value of that 15.2 grams of</p> <p>14 heroin would have been?</p> <p>15 A. No.</p> <p>16 Q. Neither do I. However, there were 100</p> <p>17 bags.</p> <p>18 A. Well, the estimated value was \$1080.</p> <p>19 Q. Oh, I'm sorry. I missed that. \$1080.</p> <p>20 A. Correct. It said -- it's Box 31.</p> <p>21 Q. Yeah. Okay. That's what I was looking</p> <p>22 for. Thanks for helping me, Nancy.</p> <p>23 So I guess the question is, again, it's</p> <p>24 your belief that Watts and his people might have</p>
Page 99	<p>1 understanding what the duty of the cleanup guy is?</p> <p>2 A. Yes.</p> <p>3 Q. What is it?</p> <p>4 A. When they yell "clean up," it means they</p> <p>5 need to hide the drugs.</p> <p>6 Q. Okay. And when you say "the drugs,"</p> <p>7 would one individual collect drugs from all those</p> <p>8 who were distributing at the time?</p> <p>9 MR. STARR: Objection, form, foundation.</p> <p>10 Go ahead.</p> <p>11 THE WITNESS: I don't -- I can't testify</p> <p>12 to that because I don't know how it works in the</p> <p>13 sense of does the other one hand somebody</p> <p>14 something. But I know that that could be an</p> <p>15 absolute possibility because they put it in a bag,</p> <p>16 and they put a magnet in the bag, and they throw it</p> <p>17 down the shoot so it sticks, so, you know.</p> <p>18 But remember, what you're reading about</p> <p>19 Phillip Thomas is what they're saying. This is</p> <p>20 what they're saying about this. This is their</p> <p>21 analysis of it, not necessarily mine. Because I</p> <p>22 remember there was a picture of the hole. And I</p> <p>23 don't know how many baggies -- it's not that big.</p> <p>24 I don't think I came to that conclusion. That was</p>	Page 101	<p>1 been motivated to lay \$1100 worth of drugs on</p> <p>2 Thomas for what purpose? What motivation would</p> <p>3 they have to drop \$1100 worth of drugs on him?</p> <p>4 A. I don't think I understand the question.</p> <p>5 MR. PALLES: I'm not going to -- I'll drop</p> <p>6 it.</p> <p>7 Let's go back to where we might have been</p> <p>8 on that last page, No. 1, I guess. Exhibit 1.</p> <p>9 Everybody still good?</p> <p>10 All right. I'm going to need to get some</p> <p>11 water in a minute.</p> <p>12 BY MR. PALLES:</p> <p>13 Q. Let's talk about Alvin Jackson for a</p> <p>14 minute.</p> <p>15 Now, you say the case met some of the</p> <p>16 criteria. So you gave me all of the criteria that</p> <p>17 we've been talking about; correct?</p> <p>18 A. Correct.</p> <p>19 Q. Okay. And as you've said, you looked at</p> <p>20 it more holistically, so you didn't have to meet</p> <p>21 all six criteria; correct?</p> <p>22 A. Yes.</p> <p>23 Q. On the other hand, it says here that CCSAO</p> <p>24 considered the fact that a police informant, who</p>

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Page 102	<p>1 remained unidentified throughout the investigation,</p> <p>2 and who provided key evidence leading to Jackson's</p> <p>3 arrest was highly suspect.</p> <p>4 Okay. Do you know what we're talking</p> <p>5 about here?</p> <p>6 A. Well, I think this is another example of</p> <p>7 trying to show when you don't have a full set of</p> <p>8 evidence, that you can't jump to conclusions.</p> <p>9 And so I don't know who this person was,</p> <p>10 so I can't interview them, and I cannot assess</p> <p>11 their credibility. Just like when you see a</p> <p>12 concerned citizen saying that drug dealing is going</p> <p>13 on. There's no doubt in my mind that the great</p> <p>14 people who lived in Ida B. Wells would complain</p> <p>15 about the drug dealing. But since there's no</p> <p>16 contact card, I can't go and interview that person</p> <p>17 and say, Do you remember doing this? Do you</p> <p>18 remember this? Do you remember that? So this is</p> <p>19 when you take these things as suspect not because</p> <p>20 they're inherently suspect in and of themselves,</p> <p>21 but because I cannot look into them and corroborate</p> <p>22 them in any way, shape, or form because I don't</p> <p>23 know who it is. So this becomes a 6 or a 9. It</p> <p>24 doesn't mean anything. It's not an 8. I don't</p>	Page 104	<p>1 BY MR. PALLES:</p> <p>2 Q. Okay. And those motives are probably</p> <p>3 largely irrelevant ultimately to whether or not</p> <p>4 there was probable cause for an arrest or whether</p> <p>5 or not there was an actual crime committed; right?</p> <p>6 MR. STARR: Form.</p> <p>7 THE WITNESS: That's a difficult question</p> <p>8 to answer without speculating. So I think the</p> <p>9 hypothetical is that someone can say something that</p> <p>10 maybe isn't true, but then they think it's not</p> <p>11 true, but it turns out to be true. So is there a</p> <p>12 motive for what they do relevant to the facts?</p> <p>13 So, yes. It all goes down to what the evidence is</p> <p>14 and what the facts are. I can't tell you what was</p> <p>15 in somebody's head.</p> <p>16 BY MR. PALLES:</p> <p>17 Q. Now, Jackson in his affidavit stated that</p> <p>18 Watts had told him that a person named Shock, a</p> <p>19 rival drug dealer, paid Watts to arrest him.</p> <p>20 Now -- so does that not corroborate</p> <p>21 perhaps that somebody provided information to Watts</p> <p>22 about Jackson's drug dealing?</p> <p>23 A. It could.</p> <p>24 MR. STARR: Form and foundation, speculation.</p>
Page 103	<p>1 know who this person was. And so I have problems.</p> <p>2 This means, like, who is this person? I don't know</p> <p>3 who this person is, so I can't interview them. I</p> <p>4 can't interview them. So that's what becomes</p> <p>5 suspect is I'm missing the pieces, and the missing</p> <p>6 pieces become missing pieces of the puzzle.</p> <p>7 Q. I'm sorry. In addition to the good</p> <p>8 citizens of Ida B. Wells, there might very well be</p> <p>9 rival drug dealers who are passing along</p> <p>10 information to bring down their competitors; isn't</p> <p>11 that true?</p> <p>12 A. I think that's speculative. I think that</p> <p>13 would be very dangerous for someone to do, but I</p> <p>14 don't know. But that's speculative. I can't say</p> <p>15 yes or no to that. Is it out of the realm of</p> <p>16 possibility? Probably not. I don't know.</p> <p>17 Q. Okay. I guess what I'm saying is people</p> <p>18 who provide information to police officers may or</p> <p>19 may not have the purest of motives to do so; am I</p> <p>20 correct?</p> <p>21 MR. BATTLE: Objection, incomplete</p> <p>22 hypothetical, calls for speculation.</p> <p>23 THE WITNESS: People have all kinds of</p> <p>24 motives.</p>	Page 105	<p>1 BY MR. PALLES:</p> <p>2 Q. Okay. Now, Jackson also claimed that</p> <p>3 police officers took \$948 from him.</p> <p>4 Do you recall that allegation?</p> <p>5 A. Specifically that number no, but in</p> <p>6 general, the allegation of monies being taken, yes.</p> <p>7 I do recall the petitioners did make those</p> <p>8 allegations.</p> <p>9 Q. All right. And if I were to represent to</p> <p>10 you that \$948 was inventoried that day as drug</p> <p>11 proceeds, would that cause you to reevaluate the</p> <p>12 claim as to whether or not the officers took</p> <p>13 Jackson's money?</p> <p>14 MR. STARR: Objection to form, foundation.</p> <p>15 THE WITNESS: I would need more facts to</p> <p>16 say, but the fact that they inventoried some monies</p> <p>17 and took others, if you will, skimmed, I would</p> <p>18 never know that. So it doesn't really add that</p> <p>19 much.</p> <p>20 BY MR. PALLES:</p> <p>21 Q. Well, but he doesn't allege that they</p> <p>22 skimmed. He says that they took \$948 from him, and</p> <p>23 \$948 was inventoried.</p> <p>24 A. You're assuming they have twice the</p>

