

EXHIBIT 49



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Transcript of Manuel Leano

Date: September 26, 2019

Case: Watts Coordinated Cases

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Transcript of Manuel Leano
Conducted on September 26, 2019

1 (1 to 4)

1 1 IN THE UNITED STATES DISTRICT COURT 2 NORTHERN DISTRICT OF ILLINOIS 3 EASTERN DIVISION 3 IN RE:) 4 WATTS COORDINATED CASES) Master Docket Case No. 19-cv-01717) 6 7 Videotaped Deposition of: 8 MANUEL LEANO 9 Chicago, Illinois 10 Thursday, September 26, 2019 11 11:28 a.m. 12 13 14 15 16 Job No.: 262544 17 Pages: 1 - 215 18 Reported by: Kimberly Winkler Christopher, CSR 19 20 21 22 23 24	3 1 A P P E A R A N C E S 2 ON BEHALF OF CERTAIN PLAINTIFFS: 3 THERESA KLEINHAUS, ESQUIRE 4 SCOTT R. RAUSCHER, ESQUIRE 5 LOEVY & LOEVY 6 311 North Aberdeen Street 7 3rd Floor 8 Chicago, Illinois 60607 9 (312) 243-5900 10 11 ON BEHALF OF CERTAIN PLAINTIFFS: 12 JOEL A. FLAXMAN, ESQUIRE 13 KENNETH N. FLAXMAN, P.C. 14 200 South Michigan Avenue 15 Suite 201 16 Chicago, Illinois 60604 17 (312) 427-3200 18 19 20 21 22 23 24
2 1 Videotaped Deposition of MANUEL LEANO, at 2 the location of: 3 4 LOEVY & LOEVY 5 311 North Aberdeen Street 6 3rd Floor 7 Chicago, Illinois 60606 8 (312) 2432-5900 9 10 11 12 13 Pursuant to notice, before Kimberly Winkler 14 Christopher, a Certified Shorthand Reporter in and 15 for the State of Illinois. 16 17 18 19 20 21 22 23 24	4 1 A P P E A R A N C E S (Continued) 2 ON BEHALF OF DEFENDANTS ALVIN JONES, ROBERT 3 GONZALEZ, MIGUEL CABRALES, DOUGLAS NICHOLS, JR., 4 MANUEL S. LEANO, BRIAN BOLTON, KENNETH YOUNG, 5 JR., DAVID SOLTIS, ELSWORTH J. SMITH, JR., JOHN 6 RODRIGUEZ, GEROME SUMMERS, JR., CALVIN RIDGELL, 7 JR., LAMONICA LEWIS, REBECCA BOGARD, FRANKIE 8 LANE, and KATHERINE MOSES-HUGHES, DARRYL EDWARDS: 9 ANTHONY E. ZECCHIN, ESQUIRE 10 HALE & MONICO, LLC 11 53 West Jackson Boulevard 12 Suite 337 13 Chicago, Illinois 60604 14 (312) 870-6933 15 16 ON BEHALF OF DEFENDANT KALLATT MOHAMMED: 17 ERIC S. PALLES, ESQUIRE 18 RAVITZ & PALLES, P.C. 19 203 North LaSalle Street 20 Suite 2100 21 Chicago, Illinois 60601 22 (312) 558-1689 23 24

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2 (5 to 8)

5	7
1 A P P E A R A N C E S (Continued) 2 ON BEHALF OF DEFENDANT RONALD WATTS: 3 AHMED A. KOSOKO, ESQUIRE 4 JOHNSON & BELL LTD. 5 33 West Monroe Street 6 Suite 2700 7 Chicago, Illinois 60603 8 (312) 372-0770 9 10 ON BEHALF OF DEFENDANTS CITY OF CHICAGO, PHILIP 11 CLINE, DEBRA KIRBY, KAREN ROWAN, JOSE LOPEZ, 12 JEROME A. FLUDER, MIKE RYLE, EDWARD W. GRIFFIN, 13 and JERROLD BOSAK: 14 PAUL A. MICHALIK, ESQUIRE 15 REITER BURNS LLP 16 311 South Wacker Drive 17 Suite 5200 18 Chicago, Illinois 60606 19 (312) 982-0090 20 21 22 23 24	1 C O N T E N T S 2 EXAMINATION OF MANUEL LEANO PAGE 3 By Mr. Rauscher 9, 206, 212 4 By Mr. Flaxman 194, 210 5 By Mr. Kosoko 199 6 By Mr. Zecchin 205, 212 7 8 9 10 11 E X H I B I T S PAGE 12 LEANO EXHIBIT 13 Exhibit 1 (Vice Case Report) 109 14 Exhibit 2 (Original Case Incident Report) 156 15 Exhibit 3 (Arrest Report) 185 16 Exhibit 4 (Arrest Report) 187 17 18 19 20 21 22 23 24
6	8
1 A P P E A R A N C E S (Continued) 2 ON BEHALF OF DEFENDANTS MICHAEL SPAARGAREN and 3 MATTHEW CADMAN: 4 MICHAEL J. SCHALKA, ESQUIRE 5 LEINENWEBER BARONI & DAFFADA LLC 6 120 North LaSalle Street 7 Suite 2000 8 Chicago, Illinois 60602 9 (312) 663-3003 10 11 ALSO PRESENT: 12 MR. RICK KOSBERG, Videographer 13 14 15 16 17 18 19 20 21 22 23 24	1 P R O C E E D I N G S 2 THE VIDEOGRAPHER: This is the video 3 deposition of Manuel Leano taken by Loevy & Loevy in 4 the matter of the Watts coordinated pretrial 5 proceedings, Master Docket Case No. 19-cv-01717, 6 held at Loevy & Loevy, 311 North Aberdeen Street, 7 Chicago, Illinois. Today is September 26th, 2019. 8 The time is 11:28. 9 The court reporter is Kim Christopher of 10 Planet Depos. The videographer is Rick Kosberg. 11 Counsel can now introduce themselves and the court 12 reporter is free to administer the oath. 13 MR. RAUSCHER: Scott Rauscher on behalf of 14 all the -- all the plaintiffs represented by Loevy & 15 Loevy in the Watts coordinated cases. 16 MS. KLEINHAUS: Theresa Kleinhaus on behalf 17 of the Loevy & Loevy plaintiffs. 18 MR. FLAXMAN: Joel Flaxman on behalf of the 19 Flaxman plaintiffs. 20 MR. SCHALKA: Michael Schalka on behalf of 21 defendants Spaargaren and Cadman. 22 MR. PALLES: Eric Palles on behalf of 23 defendant Mohammed. 24 MR. KOSOKO: Ahmed Kosoko on behalf of

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3 (9 to 12)

9	11
1 Ronald Watts. 2 MR. MICHALIK: Paul Michalik on behalf of 3 defendant City of Chicago and certain municipal 4 official defendants. 5 MR. ZECCHIN: Anthony Zecchin on behalf of 6 Officer Leano and the individual defendants 7 represented by the Hale & Monico law firm. 8 THE COURT REPORTER: Please raise your right 9 hand. 10 (Witness sworn.) 11 MANUEL LEANO, 12 having been duly sworn, testified as follows: 13 DIRECT EXAMINATION BY COUNSEL FOR CERTAIN PLAINTIFFS 14 BY MR. RAUSCHER: 15 Q Mr. Leano, you understand you are a 16 defendant in a number of case -- individual cases in 17 the Watts coordinated cases? 18 A Yes. 19 Q And today we are going to ask questions 20 specifically about four cases. And just for the 21 record, I'm going read the case captions and numbers 22 into the record. 23 So we have Anthony McDaniels -- and I'm just 24 going to list the plaintiffs and case numbers.	1 second was also involved shooting. 2 Q Were they police shootings? 3 A Yes, police involved shooting. 4 Q Do you know the names of the plaintiffs in 5 those cases? 6 A The officers you mean? 7 Q No. The persons suing. 8 A The persons suing? The first one was -- if 9 I'm not mistaken, is Christian Green; and the second 10 would be Ronald Johnson, I believe. 11 Q Were you a defendant in those cases? 12 A In the beginning, yes. 13 Q And then you were voluntarily dismissed? 14 A I believe so. 15 Q Do you know how the cases were resolved? 16 A The first one went to trial and the second 17 one I believe is still ongoing. 18 Q Do you know the result of the trial in the 19 Green case? 20 A I believe they found in favor of the 21 plaintiff. 22 Q But by the time of trial you were not a 23 defendant anymore? 24 A No.
10	12
1 Anthony McDaniels, Case No. 18-cv-5126; Christopher 2 Scott, 18-cv-5128; Taurus Smith, 18-cv-5130; and 3 Lionel White, Senior, Case No. 17-cv-2877. 4 Do you understand that you are here to 5 answer questions about those cases? 6 A Yes. 7 Q And it sounds like we have some construction 8 going on upstairs so let me know if you ever can't 9 hear one of my questions, okay? 10 A Yes. 11 Q And then also let me know if I ask a 12 question and you don't understand it, okay? 13 A Okay. 14 Q And if you don't do that, I'm going to 15 assume that you did understand the question. 16 A Okay. 17 Q How many times have you been deposed in the 18 past? 19 A I would say at least two. 20 Q Does that mean you have a specific 21 recollection of being deposed twice? 22 A Yes. 23 Q Tell me about those cases, please. 24 A One was -- involved a shooting and the	1 Q No, you were not? 2 A I was not. 3 Q Were you the -- one of the officers who had 4 been accused of shooting people in those cases? 5 A No, I wasn't. 6 Q Are you currently a Chicago police officer? 7 A Yes, I am. 8 Q What's your current role with the police 9 department? 10 A Administrative. 11 Q How long have you been in an administrative 12 role? 13 A Since last -- November of 2017, I believe. 14 Q How long have you been with the department? 15 A A little over 18 years. 16 Q Was your move to an administrative role 17 voluntary? 18 MR. ZECCHIN: Objection to form. You can 19 answer. 20 A I don't believe so. 21 Q Why do you not believe your move to an 22 administrative role in November of 2017 was 23 voluntary? 24 A Could you repeat that?

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4 (13 to 16)

13	1 Q Sure. You said you don't believe that your 2 move to an administrative role was voluntary? 3 A It wasn't voluntary. 4 Q Okay. And how did it come about that you 5 got moved to an administrative role? 6 A Well, I was a street officer and all of a 7 sudden I was informed I was going to be placed into 8 administrative duties. 9 Q Who told you you were getting moved to 10 administrative duties? 11 A I believe the commander at the time in the 12 2nd District. 13 Q And who was the commander at the time in the 14 2nd District? 15 A I believe it's Crystal King. 16 Q Crystal King? 17 A Yes, sir. 18 Q And what did Crystal King tell you about why 19 you were getting moved to an administrative role? 20 A I don't recall what was said except we were 21 being reassigned to administrative duties. 22 Q Who is the "we"? 23 A Myself, Officer Nichols, and I believe 24 Officer Gonzalez.	15
14	1 Q And was that one conversation with the three 2 of you and Crystal King? 3 A I don't recall whether it was individual or 4 all at once. 5 Q Was it an in-person conversation? 6 A Yes. 7 Q Is it Ms. King, Crystal King? 8 A I couldn't tell you if it was Ms. King or 9 Mrs. King. 10 Q All right. Do you remember anything else 11 that -- we'll say Ms. King for today -- Ms. King 12 told you about why you were getting moved to 13 administrative duty? 14 A No. 15 Q So she just said you're getting moved to 16 administrative duty with no context? 17 A Yes. 18 Q Did you have any questions about that? 19 A I -- I might have asked why, but I wasn't 20 told at that moment why. 21 Q You think you asked her why but didn't get a 22 response? 23 A No. 24 Q No, you don't think --	16
	1 A No, I didn't get a response. 2 Q All right. Let's back up a step. 3 When you were -- when Ms. King told you that 4 you were being moved to administrative duty, did you 5 ask her why? 6 A Yes, I believe I did. 7 Q And did she give you any sort of response? 8 A I don't believe she did. 9 Q How long was your conversation with Ms. King 10 when she told you you were getting moved to 11 administrative duty? 12 A Maybe 5, 10 minutes. 13 Q Is -- and so what -- you think that all she 14 said in that 5 to 10 minutes was you're getting 15 moved to administrative duty? 16 A I believe so, yes. 17 Q Did she say it in multiple different ways? 18 A She said we were being taken off the street 19 and placed into administrative duties. The context 20 of the conversation, that's all I can remember. 21 Q Do you remember where you were when you had 22 this conversation? 23 A I believe we were in a tac office and then 24 we were called into her office.	

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5 (17 to 20)

17	1 Q Okay. Do you consider being moved to 2 administrative duty discipline? 3 A Do I believe? 4 Q Yes. 5 A Yes. 6 Q Why do you believe that you've been 7 disciplined? 8 A Why do I believe I've been disciplined? 9 Q Yes. 10 A Because -- I can't say, but it has to do 11 something with all these cases being exonerated. 12 Q When you were told that you got placed on 13 administrative duty, did you talk to Nichols or 14 Gonzalez? 15 A Did I talk to -- I believe they were present 16 when we were told we were being placed into 17 administrative duty. 18 Q Do you think it's more likely that all three 19 of you were told at the same time? 20 A We were probably told at the same time, but 21 we probably spoke to the commander individually at 22 some point. 23 Q On the same day or -- 24 A At the same -- at that day.	19
18	1 or not. 2 Q You know it's unfair on your part? 3 A Yes. 4 Q Why is it unfair that you've been placed on 5 administrative duty? 6 A Well, I used to be an officer that's on the 7 street and now all of a sudden I'm on administrative 8 duty entering blue cards that document that the 9 officers -- traffic stop when a citation is not 10 given. I don't believe that's a police -- as an 11 officer, I don't believe that's a police duty that I 12 should be doing. 13 Q So it sounds like you don't like the job of 14 administrative duty. Is that fair? 15 A I would rather be on the street, if that's 16 what you're asking me to. 17 Q Well, I think -- that's one question is 18 whether you enjoy the job responsibilities of being 19 on administrative duty. 20 A No, I don't enjoy being on administrative 21 duty. 22 Q And a separate question is you said you 23 don't believe it was fair to -- for you to be placed 24 on administrative duty, right?	20

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6 (21 to 24)

21	1 were you given any paperwork to sign? 2 A I don't believe so. 3 Q Were you moved into a different unit when 4 you got placed on administrative duty? 5 A No, I wasn't. 6 Q What unit are you currently in? 7 A Still the 2nd District assigned to 264 team. 8 Q Assigned to what? 9 A 264 team. 10 Q Are you assigned to a different team than 11 you used to be assigned to? 12 A I was previously assigned to that unit. 13 Q Were you previously assigned to the 264 14 team? 15 A Yes. I was assigned to 264 and remain in 16 264. 17 Q But you're just doing different things; is 18 that right? 19 A Just in administrative portion of it. 20 Q What shift do you currently work? 21 A 1700 to 0200. 22 Q So the same shift you were working before? 23 A Before we used to rotate nights and days. 24 So nights would be 1700 to 0200. Days would be	23
22	1 A November 2004. 2 Q Until November of 2017 you were on the tac 3 team in the 2nd District on the street? 4 A Yes. 5 Q Okay. And then since then you've been on 6 the tac team in the 2nd District but just in an 7 administrative role? 8 A That would be correct. 9 Q What has your title been? 10 A My title? 11 Q What is your title? 12 A Police officer. 13 Q Has that always been your title? 14 A Yes. 15 Q Did your responsibilities change from '04 to 16 November 2017? 17 A Did my responsibilities change -- 18 Q So setting apart the administrative duty, 19 there was a 13-year period or so when you were on 20 the street as a member of the tac team, correct? 21 A Yes. 22 Q And did your responsibilities as a member of 23 the tac team change over the years? 24 A No.	24

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7 (25 to 28)

25	1 Q And were there different time periods when 2 you patrolled them or was it one day at Ida B. Wells 3 and maybe the next day at Stateways? 4 A It varies. Whichever we have more 5 complaints, we would focus on that housing projects. 6 Q How frequently would it vary where you went? 7 A I mean, it all depends. We try to patrol 8 all the housing projects in the 2nd District during 9 the day at some point. 10 Q So it could be one day you're at both Ida B. 11 Wells and Stateways? 12 A Yes. 13 Q And when you're out patrolling the housing 14 projects -- when you were out patrolling the housing 15 projects in the 2nd District, what were you doing 16 specifically? 17 A Looking for any criminal activities, whether 18 it be drugs, guns, gang activities, battery, 19 robberies. 20 Q What were the most common types of crimes in 21 Ida B. Wells and Stateways from November of 2004 to 22 November 2 of 2017? 23 A I mean, I state whether most obvious crime 24 would be narcotics.	27	1 night and day? 2 A Yes. 3 Q How frequently did your shifts rotate? 4 A Every period, which is basically every 5 month. 6 Q Were the eight officers led by Sergeant 7 Watts -- did you all work together every day? 8 A Did we work together every day? 9 Q Yes. 10 A I don't believe we do -- we worked together 11 every day, no. 12 Q Did you work together -- did you work with 13 other people also during that time period? 14 A Did I work with other people? If my partner 15 is off that day, I probably worked with a different 16 officer that day. 17 Q Would it be a different officer who's on the 18 tac team? 19 A On my -- on our tac team. 20 Q So I should rephrase the question. 21 Did you all work -- did the eight officers 22 and Sergeant Watts all work together on the days 23 when they were working? 24 A I don't understand the question you're
26	1 Q You said the most obvious crime -- 2 A Yeah. 3 Q (Continuing) -- would be narcotics? 4 A Narcotics, yes. 5 Q How many members of the tac team were there 6 from, let's say, November of 2004 to 2- -- to the 7 end of 2008? 8 A Could you repeat that question? 9 Q Do you know how many members of the tac team 10 there were from November of 2004 until the end of 11 2008? 12 A Are you speaking of our tac team? 13 Q Your tac team. 14 A It consist of eight officer and one 15 sergeant. 16 Q Who were those officers during the 2004 to 17 2008 time frame? 18 A That would be Ronald Watts. And if I'm not 19 mistaken, it would be Kenny Young, Officer Jones, 20 Elsworth Smith, Cynthia Torres I believe, myself, 21 Officer Douglas Nichols, Brian Bolton, and Robert 22 Gonzalez, if I'm not mistaken. 23 Q And from 2004 -- from November of 2004 24 through the end of 2008, did your shifts rotate	28	1 asking me. 2 Q So -- you were all on a team, the eight 3 officers led by Sergeant Watts? 4 A Yes. 5 Q And did other officers go out patrolling 6 with your tac team? 7 A I don't understand what you mean by other 8 officer. 9 Q Other officers who are not members of your 10 tac team. 11 A They patrol -- it doesn't restrict them of 12 patrolling any of the housing projects. They're 13 Chicago police officers. 14 Q Who was your partner from 2004 to 2008, 15 partner or partners? 16 A My regular partner would be Officer Douglas 17 Nichols. 18 Q Did your shifts rotate with him? Did you 19 and him rotate together? 20 A Yes, we did. 21 Q What did it mean for your job to be a member 22 of -- can I call it the Watts team? Will you 23 understand what I'm talking about? 24 A If you want to refer as the Watts team, but

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8 (29 to 32)

29	1 I refer to it as 264 team. 2 Q 264 team? 3 A Yes. 4 Q Did you call it the 264 team at the time? 5 A Yes. 6 Q Okay. What did it mean for your day to day 7 to be a member of the 64 team? 8 MR. ZECCHIN: Objection to form. You can 9 answer if you understand the question. 10 A It's kind of vague, what question -- what 11 you're asking me. 12 Q Well, can you just describe what a typical 13 day would look like as a member of the 264 team for 14 you? 15 A We would patrol the entire 2nd District, but 16 mostly the housing, and try to arrest people 17 committing crimes. 18 Q How would the day start as a member of the 19 264 team? 20 A We would have a roll call in the 2nd 21 District. 22 Q And who would lead the roll call? 23 A The sergeant of 264 team would be Ronald 24 Watts.	31
30	1 the tac office. 2 Q How many arrests do you think you 3 participated in as a member of the 2nd District tac 4 team? 5 A I can't even guess to tell you. 6 Q Was it in the thousands? 7 A I -- I can't answer whether it's in the 8 thousand or in the hundreds. 9 Q Can you say it's more than 500? 10 A I believe possibly more than 500. 11 Q Do you think it's more than a thousand? 12 A It could be. 13 Q Do you think it's more than 2,000? 14 A Possible, but I don't it. 15 Q So somewhere between 500 and 2,000 most 16 likely? 17 MR. ZECCHIN: Objection, form. You can 18 answer. 19 A I guess. 20 Q Is between 500 and 2,000 your best estimate 21 of how many arrests you participated in as a member 22 of the 2nd District tactical team? 23 A If I would have to guess, maybe. 24 Q Do you have a specific recollection of many	32
30	1 Q What topics were covered at the roll calls 2 led by Ronald Watts? 3 A What happened the night before or the 4 previous day or any complaints that's been received 5 that day or the night before and what we need to 6 focus on that day. 7 Q How long did roll calls led by Ronald Watts 8 last? 9 A It varies. Sometimes ten minutes, sometimes 10 half an hour. 11 Q And then what's the next thing you as an 12 officer would do after roll call finished? 13 A We'd get our gears together and then we 14 would hit the street. 15 Q Would someone tell you where you should be 16 going? 17 A If there's a special problem that was -- we 18 needed to address that day, yes. If not, we're free 19 to roam the 2nd District or any housing project in 20 the 2nd District. 21 Q If there was a special problem that you were 22 supposed to be concentrating on, who would tell you 23 where you should be going? 24 A Either our sergeant or any other sergeant in	32