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Page 106	<p>1 amount.</p> <p>2 Q. Oh, okay. All right.</p> <p>3 A. So again, that factor doesn't give me one</p> <p>4 way or the other.</p> <p>5 Q. Okay. What about Robert Forney?</p> <p>6 Robert Forney was busted with --</p> <p>7 A. Go back a little bit. Right there</p> <p>8 (indicating).</p> <p>9 Q. There we go.</p> <p>10 Robert Forney was busted for 15.4 grams</p> <p>11 of MDA -- MDMA, ecstasy.</p> <p>12 A. Yeah.</p> <p>13 Q. Now, what do you make of that? What about</p> <p>14 that suggests that these drugs were illegally</p> <p>15 planted?</p> <p>16 A. Nothing. I'm sure I probably just</p> <p>17 remarked that, wow, you don't see that every day.</p> <p>18 You didn't see that every day in that time</p> <p>19 frame. It was coke. It was marijuana. It was</p> <p>20 crack. It was heroin. So I probably made a</p> <p>21 comment you don't see that every day because I --</p> <p>22 the scenario now, the fact that there's ecstasy</p> <p>23 mixed in means nothing. But I could have made a</p> <p>24 comment. I could have said, wow, that's different.</p>	Page 108	<p>1 trying to get some type of corroboration, but</p> <p>2 corroboration wasn't somehow relevant still in</p> <p>3 2018.</p> <p>4 Q. Okay. And, again, this one focuses again</p> <p>5 on the fact that there's a concerned -- an</p> <p>6 unidentified concerned citizen.</p> <p>7 (Internet interruption.)</p> <p>8 THE COURT REPORTER: Okay. We're going to</p> <p>9 go off the record.</p> <p>10 THE VIDEOGRAPHER: We're going off the</p> <p>11 record. The time is --</p> <p>12 (Recess taken.)</p> <p>13 THE VIDEOGRAPHER: We are going back on</p> <p>14 record. The time is 3:37 p.m.</p> <p>15 BY MR. PALLES:</p> <p>16 Q. Okay. I would like to turn to Exhibit 1,</p> <p>17 pages 15 to 16. We're going to talk a little bit</p> <p>18 about Andre McNairy, if you remember his case at</p> <p>19 all, ma'am.</p> <p>20 A. No.</p> <p>21 MR. PALLES: Okay. You know what?</p> <p>22 Again, this case -- let's stop here. It</p> <p>23 says September 15, 2008. \$4700 worth of heroin.</p> <p>24 Can you keep rolling down? Move it up so she can</p>
Page 107	<p>1 That's something weird. Wow, that's weird. I</p> <p>2 don't know.</p> <p>3 Q. But you don't see allegations that the</p> <p>4 Watts team planted MDMA on anybody; do you?</p> <p>5 MR. STARR: Objection, form, foundation,</p> <p>6 mischaracterizes facts in evidence.</p> <p>7 THE WITNESS: It was just kind of general</p> <p>8 as far as the drugs I had were mine, whatever those</p> <p>9 drugs were. It's the tenor of the allegations by</p> <p>10 the petitioners. But the fact that one of the</p> <p>11 drugs was ecstasy was probably only remarkable</p> <p>12 because that's not something you saw every day.</p> <p>13 That's all that means to me now looking at this.</p> <p>14 MR. PALLES: Okay. Let's move down to</p> <p>15 page 26, if you don't mind. Angelo Shenault,</p> <p>16 No. 1089184.</p> <p>17 BY MR. PALLES:</p> <p>18 Q. Now, it's stated here that this case met</p> <p>19 some of the criteria, but not all.</p> <p>20 Again, at the time you're reversing these</p> <p>21 convictions, you've already gotten to the point</p> <p>22 where you've decided you don't need to meet all of</p> <p>23 the criteria to reverse a conviction; correct?</p> <p>24 A. I can't state at this time if I wasn't</p>	Page 109	<p>1 read the narrative. You know, the rest that</p> <p>2 follows is mostly nothing here. Keep going.</p> <p>3 BY MR. PALLES:</p> <p>4 Q. Okay. So now, this case, of course, has</p> <p>5 certain features that are, you know, that are</p> <p>6 included and some that are not. For example, it</p> <p>7 doesn't take place at Ida B. Wells; right?</p> <p>8 A. (No audible response.)</p> <p>9 Q. And -- did you answer yes?</p> <p>10 A. It does not, correct. I did not answer</p> <p>11 out loud. I'm sorry.</p> <p>12 Q. Yeah, yeah, yeah.</p> <p>13 By the way, you need to get me that back</p> <p>14 setup that you have.</p> <p>15 A. It's the Daley Center.</p> <p>16 Q. Yeah. Because, you know, I like it. It</p> <p>17 reminds me of a scene from that Jason Bateman.</p> <p>18 Ozark. Anyway...</p> <p>19 Okay. So you talk here about a pattern in</p> <p>20 which Watts asks McNairy on a previous occasion to</p> <p>21 provide him with some drug information. He</p> <p>22 doesn't, so Watts then decides to arrest McNairy</p> <p>23 and lay \$4000 worth of drugs on him. You call this</p> <p>24 a pattern.</p>

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<p style="text-align: right;">Page 110</p> <p>1 Do you recall any other cases that were 2 similar to this in which you granted relief? 3 A. I don't think I understand the question 4 because there are similarities that I've seen in 5 this. So -- 6 Q. I'm talking specifically about the fact 7 that Watts is asking for information on drug 8 dealers, and when he doesn't get it, he decides to 9 falsely arrest somebody. 10 A. And the question is have I seen that 11 before? 12 Q. Yeah. 13 A. If I recall, I did see that allegation 14 made before. 15 Q. Do you recall in any particular case? 16 A. No. 17 Q. Okay. 18 A. But I'm not saying it was a case that 19 necessarily -- I just don't remember. I mean, but 20 it's not the first -- I mean, it's definitely 21 something I've read about that there were 22 allegations against him. 23 Q. Okay. Now, in this particular case, there 24 were a number of co-arrestees, and all the</p>	<p style="text-align: right;">Page 112</p> <p>1 Q. And I take it that you did not consider 2 those two other drug crimes to be evidence of 3 Mr. McNairy's propensity to engage in drug 4 transactions; am I right? 5 A. You're correct. 6 Q. Okay. On the other hand, am I correct 7 that the convictions of Kallatt Mohammed and Ronald 8 Watts created in your mind a propensity inference 9 that they may have falsely -- being involved in the 10 false arrests of, what, some 200 individuals? 11 A. That's incorrect. 12 Q. Okay. And why is that incorrect? 13 A. Because the fact that they had a 14 conviction went to their credibility. It didn't 15 mean they did or didn't do anything. It just meant 16 what do I believe from them because they violated 17 their oath of office. And if they violated their 18 oath of office, what else did they violate? It 19 created a question. I didn't believe one thing 20 over another. It created a question. 21 MR. PALLES: Okay. Excellent. All right. 22 Page 17 of Exhibit 1. We're talking about the 23 Henry Thomas arrest, and perhaps this is not the 24 correct page. Go back one page.</p>
<p style="text-align: right;">Page 111</p> <p>1 co-arrestees were picked up for trespass. None of 2 them were accused of possessing any drugs other 3 than McNairy. 4 How did you factor those circumstances 5 into your ultimate deliberation? 6 MR. STARR: Objection to form. 7 THE WITNESS: The fact that other people 8 were arrested at the same time? 9 BY MR. PALLES: 10 Q. Yes, but not charged with drug offenses. 11 A. I think it's irrelevant. 12 Q. Okay. 13 A. I mean, just because they didn't have -- I 14 think I see what you're saying. Okay. Now I get 15 it now. It took me a second. 16 Okay. No. It wouldn't have factored in 17 in this situation, that fact, no. 18 Q. Okay. You also state that Mr. McNairy was 19 already serving two consecutive sentences at the 20 time of his trial. 21 What was the significance of that in your 22 review? 23 A. Why doesn't he plead concurrently to all 24 three and get a package deal?</p>	<p style="text-align: right;">Page 113</p> <p>1 BY MR. PALLES: 2 Q. I'm just going to ask you. 3 There's a Henry Thomas conviction where 4 there were two officers who were involved in the 5 case. They're not regular parts of the Watts 6 tactical team, Officers Heard and Atkins, correct. 7 Now, at one point as I recall during your 8 discussions with COPA and Mark Rotert, there was at 9 least a suggestion that the presence of outlying 10 officers would cut against an evaluation that the 11 arrest was illegitimate; am I correct? 12 A. Correct. 13 Q. Okay. 14 A. Well, I'd have to look at the facts of the 15 case more specifically. Absolutely, normally I 16 would, but it depends on what their ability to 17 observe was. What they did. Were they on 18 inventory sheets? Were they there? Did they come 19 on the scene later on? Did they just do -- were 20 they a transport car? So it would be a factual 21 basis analysis. So I can't tell you that just 22 their presence alone on the police reports would be 23 altering. It could be, though. 24 Q. Okay. Let me -- actually, I meant to ask</p>

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<p style="text-align: right;">Page 114</p> <p>1 you a question a few minutes ago about these 2 concerned citizen reports that you find, I guess, 3 uncomfortably vague. 4 Do you -- have you in your experience 5 observed police reports where the police officers 6 identify their confidential informant? 7 A. So, first of all, you're talking about a 8 couple different things. And I just want to make 9 it clear. I'm not uncomfortable with this. It's 10 just a fact. I don't know who this concerned 11 citizen was. And you're right, CIs are different 12 than concerned citizens. 13 But they're usually kept anonymous. It 14 would have been nice if they had something I could 15 reference to for future purposes, but nobody was 16 thinking this back then, a contact card or 17 something. But people want to be anonymous. I 18 understand that. 19 CIs are a different story, a totally 20 different story legally than just someone just 21 flagging somebody down and saying, hey, I want you 22 to know they're pitching over here. 23 Q. Okay. Page 23 relates to a discussion you 24 had on April 24, 2018, concerning Anthony</p>	<p style="text-align: right;">Page 116</p> <p>1 recollection. That I did not take this action; 2 that they did. That's my recollection as I sit 3 here right now. 4 Q. Okay. And, in fact, you found 5 Mr. McDaniels' story to be not particularly 6 credible? 7 MR. STARR: Objection, form, foundation, 8 calls for speculation. 9 THE WITNESS: It does not fit my review 10 pattern enough for me to deviate in such a way 11 knowing that he had a PC pending, and he was 12 subject to relief possibly there. I didn't feel it 13 was appropriate on my end. 14 BY MR. PALLES: 15 Q. Do you know whether or not the fact of 16 McDaniels' incarceration was a factor one way or 17 another in the state's attorney's handling of this 18 PC? 19 A. I don't know. 20 Q. You know, I think as we've discussed 21 before, a lot -- Well, all but perhaps 22 Mr. McDaniels and maybe Mr. Roberts had already 23 been -- They'd already served their sentences for 24 these convictions; correct?</p>
<p style="text-align: right;">Page 115</p> <p>1 McDaniels. Now -- and, of course -- Well, it says 2 here on page 23 that CIU had decided not to move to 3 vacate McDaniels' conviction. 4 And I guess my first question is, was that 5 still the state of play? In other words, was 6 McDaniels' conviction still standing as of 7 April 24, 2018? 8 A. I don't know. 9 Q. Okay. At some point, though, am I correct 10 that CIU ultimately agreed to move to vacate 11 McDaniels' conviction? 12 A. You're incorrect. 13 Q. Okay. How am I incorrect? 14 A. This was based on a PC standard in the PC 15 unit. It was a PC decision. It was the 16 post-conviction hearing supervisor's and their 17 supervisor's decision. It was all on the PC side, 18 not on the CIU side. We were separate at this 19 point. 20 Q. Okay. And did the PC group agree to the 21 reversal of this conviction? 22 A. I can't tell you what the PC unit agreed 23 to. I can tell you that they took the action to 24 vacate this conviction. That's to the best of my</p>	<p style="text-align: right;">Page 117</p> <p>1 A. Are we talking about the two weapons 2 cases? 3 Q. No. I'm talking about the other 200. 4 A. Oh, I apologize. 5 Yes, my understanding is they all served 6 their sentences, correct. 7 Q. Okay. All right. So let me ask you. 8 Had CIU made the determination to oppose 9 the reversal of these convictions, it would have 10 involved a substantial devotion of Cook County 11 resources; am I correct? 12 MR. STARR: Objection, form, foundation, 13 vague. 14 THE WITNESS: I cannot answer that 15 question as presented. I am not understanding. 16 It's very general, and I don't think I'm 17 understanding the question. 18 BY MR. PALLES: 19 Q. Okay. What would it have taken -- Let me 20 ask you this. 21 How many people were in CIU in 2018? 22 A. Give me a second. 23 Q. Of course. 24 A. Six, not including -- So, six. I think</p>

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<p style="text-align: right;">Page 118</p> <p>1 six, yeah.</p> <p>2 Q. Okay. And Josh Tepfer filed 200 separate</p> <p>3 post-conviction petitions on behalf of the Watts</p> <p>4 plaintiffs. It would have been your group that</p> <p>5 would have had to respond?</p> <p>6 A. No.</p> <p>7 Q. It would be the PC unit?</p> <p>8 A. Correct.</p> <p>9 Q. Page 19. We're talking about Lee Rainey.</p> <p>10 And it says here towards the end, "The quantity of</p> <p>11 drugs Rainey was charged with was unusually high,</p> <p>12 15 grams of cocaine, which tested positive.</p> <p>13 Although it was a very high amount, Rainey got only</p> <p>14 probation for this charge, which was also somewhat</p> <p>15 unusual and could indicate that someone knew</p> <p>16 something wasn't a 100 percent kosher with the</p> <p>17 charges."</p> <p>18 Now, does that accurately express your</p> <p>19 views?</p> <p>20 A. No. That's not something that I would</p> <p>21 ever say because you can get probation if you have</p> <p>22 no background. You get rid of Count 1 and Count 2,</p> <p>23 and you go on Count 3. So i don't know where that</p> <p>24 came from. Maybe they asked me a hypothetical, and</p>	<p style="text-align: right;">Page 120</p> <p>1 available to you theoretically?</p> <p>2 A. So theoretically, absolutely, I could</p> <p>3 have. I probably wouldn't have. I mean, I would</p> <p>4 look at the blueback before I would talk to the</p> <p>5 prosecutor. Looking at the blueback would be a lot</p> <p>6 better research than talking to the prosecutor to</p> <p>7 see if they remember. Hey, do you remember about a</p> <p>8 case that pled out? They have tons of cases all</p> <p>9 the time.</p> <p>10 Q. Right. And correct me if I'm wrong. I</p> <p>11 don't know. If you wouldn't have a problem,</p> <p>12 April Perry might certainly have a problem with the</p> <p>13 prosecutor with serious reservations about the</p> <p>14 guilt of a particular defendant, but essentially</p> <p>15 agreed to falsely plead to a -- you know, to</p> <p>16 probation?</p> <p>17 MR. STARR: Objection, form, foundation.</p> <p>18 THE WITNESS: I can't answer that.</p> <p>19 BY MR. PALLES:</p> <p>20 Q. Okay. Well, would it be ethical for a</p> <p>21 prosecutor to take a sentence if he felt -- if he</p> <p>22 had serious -- take a plea if he had serious</p> <p>23 reservations about the guilt or innocence?</p> <p>24 A. So you're saying about the evidence that</p>
<p style="text-align: right;">Page 119</p> <p>1 I answered it that way.</p> <p>2 Q. You haven't studied Judaic dietary laws?</p> <p>3 A. I mean, I know you can't have a</p> <p>4 cheeseburger.</p> <p>5 Q. All right. Okay. So that comment is not</p> <p>6 yours?</p> <p>7 A. I don't recall. If it is, I don't agree</p> <p>8 with it right now. And if I said it then, I don't</p> <p>9 remember. It just doesn't seem like something I</p> <p>10 would say.</p> <p>11 Q. All right. And let me ask you.</p> <p>12 Had you believed that, would you've gone</p> <p>13 about talking to the prosecutors involved?</p> <p>14 A. I mean, it's just such a hard thing to</p> <p>15 corroborate. It's so speculative. It's such a</p> <p>16 9 or a 6. It's so out there. I mean, how could</p> <p>17 you ever even begin to drill down on that? Since I</p> <p>18 can't try and corroborate it, I don't even let it</p> <p>19 go into my head. You can get -- we nolle Count 1s</p> <p>20 all the time and go on a lower charge. So the</p> <p>21 idea, it just doesn't make sense. It just doesn't</p> <p>22 make sense to me at all.</p> <p>23 Q. So you could have talked to the</p> <p>24 prosecuting attorney, couldn't you, because he was</p>	<p style="text-align: right;">Page 121</p> <p>1 would be part or the factual basis for someone</p> <p>2 pleading guilty?</p> <p>3 Q. Yeah.</p> <p>4 A. Yeah. If you have serious doubts, you do</p> <p>5 not take the plea, correct.</p> <p>6 MR. PALLES: Okay. Now, let's take</p> <p>7 Exhibit 1 down, thankfully.</p> <p>8 BY MR. PALLES:</p> <p>9 Q. Do you remember in July of 2021,</p> <p>10 Mr. Flaxman filed a petition on behalf of 88</p> <p>11 petitioners whose convictions were being held by</p> <p>12 the state's attorney's office?</p> <p>13 A. The 88 cases with Watts, yes. Yes.</p> <p>14 MR. PALLES: Okay. And now, let's go to</p> <p>15 that, Toby. Do you know which one it is? The last</p> <p>16 one?</p> <p>17 BY MR. PALLES:</p> <p>18 Q. Does this -- I don't know if we want to</p> <p>19 get into it, but does this look like the petition</p> <p>20 that -- We both have this petition in mind?</p> <p>21 (Exhibit 19 referenced for</p> <p>22 identification.)</p> <p>23 THE WITNESS: I've seen this before, yes.</p> <p>24 MR. PALLES: All right. Okay. Now, let's</p>

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<p style="text-align: right;">Page 122</p> <p>1 go to paragraph -- Let's find Paragraph 14, if we 2 can. There's a lot of names, too. Stop. There we 3 go. 4 BY MR. PALLES: 5 Q. All right. Now, this paragraph -- I'm 6 going to ask you to look at Paragraph 14 for a 7 moment. 8 Now, you were involved when Jamie Kalven's 9 petition for a special master was appointed -- I 10 mean, was filed; do you recall that? 11 A. I was in CIU at the time. I wasn't 12 involved in the discussions regarding a special 13 master. I did not appear in court. 14 Q. I see. So do you know why -- Do you have 15 any understanding as to why the Kalven petition 16 didn't come to fruition? 17 A. My understanding is there was an agreement 18 between the state's attorney's office and the chief 19 judge at the time, which I believe was Martin, 20 Judge Martin -- our office, Judge Martin, and the 21 Alvarez administration that we would begin a review 22 pursuant to the master's protocol, whatever they 23 were requesting, right, and we would do it in such 24 a way through CIU. So we agreed to it is my</p>	<p style="text-align: right;">Page 124</p> <p>1 it. And then there was the transition to the Foxx 2 administration, which was the end of December 2016, 3 and this was an issue that needed to be addressed 4 by the administration. And they took charge of it 5 very quickly, as you can see. They looked at it in 6 February. I don't know Fabio's status in February. 7 So I don't know who actually was part of it. I 8 just don't know. 9 That's a long answer to say I don't know. 10 I'm trying to think who told me about it, but I 11 think it was April, who would have been the 12 successor, if you will, to Fabio and supervising me 13 when Fabio left the office sometime around 14 February 2017, I believe. 15 Q. Was Eric Sussman involved at all in these 16 discussions? 17 A. You know, I'm sure he was, but I can't say 18 for sure because he was the first assistant and 19 this was kind of a big deal. I just don't know. 20 I'm sorry. 21 Q. Do you know what promises were made about 22 the use of the resources? 23 A. No, I don't. 24 Q. Okay. Do you know what resources were</p>
<p style="text-align: right;">Page 123</p> <p>1 understanding. We weren't agreeing to a special 2 master. We were agreeing to become, if you will, 3 the special master, for lack of a better term. 4 Q. Okay. Right. And so this says here, 5 "Petitioner Kalven withdrew the request in 6 February 2017 after receiving assurances from the 7 CCSAO that the State was dedicating its own 8 resources to identifying the victims and engaging 9 in their own investigation." 10 A. Yes. 11 Q. Right. Okay. Now, but you're saying you 12 were not involved in that decision? 13 A. No. Once the decision was made, I was 14 informed of it. I was not part of the 15 decision-making process. 16 Q. Do you know who the participants were in 17 the decision? 18 A. I believe Fabio Valenti. Maybe not. 19 So there was a change in personnel right 20 around that time, so I apologize. I can't remember 21 the exact timing, but it would have been -- I'm 22 getting my dates mixed up. Let me think about this 23 for a second. Because I think this came up under 24 the Alvarez administration, and Fabio was handling</p>	<p style="text-align: right;">Page 125</p> <p>1 dedicated? 2 A. No, I don't. 3 Q. You didn't hire any additional people in 4 CIU; did you? 5 A. Correct. We did not. 6 Q. Okay. Well, I'm not really sure we need 7 to look at the page here, but -- Well, Paragraph 24. 8 A. Oh, shoot. You know, I just realized in 9 2018, there might have been seven ASAs, and you 10 just reminded me, in CIU then. Anyway, sorry about 11 that. There might have been seven. 12 Q. Seven as opposed to how many before? 13 A. Six. Because you just sparked my memory 14 when you said you didn't hire any specials, because 15 there was later on, not for Watts. Later on there 16 was someone that came in, and it might have been in 17 2018. And so I just remembered that one, and I 18 wanted to correct it. I could have been wrong 19 about six. It could have been seven ASAs. 20 Q. Okay. All right. And according to this, 21 it was just two months after the -- it was just two 22 months after the withdrawal -- excuse me. Let me 23 strike that. 24 It appears that on November 17th the</p>