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9 (33 to 36)

33	1 Q Has your memory about McDaniels been 2 refreshed or do you have an independent 3 recollection? 4 A No, I have an independent recollection of 5 McDaniels. 6 Q Is there some particular reason you think -- 7 let me rephrase that. 8 Is there a particular reason that you can 9 think of why you remember Anthony McDaniels' arrest 10 but no other ones other than two shootings? 11 MR. ZECCHIN: Objection to form. You can 12 answer. 13 A Well, McDaniels is a gun arrest. I don't 14 make -- I haven't made too many arrests -- gun 15 arrests. And it's kind of particular. There was an 16 actual chase that happened, a car chase and a foot 17 chase. So it sticks -- something that sticks out in 18 my memory. 19 Q Got it. You didn't have to chase a lot of 20 people over the years? 21 A Chase, but nothing that sticks out like 22 McDaniels sticks out. 23 Q How many foot chases do you think you 24 participated in on your 13 years on the tac team in	35	1 A Could be. 2 Q Do you think you chased more than 200 people 3 as a member of the 2nd District tactical team? 4 A Possible. 5 Q Do you think you chased more than 300 people 6 as a member of the 2nd District tactical team? 7 A Possible. 8 Q Do you think you chased more than 400 9 people? 10 A Like I said, again, possible. 11 Q But as you sit here today, you don't 12 remember any of those up to 500 chases other than 13 McDaniels? 14 A Well, out of those chase, nothing really 15 sticks out in my mind. 16 Q So do you remember any of the 500 or so 17 chases? 18 MR. ZECCHIN: Objection to form. You can 19 answer. 20 A No. 21 Q Did you ever patrol with Ronald Watts? 22 A I'm pretty sure I have. 23 Q Do you know how many times you went out on 24 patrol with Ronald Watts?
34	1 the 2nd District? 2 A I couldn't -- I couldn't tell you. 3 Q What's your best estimate of how many foot 4 chases you participated in on the 2nd District tac 5 team? 6 A I can't even guess. 7 Q Is it because it's too many to guess? 8 A I wouldn't say too many, but I don't want to 9 give you the wrong amount or number. 10 Q Was it more than five? 11 A Yes. 12 Q Did you have to chase more than 10 people in 13 13 years? 14 A Probably. 15 Q Do you think you've had to chase more than 16 50 people in your 13 years on the tac team? 17 A Possible. 18 Q Do you think you chased more than a hundred 19 people in 13 years on the tac team? 20 A Possible. 21 Q Do you think you chased more than 500 people 22 in 13 years on the tac team? 23 A I doubt it. 24 Q Somewhere between 100 and 500?	36	1 A That I can't recall. 2 Q And you said you remembered McDaniels and 3 then the two shootings. 4 Are those the two shootings that you talked 5 about at the beginning? 6 A Yes. 7 Q Okay. How many gun arrests have you been 8 involved in as a police officer? 9 A I can't -- I can't guess how many. 10 Q Is it more than a hundred? 11 A Probably. 12 Q Do you think it's more than 500? 13 A Possible, but I doubt it. 14 Q Somewhere between 100 and 500 gun arrests? 15 A Possible. 16 Q And all of those as a member of the 2nd 17 District tactical team? 18 A Yes. 19 Q And when I've been asking questions about 20 the 2nd District tactical team, have you understood 21 those to be about your time on the 264 team? 22 A Yes. 23 Q Other than McDaniels, which gun arrests do 24 you remember?

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10 (37 to 40)

37	1 A Actually nothing sticks out in my mind at 2 this moment. 3 Q Did members of the 264 team socialize 4 together? 5 MR. ZECCHIN: Objection to the word 6 "socialize." 7 A I don't understand what you mean by 8 "socialize." 9 Q Did you spend time together outside of work 10 with any of the members of the 264 team? 11 A A police department involved function, yes. 12 Q I'm sorry. Say that again. 13 A Police department involved functions, yes. 14 Q If there was police department sponsored 15 events basically? 16 A For the most part, yes. 17 Q Would you go get drinks together? 18 A Would we go get drinks together? I'm pretty 19 sure it happens once or twice, but more than that I 20 don't recall. 21 Q Were you friends with any of the members of 22 the 264 team outside of work? 23 A I mean, I consider them friends, but we 24 rarely hang out afterwards.	39	1 A Officer Nichols, I believe. 2 Q And who was Watts with anybody? 3 A I don't believe -- I believe he was by 4 himself. 5 Q Was he already off of the force by the time? 6 A Excuse me? 7 Q Was he already off the force when you saw 8 him? 9 A Yes. 10 Q Where did you -- where did you bump into 11 him? 12 A I believe a restaurant. I can't recall the 13 restaurant. Somewhere on the South Side. 14 Q Did you say anything to him? 15 A Hi, how you doing. That's about it. 16 Q And what did he say in response to you? 17 A He didn't say much. He said he was doing 18 all right. I believe that was his response. 19 Q How long was Nichols your partner? 20 A Nichols was my partner from November '04 -- 21 he took maybe a six-month break, went back to the 22 watch for six months and then came back and became 23 my partner again. So from 2004 until now except 24 that six months when he went back to the watch.
38	1 Q And has that always been the case? 2 A Yes. 3 Q Which members of the 264 team do you 4 consider to be personal friends? 5 A I consider everyone on the 264 team my 6 personal friends. 7 Q Including Ronald Watts? 8 A Yes. 9 Q Was Kallatt Mohammed on the 264 team? 10 A Yes, he was. 11 Q Is he a friend of yours? 12 A I consider him a friend, yes. 13 Q When was the last time you talked to Ronald 14 Watts? 15 A Last time I talked to him or bump into him? 16 Q Either or both. 17 A I think the last time I bumped into him was 18 after he got arrested. 19 Q Did you talk to him then? 20 A We -- we were eating lunch. He just 21 happened to walk in when we were eating lunch. Not 22 much was said. We just -- he ordered his food, 23 ate -- and we ate. 24 Q Who were you with?	40	1 Q He went back to the watch? 2 A Yes. 3 Q What does that mean? 4 A He went back to the watch. He was no longer 5 on the tac team. 6 Q What does it mean to be on the watch? 7 A You work in a marked vehicle, respond to 8 radio calls. 9 Q Do you know why he went back to the watch 10 for six months? 11 A I didn't ask him. 12 Q But do you know why he went back to the 13 watch? 14 A No, I didn't. 15 Q Did anybody tell you why? 16 A No. 17 Q Did you -- do you have any information as to 18 why he went to the watch? 19 A I don't recall -- I don't recall why he went 20 to the watch. 21 Q Do you know -- can you tell me again what 22 time period it was that he went to the watch? 23 A That I couldn't tell you, the time period he 24 went back to the watch.

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11 (41 to 44)

41	1 Q And were you curious as to why he wasn't 2 your partner anymore? 3 A He said he was going on the watch and I left 4 it at that. 5 Q Why didn't you ask him any follow-up 6 questions? 7 A I didn't believe I needed to. If that's 8 what he wanted to do, I guess that's what was best 9 for him at that moment. 10 Q And then when he came back, did you talk 11 about why he had left then? 12 A No. 13 Q Who was your partner while Nichols was on 14 the watch? 15 A I believe Mark -- I'm probably going to 16 butcher his last name. Kowetski (phonetic) or 17 something like that. Probably I even said it wrong. 18 Mark something. 19 Q When you were on the 264 team, were you 20 patrolling in unmarked vehicles? 21 A That would be correct, yes. 22 Q And did you wear uniforms? 23 A Wear plain clothes with a vest over it, a 24 bulletproof vest.	43	1 Q And did you talk with other members of the 2 264 team on your cell phones about work? 3 A It could be work or it could be something 4 else. 5 Q How frequently would you call each other on 6 your cell phones to talk about the things that were 7 happening in the 2nd District? 8 A I don't understand what you mean how often. 9 Q So how frequent -- like every day would you 10 call people on their cell phones to talk about 11 things that happened on the job? 12 A You mean after work would I call them and 13 say -- 14 Q No, no. Did -- well, okay. Let me back up. 15 Did you use your cell phone during a shift 16 to talk about things that were happening on the 17 shift? 18 A I doubt it. 19 Q You don't remember doing that? 20 A No, I don't believe I used my phones about 21 what was going on that day. 22 Q Sorry. Say that again. 23 A I don't believe I used my phone to call 24 another officer to discuss what was going on that
42	1 Q Did you get to know a lot of the residents 2 in Ida B. Wells over the years as a member of the 3 264 team? 4 A I don't understand what you mean "get to 5 know." I mean, I say hi to people that says hi to 6 me. 7 Q Did you begin to recognize certain people? 8 A Yeah. Certain people I recognized, yes. 9 Q And did people recognize you as a police 10 officer? 11 A Yes. 12 Q You weren't undercover? 13 MR. ZECCHIN: Objection to form. 14 A I don't understand what you mean "under 15 cover." 16 Q Well, was it -- it wasn't any sort of secret 17 that you were a police officer even though you 18 weren't wearing a uniform. Is that fair? 19 A Yes, that's fair. 20 Q Did you have cell phone numbers of other 21 members of the 264 team? 22 A I believe I did, yes. 23 Q And did you all talk on your cell phones? 24 A Yes.	44	1 day. 2 Q Do you know whether the Cook County State's 3 Attorney's Office will call you as a witness in 4 criminal cases? 5 A Could you repeat that? 6 Q Do you know whether the Cook County State's 7 Attorney's Office will currently use you as a 8 witness in criminal cases? 9 A From what I have seen in the news and in the 10 Internet, no, they're not willing to call us for any 11 cases. 12 Q And I just mean you specifically. 13 A Me? No, they're not willing to call me in 14 any cases. 15 Q Has anybody told you other than a news 16 report? 17 A I found out as -- like everyone else, when 18 it came out on the news media that I was no longer 19 going to be called on any testimony regarding Cook 20 County. 21 Q And did you ever get a memo or anything like 22 that? 23 A No, I did not. 24 Q Other than being placed on administrative

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12 (45 to 48)

45	1 duty, have you ever been disciplined as a Chicago 2 police officer? 3 A I don't believe I have. 4 Q You would know if you had, right? 5 A Yes, that would be correct. 6 Q What's your best estimate of how many people 7 the 264 team arrested during your 13 years on the 8 street with that team? 9 MR. ZECCHIN: Objection to foundation from 10 this witness. You can answer if you know. 11 A I don't -- I don't recall. I can't even 12 give you a guess. 13 Q It's in the thousands, though, right? 14 A Probably, yes. 15 Q You mentioned a few types of the most common 16 crimes from your time on the 2nd District tactical 17 team, on Team 264. You didn't talk about 18 trespassing. 19 Did you ever arrest people for trespassing 20 frequently? 21 A Did I arrest people -- yes. 22 Q What was the standard that you used to 23 decide whether someone should be arrested for 24 trespassing?	47	1 pretend it's today. Let's say last night you saw 2 someone and gave them a verbal warning. You see 3 them the next day. You would give them another 4 verbal warning? 5 A Yeah, it's a different day. Last night he 6 could have just been hanging out not visiting 7 anyone. The following day he could be there -- 8 legitimately there to see someone. So I would do 9 the same thing. I'm like, Are you here to visit 10 anyone? I know you don't live there. And if you're 11 not here to visit anyone, if you don't live here, 12 I'm giving you a warning to leave the area otherwise 13 you'll be locked up for trespass. 14 Q And so then it would only be if someone came 15 back the same day after that warning? 16 A Yes. 17 Q That you would arrest them for trespassing? 18 A Yes. 19 Q How would you know that the second time that 20 day they weren't there to visit somebody? 21 A I would ask them. If they said, I'm 22 visiting so and so, you verify whether that's true 23 or not. 24 Q Did it frequently happen that you'd tell
46	1 A I would give them a verbal warning, stating, 2 If you don't live in the area and you're not 3 visiting anyone -- there's signs posted all over the 4 building no criminal trespass, no loitering. And if 5 you return, then I'll lock you up; but I give you a 6 verbal warning first. 7 Q So you'd only arrest people for trespassing 8 if you had specifically seen them on a different day 9 trespassing and giving them warning? 10 MR. ZECCHIN: Objection. Misstates his 11 answer. 12 A I usually give them a verbal warning that 13 day. Whether I saw them last night, I would give 14 them a verbal warning that day because he could be 15 visiting someone that day. So I would give him a 16 verbal warning. If you're not here visiting anyone 17 and you don't live here, there's a sign posted no 18 loitering, no trespassing. And when they come back 19 after I give them that verbal warning, then I lock 20 them up for criminal trespass. 21 Q All right. Maybe you can help me understand 22 more about the verbal warnings. 23 You said -- so you could give someone a 24 verbal warning, let's say, last night. Let's	48	1 somebody, You can't be here unless you're visiting. 2 If you come back, you're going to get arrested. 3 Then they would come back and they would admit to 4 you they weren't visiting anybody? 5 A Could you repeat that? 6 Q Yeah, sure. Did it happen frequently where 7 you would give somebody a warning along the lines 8 of, You can't be here unless you're visiting 9 somebody or you live here and then they would come 10 back that very same day and admit to you that they 11 weren't visiting anybody? 12 A If they admit to me they weren't visiting 13 someone? 14 Q Did that happen a lot? 15 A I'm not going to say it never happened, but 16 I don't recall the incident that actually happened 17 that way that you spoke of. 18 Q Is there another way you could have arrested 19 someone for trespassing? 20 A I don't understand that question. What do 21 you mean another way? 22 Q Well, I guess you said you don't remember it 23 happening a lot the way that I described the 24 sequence, right?

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13 (49 to 52)

49	1 A That -- that the individual come up to me 2 and say, I was actually lying; I wasn't here to 3 visit? Is that what you're trying to say? 4 Q No. What I'm asking you is you said, as I 5 understand it -- and tell me if I am 6 misunderstanding -- you said you arrest people for 7 trespassing only when you've already given them a 8 verbal warning that very same day that they can't be 9 in the place and then they come back that same day. 10 A Okay. 11 Q Is that right? 12 A Yes. 13 Q And you only know the second time that 14 they're not there to see someone legitimately if you 15 ask them, correct? 16 A If I ask them? I would have verified that 17 from the first encounter. So next time I see them I 18 know they weren't there to see anyone because I 19 already gave them a verbal warning to leave. 20 Q How do you know that the next time that they 21 weren't there to see someone? 22 A I probably verified it again if they give me 23 a different person or a different location that they 24 were going to.	51
50	1 Q And then you would just make your best 2 estimate? 3 A No. I would verify -- let's say, I spoke to 4 a subject the first time that say, I'm here to go 5 visit someone in 201 named Smith. I go up there. 6 Does anyone Smith lives in this apartment. They say 7 no. Then I give him that warning to leave. The 8 second time, I told you already. I told you to 9 leave and then he gives me another excuse. Well, I 10 actually got the apartment wrong. I wanted to go 11 301. And I know myself 301 is a vacant apartment, 12 so then I lock him up. 13 Q Okay. Did you participate in surveillance 14 operations as a member of the 264 team? 15 A Surveillance? Pretty sure I have, but I 16 don't recall any of those at this time. 17 Q Was -- were -- well, what types of 18 surveillance did you participate in as a member of 19 the Watts team? 20 A Probably narcotics. 21 Q Probably narcotics you said? 22 A Most likely narcotics. 23 Q Do you remember how you conducted 24 surveillance as a member of the Watts team?	52
	1 A Probably pick an area where I could see the 2 subject, whatever the subject was selling drugs, 3 where I can't be seen and see the narcotics 4 transaction. 5 Q When you say you probably did it that way, 6 did you do it that way? 7 A Most likely I would do it that way. 8 Q But you don't have no specific memory right 9 now of ever conducting surveillance as a member of 10 the Watts team? 11 A Nothing comes to mind at this moment. 12 Q And you can't say for certain one way or the 13 other whether you actually conducted surveillance as 14 a member of the Watts team? 15 A I'm pretty sure I have, but I just don't 16 recall of those at this moment. 17 Q So you know you did it. You just don't 18 remember any specific times; is that right? 19 A That would be correct. 20 Q And do you know any specific methods that 21 you used? 22 A It varies on the situation. 23 Q Well, tell me about -- I'm not asking you to 24 generally describe how someone might conduct	

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14 (53 to 56)

53	1 A It happens, yes. 2 Q How frequently did that happen as a member 3 of the Watts team? 4 A I can't say. If there's no beat cars 5 available at that moment, we might transfer them 6 ourself. 7 Q Was that a weekly occurrence? 8 A Again, it varies. 9 Q Sometimes every week, sometimes not? 10 A It could be every week or it could happen 11 once a month, once every two months. It just varies 12 on how busy the district that day where there's no 13 available squad car to transport for us. 14 Q Did any of the -- do you remember anybody 15 ever telling you when you were transporting them to 16 the police station that they had been framed or they 17 weren't guilty? 18 A They had been framed? I don't believe so. 19 Q Or that they weren't guilty? 20 A That they were guilty? 21 Q Were not. 22 A I don't believe so. 23 Q What about that they were guilty. Did 24 anybody ever tell you they were guilty?	55	1 Q And what about Al Jones? 2 A Probably the same, at our civil law firm. 3 Q You just said hi also? 4 A Yes. For the most part, yes. 5 Q And what about Smith? 6 A Smith, probably a week ago said hi because 7 he works the radio in the 2nd District. 8 Q He's also on administrative duty? 9 A I believe so, yes. 10 Q You said Cynthia Torres? 11 A Yes. 12 Q And when was the last time you talked to 13 Cynthia Torres? 14 A Couldn't remember. Maybe months or even a 15 year. 16 Q Okay. And what did you talk with her about? 17 A She works the desk so probably said hi. 18 Q Do you still talk to Nichols every day? 19 A We work together in the same room, yes. 20 Q And when was the last time you talked to 21 Bolton? 22 A Probably at one of our fantasy leagues 23 together. 24 Q Are you still in that -- is it football -- a
54	1 A That would be actually good if they would 2 tell us they were guilty. 3 Q Yeah. But did anyone do it? 4 A I don't believe so. 5 Q That would be highly unusual? 6 A I would say so. 7 Q Which members of the Watts team do you still 8 work with? 9 MR. MICHALIK: I'm just going to object to 10 the -- I think he said before that -- he called it 11 the 264 team, not the Watts team. 12 A I mean, I still work with Officer Nichols. 13 If you call that working administratively, yes, that 14 would be Officer Nichols. 15 Q Anyone else? 16 A That's about it. 17 Q When was the last time you talked to Kenny 18 Young? 19 A Probably months. 20 Q And what did you talk with him about when 21 you last talked? 22 A Probably that was at our civil lawyer's 23 building. Probably just said hi. I can't remember 24 when that was.	56	1 fantasy football league? 2 A Yes, that would be correct. 3 Q Are you still on a league with him? 4 A Yes. 5 Q What's his team name? 6 A I can't remember his team name. 7 Q What's your team name? 8 A My team name? On that one, My Butkus -- My 9 Ditka and Our Butkus. 10 Q Who else is in that fantasy football league? 11 A That one -- that league would be Officer 12 Bolton, Gonzalez, and other officer that I can't 13 remember their names. 14 I remember some of them. Do you want me to 15 mention them? 16 Q Yeah. 17 A Lieutenant Jones, Sergeant Cologne, Ryan 18 Goldie, Derrick Cross. I know I'm forgetting 19 something. Sergeant Stevens, a retired officer 20 Marvin Jones. I know I'm forgetting something 21 because it's a 12-man league. I'm probably 22 forgetting an officer. 23 Q When you said Lieutenant Jones, who are you 24 talking about?

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15 (57 to 60)

57	1 A A different Jones. 2 Q Okay. What's Gonzalez's team name? 3 A I believe Los Chingones. 4 Q And when's the last time you talked to 5 Officer Gonzalez? 6 A Probably last month because he rotates, so 7 sometimes we work the same shifts. 8 Q Have you ever talked to anybody other than 9 your lawyers about the allegations made against you 10 in the civil cases? 11 A No. 12 Q Have you ever talked to anyone other than 13 your lawyers about your being moved to 14 administrative duty? 15 A No. 16 Q Has anyone ever come talk to you -- any 17 other defendants in these cases ever come to you and 18 said anything about the cases or about whether they 19 think it's fair or they did anything wrong? 20 A No. 21 Q Do you still have Watts' phone number? 22 A I don't believe I -- I don't have. 23 Q You think you do not have it anymore? 24 A I don't believe -- I don't have his number	59	1 A No. 2 Q Did you ever suspect that Kallatt Mohammed 3 was corrupt? 4 A No. 5 Q Have you ever suspected that any Chicago 6 police officers were corrupt that you worked with? 7 A No. 8 Q Do you -- are you familiar with the term 9 "code of silence"? 10 A Other than what I heard in the media and 11 from the former mayor, no. 12 Q Do you have an understanding of what a code 13 of silence is? 14 A From what the media and former mayor, yes. 15 Q What's your understanding of what a code of 16 silence means? 17 A According to the media, it's another officer 18 don't turn an officer over. 19 Q And do you know whether there is a code of 20 silence in the Chicago Police Department? 21 A I don't believe so. 22 Q You -- you've never seen any other officers 23 engage in wrongdoing, though, right? 24 A No, I haven't.
58	1 anymore. 2 Q What about Kallatt Mohammed? 3 A The same. I don't think I have -- I don't 4 have his number anymore. 5 Q I'm sorry if I'm repeating this, but when's 6 the last time you talked to Mohammed? 7 A The last time I bumped into him or talked to 8 him, probably after he got out of jail. 9 Q How long after? 10 A That I couldn't tell you how long after he 11 got out of jail. 12 Q Do you know where you were? 13 A We were just patrolling the 2nd District. 14 And I guess he was driving and we just happened to 15 see him on the street. 16 Q Did you stop and talk to him? 17 A Yeah. Said hi, how he was doing, to that 18 extent. 19 Q And what did he say to you? 20 A He said he was fine. 21 Q Was it you and Nichols? 22 A I believe -- yes. 23 Q Did you ever suspect that Ronald Watts was 24 corrupt?	60	1 Q And you've never heard of any other officers 2 engage in wrongdoing? 3 A No, I haven't. 4 Q No civilians have ever complained to you 5 about officer wrongdoing? 6 A Any civilians? I don't recall. 7 Q You don't recall one way or the other? 8 A No. 9 Q If you would have known that a different 10 member of your team was extorting civilians, you 11 would have said something about it? 12 A I would have probably brought it up to -- 13 not probably. I would have brought it to one of the 14 supervisors. 15 Q Which supervisors would you have brought it 16 to? 17 A If the suspect was on our team, then I would 18 have brought it up to a different supervisor. If he 19 was on another team, then I would have told my 20 sergeant. 21 Q Did you work with Lamonica Lewis? 22 A I'm for sure I have. 23 Q Do you know if she was a member of the 264 24 team?

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16 (61 to 64)

61 1 A Yes, she was. 2 Q And was she on the 264 team when you were on 3 the team? 4 A At some point, yes. 5 Q Do you remember what years she was on the 6 team? 7 A She got on the team after us. The year, I 8 couldn't tell you what year she joined our team. 9 Q Do you remember when Mohammed became part of 10 the team? 11 A Mohammed was there when I got there. 12 Q Was there when you got there? 13 A Yes, in 2- -- in 2004. 14 Q Did Watts and Mohammed often go do things on 15 their own out of view of you or other officers? 16 A Could you repeat that? 17 Q Sure. Were Watts and Mohammed often doing 18 things outside of your view? 19 A I don't understand what you mean outside my 20 view. 21 Q Well, if you would go with a group on the 22 264 team to arrest people -- 23 A Again, I don't understand the question 24 you're asking me right now.	63 1 A I don't believe I have. 2 Q Which members of the Watts 264 team that 3 you're aware of played the role of a pretend drug 4 dealer? 5 A That would be the African American officer. 6 Q Which ones specifically? 7 A It varies. It could be Al Jones, Officer 8 Smith, Officer Lamonica, Officer Kallatt Mohammed. 9 Am I missing anyone? That would be the officer that 10 would pretend to be the drug dealers. 11 Q Would Watts ever do it? 12 A I'm pretty sure he had. 13 Q You're pretty sure he has? 14 A Yes. 15 Q How do reverse stings work in an area -- how 16 were they successful? 17 A Could you repeat that? 18 Q The 264 team was a pretty big presence in 19 Ida B. Wells, correct? 20 A Okay. 21 Q I'm asking. Is that -- do you agree with 22 that? 23 A Yeah. We're known in Ida B. Wells, yes. 24 Q How was it that you were able to
62 1 Q All right. Well, did you ever go out with 2 multiple people on the 264 team to go do 3 surveillance or run operations? 4 A I mean, it depends on the situation. If the 5 situation dictate that it needs more than two 6 officers to do a surveillance, yes. But if it just 7 need me and my partner, me and my partner will do 8 the surveillance. It all depends on the situation. 9 Q Did you participate in reverse stings? 10 A Yes. 11 Q Tell me what a reverse sting is. 12 A A reverse sting is where our focus is on the 13 buyer, not the seller. 14 Q A reverse sting that focuses on the buyer? 15 A Yes. 16 Q And how does a -- what is a -- how does a 17 reverse sting work? 18 A A reverse sting? Officers would pretend to 19 be a drug dealer where the buyer would approach him 20 and ask him for certain type of narcotics. And then 21 they would be arrested for attempted -- attempted 22 purchase of narcotics. 23 Q Did you ever play the role of a pretend drug 24 dealer in a reverse sting?	64 1 successfully run reverse stings? 2 MR. ZECCHIN: Objection, form and 3 foundation. You can answer. 4 A Well, the African American officer would 5 pretend to be the drug dealers. And there would be 6 normal residents still hanging outside or in the 7 lobby. 8 Q So residents would help out? 9 A Not help out, but we wouldn't kick them out 10 while we're doing it. 11 Q And then people would approach the 12 officer -- 13 A Yes. 14 Q (Continuing) -- to try and buy drugs? 15 A Yes. 16 Q And did residents or anyone -- well, did 17 residents or other civilians warn people of reverse 18 stings? 19 A I'm pretty sure they have. I'm pretty sure 20 there's people that warn saying we're in the 21 building. I'm pretty sure that happens often. 22 Q How frequently did the Watts 264 team run 23 reverse stings? 24 A It all depends. If we got too much

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17 (65 to 68)

65 1 complaint of too many drug activities at certain 2 location, we might do one every week. Or if not we 3 might do once a month or once every other month. It 4 all depends on the situation. 5 Q Did you have a target for how many people 6 you wanted to arrest on a reverse sting? 7 A We usually try not to have a target, but we 8 usually try to give it enough time to -- or for a 9 sting to work. 10 Q And what's a -- 11 A We try to give it at least an hour, an hour 12 and a half, two hours. 13 Q How -- and do you have an estimate of how 14 many people you typically would arrest in an hour 15 and a half, 2-hour reverse sting? 16 A Could you repeat that? 17 Q Do you have any estimate of how many people 18 would typically be arrested during an hour and a 19 half or 2-hour reverse sting? 20 A I would say probably on average anywhere 21 from 10 to 15 maybe. 22 Q What was your role specifically on reverse 23 stings? 24 A My role would most likely be	67 1 dealer, you say that they were outside the building 2 or inside? 3 A Some of them is outside. Some of them might 4 be hanging out in the lobby, but they could be seen 5 from the outside. The public from the outside could 6 see them. 7 Q And then -- so then the public could 8 presumably see them walking someone else away to 9 you, right? 10 MR. ZECCHIN: Objection, form and foundation 11 from this witness. 12 A What are you trying -- I can't -- I don't 13 understand your question. 14 Q Yes. Well, if they could be seen from the 15 outside and then they arrested somebody and brought 16 them over to you, the public could see that also, 17 right? 18 A No. 19 MR. ZECCHIN: The same objection to 20 foundation, what somebody else could see. 21 A They would walk them to us where -- where 22 we're at where the subject can't see us. 23 Q Where the subject -- right. You can't be 24 seen, right?
66 1 enforcement/processing team. 2 Q What is the enforcement/processing team? 3 A That's where we would be somewhere inside 4 the lobby where the officer would bring the subject 5 that attempted to buy narcotics, where we would 6 assist in placing that subject into custody. 7 Q Tell me how it would work? Like what are 8 the logistics like? Someone comes in, they go talk 9 to an officer and they try to buy drugs. 10 Where are you standing then and how do you 11 get alerted? 12 A We would be somewhere inside the building 13 where we can't be seen from the outside. Now, if 14 you're asking me how it happened outside, I can't 15 tell you that. I'm not one of the officer. But 16 usually the officer pretending to be drug dealers 17 would walk that individual to us and then we would 18 assist in placing that subject into custody. And 19 then the officer would inform us what he bought, how 20 much money he tendered. And then from then I would 21 write down the time he was arrested, the person's 22 name, what he attempted to purchase, and the amount 23 of money he tendered that officer. 24 Q And so the officer who was the pretend drug	68 1 A Yes. 2 Q But the officer could be seen from the 3 outside walking the person away, right? 4 A Okay, yes. That's possible yes. 5 Q How do they walk them to you? Do they just 6 voluntarily? 7 A Most of the time they're walking side by 8 side, and then the minute they see us they know 9 they're being arrested. 10 Q And so they don't know they were arrested 11 until they see you? 12 A Yes. You see an Asian guy, a white guy in 13 the lobby and they're being walked by and then, you 14 know, they know they're being arrested. That's when 15 we assist them in placing them into custody. 16 Q When you're doing reverse stings -- I mean 17 you, not just the team. When you are working on 18 reverse stings and you're in enforcement and 19 processing role, can you see the transaction 20 happening? 21 A No. 22 Q Is the only officer who can see the 23 transaction the one who's being the pretend drug 24 dealer?

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18 (69 to 72)

69	1 A I believe so, yes. 2 Q And do reverse sting, the way they work is 3 each time someone tries to buy drugs, a pretend drug 4 dealer officer will walk them over to you or another 5 member of the enforcement team? 6 A That would be correct, yes. 7 Q And then on the ones where you're working, 8 you will write down at that time when they were 9 arrested? 10 A Yes. 11 Q And what do you write that down on? 12 A Usually we have a bag, a packet for each 13 individual; the time he was arrested, his name, what 14 he tried to purchase, the amount of money he 15 tendered. 16 Q And where do you get that information from? 17 A From -- well, the officer will give -- will 18 inform us what he tried to purchase and how much 19 money he tendered, and we would ask that individual 20 what his name is. 21 Q And when you say "the officer," you mean the 22 officer who was the pretend drug dealer? 23 A That would be correct, yes. 24 Q So you have no way to verify whether that is	71
70	1 true other than the officer telling you that. Is 2 that fair? 3 A I have no reason to doubt that officer that 4 it isn't true. 5 Q Well, that's a different question. 6 You have no reason to verify that the 7 officer's information is accurate other than the 8 officer? 9 A That would be correct, yes. 10 Q You said you have a packet for each 11 individual who's arrested? 12 A It's a bag. 13 Q A bag? 14 A Basically a bag -- 15 Q And what -- 16 A (Continuing) -- where -- 17 Q No. Go ahead. 18 A We would write their name, like I stated 19 earlier, what time he got arrested, what he 20 attempted to purchase, how much money he tendered. 21 Q What is -- what kind of bag? I mean, 22 literally a bag? 23 A It's a clear -- it's a property -- prisoner 24 property bag. It's a clear plastic bag. I would	72
	1 say -- probably would have to guess -- 6 by 12 2 maybe. 3 Q And you write what they tried to buy, how 4 much they tendered on that bag? 5 A Yes. 6 Q And you write what time they were arrested 7 on that bag? 8 A Yes. 9 Q And -- 10 A I try to do it anyway. 11 Q You tried to or -- 12 A No. I do it anyway when that individual is 13 handed to me. 14 Q And then do you know -- what do you do with 15 the bags? 16 A I keep it with me until we go back to the 17 station. 18 Q Were you -- would you bring people back one 19 by one or you wait until the reverse sting's over? 20 A We usually wait until the operation is done 21 and then the wagon would come transport all the 22 individuals. 23 Q And when you get back to the station, what 24 do you do with the bags?	

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19 (73 to 76)

73	1 the subject in custody when the officer brings them 2 back to us. 3 Q And then what is the processing team? 4 A Processing team is completing the arrest 5 packet for that individual. 6 Q And so does the arrest packet include both 7 the property bag that you do on scene and the 8 reports that you do back at the station? 9 A Well, the property bag is just our reference 10 so we know who's who, what money he tendered and 11 what he tried to purchase. 12 Q And do you put the money in the property 13 bag? 14 A No. We put it in a -- we inventory it and 15 we put it in a different bag that's strictly for 16 money. 17 Q You do that at the scene? 18 A On the -- in the station. 19 Q What do you do with the money until you get 20 back to the station? 21 A Keep it in the bag me. 22 Q In the property bag? 23 A Yes. 24 Q And so when you are filling out reports as a	75	1 Q He plays the lottery? 2 A Yes. 3 Q How do you know he plays the lottery? 4 A He's got -- he's got lotto tickets with him. 5 Q Back in the day? 6 A I'm pretty sure, yes. 7 Q But you're not in touch with him now, right? 8 A No. 9 Q Did you receive any training as a police 10 officer on how to complete reports? 11 A In the academy and also in the field. 12 Q Tell me about your training in the academy 13 on completing police reports. 14 A I don't understand what you mean, tell you. 15 Q What was your training? 16 A We were -- probably in class on how to 17 prepare a case report, arrest report and that stuff. 18 Q Do you remember what you learned about how 19 to prepare reports in the academy? 20 A 18 years ago, I can't recall how we were 21 taught in the academy. 22 Q And you said you had some additional 23 training in report writing? 24 A Yes.
74	1 member of the processing team of a reverse sting, 2 you're doing so based on what another officer has 3 reported to you as happening? 4 A That would be correct, yes. 5 Q Who gives you -- for reverse stings who 6 would be the person to give you an assignment? 7 A Well, for the most part it would be the 8 sergeant, but it's pretty obvious our role would be 9 strictly enforcement/processing team. 10 Q Because no one would believe that you're a 11 drug dealer? 12 A That would be correct. 13 Q Did you ever -- other than fantasy football, 14 did you do any gambling with the members of the 264 15 Watts team? 16 A Gambling, I don't believe so. 17 Q Did you ever go to a casino with anyone on 18 the Watts 264 team? 19 A Casino, any on Watts -- I don't recall 20 having gone to a casino with any Watts team or 264 21 team. 22 Q Do you know if Watts liked to gamble? 23 A I can't tell you whether he likes to gamble. 24 I know he plays the lottery.	76	1 Q And tell me when you had additional 2 report -- 3 A When I was a PPO, I would be riding with an 4 FTO. 5 Q What's a PPO; what's an FTO? 6 A PTO is probationary police officer. FTO is 7 field training officer. 8 Q You'd receive training from field 9 training -- 10 A Yes. 11 Q (Continuing) -- officers? 12 A Yes. 13 Q When did that happen? 14 A Right -- right after we -- I got out of the 15 academy and got assigned to the 2nd District. 16 Q How long were you a probationary officer? 17 A I don't remember whether the probationary 18 was a year or a year and a half. I believe we was a 19 year when I was -- when I came out of the academy. 20 Q And did you spend that whole year with the 21 field training officer? 22 A The first believe three months you had a 23 field training officer, and then after that you get 24 assigned to a regular POs.

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20 (77 to 80)

77	1 Q What do you recall learning about preparing 2 police reports from the field training officers? 3 A For the most part we get a job. Let's say a 4 battery. He would assist me in how to properly fill 5 out a battery case report. 6 Q And how would they assist you on how to 7 properly fill it out? 8 A They would help us, say first you've got to 9 get an RD. Make sure you get the UCR code, get all 10 the information, the victims, and self-explanatory; 11 fill out the case report. 12 Q What's an RD? 13 A An RD is a unique number that's attached to 14 an incident. 15 Q How do you get an RD number? 16 A You -- either by dispatch or -- now we're 17 able to put it in the computer when we're preparing 18 a case report. 19 Q It just generates automatically? 20 A Yes. You put in the right UCR code and it 21 generates an RD for you. 22 Q You said UCR? 23 A Yes. 24 Q What does that stand for?	79	1 A What's the reason? I don't understand what 2 you mean by "the reason." 3 Q Well, why do you -- why does it matter if 4 you're accurate when completing police reports? 5 A Why does it matter why -- if you're accurate 6 in a police report? 7 Q Yeah. 8 A You want to be as close to as accurate as to 9 what happened at that moment. You want to put it 10 down as accurate as you can. 11 Q Right. But why do you want to have an 12 accurate police report? What's the reason for that? 13 A I don't understand the question, what you 14 mean by "What's the reason for that." 15 Q You're a police officer. You've been one 16 for 18 years. 17 A Yes. 18 Q You've completed thousands of reports? 19 A Yes. 20 Q Have you ever thought about why it matters 21 that you write complete, accurate reports? 22 A I don't know -- I'm kind of confused on your 23 question. 24 Q Well, what's the point of a police report?
78	1 A It's a -- UCR is a classification for types 2 of crimes; battery, burglary, handgun, that type. 3 Q And you said an RD number is generated in 4 the computer. What system do you use? 5 A We use Era I believe right now. 6 Q Era? 7 A Yes. 8 Q How long have you used the Era system? 9 A I couldn't tell you when it started, but -- 10 I can't give the date when Era started. 11 Q You agree that it's important to have 12 complete and accurate police reports? 13 A Yes. 14 Q Why is it important to have complete and 15 accurate police reports? 16 A You want to be as accurate as possible as to 17 what happened or occurred that moment. 18 Q And why do you want to be as accurate as 19 possible as to what occurred at that moment? 20 A Why do I want to be as accurate? You 21 want -- you want to put as much facts and accurate 22 to an incident as accurate as you can. 23 Q What's the reason for wanting to be accurate 24 in police reports or reasons?	80	1 A To document an incident as accurate as you 2 can. 3 Q And are they used for things? 4 A For trial, for criminal proceedings. 5 Q Okay. How are they used in criminal 6 proceedings in your experience with 18 years on the 7 force? 8 A How they're used in criminal proceedings? 9 Q Yes. 10 A To pros- -- 11 MR. KOSOKO: I'm going to object to the way 12 the question is phrased. 13 MR. MICHALIK: I'm going to object to form. 14 MR. PALLES: And I'm going to object to lack 15 of foundation. 16 Q Do you have experience testifying in court 17 during your 18 years as a police officer? 18 A Yes. 19 Q Did you use reports in connection with that 20 testimony sometimes? 21 A Yes. 22 Q Based on your substantial experience as a 23 police officer, do you have an understanding of how 24 police reports are used in criminal proceedings?

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21 (81 to 84)

81	1 A Yes. 2 Q Okay. How are police reports used in 3 criminal proceedings? 4 MR. ZECCHIN: Objection, asked and answered. 5 You can answer again. 6 A How is a police report used in a criminal 7 proceeding? Police reports are used to prosecute an 8 individual where the facts are stated in a case 9 report as accurate as you can. 10 Q So the reports need to be accurate so that 11 prosecutors have accurate information, right? 12 A Yes. 13 Q And if prosecutors don't have accurate 14 information, how do they make reasoned decisions on 15 whether to prosecute people? 16 MR. ZECCHIN: Objection, foundation from 17 this witness as to what a prosecutor does. 18 MR. KOSOKO: Join. 19 Q You can still answer. 20 A I don't understand the question. 21 Q Would you refer to your police reports 22 before you would testify? 23 A Yes. 24 Q Why would you refer to your police reports	83	1 A I mean, it would -- it might help my -- 2 refresh my memory by looking back on my case report. 3 Q You have no other source of information 4 other than what's in your police reports, do you? 5 MR. KOSOKO: Objection, form of the 6 question. 7 MR. MICHALIK: Join. 8 A I guess. 9 Q So if your reports aren't accurate, then 10 your testimony can't be accurate? 11 A That would be correct. 12 MR. KOSOKO: Objection, form of the 13 question. 14 MR. PALLES: Lack of foundation. 15 MR. MICHALIK: Join. 16 Q You said that your -- Nichols was your 17 partner? 18 A Yes. 19 Q From 2004 to 2008 who -- can you tell me the 20 other partners on the Watts 264 team? 21 A Like I stated earlier, most likely it would 22 be Kenny Young, Alvin Jones. 23 Q So I'm sorry. Let me clarify the question. 24 I'm sorry to interrupt. But who was partnered with
82	1 before you would testify? 2 A To refresh my memory on what happened at 3 that -- at that moment. 4 Q Because you're so busy and you do so many 5 things, you can't remember everything you do, right? 6 A Because you want to be refreshed to make 7 sure that what you put down was accurate and help 8 your memory when you're testifying in criminal 9 proceeding. 10 Q And as we sit here today, we've asked you 11 about -- you've told me you have a specific 12 recollection of 3 of the potentially 2,000 arrests 13 you made in your team -- your time on the Watts 14 team, right? 15 A Yes. 16 MR. ZECCHIN: Object to form. You misstated 17 the number he said, but you can answer the question. 18 A Yes. 19 Q So the only way that you can even talk about 20 what happened in other ones is to look at your 21 police reports, right? 22 MR. KOSOKO: Objection, form of the 23 question. 24 MR. MICHALIK: Join.	84	1 who? 2 A Okay. The partner would be most likely -- 3 264 Adam would be Officer Young, Officer Jones. 264 4 Boy would be Officer Gonzalez, Officer Bolton. 264 5 Charlie would be myself and Officer Douglas Nichols. 6 264 David would most likely be Officer Smith and 7 Officer Cynthia Torres. 8 Q When you were saying "most likely" there, is 9 that because it would depend on if people were 10 working on a given day or because you don't remember 11 exactly or some other reason? 12 A You gave me a period from 2004 to 2007. I 13 don't remember when Officer Torres left -- 14 Q Okay. 15 A (Continuing) -- so... 16 Q Do you remember who replaced Officer Torres? 17 A That I couldn't remember. I don't know 18 whether it was Officer Cabrales or Officer Lamonica 19 Lewis. 20 Q Lewis. And that's Coco? 21 A Yes, that would be correct. 22 Q Whoever replaced Torres, would they become 23 Smith's partner? Is that what happened? 24 A If Torres would have left, yes.