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<p style="text-align: right;">Page 126</p> <p>1 consolidated petition for 15 individuals. I guess, 2 18 specific convictions was filed, and the state's 3 attorney's office agreed to it within a period of 4 two months; is that correct? 5 A. I don't remember the exact amount of time. 6 I just remember for the first ones, there was a 7 short period between the initial review and the 8 relief being granted. 9 Q. Okay. And these cases that we're talking 10 about, those are in large part the cases that we've 11 been talking about today; am I correct? 12 A. Those were mostly the subject matter of 13 the COPA report, correct, those first, initial 18, 14 which is actually -- It's 18 cases, but there's 15 less individuals. 16 Q. Yeah. 15 individuals, right. 17 We don't have to go to this, but 18 Paragraph 28 alleges that the fallout from the mass 19 exonerations was severe. 20 Do you agree with that? 21 A. I don't understand your question. 22 Q. Well, I'm asking you whether you agree 23 with the allegation in Paragraph 28, according to 24 the petitioners, that the fallout from the mass</p>	<p style="text-align: right;">Page 128</p> <p>1 then I gave them the information that they asked 2 for, and then later on I found out about the 3 do-not-call list. 4 Q. Okay. Now, with respect to Paragraph 31, 5 it says that after those rulings, that the CCSAO 6 worked cooperatively. Instead of filing petitions, 7 the undersigned would submit relevant materials, 8 including sworn statements, et cetera, et cetera. 9 And as a result, in Paragraph 32, they say 10 that 77 victims -- There were 77 victims whose 11 convictions have been vacated throughout this 12 arrangement -- through this arrangement. 13 So I guess my first question is, does that 14 fairly state the process that began in the wake of 15 the 2017 exonerations? 16 A. Yes. 17 Q. Okay. How did that differ -- Let me ask 18 you this way. 19 Was there a difference between the way the 20 first 18 convictions were handled in comparison 21 with the next 77? 22 A. Only in the sense that my recollection is 23 when I received materials on the first 18, they 24 were much more wholesome. I had full transcripts.</p>
<p style="text-align: right;">Page 127</p> <p>1 exonerations was severe. 2 I guess they're specifically talking about 3 the identification of 10 Watts team members were 4 put on the do-not-call list. 5 A. Well, your question assumes there was a 6 fallout. I don't know how you would define that. 7 I would say I would disagree. There wasn't even a 8 fallout, so characterizing it as severe or not 9 wouldn't be a fair answer for me to give because I 10 don't even know if there was a fallout. 11 Q. Okay. 12 A. Yeah. So... 13 Q. All right. And I think you indicated you 14 were not involved in any decisions concerning the 15 do-not-call list for those officers? 16 A. No, except I was asked by Eric Sussman to 17 compile a list of officers that were routinely 18 involved in -- remember, I had done the background 19 in who worked 264 or 715. I did give those names 20 to, I think, Joe Magats or Eric Sussman. That's 21 all I did. I did not know why they wanted the 22 names. They just said who are the people that are, 23 you know, of those two, assigned to those units 24 typically. That's all I had to do with it. And</p>	<p style="text-align: right;">Page 129</p> <p>1 I had a lot more. And that as the cases came in, I 2 would just get a letter with a word and say, like, 3 this one fits. Get rid of this one, too. Just 4 sort of like what else is there? So that's what 5 the arrangement -- the agreement came in. And I'm 6 like, okay, well, was there a prelim, and what's 7 the procedural history, and was there a motion on 8 this one? So it was more. I had -- we worked 9 collaboratively to get the discovery. It wasn't as 10 wholesome. The packages weren't fully formed. 11 Whereas, it seemed like before, I had been 12 given more, and I was also able to get more from my 13 own office on those first 18 cases. I was able to 14 get original trial files. I was able to get 15 whatever. These other ones seemed a little -- They 16 weren't as wholesome in what I could look at and 17 what I had to consider to make my determination. 18 Q. Did you -- As a result of that, did you 19 scale up the office's individual investigation into 20 such sources as the trial files, the dockets, the 21 reports of proceedings, et cetera? 22 A. Yes. And you asked me about additional 23 personnel. 24 The Cook County -- CIU, we didn't have an</p>

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<p style="text-align: right;">Page 130</p> <p>1 admin until the Foxx administration. So when Mark</p> <p>2 came in, that was his request as well. It wasn't</p> <p>3 just because of this Watts that we had an admin.</p> <p>4 It was something that I wanted, but that became</p> <p>5 basically her job, was trying to track down. We</p> <p>6 came up with a whole system on trying to -- Because</p> <p>7 we realized we were going to get more and more. It</p> <p>8 wasn't going to be 25 cases or so. It was going to</p> <p>9 be a lot more.</p> <p>10 So we came up with a system of ordering</p> <p>11 files. If I recall, we'd get an email from</p> <p>12 Mr. Flaxman or Mr. Tepfer. I would send that to my</p> <p>13 admin. We had a system. We had a charting system.</p> <p>14 We had a folder system, and we had a checkbox on</p> <p>15 the folders of things to ask for. And, again, if I</p> <p>16 realized there was a trial, I would maybe email</p> <p>17 back to Mr. Tepfer or Mr. Flaxman. Can you please</p> <p>18 send me something? Can you get these transcripts?</p> <p>19 Can you get me copies of this motion, this</p> <p>20 pleading, et cetera, et cetera? And so we worked</p> <p>21 collaboratively to get that information for me to</p> <p>22 review the case.</p> <p>23 Q. Okay. Let me ask you this, Nancy.</p> <p>24 Do you remember we had a deposition -- I</p>	<p style="text-align: right;">Page 132</p> <p>1 A. Because they weren't.</p> <p>2 Q. Okay. The records, though, you say were</p> <p>3 not as complete as first perceived.</p> <p>4 A. That's different. I could only review</p> <p>5 what I could get my hands on, but I tried to get my</p> <p>6 hands on as much as I could. And then knowing that</p> <p>7 we had big holes in the puzzle, we had -- It was</p> <p>8 even a more difficult review because we had to talk</p> <p>9 about what we were missing. So we didn't just say</p> <p>10 we don't have it, it goes into this pile. It was</p> <p>11 the same level of review. We just didn't have as</p> <p>12 much information, perhaps. But it was case by</p> <p>13 case, fact by fact. Each case went on its own</p> <p>14 merits.</p> <p>15 Q. Okay. Now, one of the things that -- One</p> <p>16 of the complaints that was lodged against the</p> <p>17 Cook County State's Attorney's Office was that in</p> <p>18 these Watts cases, you were not as proactive as you</p> <p>19 could have been in that you did not initiate your</p> <p>20 own audit of all the Watts cases to determine the</p> <p>21 full extent of those people who had been arguably</p> <p>22 subjected to false arrests.</p> <p>23 Do you think that's a fair criticism?</p> <p>24 A. Well, I disagree with that because it's</p>
<p style="text-align: right;">Page 131</p> <p>1 think it was last August -- in the Waddy case?</p> <p>2 Do you remember that?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. And during that, we looked at some</p> <p>5 documents that seemed to be of the type you're</p> <p>6 describing where Mr. Tepfer might, you know, put in</p> <p>7 something to the effect that -- I'll throw out</p> <p>8 Joseph Roberts or Rasaan Shannon.</p> <p>9 Rasaan Shannon claims that Watts, you</p> <p>10 know, asked him for some information. He refused</p> <p>11 to do it. The next time he saw him, he was</p> <p>12 arrested. The arrest was in November of 2008. He</p> <p>13 was holding 1.6 grams of heroin. The officers</p> <p>14 were -- The arresting officers were Smith and</p> <p>15 Jones, and on scene was Mohammed, Lewis, Bolton,</p> <p>16 and Nichols.</p> <p>17 Is that typical of the type of information</p> <p>18 he would give you?</p> <p>19 A. Yes.</p> <p>20 Q. And so it's fair to say that the reviews</p> <p>21 became more cursory than they had been in the first</p> <p>22 batch; correct?</p> <p>23 A. Disagree.</p> <p>24 Q. Okay. Why?</p>	<p style="text-align: right;">Page 133</p> <p>1 not true. Initially, I think I told you, we had</p> <p>2 a list of all the Watts cases that we could get</p> <p>3 from CPD that they generated that we tried to</p> <p>4 cross-reference with our own MIS department. And</p> <p>5 we looked at those CBs where we had Watts on paper.</p> <p>6 I looked at a lot of cases, like I said, non</p> <p>7 -narcotic cases. We tried to identify as many as</p> <p>8 we could. Did we miss some? Perhaps. And then we</p> <p>9 had the added layer of them being brought to us by</p> <p>10 counsel.</p> <p>11 The one place where I will say we didn't</p> <p>12 go further is if someone didn't complain about</p> <p>13 their conviction, I didn't review it, except for</p> <p>14 background information. So if someone was saying</p> <p>15 this conviction wasn't a problem, I wasn't going to</p> <p>16 be going out and saying it unless I saw it was a</p> <p>17 problem independently.</p> <p>18 Q. And so you required, as they pointed out,</p> <p>19 that the applicant request review of their</p> <p>20 conviction; right?</p> <p>21 A. Correct. For the Watts cases, correct.</p> <p>22 We did not request that for the Elizondo-Salgado</p> <p>23 protocol, and the reason was is they wouldn't have</p> <p>24 this information, right, to know that their search</p>

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<p style="text-align: right;">Page 134</p> <p>1 warrant was false. But if Watts was planting drugs</p> <p>2 on you, you would know that. So that was a slight</p> <p>3 distinction.</p> <p>4 But, again, if I came across something --</p> <p>5 and I think I did a couple times, and I can't tell</p> <p>6 you when, but I think we tried our best to find a</p> <p>7 lot of these. And I did look at a lot of these</p> <p>8 cases, but I also had two law firms that were doing</p> <p>9 a great job of giving me cases that fit -- many</p> <p>10 times fit the pattern.</p> <p>11 Q. Okay. So in that same paragraph that I</p> <p>12 was reading from, we don't have to look at it, but</p> <p>13 the complaint was that you would only consider</p> <p>14 cases where an applicant requested review, and in</p> <p>15 almost all cases, swear to the allegations under</p> <p>16 oath.</p> <p>17 So that implies to me that not all of the</p> <p>18 cases they were presenting to you included sworn</p> <p>19 affidavits concerning the allegations; is that</p> <p>20 correct?</p> <p>21 A. I think we had affidavits in every case</p> <p>22 that was granted relief.</p> <p>23 Q. No exceptions that you're aware of?</p> <p>24 A. That I'm aware of. I just can't think of</p>	<p style="text-align: right;">Page 136</p> <p>1 these 88 petitions?</p> <p>2 MR. STARR: Objection to form.</p> <p>3 THE WITNESS: There just wasn't a lot to</p> <p>4 go on with these. There was no corroboration or --</p> <p>5 I don't remember. I think there was just one. I</p> <p>6 mean, this was like a credibility call. Many of</p> <p>7 these people pled. There wasn't an issue with the</p> <p>8 drugs. There was a question about what the</p> <p>9 involvement of Watts and Mohammed was. These were</p> <p>10 these other officers that had seen and recovered</p> <p>11 the drugs that was on-view. I had interviewed the</p> <p>12 officers, and they're telling me that if they did</p> <p>13 the inventory, they would have seen this. It</p> <p>14 wouldn't have been like Watts gave them the drugs</p> <p>15 and said just inventory this, I found this on this</p> <p>16 guy. There wasn't anything there to say there's a</p> <p>17 problem here, other than Watts and Mohammed were</p> <p>18 somehow involved in the case.</p> <p>19 But a lot of these cases, they didn't</p> <p>20 have -- They weren't the actors that were the ones</p> <p>21 that led to the conviction. They didn't recover</p> <p>22 the drugs or see the drugs. So Watts was the</p> <p>23 supervisor. Again, I couldn't tell. The reports</p> <p>24 weren't clear. Where was he? Was he at the</p>
<p style="text-align: right;">Page 135</p> <p>1 any right now. Why wouldn't I be able to get an</p> <p>2 affidavit? I would ask for that.</p> <p>3 Q. And as of the time that this petition was</p> <p>4 authored back in July of 2021, it's alleged that</p> <p>5 there were 109 cases in which -- Well, that there</p> <p>6 were 109 cases without exception in which the</p> <p>7 county found that petitioners' allegations were</p> <p>8 more likely true than not true.</p> <p>9 Do you agree with that?</p> <p>10 A. I can't until I clarify a little bit.</p> <p>11 You said by "this petition," do you mean</p> <p>12 the PC that is up right now on the screen,</p> <p>13 Exhibit No. 19?</p> <p>14 Q. Yeah, July of '21.</p> <p>15 A. Okay.</p> <p>16 Q. As of that time, is it true that 109 cases</p> <p>17 without exception had been overturned?</p> <p>18 A. Okay. So I don't know the exact number,</p> <p>19 but if it's in the petition, that sounds about</p> <p>20 right.</p> <p>21 Q. Okay. Let me ask you.</p> <p>22 What circumstances were -- What were the</p> <p>23 circumstances that led to this breakdown between</p> <p>24 you and the two petitioning law firms concerning</p>	<p style="text-align: right;">Page 137</p> <p>1 station? Did he have anything to do with this? So</p> <p>2 it became sort of a guessing game. There were too</p> <p>3 many holes in the puzzle at this point for me to</p> <p>4 feel comfortable vacating the convictions without</p> <p>5 more. And there were still cases coming in. So</p> <p>6 the Universe and all these gentlemen and females</p> <p>7 were out. So I was like let's see what else comes</p> <p>8 down. And I found some things that were a little</p> <p>9 disturbing as I had gone through some of these</p> <p>10 cases. Some impeachment and some other things had</p> <p>11 happened that made me want to wait and see if we</p> <p>12 could generate more, if we could get more</p> <p>13 information. Could we find some transcripts? Can</p> <p>14 we do some more interviews, et cetera.</p> <p>15 So it wasn't so much things changed. It</p> <p>16 was I looking for more, and I was willing to take a</p> <p>17 pause to keep looking.</p> <p>18 BY MR. PALLES:</p> <p>19 Q. Did you ultimately provide relief to these</p> <p>20 88 petitioners?</p> <p>21 A. CIU did not. These were dismissed by PC.</p> <p>22 Q. I'm going to try and share a screen now.</p> <p>23 We talked earlier about your spreadsheet.</p> <p>24 A. Cheat sheet. That's it.</p>

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<p style="text-align: right;">Page 138</p> <p>1 MR. PALLES: Cheat sheet, yeah. I just 2 wanted to make sure. All right. Well, I haven't 3 been as religious in marking some of these exhibits 4 into evidence as I would like. I'll probably do 5 that as Exhibit 1. 6 But this we'll mark as -- what was my last 7 number? This will be -- I'm going to ask 8 ultimately -- I'll send it to the reporter. This 9 will be Exhibit No. 20. 10 (Exhibit No. 20 referenced 11 for identification.) 12 MR. PALLES: And if you'll bear with me a 13 minute. 14 Well, I'll tell you. Rather than take 15 anybody else's time, I'm going to consider myself 16 done for today. There may be some follow-up 17 questions, but I don't believe I'll go into any new 18 areas. 19 So now it's 4:30. I don't know whether or 20 not any other attorneys want to start, whether or 21 not -- at this point, we've gone about half. 22 Would you like to just pick up on another 23 date? It's up to you. 24 MR. BATTLE: Anybody else got something</p>	<p style="text-align: right;">Page 140</p> <p>1 vacated were actually innocent? 2 A. Using the definition of "actually 3 innocent" as complete vindication that they had 4 nothing to do with any part of the allegations, no, 5 I did not. 6 Q. Okay. Because I know I've heard you 7 testify previously. You used the phrase "actual 8 innocence" or "factual innocence." 9 Do you recall that? 10 A. And legal innocence, correct. 11 Q. Does that mean the same thing? 12 A. No. 13 Q. Okay. So I understand, what's your 14 definition or the definition used by CIU of what 15 actual innocence is? 16 A. So that's what I would also -- just so 17 we're clear. It would be between factual 18 innocence, which is different from legal innocence. 19 So factual innocence is, the example I use 20 is look at the City of Chicago reference, The 21 Fugitive, the movie The Fugitive, right? Dr. Kimble 22 was accused legally of killing his wife, but the 23 person who actually did it was the one-arm man. So 24 he's factually innocent. He had nothing to do with</p>
<p style="text-align: right;">Page 139</p> <p>1 short? 2 MR. BAZAREK: Yeah. It's Bill Bazarek. 3 I don't know if it will be short. I mean, 4 I could start, though. 5 MR. BATTLE: You can go ahead. 6 MR. PALLES: Okay. 7 MR. BATTLE: I mean, we got until 8 5:00 o'clock, right, Sean? 9 MR. STARR: Yes. 10 MR. BATTLE: Let's just do it, unless you 11 want to jump in, Sean. 12 MR. STARR: No. I'm going to reserve my 13 questions to the end. 14 MR. BATTLE: Okay. Go ahead. 15 EXAMINATION 16 BY MR. BAZAREK: 17 Q. Good afternoon, Ms. Adduci. 18 A. Hello. 19 Q. Out of all these cases that you've reviewed 20 or that -- Strike that. 21 Out of all the cases that were reviewed by 22 the CIU, whether it was done by yourself or other 23 attorneys, did you ever make any findings that any 24 of these individuals who had their convictions</p>	<p style="text-align: right;">Page 141</p> <p>1 that crime. 2 However, the one-arm man could be legally 3 innocent because the evidence that was used against 4 him was obtained illegally, and it was suppressed, 5 which means he's still the person that performed 6 the act, but I cannot use that against him; 7 therefore, he cannot be convicted. I don't know if 8 that's clear enough. 9 Q. I understand that. 10 So in that same vein, for any of the 11 individuals whose cases were reviewed by CIU, 12 meaning the Watts cases, was there any 13 determination or finding by the CIU or the state's 14 attorney's office that they were legally innocent? 15 A. We never made that determination. We 16 looked at this under the interest of justice. We 17 had enough to act the way we did, and we stopped 18 there. But we never made -- I don't have enough 19 evidence to make a finding as to actual innocence. 20 I wasn't there. I don't know. I can't recreate 21 that. 22 Legal innocence is a whole other issue. 23 In some of these cases maybe we could argue they 24 could be or couldn't be, but it comes down to the</p>