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22 (85 to 88)

85	1 Q Yeah. And I'm not trying to get you to 2 answer a question you don't know about timing. But 3 I just mean whenever Torres left, was the person -- 4 A The person that got replaced would have been 5 working with Officer Smith. 6 Q Okay. 7 MR. RAUSCHER: Is it okay if we take a quick 8 break? 9 MR. ZECCHIN: Sure. 10 THE VIDEOGRAPHER: Off the record, 1:50 11 (sic). 12 (A recess was taken from 12:50 p.m. to 1:02 13 p.m.) 14 THE VIDEOGRAPHER: Back on the record, 1:03. 15 Q We were talking about partners among the 16 Watts 264 team before the break. And I asked you to 17 identify who was on the team from the 2004 to 2008 18 period. 19 Can you tell me other members of the team 20 over the year -- over the years who you haven't 21 mentioned yet? 22 A Over the years? The only person that I 23 could think of that I haven't mentioned is Dorian 24 Smith.	87
86	1 Q And about how long was Dorian Smith on the 2 Watts 264 team? 3 A That I couldn't remember. I know he came in 4 towards the tail end of it. 5 Q Did you ever ask to get taken off of the 6 Watts 264 team? 7 A No. 8 Q Did you ever ask to get transferred out of 9 the 2nd District? 10 A No. 11 Q Did you ever seek a promotion? 12 A Did I ever seek promotion? Yes. 13 Q When did you seek promotions? 14 A When I took the sergeant exam twice. 15 Q And what was the result of you taking the 16 sergeant exam? 17 A I didn't do too well. 18 Q When did you take the sergeant exam? 19 A I think the first one -- I'm not exact on 20 the date. It might have been 2005. And the last 21 one was whenever the last sergeant exam was. 22 Q And you've described your day-to-day 23 responsibilities when you were an active street 24 police officer.	88
	1 Can you describe Watts's responsibilities on 2 a day-to-day basis? 3 A Basically to supervise the eight officers. 4 Q And was he out on the street with you? 5 A With us or -- 6 Q With -- not just with you, with the team. 7 A For the most part, yes. 8 Q Almost every day? 9 A I couldn't say every day, but for the most 10 part, yes. 11 Q Typically he would be on the street with the 12 team? 13 A Yes. 14 Q And what would he be doing? 15 A That I couldn't answer. 16 Q Did you see him? 17 A At some point during the day, yes. 18 Q And when you saw him during the day, what 19 would he typically be doing? 20 MR. ZECCHIN: Objection to form of the 21 question. 22 A Most of the time he would log us saying he 23 saw us here, saw us at a location. 24 Q Would he participate in arrests?	

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23 (89 to 92)

89	1 Q Just generally when he was the sergeant of 2 the 264 team, was he on the scene of arrests every 3 week? 4 A I can't speak whether he would be on the 5 scene of the other vehicle. I'm not, you know, in 6 that vehicle. 7 Q I'm not asking if he was at every arrest. 8 But do you have any understanding of whether he was 9 on the scene of arrests, period, every week when he 10 was the sergeant? 11 MR. KOSOKO: I'm going to object to just the 12 form of the question. 13 MR. ZECCHIN: I'm going to join. 14 A I don't understand your questioning. 15 Q Do you know one way or the other whether 16 Sergeant Watts was on the scene of arrests every 17 week while he was the sergeant of the tac team? 18 MR. KOSOKO: I'm going to object to the form 19 again. 20 A Again, I mean, whose arrests? There's four 21 different cars on a team. 22 Q Any -- any arrests at all. 23 A Well, I can't speak for those other three 24 cars, whether he was on the scene while they were	91	1 Q Did you -- would it be -- did you frequently 2 see him on the scene of arrests? 3 A I mean, if someone made an arrest and I 4 happened to stop by and I see him, then I see Watts 5 on the scene of an arrest; but other than that, I 6 can't answer that. 7 Q Did you -- you can't answer if you saw him 8 frequently at the scene of arrests? 9 A I'm confused by your question. Like I said, 10 I'm not on those vehicles. So if they made an 11 arrest somewhere else and I'm somewhere else, how am 12 I supposed to know if Officer Watts -- I mean, 13 Sergeant Watts then was on that arrest? I can't 14 answer that. 15 Q Yeah. Let me try to help you. 16 What is -- what are you finding confusing 17 about my question? 18 A You're asking me if Watts was on an arrest 19 on a weekly basis. I don't understand that 20 question. 21 Q You don't understand it or you don't know 22 the answer? 23 A I don't understand it. 24 Q Do you have an understanding of what it
90	1 making an arrest. 2 Q So my question is do you know one way or the 3 other whether Watts was on the scene of at least 4 some arrests on a weekly basis when he was the 5 sergeant of the tac team? 6 A I mean, I can't answer that. Probably, but 7 I can't answer that -- I'm not on those vehicles. 8 Q Did you see him on a weekly basis at the 9 scene of arrests? 10 A On my arrests? 11 Q Did you see him on anyone's arrests? 12 A Again, I can't speak for those other 13 officers. We're not -- we're not always together. 14 Q Let me try again. 15 A Okay. 16 Q Because I'm asking did you see him, you see 17 him physically? Did you see Ronald Watts on the 18 scene of arrests every week while he was the 19 sergeant? 20 A Every week? 21 Q Yes. 22 A I don't know if I see him every week on the 23 scene of an arrest. I can't -- I don't know every 24 week.	92	1 means to be at the scene of on arrest? 2 A Yes. 3 Q Okay. What is your understanding of what it 4 means to be at the scene of an arrest? 5 A You're present when someone was arrested. 6 Q What do you not understand about the 7 question of whether Watts was at the scene of 8 arrests on a weekly basis? 9 A I'm asking whose arrests are you talking 10 about? 11 Q Any arrests. 12 A Again, if I wasn't there, I can't speak of 13 whether Watts was there on the scene of an arrest. 14 Q So you do understand what the question 15 means, right? 16 A Yes. 17 Q Okay. But you just are saying you don't 18 know if he was at every arrest that you didn't see? 19 A That would be correct. 20 Q I'm not asking you about arrests you didn't 21 see. 22 What I want to know is do you know one way 23 or the other whether Ronald Watts would go -- 24 whether he was at the scene of arrests on a weekly

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24 (93 to 96)

93	1 basis when he was the sergeant of the tac team that 2 you worked on? 3 MR. KOSOKO: I'm going to object based on 4 form of the question. I understand where you're 5 trying to go, but I think there's a fundamental 6 misunderstanding of what goes on at the scene. 7 MR. ZECCHIN: I'm going to join. 8 A I mean, pretty sure most -- most, not all of 9 them, he would be on the scene of an arrest, yes. 10 Q And what would his role typically be at the 11 scene of an arrest? 12 MR. ZECCHIN: Objection to the form -- 13 MR. KOSOKO: Object to foundation. 14 MR. ZECCHIN: (Continuing) -- as to arrests 15 he's not present for. 16 MR. KOSOKO: And I object to foundation as 17 to a sergeant's role. 18 A What would his role would be? He's a 19 supervisor. Supervise. 20 Q And did you see Watts supervising arrest 21 scenes over the years? 22 MR. KOSOKO: Again, I'm going to object 23 based upon foundation as to the supervisor's role 24 and what the supervisors do.	95	1 Q In your many years of working under Ronald 2 Watts' supervision, did you gain some understanding 3 of what his responsibilities were at the scene of an 4 arrest? 5 MR. ZECCHIN: Objection to the formation, 6 asked. 7 A I mean, it bears on the situation. 8 Q Okay, great. So tell me the different 9 various things that he was responsible for doing at 10 the scene of an arrest based on your experience 11 working with him. 12 MR. MICHALIK: Object to form and 13 foundation. 14 MR. ZECCHIN: Join. 15 MR. MICHALIK: That's not a question. 16 MR. KOSOKO: Join. 17 THE WITNESS: I mean, like I said, just his 18 presence alone, make sure his officer are safe. 19 That's one thing. He hears us on a job somewhere, 20 he might drop by, make sure his officer are all 21 right. 22 Q And how would he -- in your experience from 23 what you observed, how would he make sure that 24 officers were safe at the scene of arrests?
94	1 A I mean, what do you mean by supervise? He 2 could just be there as he's present supervising. He 3 wouldn't have to say anything. He could just be 4 present at the scene supervise. Just his presence 5 alone is supervise, make sure everything went well. 6 Q Okay. So one role of a supervisor would 7 just be to be there and make sure everything went 8 well, right? 9 A Or that went all right. 10 MR. KOSOKO: I just fundamentally object as 11 to his foundation as to what the supervisor's 12 duties, roles, and responsibilities are. 13 Q How many years did you work with Ronald 14 Watts as your supervisor? 15 A From 2004 until the time he got arrested. 16 Q How many years was that? 17 A 2004, I forgot the year he got arrested. 18 You would have to tell me. 19 Q More than ten years? No, sorry. 20 A I mean, I could do the math if you tell 21 me -- I don't know the year he got arrested. 22 Q You worked with him for many years. Is that 23 fair? 24 A Okay. That's fair.	96	1 A I mean, he -- 2 MR. KOSOKO: Object as to form as to what -- 3 what my client knew and did. 4 A I mean, he could just act as a guard officer 5 while we're doing our investigation. 6 Q And what does a guard officer do? 7 A You make sure the officers safe while 8 they're doing what they're doing. 9 Q And how does a guard officer make sure that 10 people are safe? 11 A Your responsibility is to be aware of your 12 surroundings, make -- keeping your officers safe, 13 make sure no one walks up behind them while they're 14 doing their investigation. 15 Q Did you ever see Ronald Watts arrest anybody 16 himself? 17 A I don't recall. 18 Q You don't recall one way or the other? 19 A No. 20 Q Did you ever see your partner, Nichols, 21 arrest anybody? 22 A Yes. 23 Q Did you ever tell a civilian how they can 24 file a complaint against any officers?

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25 (97 to 100)

97	1 A Did I ever tell? 2 Q Yeah. 3 A If an -- if an individual come up to me 4 saying they have a complaint against an officer, I 5 usually refer them to OPS at the time. I always 6 tell them, You can call OPS if you have a complaint 7 on any officer. 8 Q And what type of complaints did you get from 9 civilians over the years? 10 A I don't recall the complaint. They would 11 just say, How do I file a complaint on an officer? 12 I would state, Call OPS. 13 Q Did you tell them how to get in touch with 14 OPS? 15 A Yes. 16 Q Did you give them a phone number or -- 17 A Yes. I would look in my book. Or if I 18 don't have my book at that time, I would advise them 19 to call 311 and ask for OPS's number. 20 Q Do you remember any specific officers people 21 wanted to complain about? 22 A No. 23 Q Do you remember anyone ever coming up to you 24 and saying Watts did anything wrong?	99	1 and Mohammed got locked up. 2 Q When did you have that conversation or those 3 conversations with Nichols? 4 A Probably the day the news broke out or right 5 after. 6 Q How many times do you think you've talked to 7 Nichols about the Watts and Mohammed criminal 8 proceedings? 9 A Probably just a couple of times after -- 10 immediately after they got arrested. 11 Q What did you say to him, what did he say to 12 you? 13 A I just said, Did you know what -- probably 14 to the extent, Did you know what Watts and Mohammed 15 got locked up for according to the news media, to 16 that extent. 17 Q And what did he say to you? 18 A He probably stated he read -- he also read 19 the media or what was in the news. 20 Q And did you have any -- did either of you 21 express any surprise, disbelief? 22 A I mean, we were shocked that they got 23 arrested; but other than that, no. 24 Q Why were you shocked that they got arrested?
98	1 A No. 2 Q How many people over the years do you think 3 you gave OPS's telephone number to? 4 A That I couldn't tell you. 5 Q More than a hundred? 6 A I doubt it. 7 Q More than 50? 8 A Maybe. 9 Q How did you learn that Mohammed and Watts 10 had been charged with crimes? 11 A How did I learn? On the news. 12 Q Do you have any source of information about 13 what they were charged or convicted of other than 14 the news? 15 A No, just the news. 16 Q Did you ever talk about it with current or 17 former members of the 264 Watts team? 18 A Other than what was on the news, no. 19 Q But you've talked to them about what was on 20 the news? 21 A Yeah, about what they were locked up for. 22 Q Who did you talk to about that? 23 A Probably discussed it with my partner that, 24 Did you read on the paper -- on the news that Watts	100	1 MR. KOSOKO: I'm going to object as to form 2 of the question. 3 A That they just got arrested. 4 Q Why were you shocked that they had been 5 arrested? 6 A I had no reason to believe that they would 7 be arrested. 8 Q Why was Nichols shocked? Did he tell you? 9 A I didn't -- did I say he was shocked? I 10 don't believe I stated he was shocked. 11 Q I thought you said, We were shocked. 12 A Okay. I might have spoken -- I was shocked. 13 Q You don't know how Nichols -- 14 A No, I don't know how Nichols felt. 15 Q He didn't say to you, I'm shocked that they 16 got arrested -- 17 A No -- 18 Q (Continuing) -- or anything like that? 19 A (Continuing) -- I don't believe he did. 20 Q How long was this conversation with you and 21 Nichols about Watts and Mohammed? 22 A About a couple minutes, not more than that. 23 Q Was it at the police station? 24 A I couldn't remember if it was the police

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26 (101 to 104)

101	1 station. Most likely probably, yes, the police 2 station. 3 Q We had talked about report writing, and a 4 lot of it was in connection with reverse stings. 5 How do you decide who writes a report after 6 an arrest outside of the reverse sting context? 7 A Usually the arresting officer or the person 8 that actually observed the crime would do the 9 paperwork, but there are certain instances where 10 that doesn't happen. 11 Q What are the incidents when that doesn't 12 happen? 13 A That they don't write -- 14 Q So -- well, let's back up. 15 Who's the -- when you say "arresting 16 officer," who is the arresting officer? 17 A The person that observed the crime being 18 committed. 19 Q So there is -- when you said the arresting 20 officer or the person who writes or who observed the 21 crime being committed, is that the same person? 22 A What was that? 23 Q The arresting officer, that means that's the 24 person who witnessed the crime being observed?	103	1 not. 2 Q And what would be the incidents where maybe 3 the arresting officer wouldn't have observed the 4 transaction? 5 A The arresting officer wouldn't be the person 6 that observed the transaction. Well, let's say I'm 7 the surveillance officer. I observed a transaction. 8 Then I arrested the person. I'm relying on the 9 surveillance officer information of what happened. 10 Q So let me just understand. Who are you in 11 this scenario you just gave? 12 A Let's say I'm an enforcement officer and 13 there's a surveillance officer. Let's say so and so 14 individual did a transaction and I placed that 15 subject in custody and I end up being the arresting 16 officer. That's the incident I didn't observe what 17 happened, but I'm relying on the information from 18 the officer that actually witnessed the incident. 19 Q Understood. And then who -- should all that 20 information be written in the report so that someone 21 could look at it and know who saw what? 22 A Yes. 23 Q I'm going to shift gears a little bit again. 24 We talked about the members of the team over the
102	1 A For the most part, yes, but it doesn't 2 really -- it doesn't -- there are certain incident 3 where that doesn't happen. 4 Q Where the arresting officer doesn't observe 5 it? 6 A Yes. 7 Q And is it like -- is a reverse sting an 8 example of that? 9 A Yes; yes. 10 Q What are some other examples of when the 11 arresting officer would not be someone who observed 12 the incident? 13 A Well, I could give you an example. Let's 14 say there's a person shot. I didn't witness that, 15 but I'm relying on information I received from the 16 citizen or other officer. I might be the arresting 17 officer, but I didn't witness that incident. So 18 certain situation like that. 19 Q And when -- so let's take a drug 20 transaction. 21 Does the -- would the arresting officer 22 typically be someone who observed the transaction? 23 A The arresting officer would be the -- 24 typically, yes, but there's incident where maybe	104	1 years. 2 Did any of them have nicknames that you're 3 aware of, including you? 4 A Do any of them nicknames? I know some of 5 the resident would call me Chinaman. But as to the 6 other officer, I can't remember what nicknames they 7 have. 8 Q Other than we talked about Lewis. We know 9 some people referred to her as Coco; is that right? 10 A I believe so. 11 Q And anyone else you can think of? 12 A Sometimes they would refer to my partner as 13 Big Country. Robert Gonzalez, I'm not positive. 14 Make Gonzo. And Brian Bolton, some of them would 15 refer to him as Blue Eyes; but that's about it. 16 Q Do you know Shannon Spalding? 17 A Other than what I hear in the media, no. 18 Q You never met her? 19 A Never met her. 20 Q What about Echeverria? 21 A The same thing. 22 Q Never met him? 23 A Never met him. 24 Q So never worked with either of them?

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27 (105 to 108)

105	1 A No. 2 Q Were you ever interviewed by Internal 3 Affairs about Watts or Mohammed? 4 A I don't believe so. 5 Q Are you aware of any internal investigation 6 into Watts or Mohammed while they were officers? 7 A No. 8 Q And were you ever made aware while Watts and 9 Mohammed were still on the force of any 10 investigation involving either of them? 11 A No. 12 Q After they were arrested, did anyone from 13 the City or COPA or IPRA come talk to you about 14 Watts or Mohammed before these cases were filed? 15 A No. 16 Q You've talked to COPA, correct? 17 A Yes. 18 Q Other than COPA, has anyone from the City 19 talked to you about Watts or Mohammed? 20 A No. 21 Q And Internal Affairs, no one from the CPD, 22 anything like that? 23 A No. 24 Q Do you have any reason to believe that Watts	107	1 vice or case report. I don't recall whether it was 2 vice or case report. 3 Q Did any of the documents you looked at to 4 prepare for your deposition refresh your 5 recollection? 6 A Refresh my recollection? No. 7 Q How long -- well, did you do anything other 8 than look at documents to prepare for your 9 deposition? 10 A No. 11 Q Did you meet with your attorney? 12 A Yes, I met with -- 13 Q I don't want to know what you talked about 14 with him -- 15 A Yes. 16 Q (Continuing) -- but I do want to know if you 17 met with him. 18 A Yes, I met with my civil attorneys. 19 Q How -- when did you meet with your 20 attorneys? 21 A To prepare for this? 22 Q Yeah. 23 A Last three days, I believe. 24 Q All three days?
106	1 and Mohammed are not guilty? 2 A Do I have reason to believe they're not 3 guilty? 4 MR. ZECCHIN: Objection, foundation. You 5 can answer if you know. 6 A I can't answer that. 7 Q You don't know one way or the other? 8 A No. 9 Q Tell me what you did to prepare for your 10 deposition today? 11 A Looked at a couple of paperwork, case 12 reports. 13 Q What case reports paperwork did you look at? 14 A What do you mean? 15 Q What case reports or paperwork did you look 16 at to prepare for your deposition? 17 A Case report for McDaniels, maybe looked at 18 Lionel White, Scott, Martin -- I mean, not Martin, 19 Smith. I'm sorry. 20 Q Taurus Smith? 21 A Is that her name? Okay, Taurus Smith. 22 Q Do you remember specifically which reports 23 you looked at? 24 A Probably Arrest Report, whether -- if it's	108	1 A Yes, I believe so. 2 Q How long did each meeting last? 3 A Probably from -- any time between 10:00 to 4 2:00 or 3:00. 5 Q And who was at the meetings? 6 A Counsel, Tony. 7 Q Okay. Is that it? 8 A And some other ones who might drop in, like 9 Allyson, Bill, and Brian; but for the most part just 10 Tony. 11 Q All from Mr. Hale's office? 12 A That would be correct. 13 Q When was the last time you saw -- so you saw 14 a bunch of -- well, I shouldn't say "a bunch." 15 You saw some reports over the last few days 16 to prepare for your deposition, right? 17 A Yes. 18 Q Before that when was the last time you 19 looked at any of those reports? 20 A Before that, probably a couple of months. 21 Q And was that -- it was something else in 22 connection with this case? 23 A I don't remember if it's in connection with 24 this case; but at the same law firm, Hale's law

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28 (109 to 112)

109 1 firm. 2 Q Before these cases were filed, do you know 3 the last time you looked at any of those reports, if 4 ever? 5 A I don't recall the last time I looked at 6 those reports. 7 MR. RAUSCHER: I'm just going to go grab -- 8 it's in here. 9 MR. ZECCHIN: Oh, sure. 10 (Brief pause.) 11 Q I'm going to mark Exhibit 1, which is a 12 document Bates-stamped CITY-BG-52330 through 31. 13 Hand that to you. 14 (Leano Exhibit No. 1 was marked for 15 identification and is attached to the transcript.) 16 Q And this is on the Smith case. 17 Have you seen this document before? 18 A Yes. 19 Q Is this one of the documents you looked at 20 to prepare for your deposition today? 21 A Yes. 22 Q Tell me what this document is. 23 A It is a Vice Case Report. 24 Q And what's it a Vice Case Report of?	111 1 time period? 2 A No. 3 Q Did you ever work with members of Watts's 4 team during that time period? 5 A No. 6 Q Are you familiar with Vice Case Reports 7 generally? 8 A Yes. 9 Q Did you complete a number of Vice -- have 10 you completed a number of Vice Case Reports over the 11 years? 12 A Yes. 13 Q Row 18 on there has a few choices. 14 A Row 18. 15 Q You see they're numbered at the top. It's 16 got a check mark for Witnessed and a bunch of 17 officer names in there? 18 A Yes. 19 Q Do you have any understanding of what 20 that -- when Witnessed is checked there, what that's 21 supposed to indicate in a Vice Case Report? 22 A I mean, from my understanding, Witnessed 23 means he witnessed something. As to what, I 24 couldn't tell you.
110 1 A A vice Case Report is usually done on 2 narcotics. 3 Q And Taurus Smith is one of the offenders 4 listed here, the second window? 5 A Yes. 6 Q Do you know whether you were involved in Mr. 7 Smith's arrest? 8 A I don't believe I was. 9 Q And tell me why you don't think you were 10 involved? 11 A I was never assigned to the Unit 715. 12 Q And that's the unit that arrested him? 13 A Yes. 14 Q And how do you know that? 15 A I wasn't on the team on April 3rd, 2004. 16 Q Because you started November '04? 17 A Yes. 18 Q Where were you in April of 2004? 19 A I was assigned to midnight, first watch. 20 Q And were you assigned to midnight, first 21 watch the whole month of April 2004? 22 A I was assigned to midnight, first watch, 2nd 23 District November of '01 until November of '04. 24 Q Did you ever work other shifts during that	112 1 Q And what are the things someone might 2 witness that would warrant being included in a -- as 3 a witness in a Vice Case Report? 4 A I mean, if you're in an assisting unit, you 5 might have witnessed the subject being arrested, the 6 narcotics being recovered. As to what you 7 witnessed, I couldn't tell you from this document. 8 Q And I'm not asking specifically if you -- 9 A I understand. 10 Q You're saying you can't remember this one. 11 But it could be narcotics being recovered. What 12 else could it be? 13 A There are numerous things. 14 Q What other numerous things? 15 A Witness the subject being transport to 2nd 16 District. 17 Q What else? 18 A Observing -- witnessing someone for going 19 custodial search or actually witnessing the crime 20 being committed. 21 Q So one would be witnessed -- let me just 22 make sure I get the list right. Witnessed the crime 23 being committed? 24 A Yes.

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29 (113 to 116)

113 1 Q Witness the transport of the offender? 2 A Yes. 3 Q Witness a search? 4 A Yes. 5 Q Anything else? 6 A Witness narcotics being recovered. 7 Q And is that different than witnessing the 8 crime? 9 A Well, you -- if you observe a hand-to-hand 10 transaction, you might not have witnessed that but 11 you might witness the recovery portion of it. 12 Q So you may find -- someone may find drugs 13 somewhere else? You may see that, but -- 14 A Yes. Or while he's in custody, you might 15 witness an officer recovering another narcotics 16 somewhere on the -- on his person. 17 Q Is there anywhere on this form, these 18 reports, or elsewhere that you know of where you're 19 supposed to detail who saw what? 20 A On the narrative. 21 Q And so the narrative should say who saw the 22 transport, who saw the arrest? 23 A The narrative should -- would hopefully say 24 who did who or what officer is involved in it.	115 1 goes, Oh, okay, I read it anyways. It's good. Just 2 sign it on my behalf. 3 Q That would be the only time you'd sign for 4 someone else? 5 A Or something chaotic. You know what I mean? 6 Something -- a lot of stuff going on. He already 7 read it, I read it, and the last thing is he forgot 8 to sign it so he might give me permission to sign on 9 his behalf. 10 Q But you would only sign on his behalf if you 11 had specific permission to sign that particular 12 report after he had reviewed it? 13 A Yes. 14 Q And did you ever know of others signing your 15 name on reports? 16 A Not that I'm aware of except my partner, but 17 I would have to give him -- I would have gave him 18 permission, the same. 19 Q And that would only be after you reviewed 20 the report? 21 A Yes. 22 Q Do you know Taurus Smith? 23 A Taurus Smith? 24 Q Taurus Smith. Do you know who that is?
114 1 Q Was it your practice to say which officers 2 did what in the narrative? 3 A For the most part I would try to put in the 4 narrative what each officer did or done. 5 Q And so to do that would you have to go talk 6 to other officers before you completed reports? 7 A If I wasn't present as to what happened, 8 yes, I would talk to them. But if I was there and 9 observed what he did, I may still talk to them but 10 not necessarily. 11 Q Did you ever sign other officers' names on 12 your reports? 13 A Other officer's name? I might have signed 14 my partner's name for the most part, but that's 15 about it. 16 Q Would you get his authority to sign a 17 specific report? 18 A Yes. Before I do that I would have his 19 authority to sign on his behalf. 20 Q And would he review the report? 21 A Yes. 22 Q Then why wouldn't he just sign it himself? 23 A If he's doing something else. I say, Hey, I 24 told you to read it. You forgot to sign it. He	116 1 A No, I don't. I don't recall who that is. 2 Q All right. You can put this to the side or 3 just try to keep them stacked. 4 You listed Anthony McDaniels earlier as one 5 of the few cases you have an independent 6 recollection of? 7 A Yes. 8 Q Tell me every fact that you remember related 9 to Mr. McDaniels' arrest. 10 A I know he ran out of 5613 holding his side 11 yelling, Go, go, go and jumped into a vehicle. The 12 color or make of that vehicle I can't recall at this 13 moment. 14 That vehicle then went eastbound on 56th 15 where we followed it where the vehicle failed to 16 stop at a stop sign on 56th and King. Around 58 and 17 King we activated the lights. He refused to stop. 18 He went maybe one block south and then immediately 19 West, I believe -- that's either 59th or 60th. And 20 then he made another right into the alley, west 21 alley of King Drive. Maybe a block, not a block -- 22 or half a block the car slowed down. He jumped out. 23 I chased him. He fell. A gun ejected and fell to 24 the floor. I recovered that and maybe 30 feet away

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30 (117 to 120)

117	1 in a vacant lot he was apprehended by my partner, 2 Officer Nichols. 3 Q How long did that whole thing you just 4 described take? 5 A Probably a minute or two at the most. 6 Q Including the driving? 7 A Yes. 8 Q So from running out of the building until 9 he's under arrest from Nichols -- well, let me ask, 10 did Nichols arrest him? 11 A Yes. 12 Q So from running out of the building until 13 Nichols arrested him took 1 to 2 minutes? 14 A Yes. 15 Q When did this happen? 16 A The date, I can't tell you exactly. I would 17 have to look at a document to tell you that. 18 Q What about the year? 19 A That I couldn't tell you the year either. 20 Q What was the weather like that day? 21 A The weather like? I couldn't tell you the 22 weather. 23 Q Was it night or day? 24 A I believe it might have been day.	119	1 Q Who was driving day? 2 A Officer Nichols. 3 Q You remember that? 4 A Yes. 5 Q Which direction was your car facing? 6 A Not a hundred percent positive. I believe 7 it was facing eastbound. 8 Q And what direction did -- was Mr. McDaniels 9 running when he came out of the building? 10 A Yes. 11 Q Which direction? 12 A Was he running? 13 Q Yeah. 14 A Came out of the house going northwest. 15 Q So away from your car? 16 A No. We were on the opposite side of the 17 street on the corner. 18 Q Was he running towards your car or away from 19 it? 20 A Towards our car. 21 Q How far away was your car from the building? 22 A Whatever size the street is plus the 23 sidewalk, at an angle, so I don't know. Maybe 50, 24 60 feet.
118	1 Q Why do you think it might have been day? 2 A I just believe it was days. No other 3 reason. I believe it was days. 4 Q Was the sun out? 5 A I couldn't -- I can't answer that. 6 Q How many people were around when he ran out 7 of the building yelling, Go, go, go? 8 A I believe it was just him that came -- that 9 came out of the building saying, Go, go, go. 10 Q No one else was standing around? 11 A No, I don't believe so. 12 Q Who were you with? 13 A My partner. 14 Q Where were you? 15 A We were parked on the corner. 16 Q Windows rolled up or down? 17 A Might have been down. 18 Q Might have been or they were? 19 A I like to have the window down when I 20 patrol. 21 Q Typically they were down? 22 A Yes, on my side anyway. 23 Q And were you driving or Nichols driving? 24 A For the most part my partner drives.	120	1 Q Did you know Mr. McDaniels? 2 A Prior to this, no. 3 Q How fast was he running when he came out of 4 the building? 5 MR. ZECCHIN: Object to the form. 6 A It wasn't a sprint, but it wasn't a -- maybe 7 a light jog. 8 Q What was he wearing? 9 A That I can't recall what was he wearing. 10 Q What were you wearing? 11 A Plain clothes. 12 Q Like what clothes? 13 A I can't tell you what clothes I was wearing. 14 Q What clothes was your partner wearing? 15 A I can't tell you that either. 16 Q Why were you parked where you were parked? 17 A Excuse me? 18 Q Why were you parked in the location where 19 you parked? 20 A That's a high narcotics area. 21 Q A lot of traffic -- a lot of foot traffic? 22 A Usually, yes. 23 Q But at that time there wasn't? 24 A The moment he came out of the building, no,

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31 (121 to 124)

121 1 there wasn't. 2 Q Before he had come out of the building was 3 there other foot traffic? 4 A I don't recall. 5 Q So you saw him walk in the building? 6 A No, he did not. 7 Q You didn't see him go in? 8 A No. 9 Q Taurus was on or -- I'm sorry. The car was 10 on or it wasn't on when he got out of it? Let me 11 rephrase. 12 The car that he got into, was that on or not 13 on when he came out of the building? 14 A I don't recall if it was on or off. 15 Q Was it parked? 16 A Yes. 17 Q And were there people in it? 18 A There was a driver in it. 19 Q When did you first notice there was a driver 20 in that car? 21 A When he jumped in the passenger side of the 22 vehicle. 23 Q How many other cars were there parked near 24 you?	123 1 MR. ZECCHIN: Objection, asked and answered. 2 You can answer again. 3 A I couldn't tell you if there was people in 4 the vehicle, but I know there was other vehicles in 5 the block. 6 Q Do you know how many other vehicles were on 7 the block? 8 A Like I stated, I couldn't tell you how many 9 vehicles on the block. 10 Q And I'm sorry. You may have already 11 answered this, but do you remember what kind of car 12 it was? 13 A Like I stated earlier, I can't recall what 14 kind of car it was. 15 Q The other person -- how many other people 16 were in the car? 17 A I believe just a driver. 18 Q And what's the driver's name? 19 A That I couldn't tell you. 20 Q What did the driver look like? 21 A That I couldn't tell you. 22 Q What did the -- who talked to the driver? 23 Which officers talked to the driver? 24 A No one.
122 1 A I couldn't tell you that. 2 Q How far away was the car from -- was the car 3 that Mr. McDaniels got into from your car? 4 A Like I said -- stated earlier, the 5 building's probably, what, 50 to 60. So the car, I 6 would put it probably 40 feet away from us. 7 Q And you don't remember how many other -- was 8 it on the street? 9 A Yes. 10 Q You don't remember how many other cars were 11 on the street? 12 A No, I don't. 13 Q That was part of your job, making sure that 14 you knew your surroundings and you were aware of 15 your surroundings? 16 MR. MICHALIK: Object to the form of the 17 question. 18 MR. ZECCHIN: Join. 19 MR. KOSOKO: Join. 20 A Yes, I'm supposed to be aware of my 21 surroundings, but I don't count every vehicle on the 22 block. 23 Q You don't know if there were any other 24 vehicles on the block with people in them?	124 1 Q What did Mr. McDaniels say the driver's name 2 was? 3 A He didn't. 4 Q Did you ask him? 5 A I don't recall whether I did or not. 6 Q Did anybody ask him? 7 A I don't recall. 8 MR. ZECCHIN: Objection, foundation. You 9 can answer. 10 Q So you recovered a gun and Nichols arrested 11 Mr. McDaniels? 12 A Yes. Placed him in custody, that's correct. 13 Q And then the driver took the car away? What 14 happened with the driver? 15 A When he jumped out of the car -- 16 Q I'm sorry. When who jumped out of the car? 17 A Anthony McDaniels. When he jumped out of 18 the car, the car proceeded to go northbound on the 19 alley. 20 Q The car got away? 21 A Yes. 22 Q Whose car was it? 23 A I couldn't tell you that. 24 Q Did you call this in on the radio?

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32 (125 to 128)

125	1 A Yes, I did. 2 Q You, yourself, not your partner? 3 A Yes, I did. 4 Q What did you call in? 5 A Most likely we're behind a car going 6 southbound on King that refused to stop and gave 7 a -- gave a description. And then as he -- as 8 Mr. McDaniels bailed out of the car, probably gave 9 his description, holding his side. And then when he 10 fell, when I recovered the gun, I probably stated 11 gun recovered. 12 Q You said a car going southbound you would 13 have called in? 14 A What was that? Initially when we activated 15 our lights, yes, he was going southbound on King. 16 Q Okay. Was it unusual for someone -- in your 17 experience was it unusual to see someone jog out of 18 a building yelling, Go, go, go? 19 A Is it unusual? Yes. 20 Q Did you ever ask him why he was yelling, Go, 21 go, go? 22 A No, I did not. 23 Q Who was he yelling it to? 24 MR. ZECCHIN: Objection, foundation from	127	1 that is a dope house, no. 2 Q Do you think he committed a drug crime? 3 A I can't speak for Mr. McDaniels. 4 Q Did you find any drugs on him? 5 A No, I did not. 6 Q Did you search him for drugs? 7 A I did a custodial search in the station, 8 yes. 9 Q Did Nichols find any drugs on him? 10 A I don't believe he did. 11 Q Do you know if the car was ever recovered -- 12 A Yes. 13 Q (Continuing) -- by the police? 14 It was? 15 A Yes. 16 Q How did that come about? 17 A I believe 264 David -- that would be Officer 18 Mohammed, Lamonica, and Smith -- stating they 19 recovered a vehicle west alley around -- I might be 20 getting the address off -- 57 and King, 5720 King 21 unoccupied. 22 Q Was that near where you arrested -- or where 23 Mr. McDaniels was arrested? 24 A Yes.
126	1 this witness. 2 A I assume the driver. 3 Q Can you think of any reasons why he would 4 have needed to yell for the driver to start going 5 from outside of the car? 6 A Could you repeat that? 7 Q Yeah. So can you think of any reasons 8 when -- why Mr. McDaniels would have needed to yell, 9 Go, go, go while he was jogging to the car? 10 MR. KOSOKO: Objection. Calls for a 11 speculative response. 12 MR. PALLES: Object to the form. 13 MR. ZECCHIN: Object to the form. 14 A Do you want me to answer? 15 Q Yes. 16 A Maybe he just committed a crime. 17 Q What crime did he -- 18 A That I couldn't tell you. 19 MR. ZECCHIN: Objection. Foundation, form. 20 MR. KOSOKO: It calls for a speculative 21 response. 22 Q So any other reasons you can think of why he 23 would have jogged to the car yelling, Go, go, go? 24 A Other than maybe committing a crime because	128	1 Q How close was it to where he was arrested? 2 A Probably less than a block. 3 Q How do you know that they're the ones who 4 recovered the vehicle? 5 A I believe they went on the air. 6 Q They went on the air and -- 7 A Yes. 8 Q (Continuing) -- said that? 9 So what happened next after you recovered 10 the gun and Nichols arrested Mr. McDaniels? 11 A He was transported to the 2nd District. 12 Q Who transported him to the 2nd District? 13 A I believe Beat 214, Officer Carlos, I 14 believe. 15 Q And what did you and Nichols do next? 16 A Again, we probably relocated to 2nd District 17 to process the arrest. 18 Q What did you do to process the arrest? 19 A Sat at a computer, generated an Arrest 20 Report, and probably -- I don't know if we were 21 automated then. Probably a general case report at 22 that time. 23 Q Do you remember how much later after the 24 arrest the car was recovered?

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33 (129 to 132)

129 1 A Excuse me? 2 Q Do you remember how much after the arrest -- 3 like how long elapsed between the arrest and when 4 the car was recovered? 5 A After McDaniels Daniel was placed in custody 6 by Officer Nichols? I would say a minute or two. 7 Q So Mohammed, Lewis, and Smith got that car 8 within a minute or two after McDaniels was arrested? 9 A Yes. 10 Q And what did they do with it? 11 A I believe they drove it back to the 2nd 12 District. 13 Q Who drove it back to the 2nd District? 14 A One of those officers on 264 David. 15 Q Did any of them ever tell you? 16 A No. All they stated was they drove the 17 vehicle to the 2nd District. 18 Q And did you put in your report that someone 19 drove the vehicle back? 20 A Yes. 21 Q Who did you write down drove the vehicle 22 back? 23 A 264 David relocated the vehicle to the 2nd 24 District.	131 1 MR. MICHALIK: Object to the form of the 2 question. 3 A The majority of the time. 4 Q What do you mean "The majority of the time"? 5 A Majority of the time that we would relocate 6 the vehicle to the second district. 7 Q So the majority of time people were arrested 8 with cars, an officer would drive it back to the 9 station? 10 A Yes. 11 Q How often did you do that personally? 12 A How often would we do that? 13 Q No. You personally. 14 A If we have the keys to the vehicle, most 15 likely we would drive that vehicle to the 2nd 16 District. 17 Q What's your best estimate of how many times 18 you drove a civilian car back to the 2nd District to 19 be towed? 20 A You want me to give you a percentage or -- 21 Q No. A number -- just a number. 22 A Probably, if I would have to give you a 23 number, 8 out of 10 we would do it. 24 Q How many times total did you personally do
130 1 Q Why did one of the officers drive 2 Mr. McDaniels -- well, why did not Mr. McDaniels -- 3 why did one of the officers drive that car back to 4 the station? 5 A It's just easier to have the vehicle towed 6 in the 2nd District where you don't have to have an 7 officer sitting in that vehicle while waiting for 8 the tow truck. 9 Q Were there any policies -- CPD policies at 10 the time about officers driving cars of civilians? 11 A Relocating -- relocating to the 2nd District 12 for towing? No. 13 Q How frequently did it happen that officers 14 in your unit drove civilian cars to the police 15 station to get them towed? 16 MR. MICHALIK: I'm sorry. Can you repeat 17 that question? 18 MR. RAUSCHER: Yeah. 19 Q How -- 20 MR. MICHALIK: I may object to the form of 21 that. 22 Q How frequently did it happen in your 23 experience in your unit that officers would drive 24 civilian cars back to the station to be towed?	132 1 that? 2 A That I can't tell you. 3 Q More than a hundred? 4 A Again, probably. But it would just be a 5 guess. 6 Q More than 500? 7 A I doubt it, but anything is possible. 8 Q Was Mr. McDaniels car -- was the car that 9 McDaniels was in -- was that searched? 10 A I'm pretty sure it was. 11 Q And who searched it? 12 A We probably searched it, other officers 13 searched it, make sure there was no other 14 contrabands in the vehicle. 15 Q What do you remember about it? Do you 16 remember you searching it? 17 A I don't remember whether it was myself or 18 Officer Nichols that searched it. 19 Q So you don't know if it was you, Nichols, or 20 somebody else; but you assume somebody searched it? 21 A Yes. 22 Q And why do you assume that someone searched 23 that vehicle? 24 A Before -- it's a policy you search the

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34 (133 to 136)

133	1 vehicle to make sure there's no contraband before 2 it's being towed. 3 Q So someone searched it at the scene where it 4 was left? 5 A Most likely, yes, it was searched at the 6 scene and searched again in the 2nd District. 7 Q And was that something written in a report? 8 A That the vehicle was searched? I don't 9 think so. 10 Q Why would that not have been written down in 11 a report? 12 A It's just a common practice that all 13 vehicles to be towed are searched for any 14 contrabands or illegal -- any contrabands in the 15 vehicle. 16 Q And you don't write down that you did it and 17 didn't find any contraband? 18 A I don't believe I -- if we would have found 19 something, we would have wrote that we found 20 something in the vehicle. But most likely if there 21 was nothing found, we didn't write anything down. 22 Q You don't think it was important before you 23 just drove someone's car to write down that there 24 was no contraband in it?	135	1 Q (Continuing) -- how they got the keys? 2 A No, couldn't tell you. 3 Q You talked to McDaniels that day? 4 A Yes. 5 Q And where did -- when did you talk to him? 6 A Most likely in the 2nd District. 7 Q What do you remember? 8 A I believe -- I don't remember if it was 9 myself or Officer Nichols read him his rights and 10 asked him why he has the gun. 11 Q So you don't actually remember whether you 12 talked to McDaniels or Nichols did at the station? 13 A No, I don't. 14 Q So you don't remember him saying anything to 15 you then either? 16 A I would -- I would have been present when he 17 was Mirandized and the questions being asked. 18 Q But you don't remember him saying anything? 19 A Yes, I remember him saying -- 20 Q You don't remember -- 21 A I just don't know if it was me that asked 22 the question or Officer Nichols did. 23 Q But you remember the response? 24 A Yes.
134	1 A To write down there's no contraband? 2 MR. ZECCHIN: Object to the form. 3 A If there's nothing found, there's no need to 4 write down there was no contraband found. 5 Q Why would you not -- why would it not be 6 important to write down that you searched and didn't 7 find any contraband? 8 A What would be the purpose of it? 9 Q So there's no purpose you can think of? 10 A If there's no narcotics or contrabands, why 11 would I need to put down no narcotics or contraband 12 found in the vehicle? 13 Q Well, to have a complete report. 14 MR. ZECCHIN: Form. Is that a question? 15 MR. RAUSCHER: That's a question. 16 A I mean, it's not relevant. There was 17 nothing relevant to the case that was found in the 18 vehicle. 19 Q Where did the keys come from? 20 A Where did the keys come from? 21 Q Yeah. 22 A Couldn't tell you. 23 Q You don't know -- 24 A No.	136	1 Q Okay. What do you remember McDaniels saying 2 to you and Officer Nichols? 3 A This is not verbatim, but I believe he said, 4 I bought the gun on the street for protection. 5 Q Anything else? 6 A That's it. 7 Q You had already read him his rights or 8 someone had read him his rights? 9 A Yes. 10 Q Was it common that people would answer 11 questions about why they had contraband after you 12 read them their rights? 13 A Some would. There's some people that would 14 ask. Some wouldn't. 15 Q Was it more frequently people refused to 16 answer or answered? 17 A I would say half and half. 18 Q Were you surprised when McDaniels told you 19 he bought the gun on the street for protection? 20 A No. 21 Q Did you ask him why he needed it or why he 22 thought he needed protection? 23 A No, I did not. 24 Q Why not?