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<p style="text-align: right;">Page 142</p> <p>1 interest of justice and saying there are enough 2 problems that they could be legally guilty. They 3 could be legally innocent, but we're not going to 4 make that call because we're going to act 5 regardless. So we never came to that decision. 6 Q. And you would also agree that all of the 7 individuals whose cases you reviewed that were part 8 of the Watts cases, they very well could have been 9 guilty; correct? 10 MR. STARR: Objection, form, foundation, 11 asked and answered. 12 THE WITNESS: Factually, correct. Is 13 there a possibility that they did -- let's say the 14 allegation is they possessed drugs. Yes, they 15 could have possessed a certain amount of drugs, but 16 did they possess that amount or a greater amount 17 because something nefarious was done and drugs were 18 planted on them and more drugs were given; or is 19 this a person who was actually innocent, who just 20 got swept up because there were four bags and there 21 were four guys in the lobby. I don't know. I just 22 don't know. And because I don't know, and I could 23 never define it from the evidence I had to review, 24 I cannot say anyone is factually innocent, that</p>	<p style="text-align: right;">Page 144</p> <p>1 now. I have allegations against those officers, 2 however, that are numerous and voluminous. And so 3 that is something in and of itself that we do 4 consider now. Just because a lot of people say the 5 same thing doesn't make it true. However, it is 6 something that we did not discount. That was part 7 of our analysis. And so it's an art, not a science 8 almost. I don't know how else to answer it, except 9 I can't tell you that these gentlemen and ladies 10 are actually factually innocent. And I can't you 11 whether they're legally innocent. I can tell you 12 that in the interest of justice their cases were 13 dismissed. And, again, under the concept of it's 14 better to let one guilty person go free than to 15 convict the innocent, and I just don't know. 16 Q. If you can explain to me, though, how in 17 the interest of justice if, in fact, these 18 individuals were in fact guilty of the drug crimes 19 that they were convicted of, how could that be in 20 the interest of justice? 21 A. It's not, but I don't know. If I could 22 say fairly well that there's no issues at all, then 23 it wouldn't be. But there's that doubt, and the 24 State erred on the side of caution. And I think --</p>
<p style="text-align: right;">Page 143</p> <p>1 they were doing absolutely nothing wrong and that 2 none of the allegations against them hold any type 3 of water. I just can't say that. 4 And I can't also say that legally a 5 Fourth Amendment violation wouldn't have concluded 6 a legal finding of guilt; that if all the facts had 7 come out as true, that the process, there would 8 have been something where the evidence could not 9 have been used against them for a legal or a 10 constitutional issue. I just don't know because we 11 had officers involved that had a credibility issue. 12 BY MR. BAZAREK: 13 Q. When you say officers that were "involved 14 that had a credibility issue," what do you mean by 15 that? 16 A. Officer Watts and Mohammed were convicted 17 of crimes. They violated their oath of office. 18 They lied. That is a credibility issue. 19 Q. So in the CIU's review of the Watts cases, 20 the credibility issues were limited to Watts and 21 Mohammed; do I have that right? 22 A. Those were the clear credibility issues, 23 correct. I don't have evidence to undermine the 24 credibility of other officers as I sit here right</p>	<p style="text-align: right;">Page 145</p> <p>1 And I get that there's two sides to this, and maybe 2 I'm the one in the middle, but painting with a 3 broad brush doesn't mean everyone -- it's not black 4 and white at all. It's a gray area. CIU is always 5 a gray area. And it's not like they were doing 6 absolutely nothing wrong. All of these individuals 7 were all doing absolutely nothing wrong. I mean, 8 statistically that would just be impossible, right? 9 But, hey, wait, there was one or two people that 10 got caught, or Watts and Mohammed were playing fast 11 and loose at times because they were unchecked to a 12 certain extent, or that that was a Fourth Amendment 13 violation, or maybe that was putting the thumb on 14 the scale of justice when it came to drug dealers 15 who were not paying protection or who were not 16 playing along. I don't know. But I know that 17 there's two sides to the story. I got stuck in the 18 middle, and then trying to act in the interest of 19 justice. 20 But you're right. If I had known there 21 was no doubt and there were no questions, that 22 would not be in the interest of justice to let a 23 guilty -- a known guilty man go free. 24 Q. I know earlier in the deposition you were</p>

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<p style="text-align: right;">Page 146</p> <p>1 distinguishing between the reviews that were 2 undertaken by the conviction integrity unit early 3 on versus the reviews that were taken later on 4 during the review. 5 Do you recall that testimony? 6 A. Yes. 7 Q. And you said something along the lines of 8 fundamental fairness required that the other 9 convictions be vacated, too, something like that. 10 Do you recall that? 11 A. I do. I do. 12 Q. And what do you mean by that? 13 A. So the first cases had two advantages for 14 reviewing them that made it a little bit easier. 15 The first one is there had been no 16 publicity about these cases. There had been nobody 17 saying -- like jumping on this bandwagon, for lack 18 of a better term, right? It was in a vacuum and it 19 wasn't so clear. It wasn't publicized. There 20 wasn't media attention. And the other thing is 21 these cases had a lot more evidence. They had 22 motions. They had trials. They just had more. 23 And what happened later on is that, 24 unfortunately, you had the publicity, and you had</p>	<p style="text-align: right;">Page 148</p> <p>1 that. So I didn't find these other officers have 2 done anything wrong, and based on the convictions 3 of Watts and Mohammed and trying to paint with a 4 broad enough brush that the interests of justice 5 are served. That's not a perfect line. 6 Q. I do have a question where -- And there's 7 references in the documents where -- Strike that. 8 Mr. Rotert, I believe, used the phase 9 "pattern of misconduct." I thought I saw him use 10 that phrase. 11 But what does that even mean, a pattern of 12 misconduct? 13 MR. STARR: Objection, form. 14 THE WITNESS: Well, I think you'd have to 15 ask Mark. But I think what he meant, and I think 16 what I'm going to interpret what I mean -- I don't 17 know what Mark meant -- but I know that I -- Again, 18 this goes back to what I just said. We had 19 hundreds of people telling us basically the same 20 thing. You have to look at that. Hundreds of 21 people saying similar things. 22 Now, there's a lot of reasons they could 23 say the same things. It doesn't mean it's 24 necessarily true, but it's not something you could</p>
<p style="text-align: right;">Page 147</p> <p>1 people that perhaps were jumping on the train after 2 the train crash, right? They weren't on the train 3 when it crashed. They really, truly did not have 4 legitimate claims, but we're saying they did. I 5 don't have a magic wand to figure that out. And 6 then what was happening is these people -- A lot of 7 them pled guilty. So the idea is because I have 8 less evidence to review their claim, does that mean 9 that they get treated worse than someone where I 10 have more evidence to evaluate? Or do we do what I 11 have stated in court that we're going to do, which 12 is we're going to have to accept we're letting 13 guilty people out to make sure we don't miss the 14 innocent or the not guilty or the people who may 15 have had something wrong done to them. Since we 16 couldn't define the line, and in all fairness, I 17 can't punish people because they pled guilty and I 18 just can't review this stuff. That doesn't mean I 19 believed everything they were saying. And at times 20 these petitions got so formulaic, the affidavits 21 from the petitioners, that, I mean, I could tell 22 which lawyer it came from. Without even looking, I 23 knew who wrote it. I mean, that was disturbing and 24 problematic. However, we still had to look past</p>	<p style="text-align: right;">Page 149</p> <p>1 ignore. 2 BY MR. BAZAREK: 3 Q. Well, they all had the same attorneys, 4 right, that were petitioning to have the convictions 5 vacated; right? 6 A. Correct. That's one way of looking at it. 7 Absolutely. 8 Q. And so you were fielding phone calls and 9 emails from Mr. Josh Tepfer; correct? 10 A. Yes. 11 Q. And you were fielding phone calls and 12 email correspondence from Mr. Flaxman; right? 13 A. Yes. 14 Q. Were those the two attorneys that you 15 communicated with during your review of the Watts 16 cases? 17 A. There were other attorneys, but it turned 18 out the cases that they had submitted were not 19 Watts cases. They were not -- they just weren't. 20 They were other officers who had worked with Watts, 21 but they weren't Watts related. They turned out 22 not to be Watts related. 23 Q. Were there times when you were 24 communicating with Mr. Flaxman or Mr. Tepfer where</p>