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35 (137 to 140)

137 1 A I just didn't ask him that. 2 Q Have you read Mr. McDaniels' affidavit 3 describing the events? 4 A I believe I did. 5 Q And is there anything in that that you 6 remember you agree with? 7 A Do I agree with? I don't agree to any of 8 it. 9 Q So you don't agree that his conviction 10 should have been vacated? 11 A No. His conviction should never have been 12 vacated. 13 Q Why do you think his conviction should not 14 have been vacated? 15 A Why? Because everything that happened 16 happened the way it happened and his conviction 17 shouldn't have been vacated. He committed a crime 18 and we arrested him lawfully, truthfully; and 19 there's no reason for his case to be vacated. 20 Q Was his car towed from the 2nd District? 21 A I believe so, yes. 22 Q Why do you believe that to be the case? 23 A Because it was relocated to the 2nd District 24 so it would have been picked up from the 2nd	139 1 A I don't believe, no. 2 Q What? 3 A I don't believe so, no. 4 Q Do you remember them telling you that they 5 relocated it to the 2nd District? 6 A They would have had to tell me because I put 7 it down in my report for 264 David, car was 8 relocated to the 2nd District. 9 Q You only -- you know that they told you it 10 was relocated to the 2nd District. You don't 11 actually know if it happened; is that fair? 12 A If you're asking me if I went in the parking 13 lot and physically looked at the car, no. 14 Q I'm just going to shift gears for one 15 second. I should have asked you this earlier. But 16 for Taurus Smith, you don't have an opinion about 17 whether his conviction should have been vacated? 18 A Taurus Smith? 19 Q Yeah. 20 A Like I said, I wasn't -- 21 MR. ZECCHIN: I'm going to object to any 22 questions about Taurus Smith. He wasn't involved in 23 an arrest. But go ahead. You can answer the 24 question.
138 1 District. 2 Q Did you call in for the tow? 3 A I don't know if I did or some other officer 4 did. 5 Q Did you see the car at the 2nd District? 6 A Did I see the car at the 2nd District? I 7 can't -- I can't recall whether I did or not. 8 Q Did you see a tow come pick it up? 9 A I don't believe I did. 10 Q So you don't know one way or the other 11 whether it was towed from the 2nd District? 12 A No, but I was informed by an officer that it 13 was relocated to 2nd District. 14 Q Who told you that? 15 A Most like 264 David. 16 Q Mohammed, Lewis -- 17 A One of the two -- one of those officers in 18 that car. 19 Q It was most likely them or it was them? 20 A One of those three officers on 264 David 21 would have informed me that the car was located to 22 the 2nd District. 23 Q And did one of them tell you it was towed 24 from the 2nd District?	140 1 A Like I said, I don't know anything about 2 that case. I wasn't involved in that arrest so I 3 can't speak either or. 4 Q What kind of gun did you recover from Mr. 5 McDaniels? 6 A I believe it was a Glock 9 millimeter. 7 Q Why do you believe it was a 9 millimeter? 8 A Why do I believe? I mean, I would have to 9 look at my case report to verify it, but I believe 10 it was a Glock 9 millimeter. 11 Q So you don't have an independent 12 recollection of what kind of gun it was? 13 A No. 14 Q And do you remember what it looked like? 15 A Blue steel. 16 Q Blue steel? 17 A Blue steel is basically a black gun. 18 Q How big was it? 19 A How big was it? I'm bad with -- what would 20 you consider this? Maybe 6, 7 inches. 21 Q Do you remember that -- do you remember what 22 it looked like? 23 A Yeah. It's a Glock. 24 Q Did the gun fall or did he throw it?

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36 (141 to 144)

141	1 A It fell. 2 Q What did -- describe how you saw it. Did 3 you see it fall? 4 A As he fell, the cuff -- as he fell, the gun 5 fell. 6 Q Where did it fall from? 7 A From his waistband. 8 Q When he was leaving the building, when he 9 was jogging out of the building when you first saw 10 him, did you think he had a gun? 11 A He was holding his side. 12 Q But did you think he had a gun? 13 A Most likely, yes, by the way he was holding 14 his side, yes. 15 Q Did you call in and say, We think we're 16 following someone who's fleeing with a gun? 17 A No, I did not. 18 Q Why would you not have included that 19 information? 20 A Because I didn't have verification that it 21 was a gun. I was -- I'm just thinking he might have 22 a gun the way he was holding his side. 23 Q So you wouldn't call something in on the 24 radio if you suspected he had a gun until you saw	143	1 first -- when he did that, you thought he was 2 holding a gun? 3 A No. I suspect he might be. 4 Q Did you think he likely was -- had a gun? 5 MR. MICHALIK: Object to the form of the 6 question. 7 MR. ZECCHIN: Join. 8 MR. MICHALIK: Argumentative. 9 A Most likely he might, but I'm not sure 10 because I didn't have visible indication that he has 11 a gun. 12 Q Would you have wanted other officers to know 13 if he had a gun if they came across him? 14 A When they came across him? When he got out 15 of the car, that's when I said he was still -- he 16 was holding his side. Or while he's in the car I 17 didn't give that -- I didn't give that information 18 out. 19 Q So why did you give it out when he got out 20 of the car? 21 A Because he was still holding his side when 22 he got out of the car. 23 Q Did you see the gun then? 24 A Yes.
142	1 it? 2 A Yes, I would say he was holding his side. I 3 wouldn't say he had a gun when I eventually wouldn't 4 see a gun. 5 Q You wouldn't even say, I think he might have 6 a gun? 7 A No. I would say he was holding his side. 8 Q So you would have called in and said, 9 Someone is fleeing southbound and they were holding 10 their side when they got in the car? 11 A When he got out of the car, I believe that's 12 when I said he was holding his -- holding his side. 13 Q When he got out of the car? 14 A Yes. 15 Q What about when he got into the car the 16 first time? 17 A No, I didn't call that -- we didn't call 18 that -- I didn't call out the car chase until we 19 activated our lights on 58th Street. 20 Q But by that time you had already seen him 21 leave a building jogging and holding his side, 22 right? 23 A Yes. 24 Q And that's the time I was asking about, the	144	1 Q You saw the gun right when he got out of the 2 car? 3 A No, not right away. 4 Q Okay. So then why did you call it in? 5 A Why did I call it in? 6 Q Did you call in the gun -- did you call in 7 that he was holding his side before you saw a gun or 8 after? 9 A Before I saw the gun, I stated he jumped out 10 of the car holding his side. And then when I 11 visually saw the butt of the gun, I think I stated 12 he has a gun. 13 Q So why did you call in that he was holding 14 his side when he got out of the car but not when he 15 got in the car? 16 A I didn't call that out when he got in the 17 car. 18 Q Did you call in -- did you first call in 19 this call -- did you first call this in over the 20 radio after Mr. McDaniels was out of his car? 21 A Repeat that. 22 Q Did you first call in this event after 23 Mr. McDaniels was out of his car? 24 A No. I called in this while he was going

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37 (145 to 148)

145 1 southbound on King on 58th Street when we activated 2 the lights. 3 Q And at that time why didn't you mention that 4 he had been holding his side when he was jogging out 5 of the building before the car -- 6 A Well, I don't know if he still had the gun 7 on him. He might have just left it in the car. So 8 when he got out of the car still holding his sides, 9 that's when I went over the air, Subject jumped out 10 of the car holding his side. And then when I had 11 visible indication that he does have a gun, that's 12 when I probably stated, Subject has a gun. 13 Q I thought you just said you called in that 14 he was holding his side before he had a gun? 15 A Yes, when he got out of the car. 16 Q What do you mean -- but when you said he 17 might have left it in the car, what do you mean by 18 that? 19 A Well, weren't you asking me why didn't I 20 call that he was holding his side while he was in 21 the car? While he's in the car, I don't know where 22 the gun is. 23 Q Why would that matter? 24 A Okay. Like I said, I had no visible	147 1 Q That was -- but before he got in the car, 2 you saw him holding his side, right? 3 A Correct. 4 Q You thought that he might have a gun? 5 A Yes. 6 Q And then you called it in while he was still 7 in the car? 8 A Correct. 9 Q Why did you not say then he was holding his 10 side when he jumped in his car? 11 A Couldn't tell you why I didn't say it. 12 Q Why did you say it when he got out of the 13 car? 14 A Why did I say it? 15 Q Yeah. 16 A I'm giving a description letting other 17 officer responding he might -- might have a gun. 18 Q Did other officers respond? 19 A I believe so. 20 Q Which other officers responded? 21 A That I couldn't tell you. 22 Q Did Nichols see the gun at the scene? 23 A Did Nichols see the gun? After he was 24 placed in custody, I probably showed him.
146 1 indication that he had a gun. He was just holding 2 his side. So I'm not going to tell the officer, So 3 and so we're chasing has a gun when I don't have 4 visible indication a hundred percent that he has a 5 gun. 6 Q What was different about the -- well, let me 7 try to rephrase that. 8 Why did you say that he was holding his side 9 when he got out of the car but not describe that 10 event when you called it in before he got out of the 11 car? 12 There were two times when he was holding his 13 side, right? 14 A Yes. 15 Q Once before he got in the car and once 16 after, right? 17 A I didn't get on the radio when he was coming 18 out of the car. I got on the radio when we 19 activated our lights at 58th Street. 20 Q And where was that in this chain? 21 A What do you mean where was that? 22 Q What was he doing? 23 A I don't know what he was doing. He was in 24 the car.	148 1 Q But you don't remember? 2 A No. 3 Q How long were you talking to Mr. McDaniels 4 at the station? You and -- I'm sorry. Let me 5 rephrase. 6 How long were you and Nichols talking to 7 Mr. McDaniels at the station? 8 A Probably a minute or two. How long it takes 9 for us to read him his rights and how long for him 10 to answer that he bought the gun on the street for 11 protection. 12 Q So just straightaway he told you? 13 A Yes. 14 Q Do you remember that it was a minute or two 15 or are you just -- 16 A I'm approximating it. 17 Q Did Nichols ask how many -- did Nichols ask 18 him who was driving the car? 19 A I don't -- I don't believe so. 20 Q Did the person driving the car commit a 21 crime? 22 A Yes. 23 Q What crime did that person commitment? 24 A Failing to stop at a stop sign.

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149 1 Q Have you ticketed or arrested people over 2 the years for failing to stop at a stop sign? 3 A If they don't have a license, they're 4 suspended otherwise it would just be a citation. 5 Q Is there some sort of crime fleeing from the 6 police? 7 A Fleeing from the police? Yes. 8 Q And had the driver committed that crime? 9 A If he would have been apprehended, most 10 likely he would have been charged with that citation 11 and fleeing the police. 12 Q So he -- in your opinion the driver did 13 illegally flee from the police? 14 A Yes. 15 Q Is it common in your -- well, have you had 16 other instances of people trying to flee from the 17 police? 18 A Yes. 19 Q And is it common in your experience that if 20 one person of multiple people is caught fleeing from 21 the police you don't even ask who the other person 22 is? 23 A Would we ask? We might ask, but they don't 24 usually -- for the most part they won't give you the	151 1 most part we would just give a description, a 2 physical description of who was driving the car. 3 Q But I'm not asking how people answer. I'm 4 asking are there any other reasons other than you 5 just forgot to ask why you wouldn't have asked who 6 was driving the car? 7 A I mean, most of the time we probably would 8 ask, but I don't know why we didn't ask in this 9 incident or I didn't ask in that incident. 10 Q So there's no other reasons you can think of 11 other than just forgetting? 12 A Yes. 13 Q Yes, you're agreeing you can't think of -- 14 A Yes, I'm agreeing with you. 15 Q If Mr. McDaniels was willing to openly tell 16 you why he had a gun, do you think he would have 17 fallen in the category of people who wouldn't have 18 told you who the driver was or who would have? 19 MR. ZECCHIN: Objection, form and foundation 20 from this witness. 21 A I can't tell you whether he would or not. I 22 can't get in McDaniels' mind. 23 Q Did you testify in criminal proceedings 24 brought against Mr. McDaniels?
150 1 driver's name or the person's name. 2 Q But you ask? 3 A I don't -- like I said, I don't know if we 4 did or not. 5 Q But typically you would ask? 6 A You would. 7 Q It would be pretty unusual to not even ask 8 who was with you, right? 9 A It would. 10 Q Of course you would ask, right? 11 MR. ZECCHIN: Objection, argumentative. 12 Q All right. You don't have to answer that. 13 Are there any reasons you can think of why 14 you wouldn't have asked or why Nichols wouldn't have 15 asked who was driving the car that fled from the 16 police? 17 A I don't recall why. We might have just 18 forgot to ask who was in the vehicle, who was 19 driving the vehicle. 20 Q Other than forgetting to ask, are there any 21 other reasons you can think of why no one would have 22 asked who was driving the vehicle? 23 A I mean, for the most part they wouldn't tell 24 you who was driving the vehicle anyway. So for the	152 1 A Yes, I did. 2 Q How many times? 3 A I don't remember if this went to the Grand 4 Jury. So if he went to the Grand Jury, I probably 5 testified at Grand Jury and at his trial. 6 Q You remember testifying at his trial? 7 A Yes. 8 Q How did you prepare to testify at his trial? 9 A Look at the documents. 10 Q Which documents did you look at? 11 A The Arrest Report, probably the general case 12 report. 13 Q Do you know who else testified at his trial? 14 A That I can't recall who else testified at 15 his trial. 16 Q Did you talk to anybody else in preparation 17 for your testimony? 18 A In preparation for this? 19 Q No, no. In preparation for your testimony 20 at Mr. McDaniels' -- did you talk to anyone else 21 before you testified at Mr. McDaniels' criminal 22 trial? 23 A The State's Attorneys. 24 Q Do you remember which State's Attorneys you

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153	1 talked to? 2 A No, I don't. 3 Q Do you remember how long you talked to them? 4 A That I can't tell you. 5 Q Did you talk to Mohammed? 6 A Did I talk to Mohammed? If he was in the 7 courtroom, probably yes. 8 Q Did you talk to him about your testimony? 9 A Did I talk to him? I talked to the State's 10 Attorney about my testimony. 11 Q Right. 12 A I don't know if I talked to Mohammed about 13 my testimony. 14 Q Is it possible that you talked to Mohammed 15 about what your testimony was going to be before he 16 testified? 17 A He might have been in the room while I was 18 talking to the State's Attorney, but. . . 19 Q So if Mohammed was in the room when you were 20 preparing with the State's Attorney, then he would 21 have known about -- then you would have talked to 22 him about your testimony, but otherwise you wouldn't 23 have independently just talked to him? 24 A I probably wouldn't talk to him about my	155	1 McDaniels' trial? 2 A The case. 3 Q Anything specifically? 4 A Of what happened, the facts of the case. 5 Q Did you cover the car being towed with the 6 State's Attorney? 7 A Did we cover? I'm pretty sure we did. 8 Q Do you remember talking about that with the 9 State's Attorney or you just think you would have 10 because it's a part of the story? 11 A I don't have no independent recollection 12 whether we talked about the case report with the 13 State's Attorney, but most likely we would have. 14 Q Do you have any independent recollection of 15 your conversation with the State's Attorney about 16 the McDaniels case? 17 A Independent recollection, no. 18 Q You're just going based on typical practice? 19 A Yes. 20 Q After you recovered the -- when you 21 recovered the gun, did you see any other civilians 22 around? 23 A I don't believe I did. 24 Q Did people gather around at all after
154	1 testimony because I would have probably been talking 2 to the State's Attorney. 3 Q Did you talk to anybody else other than the 4 State's Attorney about what you were going to be 5 testifying about -- 6 A No. 7 Q (Continuing) -- Nichols, anybody? 8 A No. 9 Q Do you know how many criminal trials you've 10 testified in over the years? 11 A I can't give you a number. 12 Q A best estimate. 13 A Probably a hundred or less. 14 Q What's the process you typically go through 15 to prepare for testimony in criminal cases? 16 A I would review the document -- the Arrest 17 Report, whether the vice or case. 18 Q Is that it? 19 A Yes. 20 Q And then would you also talk to the State's 21 Attorney? 22 A Yes. 23 Q Do you remember what you talked to the 24 State's Attorney about before you testified in	156	1 Mr. McDaniels was arrested? 2 A I don't believe so. 3 MR. RAUSCHER: Let me grab the McDaniels 4 reports. Anybody need a short break while I get 5 this or do you want to just hang out? 6 MR. PALLES: No, that's fine. 7 MR. RAUSCHER: All right. We're going to 8 mark -- we're going to mark as Exhibit 2 a report, 9 Bates-stamped DO-JOINT 5777 through 5779. 10 (Leano Exhibit No. 2 was marked for 11 identification and is attached to the transcript.) 12 Q Just let me know when you've had a chance to 13 read through it. 14 A Okay. 15 (Witness examining document.) 16 Q Have you seen this document before? 17 A Yes. 18 Q Is this one of the documents you looked at 19 to prepare for your deposition today? 20 A Yes. 21 Q Did you create this document? 22 A Yes, I did. 23 Q And tell us what the document is? 24 A It is Original Case Incident Report.

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157 1 Q What is an Original Case Incident Report? 2 A It's a general case report. 3 Q And what's the purpose of creating an 4 Original Case Incident Report? 5 A To document a crime incident that happened. 6 Q And what's the crime incident that you were 7 documenting in this Original Case Incident Report? 8 A Weapon violation, unlawful handgun. 9 Q This is Anthony McDaniels' arrest that we've 10 been talking about? 11 A Yes. 12 Q When did you create this report in relation 13 to the events? 14 A Probably right after we got back in the 2nd 15 District. 16 Q Why do you think it was probably right after 17 you got back? 18 A As soon as we relocated to 2nd District, got 19 situated is when most likely I started this case 20 report. 21 Q You see toward the end you have -- we're on 22 Page DO-JOINT 5779, Page 3 of 3. 23 A Okay. 24 Q There's a -- it looks like a quote, I think.	159 1 at this case report, it says, Owner, McDaniels. 2 Q Does that mean to you that the gun was in 3 the car when he jumped in the car in the first place 4 or you do not know one way or the other? 5 A Could you repeat that? 6 Q Yeah. Do you know where the gun was when 7 Mr. McDaniels jogged out of the building yelling, 8 Go, go, go? 9 A No, I don't. 10 Q You don't know if it was in the car or with 11 him somewhere else? 12 A That would be correct. 13 Q It says here, "Further investigation 14 revealed above offender is a convicted felon," and 15 then you list a case number? 16 A Yes. 17 Q What -- did you do the investigation to 18 determine that he was a convicted felon? 19 A I would have ran his rap sheet. 20 Q How would you have run his rap sheet? 21 A Either by his IR or by his name. 22 Q Would you have done it before you talked to 23 him or after? 24 A Before I talked to him? What do you mean
158 1 It says -- well, let's -- there's a sentence that 2 says, "R/Os read subject rights from F.O.P. book at 3 1428 hours. Subject then stated 'I bought the gun 4 on the street for protection and I wanted to get the 5 gun out of my car'." 6 Do you see that? 7 A Yes. 8 Q Is that a verbatim quote of something 9 Mr. McDaniels told you and Mr. Nichols? 10 A Yes, that would be verbatim. 11 Q And did you ask him why he wanted to get the 12 gun out of his car? 13 A No, I did not. 14 Q Did you have any opinion as to why he might 15 have wanted to get the gun out of his car? 16 MR. RAUSCHER: Objection. Foundation, form. 17 A I can't tell you why he said he wanted it 18 out of his car. 19 Q Why did you not ask him why he wanted to get 20 it out of his car? 21 A I can't recall why. 22 Q Do you know if a gun was in his car -- well, 23 do you know if the Taurus was his car? 24 A At that moment, no; but if I look at this,	160 1 before I talked to him? 2 Q Before you read him his rights or after. 3 Before his rights were read to him or after. 4 A That I couldn't tell you whether it was 5 before or after that. 6 Q The report lists a number of people in 7 different roles. 8 Do you see that? 9 A Yes. 10 Q So it's got the first arresting officer. 11 That's you, right? 12 A Yes. 13 Q And star number 4303? 14 A Yes. 15 Q Has that always been your star number? 16 A Yes. 17 Q It's still your star number? 18 A Yes. 19 Q What is first -- well, let me ask you this 20 first: Do you as the person who created this 21 report -- did you get to decide who got listed in 22 what category here? 23 A Do I decide? 24 Q Yeah.