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<p style="text-align: right;">Page 150</p> <p>1 it was your perception that they weren't providing 2 you with wholesome information about the cases they 3 were advocating for? 4 MR. STARR: Objection, form, foundation, 5 calls for speculation. 6 THE WITNESS: No, I wouldn't say that. I 7 would say that sometimes they wouldn't give me a 8 preliminary hearing, and I would ask for it, and 9 they would go out of their way to get it. But they 10 didn't always supply me with everything I wanted, 11 and I did have to ask occasionally, but I don't 12 think it was because they were trying to not be 13 wholesome in what they were giving. It was like is 14 this enough? Okay. You want more? Okay. What do 15 you want? Here it is. There was definitely 16 collaboration on getting documentation. 17 BY MR. BAZAREK: 18 Q. So tell me, and I believe you know this, 19 where, for instance, one of the petitioners alleges 20 that, you know, a police officer committed 21 misconduct against them, and then through your own 22 review, you determined that that police officer 23 wasn't working on that particular day, or maybe 24 they weren't even in the unit at the time of the</p>	<p style="text-align: right;">Page 152</p> <p>1 recommendations. It was whether I recommended 2 relief or I didn't. If someone disagreed with my 3 recommendation, I did not oppose anything. Unless 4 it was something immoral, illegal, or unethical, 5 that was my recommendation. I worked for the 6 state's attorney. So there was no opposition. It 7 was an opinion or a recommendation. That's it. 8 Q. Would you agree there were dozens of cases 9 where your recommendations were not followed by the 10 Cook County State's Attorney; correct? 11 MR. STARR: Objection. 12 THE WITNESS: That's correct. There were 13 cases where my recommendations were not followed. 14 BY MR. BAZAREK: 15 Q. And as an example of recommendations you 16 would find something in, say, for instance, an 17 affidavit that was false, and as you said, then you 18 were not going to recommend that that conviction be 19 vacated; correct? 20 MR. STARR: Form, foundation, incomplete 21 hypothetical. 22 THE WITNESS: So to answer that question, 23 you're making it sound like a formulaic pattern. 24 It would depend on the facts of the case, and it</p>
<p style="text-align: right;">Page 151</p> <p>1 incident. 2 Do you recall things like that happening? 3 A. I do. 4 MR. STARR: Form, foundation, incomplete 5 hypothetical. 6 BY MR. BAZAREK: 7 Q. So what would you do with that information 8 if you had that inconsistency with what was being 9 asserted in an affidavit, and then you're looking 10 at some other documents that are contradicting 11 what's asserted in an affidavit? 12 What do you do with that? 13 MR. STARR: Same objections. 14 THE WITNESS: I would not recommend 15 relief. I would not recommend relief. 16 BY MR. BAZAREK: 17 Q. Meaning that you would be opposed to that 18 conviction being vacated? 19 A. Correct. 20 Q. So there were occasions where you opposed 21 a conviction being vacated, but that recommendation 22 was not followed; is that correct? 23 A. Yes. You're using the word "opposed." 24 Just to make sure I'm clear. I made</p>	<p style="text-align: right;">Page 153</p> <p>1 would depend on the level of the falsehood. It 2 would depend on a lot of different things. But the 3 significant impeachment would go to the credibility 4 of the petitioner. And if that's all I was going 5 with, I didn't have anything else, and it a plea, 6 yes, that would probably be -- And then looking at 7 maybe what the composition of the officers were. 8 Maybe Watts was, you know, not even on the 9 paperwork. It's a fact. There's a lot of factors. 10 So it's really hard -- It would be speculative for 11 me to answer that hypothetical in a vacuum, but 12 yes, that was a factor for us to consider. 13 BY MR. BAZAREK: 14 Q. Okay. How would you communicate your 15 recommendation for the matters that you and the CIU 16 reviewed? 17 A. That depended on the time. It depended on 18 a bunch of different things. So there's not one 19 answer to that. 20 Q. So were they -- were your recommendations 21 committed to writing? 22 A. Yes. 23 Q. And would you actually meet in person with 24 the Cook County State's Attorney -- Strike that.</p>

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Page 154	<p>1 Would you actually meet in person with the</p> <p>2 Cook County State's Attorney to discuss your</p> <p>3 recommendations?</p> <p>4 A. No.</p> <p>5 Q. Okay. So how -- So at no time did you</p> <p>6 ever have an in-person meeting with the Cook County</p> <p>7 State's Attorney regarding your recommendation; is</p> <p>8 that correct?</p> <p>9 A. That's correct.</p> <p>10 Q. In terms of your written recommendations</p> <p>11 that you would make, who would you provide those</p> <p>12 to?</p> <p>13 A. It depends again on the timing, who were</p> <p>14 my supervisors. But across the board you would --</p> <p>15 Mark Weber, Eric Sussman, April Perry, Risa Lanier,</p> <p>16 Joe Magats, Jennifer Coleman, before Martin, I</p> <p>17 think. So those were all the first assistant chief</p> <p>18 deputies during the tenure of the investigation.</p> <p>19 Those are people I would speak with.</p> <p>20 Q. Okay. And also you would provide the</p> <p>21 written recommendation to depending on what the</p> <p>22 time frame was? Do I have that right?</p> <p>23 A. Yeah. So let me try to answer the best I</p> <p>24 can.</p>	Page 156	<p>1 recommendations, involvement in the decision-making</p> <p>2 process prior to the final decision. And also,</p> <p>3 that there's no particularized need for the</p> <p>4 underlying analysis. That's page 47.</p> <p>5 So I would instruct the witness not to</p> <p>6 answer about specifics where there was some debate</p> <p>7 going back and forth as to who made what</p> <p>8 recommendation and how that played out. I think</p> <p>9 that runs afoul of the order.</p> <p>10 MR. BATTLE: I think he's right about that</p> <p>11 one.</p> <p>12 MR. BAZAREK: Right. And I don't need a</p> <p>13 specific name, if she can answer without specificity.</p> <p>14 MR. BATTLE: I think it's the analogy in</p> <p>15 general, Bill.</p> <p>16 MR. HENRETTY: But the ruling -- I just</p> <p>17 read it, and I can read it again if you want.</p> <p>18 MR. BAZAREK: I'll ask another question.</p> <p>19 BY MR. BAZAREK:</p> <p>20 Q. I want to go back earlier in the</p> <p>21 deposition. You said the buck stops with me on the</p> <p>22 Watts cases.</p> <p>23 Do you recall that testimony?</p> <p>24 A. Yes.</p>
Page 155	<p>1 So let's say it's 2018, and Mr. Tepfer and</p> <p>2 Mr. Flaxman had given me, let's say, 25 cases. And</p> <p>3 they'll say, Where do you stand with these cases?</p> <p>4 Then I might go to my bosses and ask them questions</p> <p>5 about these cases. This is the breakdown. Let me</p> <p>6 know about it. And then I would relay that</p> <p>7 information to Mr. Tepfer or Mr. Flaxman. That was</p> <p>8 basically it, kind of in a nutshell.</p> <p>9 Q. And when you would make the recommendations</p> <p>10 on behalf of CIU, did you --</p> <p>11 Strike that.</p> <p>12 Were you ever asked to do additional work</p> <p>13 on any recommendation that you made, or it was sent</p> <p>14 back to you? That type of thing is what I'm asking</p> <p>15 you.</p> <p>16 A. There were a few. There was one -- Gosh,</p> <p>17 I wish I could remember the name, where part of the</p> <p>18 reason I was not recommending relief was because I</p> <p>19 believed --</p> <p>20 MR. HENRETTY: I have to jump in. I think</p> <p>21 the question and answer runs afoul of Judge</p> <p>22 Finnegan's order, in particular that, you know, if</p> <p>23 you look on page 36, that the defendants are not</p> <p>24 entitled to know specific positions, arguments, or</p>	Page 157	<p>1 Q. Okay. And the reason why I ask that is</p> <p>2 because right before you said that, you said that</p> <p>3 Rotert never worked on a Watts case.</p> <p>4 Do you recall that testimony?</p> <p>5 A. Correct.</p> <p>6 Q. So do I have this right in terms of</p> <p>7 document review, preparing a cheat sheet, making</p> <p>8 recommendations, that was something that Rotert had</p> <p>9 no involvement in?</p> <p>10 A. Except the last part. I did all the</p> <p>11 document review, all the interviews, all -- except</p> <p>12 there's two things that he did do. He read part of</p> <p>13 the 302s and took notes. He did go with me and do</p> <p>14 that. And he did do review of the final product.</p> <p>15 So the cheat sheet, we do roundtable. We would</p> <p>16 talk about stuff. So he was involved in the</p> <p>17 deliverance part.</p> <p>18 But when I say the buck stops here, is if</p> <p>19 there's something missing from a file, that's on</p> <p>20 me. Those were my cases. I put them together. I</p> <p>21 did all the analysis, and then I shared it, and we</p> <p>22 discussed it. But I'm the one that put the cases</p> <p>23 together and did the investigation. Obviously, he</p> <p>24 was my supervisor, so he gave me direction, but if</p>