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161 1 A I mean, I would be the first arresting 2 officer and then my partner would be the second 3 arresting officer and everyone else would be 4 assisting. 5 Q But you're the one who -- the report writer 6 in this case, you, you're the one who makes the 7 decision about whose names go on here? 8 A Not necessarily. 9 Q Okay. Did you in this case? 10 A Yes. 11 Q Okay. Who else -- in other situations who 12 else other than the person writing the report would 13 decide which person goes into which category or 14 who's listed on a report? 15 A If I was the one that observed the crime, I 16 might say I'll be Box 1 and whoever is writing the 17 report, you guys can go in Box 2. 18 Q And what's Box 1, Box 2? 19 A Just -- 20 Q You're talking about the different layout of 21 reports? 22 A No. In this case report, Box 1 is just 23 reporting officer who is preparing the case report. 24 Q Okay. Why were you the first arresting	163 1 question I don't want to know generally how you 2 would decide that. I just want to know in this case 3 who decided who would be in Box 1? 4 A Most likely I did. 5 Q And why did you decide that you would go in 6 Box 1? 7 A Why did I decide? Probably just told my 8 partner, I'm taking this one; I'll be in Box 1. 9 Q And why would you have been in Box 1 as 10 opposed to Nichols in this case? 11 MR. ZECCHIN: Objection, asked and answered. 12 You can answer it again. 13 Q Well, is there a reason or is it just 14 random? 15 A I mean, we usually decide -- we both 16 observed a crime being committed. Do you want to be 17 in Box 1 or do you want to be in Box 2, and this day 18 I decided to be in Box 1. 19 Q And Box 1 is the person who's likely going 20 to testify? 21 A Most likely, but there's other ways, like in 22 the narrative where you observe something, you might 23 be also called to testify. For the most part the 24 State's Attorney usually subpoena the first
162 1 officer? 2 A Why was I the first arresting officer? 3 Q Yes. What does that mean? 4 A I'm the one that arrest him and most likely 5 I'm the one that will be testifying in a court 6 proceedings. 7 Q How were you the one who arrested him? What 8 did you do to be the one who arrested him? 9 A What did I do? 10 Q Yeah. 11 A What do you mean what did I do? 12 Q I thought Nichols arrested him? 13 A Placed him in custody, yes. 14 Q So why are you the one who arrested him? 15 That's what I'm trying to understand. 16 A We both arrested him. I just happened to be 17 in Box 1. He could have gone in Box 1 if he wanted 18 to, but I just happened to go in Box 1. 19 Q Who decided that you should go in Box 1? 20 A Who decided? I mean, we both observed a 21 crime being committed. If he wanted to go in Box 1, 22 he could have gone in Box 1; but we made a decision 23 I would be in Box 1. 24 Q Yeah. So I'm not trying -- for this	164 1 arresting officer. 2 Q Did you -- when you both observed a crime, 3 did you try to trade off to keep it even who would 4 be in Box 1? 5 A No. It's -- we don't try to keep it even. 6 It just depends on that day. Like, All right, I'm 7 taking this one. You might take the next two or you 8 might take the next one. So there's no random 9 reason. I just decided to take the first arresting 10 officer in this case. 11 Q But you're not trying to testify more than 12 Nichols as a general matter? 13 A No, no. 14 Q So can you tell me what specifically it is 15 supposed to indicate when it says first arresting 16 officer and how it -- if anything is different than 17 second arresting officer? 18 A First arresting officer is usually the 19 officer that would be testifying in a criminal 20 proceeding. Second arresting officer could also 21 testify in a -- in the criminal proceeding, just 22 depending on what he observed or what he saw. I 23 mean, I could be the first arresting officer. I 24 might not observe as much as the second arresting

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165 1 officer. I just decide I'm taking the -- I'll be 2 the first arresting officer. 3 Q Are you aware of any CPD rules or guidelines 4 in place to decide who should be listed as first 5 versus second arresting officer? 6 A Not that I'm aware as long as you indicate 7 the facts truthfully and accurately as possible in a 8 case report. 9 Q Why is Nichols listed as assisting arresting 10 officer and the second arresting officer? 11 A Might just be a typo. 12 Q And it's with different beats? 13 A Might just be a typo on my part. 14 Q Is there any reason you can think of other 15 than a typo? 16 A No, just -- it's just a typo on my part. 17 Q Do you think that means there should be an 18 additional officer listed as an assisting arresting 19 officer? 20 A I might just click -- put his star number by 21 accident and then would delete it. 22 Q When you fill out this form, are you -- do 23 you have to manually type in the beat? 24 A Yes.	167 1 A That could also be fair. 2 Q What are you trying to capture when you 3 write down assisting arresting officers on a report? 4 A Person that assisted you in your lawful duty 5 as an officer. 6 Q And that can range from just having 7 responded to the call and being at the scene to 8 what? 9 A Helping with paperworks, helping with 10 searches, various ways. 11 Q If Bolton would have had a substantive role 12 in the response, it would have been listed in the 13 narrative; is that right? 14 A Yes. 15 Q It says in here Beat 264A located the 16 vehicle -- I'm paraphrasing. I'm not quoting. But 17 located the vehicle at 57 South King in the west 18 alley unoccupied. 19 A Yes. 20 Q And then it says that beat relocated the 21 vehicle to the 2nd District? 22 A Yes. 23 Q Do you know who provided you with that 24 information?
166 1 Q So you have to assign -- so when you write 2 Bolton, Beat 264B, you're actually writing 264B? 3 A Typing it, yes. 4 Q And that's not a drop-down or anything? 5 A There is. You can type it or there's a 6 drop-down. 7 Q But it's not like it autopopulates, like you 8 put in a name and it -- 9 A No. 10 Q What was Brian Bolton's role in the arrest 11 of Mr. McDaniels? 12 A I couldn't tell you. Might have been 13 arrived on the scene, but I couldn't tell you what 14 his role was. 15 Q What is the point of writing him down as an 16 assisting arresting officer? 17 A What is the point? 18 Q Yeah. 19 A If he showed up at my call, whether he did 20 minimal, he could be an assisting unit. Whether 21 it's just standing there or making sure everything 22 is okay, he could be an assisting unit. 23 Q Or he might not have had any role. Is that 24 fair?	168 1 A One of the officers on Beat 264A. I might 2 have spoken earlier that I said 264 David, but that 3 beat that day was actually 264 Adam. 4 Q But you're talking about the same people you 5 mentioned earlier, right? 6 A Smith, Coco, and Mohammed. 7 Q And the only way that you know that it was 8 someone from that beat who told you that they had 9 found a car unoccupied and brought it back to the 10 station is because you wrote down Beat 264A in this 11 report? 12 A Well, the car being located at 5720, that 13 was broadcast over the air. Being relocated to the 14 2nd District, I would have had to receive that 15 information from one of those three officers. 16 Q And you remember sitting here today, you 17 have an independent recollection of hearing that the 18 car had been located at 5720? 19 A Yes. 20 Q But you don't remember who said it? 21 A No, I don't. 22 Q Were you only on certain channels over the 23 radio? 24 A It would be the 2nd District broadband,

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169 1 whatever the 2nd District frequency would be. 2 Q But you don't remember what that is at this 3 time? 4 A It would be Zone 5. 5 Q Zone 5? 6 A Yes. 7 Q At the time it was Zone 5? 8 A I think it's still Zone 5. 9 Q Okay. Why didn't you write in the report 10 who specifically relocated the vehicle to the 2nd 11 District? 12 A Put in the beat. I thought it was 13 sufficient enough. When it came to court, the 14 State's Attorney could have actually asked what 15 individual actually located the car. But I thought 16 it was sufficient just putting the beat number that 17 one of them -- Beat 264 Adam relocated the car to 18 the 2nd District. 19 Q You didn't think there was a reason to just 20 identify which officer it was? 21 A I didn't felt it was necessary at that time. 22 Q And do you know why you didn't think it was 23 necessary at the time? 24 A Because I already put down what beat	171 1 A It would have been indicated somewhere. 2 Q You've got in here that seven -- there were 3 seven live rounds and one in the chamber? 4 A Yes. 5 Q And how did you know that? 6 A How did I know that? I recovered the gun. 7 Q And then what did you do with the gun when 8 you recovered it? 9 A I deemed it safe. 10 Q What did you do to deem it safe? 11 A I would eject the slide back so the 12 ammunition would eject out. Then I would make a 13 physical -- visual and physical inspection of the 14 gun, making sure there's no other live rounds in the 15 gun. 16 Q What did you do with the gun and the 17 ammunition after you completed that process of 18 making sure it was safe? 19 A Kept it on my person. 20 Q Until when? 21 A Until we got to the 2nd District. 22 Q When you kept it on your person, how did 23 you -- did you have an evidence bag? What -- 24 A I probably kept it in one of my pockets if I
170 1 transported. I don't know who was driving so I 2 don't know who transported, but I know it was Beat 3 264 Adam. 4 Q How fast was the Taurus moving when 5 Mr. McDaniels got out? 6 A The Taurus was moving? 7 Q It was moving, right? 8 A It was in motion, but I wouldn't -- maybe if 9 I would have to guess, 3 miles, 2 miles an hour. 10 Q Just barely rolling? 11 A Yes. 12 Q How far away was your car from the Taurus 13 when Mr. McDaniels jumped out? 14 A Maybe a car length, two at the most. 15 Q And then how long did it take you and 16 Nichols to catch up with him? 17 A To catch up with who? 18 Q With Mr. McDaniels once he got out. 19 A Probably seconds or a minute. 20 Q Did he resist arrest at all? 21 A Did he resist? I wasn't there when he was 22 placed in custody. I don't believe so, no. 23 Q If he would have resisted, it would have 24 been --	172 1 was wearing cargo pants. I'm not sure what kind of 2 pants I was wearing. 3 Q And do you -- do you remember what you did 4 with them when you got back to the station? 5 A Probably -- I don't know if I did 6 inventories. But if I did inventories, I would 7 probably generated a unique inventory number with 8 all the classification of the gun, serial number and 9 all that. If not, if I didn't do the inventories, I 10 probably would have handed that weapon to the person 11 generating that inventory number. 12 Q And then where would -- physically where 13 would the gun go? 14 A Where would the gun go? 15 Q Yeah. 16 A After we're done with inventory, it would be 17 placed in a gun -- in a gun safe in the front desk 18 until it's picked up by ERPS. 19 Q To an evidence -- 20 A Evidence technician, yes. 21 Q And do you have any independent recollection 22 of doing any of those things you've just described 23 with this -- 24 A Like I said --

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173	1 Q (Continuing) -- particular gun other than 2 making it safe? 3 A Like I said, I don't know if I'm the one 4 that inventoried the gun or someone else. 5 Q And I should ask you this: Do you have an 6 independent recollection of making sure the gun was 7 same? Do you know you did that? 8 A Yes. 9 Q You remember doing that? 10 A Yes. 11 Q And you did that at the scene? 12 A I do that with all the guns. 13 Q But do you remember doing it with this gun? 14 A Yes. 15 Q Or do you just know you do it with all the 16 guns? 17 A No. I remember doing it with this gun. 18 Q How long did that process take you? 19 A The process? 20 Q Just making sure the gun was safe. 21 A Seconds or less than a minute. 22 Q Did you ever see the gun again after you 23 brought it back to the station? 24 A At trial, yes.	175	1 comparing, seeing if it was the same serial number 2 or anything like that? 3 A Do I remember independently, no, but most 4 likely that's what would have been done. 5 Q That's what commonly you would be asked to 6 do? 7 A Yes. 8 Q Do you have any estimate of how many gun 9 cases you've testified in? 10 A Testified in? I can't tell you that. 11 Q Do you have an estimate as to how many 12 arrests you were involved in that Mohammed was 13 involved in in some way? 14 A That I can't tell you. 15 Q Do you think it's in the hundreds? 16 A Possible. 17 Q Likely? Is it likely in the hundreds? 18 A Possible, yes. 19 Q Can you move it past the possible category 20 or no? 21 A Probably a hundred, yes. 22 Q Do you see Edgar Carlos is also listed as an 23 assisting arresting officer? 24 A Yes.
174	1 Q Not in between that? 2 A No. 3 Q How do you know if it was the same gun at 4 trial? 5 A The same serial number, same make. 6 Q You looked at the serial number? 7 A The inventory numbers. 8 Q And were you asked to do all those things, 9 look at all those things? 10 A What was that? 11 Q You would compare the serial number and that 12 sort of thing? 13 A It would be the unique inventory number 14 attached to that gun. 15 Q Okay. So I just want to know what you 16 remember. 17 Do you remember looking at serial numbers, 18 doing comparisons? 19 A When? 20 Q At the trial, any time -- so the only time 21 you saw the gun was the day when you are testifying 22 you recovered it and then at trial; is that right? 23 A Yes. 24 Q And do you remember doing any like	176	1 Q Do you know Mr. Carlos? 2 A Yes. 3 Q Was he ever a member of the Watts 264 team? 4 A He was never a member of the 264 team. 5 Q Do you know what his role was in assisting 6 the McDaniels arrest? 7 A I believe he was the transport officer. 8 Q Do you have an independent memory of that? 9 A Independent memory of it? No. 10 Q Why do you think he was the transport 11 officer? 12 A Why -- I don't know if I indicated on my 13 report or not, but I believe he was the transport 14 officer. 15 Q Is that just a role he frequently had? 16 A No. Usually he was still in a beat car. So 17 if he was on scene, most likely we would have asked 18 him to transport for us. 19 MR. RAUSCHER: Take another quick -- 20 MR. ZECCHIN: Sure. 21 THE VIDEOGRAPHER: Off the record, 2:40. 22 (A recess was taken from 2:40 p.m. to 2:57 23 p.m.) 24 THE VIDEOGRAPHER: Back on the record, 2:57.

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45 (177 to 180)

177	1 Q Do you remember how many people you arrested 2 on November 21st, 2008? 3 A No, I don't. 4 Q Do you know if you arrested anyone other 5 than Mr. McDaniels? 6 A I don't recall if we did or not. 7 Q You don't recall either way? 8 A No. 9 Q Do you remember what kind of car you were 10 driving that day? 11 A Most likely would have been a Crown Vic. 12 Q But you don't remember specifically? 13 A I don't have no independent recollection 14 whether it was a Crown Vic, but most likely it would 15 be. 16 Q Why do you think it was most likely a Crown 17 Vic? 18 A That was the car we drove at that time. 19 Q What color was it? 20 A Most likely it would have been gray. 21 Q Did it have automatic windows or locks? 22 A I believe so. 23 Q Both, both automatic windows and locks? 24 A Yes.	179	1 A Probably one of the State's Attorney. 2 Q Do you have any explanation as to why the 3 tow truck driver is giving testimony that conflicts 4 with your version of events? 5 A I can't -- 6 MR. ZECCHIN: Objection, form and 7 foundation. 8 A I can't answer that question. 9 Q So you don't know? 10 A I don't know. 11 Q Have you ever spoken to the tow truck 12 driver? 13 A No. 14 Q And have you ever talked with anybody other 15 than the State's Attorney about the car being towed? 16 A No. 17 Q Do you know whether anyone else on the Watts 18 264 team had any interactions with McDaniels -- 19 A That I can't -- 20 Q (Continuing) -- the day of his arrest, 21 November 21st, 2008? 22 A Could you repeat that? 23 Q Yeah. I was going slow. I'll try again, 24 so. . .
178	1 Q Do you know if your partner, Nichols, knew 2 Mr. McDaniels? 3 A I don't recall. 4 Q You don't know -- 5 A I don't know if he knows Mr. McDaniels. 6 Q Do you know if Mohammed knew Mr. McDaniels? 7 A That I don't know either. 8 Q Were you pressed for time for any reason 9 when you were back at the station after 10 Mr. McDaniels had been arrested? 11 A I don't believe so. 12 Q You had plenty of time to ask him whatever 13 you wanted to? 14 A Yes. 15 Q Did you hear a tow truck driver testify 16 during Mr. McDaniels trial? 17 A I believe he did. 18 Q Did you hear his testimony? 19 A No. 20 Q Do you know his testimony conflicts with the 21 idea that the car was towed from the 2nd District? 22 A I believe, yes, it did conflict with 2nd 23 District. 24 Q And who told you that it conflicts with --	180	1 Do you know whether anyone else on the Watts 2 264 team had any interaction with Mr. McDaniels on 3 November 21st, 2008, other than the events that 4 you've described today? 5 A I don't recall. 6 Q You don't know? 7 A I don't know. 8 Q Do you know whether anyone on the Watts 264 9 team had any interactions with Mr. McDaniels on any 10 other day ever? 11 A I don't know. 12 Q You never asked anybody? 13 A No. 14 Q I'm going to shift gears again and ask you 15 about Christopher Scott. 16 A Okay. 17 Q Do you know who Christopher Scott is? 18 A No, I don't. 19 Q Do you have any recollection of being 20 involved in arresting Mr. Scott? 21 A No, I don't. 22 Q Are you aware, though, that you're a 23 defendant in a lawsuit he's brought? 24 A Yes.

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46 (181 to 184)

181	1 Q Do you have any basis one way or the other 2 to determine whether the allegations in the lawsuit 3 are correct? 4 A Could you repeat that? 5 Q Yeah. Do you know whether what Mr. Scott is 6 alleging happened actually happened? 7 A No, it didn't happen the way he's alleging. 8 Q And how do you know that if you don't have 9 any memory of arresting him? 10 A I have no reason to doubt any of the 11 officers of their lawful duty in that arrest. 12 Q You still think Mohammed and Watts didn't do 13 anything wrong? 14 A At that -- 15 MR. ZECCHIN: Objection, argumentative. 16 A At that moment I have no reason to doubt any 17 officer, their credibility or their lawful duty in 18 that incident. 19 Q So even now that you know that Watts and 20 Mohammed have been convicted and they abused their 21 power, you don't doubt their actions? 22 A Like I stated -- 23 MR. KOSOKO: I'm going to -- I'm going to 24 object to the form of the question.	183	1 officers? 2 MR. ZECCHIN: Objection. That's not what he 3 testified to. If you're going to ask a different 4 question, that's fine. 5 A At that incident, yes. 6 Q But after that incident you have no reason 7 to think they might have done that or something 8 similar ever a different time? 9 A I have never witnessed any officer commit 10 any unlawful act in my presence or otherwise. 11 Q Have you read the complaints -- any of the 12 complaints that list you as a defendant? 13 A Any of the complaints, some of them, yes. 14 Q Have you read the parts where the federal 15 government accused Watts and Mohammed of abusing 16 their power repeatedly? 17 A I don't know if I ever read that one. 18 Q So if the federal government did make that 19 accusation, do you have any reason to believe it's 20 wrong? 21 MR. KOSOKO: Objection. Calls for a 22 speculative response. 23 A I can't answer it. 24 Q Because you don't think you read that part
182	1 A Like I stated, I have no reason to doubt 2 those officers at that time. 3 Q Do you agree that Watts and Mohammed abused 4 their power as police officers? 5 A Could you repeat that? 6 Q Do you agree -- let me rephrase it. 7 Did Officer Watts and Officer Mohammed abuse 8 their power as police officers? 9 MR. ZECCHIN: Objection; form, foundation. 10 A Abused their power on what incident? 11 Q Generally. Did they abuse their power as 12 police officers ever? 13 A Ever other than what I heard in the news? I 14 have no other knowledge of them abusing their police 15 power. 16 Q From what you heard on the news, do you 17 agree that they did abuse their police power? 18 A According to the news, they were locked up 19 for taking funds from a government agency. 20 Q Is that an abuse of power? 21 A At that -- 22 MR. KOSOKO: Object to the form. 23 A At that moment, yes. That incident, yes. 24 Q So, yes, they abused their power as police	184	1 of the complaint? 2 A I mean, I never witnessed any wrongful act 3 by any officer in my presence. 4 Q And if the federal government had accused 5 them of that, it still wouldn't give you any pause 6 as to their actions that you didn't observe? 7 A There was other officers involved in most of 8 those arrests. 9 Q What does that mean? 10 A So I have no reason to doubt those other 11 officers and their lawful duty as a police officer 12 in that incident. 13 Q Because they haven't been convicted yet? 14 MR. ZECCHIN: I'm going to object as -- 15 Q I didn't mean that to assume. 16 Is that because they haven't -- there are no 17 other officers who have been convicted? 18 A Not just that. I have never witnessed any 19 officer do any wrongful thing in my presence. 20 Q Did you review any reports relating to 21 Christopher Scott's arrest before -- 22 A Yes. 23 Q (Continuing) -- your deposition? 24 Did the reports refresh your recollection at

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47 (185 to 188)

185 1 all? 2 A No. 3 MR. RAUSCHER: Let's mark this as Exhibit 3. 4 This is Bates-stamped CITY-BG-32187 to 188 -- no, to 5 190. 6 MR. ZECCHIN: Could you read those again, 7 Scott? 8 MR. RAUSCHER: Yeah, sure. It's 9 CITY-BG-32187 to 190. 10 (Leano Exhibit No. 3 was marked for 11 identification and is attached to the transcript.) 12 Q Have you seen this document before? 13 A Yes. 14 Q Tell me what this document is. 15 A It's an Arrest Report. 16 Q And do you have any independent knowledge as 17 to whether what's alleged in this report is true? 18 A Independent, no. 19 Q Do you have any knowledge that isn't -- any 20 knowledge as to whether it's true? 21 A Do I have what? 22 Q Any knowledge at all as to whether what's 23 alleged in this report is true? 24 A That is true independent, no.	187 1 A Not really. 2 Q Do you know who he is at all? 3 A No. 4 Q Do you know if you were involved in his 5 arrest or any arrest any time arresting him? 6 A Maybe, but I'm not a hundred percent sure. 7 Q Why do you say "maybe"? 8 A I might have looked at a document stating I 9 was assisting on it. 10 Q No independent -- you don't have any -- 11 A No. 12 Q (Continuing) -- independent recollection of 13 being involved in any arrest of Lionel White, 14 Senior? 15 A No. 16 MR. RAUSCHER: I'm going to mark Exhibit 4, 17 a document that's BAKER GLENN 4144 through 4150. 18 (Leano Exhibit No. 4 was marked for 19 identification and is attached to the transcript.) 20 (Witness examining document.) 21 MR. PALLES: Those of us following the 22 Lionel White matter. 23 MR. RAUSCHER: Yes. 24 MS. KLEINHAUS: All of us are following the
186 1 Q You just assume it is accurate because one 2 of your fellow officers wrote it; is that right? 3 A Yes. 4 Q But you've never talked to anybody about 5 Christopher Scott's arrest? 6 A No. 7 Q Do you remember being at the scene of his 8 arrest? 9 A I don't believe I was at this arrest. 10 Q Why do you think you weren't at this arrest? 11 A I believe I was on furlough at this time. 12 Q How long were you on furlough for? 13 A Depends on the year and the amount of time I 14 have on the job. 15 Q When you say "furlough," are you talking 16 about a vacation? 17 A A vacation. 18 Q Why do you think you were on vacation for 19 this particular arrest? 20 A I recall looking at A&As indicating I was on 21 furlough on this date. 22 Q Do you know who Lionel White, Senior is? 23 A Do I know who he is? 24 Q Yeah.	188 1 line. 2 MR. RAUSCHER: I'm not sure. 3 MR. PALLES: They told me I've got to stay 4 awake. 5 Q Have you had a chance to review that? 6 A Yes. 7 Q Is this or some of this at least documents 8 you reviewed in preparation for your deposition 9 today? 10 A Yes. 11 Q And you see your name is listed on what's 12 BAKER GLENN 4147? 13 A Uh-huh, yes. 14 Q And it lists you as a witness? 15 A Yes. 16 Q Did you witness anything relating to 17 Mr. White's arrest? 18 A Witnessed something; but as to what, I don't 19 recall at this time. 20 Q You don't -- you don't really know if you 21 witnessed anything, right? 22 A No, I witnessed something; but to the 23 capacity of what I witnessed, I don't recall what 24 that is.