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<p style="text-align: right;">Page 158</p> <p>1 there's something missing from a file or how we</p> <p>2 came up with a pattern, that was all me.</p> <p>3 Q. Have you seen any broadcast, television</p> <p>4 where Rotert was speaking about the Watts cases on</p> <p>5 TV?</p> <p>6 A. No.</p> <p>7 Q. Do you recall there was a lot of press</p> <p>8 when the original group of individuals in</p> <p>9 November of 2017, when their convictions got</p> <p>10 vacated, it got a lot of media attention?</p> <p>11 Do you recall that?</p> <p>12 A. I do.</p> <p>13 Q. Do you recall Mr. Rotert standing with a</p> <p>14 group of individuals and then giving public comment</p> <p>15 to the reporters? Do you remember anything like</p> <p>16 that?</p> <p>17 A. I recall that day. I don't recall what he</p> <p>18 said.</p> <p>19 Q. Did you speak with Rotert about anything</p> <p>20 he was going to say to the press?</p> <p>21 A. No. I don't recall.</p> <p>22 Q. Did Rotert ever tell you things that he</p> <p>23 was going to say on camera about the Watts cases at</p> <p>24 any time?</p>	<p style="text-align: right;">Page 160</p> <p>1 reports that you and Mr. Rotert reviewed. And that</p> <p>2 was over -- Was it you went together one day, and</p> <p>3 then the next day you went by yourself?</p> <p>4 A. Correct.</p> <p>5 Q. Okay. And then you were describing a</p> <p>6 circumstance earlier in the deposition about one</p> <p>7 drug line, you know, the drugs are taken from them,</p> <p>8 but they're not arrested, and they're told, you</p> <p>9 know, beat it. And then the other individuals that</p> <p>10 were involved in another drug line ended up getting</p> <p>11 arrested.</p> <p>12 Am I paraphrasing that the way you said</p> <p>13 it?</p> <p>14 A. Correct. Yes, that's correct.</p> <p>15 Q. So is it your testimony that that</p> <p>16 occurrence that you described, that was in 302</p> <p>17 reports that you reviewed?</p> <p>18 A. I don't think that was in the 302s, but I</p> <p>19 don't know. I'm not sure. But I remember talking</p> <p>20 to somebody about that. That was probably one of</p> <p>21 my interviews doing the background.</p> <p>22 Q. Okay.</p> <p>23 A. Because I remember him naming all of these</p> <p>24 different names of the lines, and I thought it was</p>
<p style="text-align: right;">Page 159</p> <p>1 A. Okay. That day I think I can answer</p> <p>2 because he was talking to the press office, and he</p> <p>3 was talking to Eric Sussman, and he was the</p> <p>4 supervisor, so that was his role in doing that.</p> <p>5 And I had nothing to do with that. I was worried</p> <p>6 about all the paperwork that day. So I did not</p> <p>7 discuss it with him, not because I didn't want to,</p> <p>8 but because I was doing other stuff. Whether we</p> <p>9 talked about it before the actual day or after, I</p> <p>10 just don't recall. I'm sorry.</p> <p>11 Q. So before Rotert spoke to the cameras that</p> <p>12 day there was a big news story, he was in</p> <p>13 discussions with Sussman?</p> <p>14 A. I believe so. Like I said, I was doing</p> <p>15 the paperwork. There was a lot of paperwork, and I</p> <p>16 was running around doing that. So I can't tell you</p> <p>17 what he did. I just know I didn't talk to him</p> <p>18 about that stuff.</p> <p>19 Q. Do you know if Rotert had talking points</p> <p>20 that he was going to use as he addressed the press</p> <p>21 that day?</p> <p>22 A. I don't. I was standing right next to</p> <p>23 him. I didn't see him reading anything.</p> <p>24 Q. I do have some questions about the 302</p>	<p style="text-align: right;">Page 161</p> <p>1 funny. And he remembered that. He couldn't</p> <p>2 remember other stuff, but he remembered some of the</p> <p>3 names of the lines. One of them was the Obama</p> <p>4 line.</p> <p>5 Q. Okay.</p> <p>6 A. And I think Obama was president. It was</p> <p>7 kind of funny to name a drug line with the</p> <p>8 president.</p> <p>9 Q. Do you remember in your review of all the</p> <p>10 affidavits that you reviewed in the Watts cases, do</p> <p>11 you recall that type of occurrence being asserted</p> <p>12 in an affidavit?</p> <p>13 A. No. I mean, yes and no. The last part,</p> <p>14 not the first part. The last part, which is they</p> <p>15 said these drugs are yours, right? But they</p> <p>16 weren't theirs. That was something that was</p> <p>17 asserted. So that last part of the scenario you</p> <p>18 stated would fit, but the first part, no.</p> <p>19 Q. Okay. So your best recollection is that</p> <p>20 someone told that to you when you were doing your</p> <p>21 investigation?</p> <p>22 A. Yes.</p> <p>23 Q. Okay. And I just to confirm. When you</p> <p>24 and Mr. Rotert went to review the 302s, you took</p>

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<p style="text-align: right;">Page 162</p> <p>1 notes and he took notes; is that correct?</p> <p>2 A. I don't know if he -- actually, you know</p> <p>3 what? I do know he took notes because he showed</p> <p>4 them to me. So I do know he took notes. And yes,</p> <p>5 I took notes.</p> <p>6 Q. And then those notes, where are they?</p> <p>7 A. Probably with the original Watts</p> <p>8 background information file, which includes the</p> <p>9 master -- request for a special master, et cetera,</p> <p>10 et cetera.</p> <p>11 Q. Okay. I do have a question.</p> <p>12 I know at some point, I believe,</p> <p>13 procedures changed with the conviction integrity</p> <p>14 unit where at one point for a matter to be reviewed</p> <p>15 by the conviction integrity unit, you -- the</p> <p>16 individual actually had to still be in prison or</p> <p>17 incarcerated for CIU to review; is that correct or</p> <p>18 not correct?</p> <p>19 A. I don't remember that being a requirement.</p> <p>20 Definitely people in custody get precedent. If we</p> <p>21 have a lot of volume, we'll triage cases based on</p> <p>22 custody status. But no, you don't have to be in</p> <p>23 custody to get reviewed. You just have to be</p> <p>24 convicted in Cook County of a felony and be alive.</p>	<p style="text-align: right;">Page 164</p> <p>1 A. There was a female. There's Greg. I</p> <p>2 think it's Greg Masters. It was Dion. Then there</p> <p>3 was one other. There was a female and one other</p> <p>4 guy. But it was mostly Anthony and Greg, and then</p> <p>5 they had an investigator that would come sometimes,</p> <p>6 too. I forgot his name.</p> <p>7 Q. Okay. Did Mr. Becknek and Mr. Masters,</p> <p>8 did they seem to be leading the discussion that you</p> <p>9 had with them?</p> <p>10 A. Mr. Becknek was definitely the leader, if</p> <p>11 you will, but everyone had questions because</p> <p>12 everyone had their own case files. So if it was</p> <p>13 their case file, they would be asking questions,</p> <p>14 that investigator, whether it would be Greg or Dion</p> <p>15 or whoever it was.</p> <p>16 MR. BAZAREK: All right. So I think -- I</p> <p>17 know we're going to pick this up on another day,</p> <p>18 and I'll continue with my questions when we</p> <p>19 reconvene.</p> <p>20 MR. BATTLE: All right. That sounds like</p> <p>21 a plan. You ready to go off the record?</p> <p>22 MR. BAZAREK: Yes.</p> <p>23 THE VIDEOGRAPHER: Are there any orders</p> <p>24 for the video today?</p>
<p style="text-align: right;">Page 163</p> <p>1 That's the only requirement while I was doing the</p> <p>2 review.</p> <p>3 Q. Earlier in the deposition you talked about</p> <p>4 the way your meetings with COPA were documented,</p> <p>5 and from what I heard was they were not accurate;</p> <p>6 is that correct?</p> <p>7 A. There's a level of certainty in the</p> <p>8 statements that are in those reports that I don't</p> <p>9 have, that I didn't make it with that level, or</p> <p>10 there's a misunderstanding of the meaning of what I</p> <p>11 was saying.</p> <p>12 Q. Okay. So then if I hear you correctly --</p> <p>13 Strike that.</p> <p>14 It's your testimony that COPA is not an</p> <p>15 accurate historian of certain communications that</p> <p>16 you had with them; is that fair to say?</p> <p>17 A. In some instances that is a fair statement</p> <p>18 based on what I read.</p> <p>19 Q. And the individuals that you were meeting</p> <p>20 with were Mr. Becknek; is that right?</p> <p>21 A. Correct.</p> <p>22 Q. And then who were some of the other</p> <p>23 individuals that you were meeting with besides</p> <p>24 Becknek?</p>	<p style="text-align: right;">Page 165</p> <p>1 Any orders for the video today?</p> <p>2 MR. BAZAREK: I don't want it.</p> <p>3 MR. PALLES: Not from me.</p> <p>4 THE VIDEOGRAPHER: Unless there's anything</p> <p>5 else, I'll take us off.</p> <p>6 We are off the record at 4:57 p.m., and</p> <p>7 this concludes the testimony given by Nancy Adduci.</p> <p>8 (FURTHER DEPONENT SAITH NAUGHT...)</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>

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1 STATE OF ILLINOIS)
) SS.
2 COUNTY OF COOK)
3

4 I, Sharon L. Patanella, Certified
5 Shorthand Reporter, do hereby certify that on
6 October 21, 2024, the deposition of the witness,
7 NANCY ADDUCI, called by the Defendants, was taken
8 before me via videoconference, reported
9 stenographically, and was thereafter reduced to
10 typewriting under my direction.

11 The said deposition was taken via
12 videoconference, and there were present counsel,
13 all via videoconference, as previously set forth.

14 The said witness, NANCY ADDUCI, was first
15 duly sworn to tell the truth, the whole truth, and
16 nothing but the truth, and was then examined upon
17 oral interrogatories.

18 I further certify that the foregoing is a
19 true, accurate, and complete record of the
20 questions asked of and answers made by the said
21 witness, NANCY ADDUCI, on the date and time
22 hereinabove referred to.

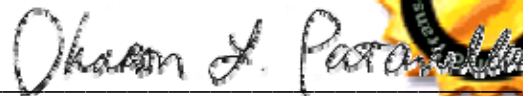
23 I further certify that I am not a relative
24 or employee or attorney or counsel of any of the

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1 parties, or a relative or employee of such attorney
2 or counsel, or financially interested directly or
3 indirectly in this action.

4 Witness my official signature as a
5 Certified Shorthand Reporter in the State of
6 Illinois on November 8th, 2024.

7
8 
SHARON L. PATANELLA, CSR
161 North Clark Street
Suite 3050
Chicago, Illinois 60601
Phone: 312.361.8851



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12 CSR No. 84-002169
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