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48 (189 to 192)

189	1 Q How do you know that you witnessed 2 something? 3 A It's checked I witnessed so I must have 4 witnessed something. 5 Q Or the report's wrong? 6 A Possible, but I doubt it. 7 Q Do you know who -- who created this report? 8 A I'm just assuming here since reporting 9 officer is Officer Jones, it would be Officer Jones. 10 Q Did you ever talk to Officer Jones about his 11 report? 12 A Did I ever talk to Officer Jones about his 13 report? 14 Q This report. 15 A This report? No. 16 Q Do you remember anything you did on this 17 day? 18 A No, I don't. 19 Q Do you remember Officer Jones getting into 20 fights with anybody when he was an officer? 21 A Getting in fights? 22 Q Yeah. 23 A Probably -- 24 MR. KOSOKO: I'm going to object to the --	191	1 Q Do you remember him ever coming to you and 2 saying, I just had to punch somebody to subdue them 3 in connection with an arrest or anything like that? 4 A No, I don't believe so. 5 Q Did looking at any of these documents 6 refresh your recollection as to whether you were 7 involved in the arrest of Lionel White? 8 A My involvement, no. 9 Q Or as to whether you were involved at all? 10 A It has me listing as assisting. So in some 11 capacity I assisted the officer in their lawful 12 duties. 13 Q But that doesn't mean you actually assisted 14 with -- 15 A With the physical arrest? 16 Q Yeah. Or that you saw anything that he did 17 or was alleged to have down? 18 A Right. 19 Q It could mean you just got there and you 20 were making sure the scene was -- the officers were 21 safe, right? 22 A Yes. 23 Q Or you were just there. You had responded 24 to the call and you were there?
190	1 I'm going to object to the way it was phrased. 2 A I probably observe him in a struggle trying 3 to arrest someone, but I wouldn't call that a fight. 4 Q Did you ever observe him getting punched by 5 a civilian he was trying to arrest? 6 A I don't recall if I have or not. 7 Q You don't know one way or the other? 8 A No. 9 Q No, you don't know? 10 A No, I don't know. 11 Q Did you ever observe him punching anybody? 12 A I don't recall. 13 MR. ZECCHIN: Objection to form. You mean 14 in this instance or ever? 15 MR. RAUSCHER: I actually mean ever. 16 Q Do you remember him punching anybody ever? 17 A I don't believe so. 18 Q You don't think you've ever seen him punch 19 anybody? 20 A No. 21 Q Do you ever remember him coming and telling 22 you, Hey, someone just punched me in the face when I 23 tried to arrest them or something like that? 24 A I don't believe so.	192	1 A Yes. 2 Q Is there anything you can think of at all 3 that would refresh your recollection as to whether 4 you actively participated in Mr. White's arrest? 5 A I mean, there's -- might be some, but at 6 this moment I don't know what that something is. 7 Q Yeah, you can't think of anything? 8 A No. 9 Q And did you try to -- did you try to think 10 of ways to refresh your recollection before the 11 deposition? 12 A I mean, I tried. But there might be a way; 13 but as I say, at this moment I don't know what that 14 might be. 15 Q Is that the same for Christopher Scott? 16 A Christopher Scott, I believe I was on 17 furlough at that time. 18 Q And then Mr. McDaniels, other than things 19 you say you have an independent recollection of, is 20 there anything you can think of that would refresh 21 your recollection as to the other events? 22 A Could you repeat that question? 23 Q Yeah. So you said you have an independent 24 recollection of certain things relating to

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49 (193 to 196)

193	1 Mr. McDaniels' arrest. 2 A Yes. 3 Q And then there's certain things you don't 4 remember exactly? 5 A Yes. 6 Q Is there anything that would refresh your 7 recollection as to those events that you can think 8 of? 9 A There might be; but like I stated earlier, I 10 don't know what that stuff might be. 11 MR. RAUSCHER: You know, let us take another 12 quick break. And we should -- I want to talk -- 13 maybe we can talk about the best way to move forward 14 with cases. 15 MR. ZECCHIN: Sure. 16 MR. RAUSCHER: Just real quick. 17 MR. ZECCHIN: Yeah. 18 THE VIDEOGRAPHER: Off the record, 3:15. 19 (A recess was taken from 3:15 p.m. to 3:21 20 p.m.) 21 THE VIDEOGRAPHER: Back on the record, 3:21. 22 MR. RAUSCHER: I'm actually -- I think I'm 23 through with my questions. I think Joel has a 24 couple questions so I'm going to pass to him.	195	1 MR. RAUSCHER: You guys are up. 2 MR. PALLES: No questions for me. 3 MR. KOSOKO: Watts has a couple questions. 4 CROSS-EXAMINATION BY COUNSEL FOR DEFENDANT RONALD WATTS 5 BY MR. KOSOKO: 6 Q Officer Leano, have you ever been -- 7 THE VIDEOGRAPHER: Pass the mic, please. 8 (Discussion off the record.) 9 Q You wouldn't have been listed in any 10 reports, whether it be a Vice Case Report or Arrest 11 Report, unless you were either a surveillance 12 officer, an enforcement officer, or a processing 13 officer; is that correct? 14 MR. FLAXMAN: Objection, foundation. 15 A Could you repeat that, sir? 16 Q You wouldn't have been listed in either any 17 Vice Reports or Arrest Reports if you either 18 didn't -- didn't work as a surveillance officer in 19 the incident, an enforcement officer, or helped in 20 some formal way of the processing? 21 MR. FLAXMAN: Objection, foundation. 22 A Unless I was an assisting officer in some 23 capacity. 24 Q Now, back in 2008 do you remember if there
194	1 CROSS-EXAMINATION BY COUNSEL FOR CERTAIN PLAINTIFFS 2 BY MR. FLAXMAN: 3 Q Sir, do people call you Manny? 4 A Sometimes. 5 Q And another thing that Mr. Rauscher asked 6 you about were nicknames for some of the officers on 7 your team. 8 Do you remember that? 9 A Yes. 10 Q Do you remember hearing Officer Mohammed 11 ever called Smoke? 12 A Smoke? No. 13 Q And do you ever remember hearing Officer 14 Jones called AJ? 15 A No. 16 Q AJ are his initials, though, right? 17 A I thought you said EJ. 18 Q Oh, I'm sorry. Let me ask it again. 19 Have you ever heard Officer Jones referred 20 to as AJ? 21 A AJ? Maybe. 22 MR. FLAXMAN: Okay. Those are all my 23 questions. Thank you. 24 A I thought you said EJ.	196	1 was any gang warfare between any gangs in the 2nd 2 District? 3 A No, I don't. 4 Q Now, you've been on the force for 18 years; 5 is that correct? 6 A Yes. 7 Q Has any -- has any State's Attorney ever 8 used your report in lieu of your live testimony? 9 A No. 10 Q Okay. So what is the -- the purpose of your 11 report is to assist you in recollecting the 12 incident; is that correct? 13 MR. RAUSCHER: Object to form. 14 A Yes. 15 Q Okay. Now, what is the Felony Review Unit, 16 Officer Leano? 17 A It's part of the State's Attorney. You call 18 to get an approval for a felony. 19 Q Okay. Now, the Felony Review Unit doesn't 20 require approval on all felonies; is that correct? 21 A Yes. 22 Q Okay. So drug charges you don't need to 23 call -- small drug charges you don't need to call 24 Felony Review; is that correct?

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50 (197 to 200)

197 1 MR. RAUSCHER: Object to form. 2 A All drug charges, if it's felony, you don't 3 need to call for a felony. 4 Q So an officer can initiate a complaint and 5 charge an individual without contacting the Cook 6 County State's Attorney's Office? 7 A For a drug felony, no. 8 Q What about gun cases. Can you ever charge a 9 felony gun case without contacting the Cook County 10 State's Attorney's Office? 11 A No. 12 Q Okay. So the Cook County State's Attorney's 13 Office has a vetting system, is that correct, upon 14 which -- 15 MR. FLAXMAN: Objection, foundation. 16 Q Are you aware of -- 17 MR. RAUSCHER: And form. 18 MR. KOSOKO: Huh? And form? 19 Q Are you aware that the Cook County State's 20 Attorney's Office has a vetting system for all 21 felony gun cases? 22 MR. RAUSCHER: Object to form. I think 23 that -- and I will explain. I think there are legal 24 questions which I don't think are proper. 198	199 1 case in? 2 A I believe we just called the case in. 3 Q Okay. And when you call the case in, what 4 is it -- what happens? 5 A We tell them what happened. We give them -- 6 we give them his background check -- 7 Q Okay. 8 A (Continuing) -- and they make the 9 determination on that. 10 Q Okay. So they verify the facts of the 11 incident as you relay to them? 12 A Yes. 13 MR. RAUSCHER: Object to the form and 14 foundation. 15 Q And including the criminal history of the 16 assailant? 17 A That would be correct. 18 Q Okay. And the State's Attorney's office 19 decides whether or not to charge or not? 20 A Correct. 21 Q Okay. Now, in regards to Mr. McDaniels' 22 case, which occurred in November of 2008, did 23 Mr. McDaniels file a complaint with either OPS or if 24 it was called IPRA then on you based on this arrest? 200
1 Q Explain to us the felony review process. 2 A I know we would have to call Felony Review 3 to get a felony approval on a weapon. 4 Q On a weapon charge? 5 A Yes. 6 Q On a felony weapon charge? 7 A Yes. 8 Q Okay. Could you on your own charge an 9 individual without contacting the Cook County 10 State's Attorney's Office Felony Review Unit? 11 A No. 12 Q Okay. Going back to Mr. McDaniels' arrest, 13 did you call Felony Review? 14 A Yes. 15 Q Explain to all of us what's the difference 16 between a phone case and a personal case in Felony 17 Review? 18 A Could you repeat that? 19 Q What is the difference between a phone case 20 and a personal case in Felony Review? 21 A What do you -- I don't understand what you 22 mean by a phone case. 23 Q Did a State's Attorney come out to 51st and 24 Wentworth to speak to you or did you just call the	1 A I don't believe so. 2 Q Okay. Did you, yourself -- eventually 3 McDaniels was charged with armed habitual criminal; 4 is that correct? 5 A Correct. 6 Q Okay. When you called the case in to Felony 7 Review, did you call it in as armed habitual or just 8 UUW? 9 A UUW. 10 Q Okay. So the State's Attorney's office 11 determined that Mr. McDaniels should be indicted for 12 armed habitual? 13 A That would be -- 14 MR. FLAXMAN: Objection, foundation. 15 A That would be correct. 16 Q Now, after Mr. McDaniels was indicted for 17 armed habitual criminal, at some point you remember 18 testifying in the matter; is that correct? 19 A Correct. 20 Q Okay. Do you remember if you testified in 21 the motion to quash the arrest? 22 A I don't recall whether I did or not. 23 Q Do you recall if -- and at some point you 24 testified at his criminal trial; is that correct?

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51 (201 to 204)

201	1 A Yes. 2 Q And that was a bench trial? 3 A Yes. 4 Q Was that a bench trial or jury trial? 5 A Bench. 6 Q And the judge found him guilty? 7 A Correct. 8 Q Okay. After that testimony, did the Cook 9 County State's Attorney's Office ever subpoena you 10 again to testify regarding the arrest of Anthony 11 McDaniels? 12 A No. 13 Q Okay. But he was exonerated anyways? 14 A Yes. 15 Q So nothing changed from the date you called 16 the Felony Review Unit up until Mr. McDaniels had 17 been arrested? 18 MR. RAUSCHER: Object to form. 19 MR. FLAXMAN: Objection, foundation. 20 MR. RAUSCHER: And form. 21 A Correct. 22 Q Now, we can surmise that the reason 23 Mr. McDaniels was indicted was because my client 24 back in 2012 had pled guilty to theft of government	203	1 case report might tell me whether he was on duty. 2 Q The Original Case Incident Report? 3 A Yes, whether he approved it or not. 4 MR. RAUSCHER: Do you want to say what Bates 5 number that is? 6 MR. KOSOKO: Yeah. That's just your Exhibit 7 No. 2. That's just Exhibit No. 2. 8 Q Handing you Exhibit No. 2. 9 A I don't recall whether he was on duty or 10 not. 11 Q Did Sergeant Watts approve your report? 12 A No. 13 Q I'll take that back. Now, in order to 14 charge Mr. McDaniels with a U UW or to seek approval 15 of charging him with a U UW, you needed to verify his 16 criminal history, correct? 17 A Correct. 18 Q Okay. So when you called -- when you called 19 the matter in, you were able to determine that he, 20 in fact, was a felon? 21 A Correct. 22 Q Okay. And in order for Mr. McDaniels to be 23 charged with armed habitual, he would have been 24 previously convicted of multiple gun charges; is
202	1 funds; is that correct? 2 A Yes. 3 MR. FLAXMAN: Objection to form. 4 MR. KOSOKO: Huh? 5 MR. FLAXMAN: You said, We can surmise that 6 McDaniels was indicted because your client -- 7 Q Why do you think Mr. McDaniels was 8 exonerated? 9 A Why do I think? 10 Q Yeah. 11 A Based on Officer -- formerly Officer 12 Mohammed and Sergeant Watts being convicted of a 13 crime, federal crime. 14 Q Was Sergeant Watts on duty the date you 15 arrested Mr. McDaniels? 16 A I don't -- I don't recall, but I would have 17 to look at the Arrest Report whether he is or not. 18 Q Okay. I'll give you an opportunity to -- 19 let's go back to -- is there anything that would 20 help you refresh your recollection? 21 A Probably the case report or the Arrest 22 Report. 23 Q Okay. So we can look at Exhibit No. 2. 24 A Do you have a case report on there? The	204	1 that correct? 2 A I don't know how the State's Attorney 3 determined charging him with armed habitual. 4 Q Are you aware that Mr. McDaniels has been to 5 prison for murder? 6 A Yes. 7 Q Okay. And, again, you've never been asked 8 to testify regarding this arrest since his bench 9 trial. The State's Attorney's office hasn't 10 subpoenaed you to testify? 11 A No. 12 Q You don't -- do you recall ever testifying 13 at a third stage evidentiary hearing post conviction 14 petition? 15 A No. 16 Q Okay. So as it stands now, no one has asked 17 you -- nothing has changed as far as what you've put 18 forward in regard to why Mr. McDaniels was charged 19 with the gun charge that date? 20 A No. 21 Q Okay. Do you think it was safe for the Cook 22 County State's Attorney's Office to exonerate an 23 armed habitual criminal without asking you any 24 further questions?

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52 (205 to 208)

205	1 A Could you repeat that question? 2 Q Do you think -- do you think it's safe for 3 the 2nd District that the Cook County State's 4 Attorney's Office exonerated a known murderer and 5 armed habitual criminal without asking you any 6 additional questions? 7 A No, it's not safe for the City of Chicago. 8 MR. KOSOKO: No further questions. 9 MR. MICHALIK: I have no questions. 10 MR. ZECCHIN: I just have a few. 11 CROSS-EXAMINATION BY COUNSEL FOR CERTAIN DEFENDANTS 12 BY MR. ZECCHIN: 13 Q Officer Leano, you were asked questions 14 about Lionel White, Senior and the arrest that was 15 made by Officer -- Sergeant Jones, at the time 16 Officer Jones, correct? 17 A Yes. 18 Q Did you see anything -- any interaction 19 between Mr. White and Officer Jones? 20 A No, I did not. 21 Q Did you see any physical contact between 22 Officer Jones and Mr. White? 23 A No, I did not. 24 Q Did you see anything involving the narcotics	207	1 Would you agree that for the prosecutors to 2 make an informed decision, you have to give them 3 accurate information? 4 A Correct. 5 Q So if you lied to the officers, then they 6 obviously couldn't make an informed decision about 7 whether to file charges? 8 MR. MICHALIK: Object to the form. 9 A Could you repeat that? 10 Q If you -- 11 MR. MICHALIK: Did you mean attorneys? 12 MR. RAUSCHER: I'm sorry. 13 MR. MICHALIK: You said officers. Did you 14 mean attorneys? 15 MR. RAUSCHER: I didn't mean to interrupt. 16 Yeah, thanks. 17 Q If a police officer lies to a prosecutor and 18 says certain events happened in a way that they 19 didn't, the prosecutor can't make an informed 20 decision about whether to press charges, correct? 21 A If an officer lied? 22 Q Yes. 23 A That would be correct. 24 Q Tell me what you remember about the reverse
206	1 that Mr. White was ultimately charged with in 2 relation to Mr. Jones? 3 A No, I did not. 4 Q And that day do you recall there being a 5 reverse sting being held in the lobby of that 6 building? 7 A I believe so. 8 Q And was that separate and apart from the 9 arrest of Mr. White? 10 A I believe so. 11 Q And was your involvement limited to that 12 reverse sting and not involving the arrest of Mr. 13 White? 14 A Correct. 15 Q But did the arrest take place of Mr. White 16 at approximately the same time the reverse sting was 17 taking place? 18 A Yes. 19 MR. ZECCHIN: I don't think I have any other 20 questions. 21 REDIRECT EXAMINATION BY COUNSEL FOR CERTAIN PLAINTIFFS 22 BY MR. RAUSCHER: 23 Q You talked a little bit about the felony 24 review process.	208	1 sting the morning of when Lionel White, Junior -- 2 I'm sorry -- when Lionel White, Senior was arrested. 3 A Tell you about the reverse sting? 4 Q Yeah. Tell me what you remember about that 5 particular reverse sting. 6 A We were -- I was probably part of the 7 enforcement processing team. 8 Q I'm sorry. Don't -- and I don't mean to cut 9 you off, but I don't want to know what you probably 10 think you would have done. I want to know what you 11 remember. 12 A I don't -- I don't have no independent 13 recollection of that. 14 Q Of the reverse sting at all? 15 A Yes. 16 Q How do you know you were involved in a 17 reverse sting? 18 A We -- I know we did one and I'm -- I tested 19 a couple of the -- of the offenders that was 20 arrested for attempted PCS. 21 Q So you looked at some other documents? 22 A Yes. 23 Q And do you remember which documents you 24 looked at in particular?

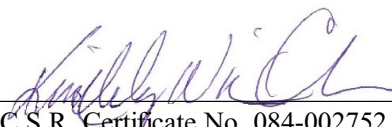
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53 (209 to 212)

209	1 A That would be probably the vice and the case 2 report -- I mean, the Arrest Report. 3 Q For what? 4 A For individuals that was locked up that day 5 for attempted PCS. 6 Q And do you know who those individuals were? 7 A No, I don't, not offhand. 8 Q How long ago did you look at those 9 documents? 10 A Probably the time last week when we prepare 11 for this deposition. 12 Q You mean the last few days? 13 A Yes. 14 Q And did those documents refresh your 15 recollection or are you just saying, I looked at 16 documents and they said there was a reverse sting? 17 A I mean, they didn't refresh my recollection; 18 but according to the document, a reverse sting was 19 conducted. 20 Q And does the reverse sting say any -- do any 21 of those documents say anything about Lionel White, 22 Senior? 23 A No, it doesn't. 24 Q And how do you know that they -- that they	211	1 A I mean, at that time they were locking up 2 Mr. White, they were probably not involved with that 3 reverse sting. 4 Q And the question I asked you was the 5 officers involved in White's arrest. The Arrest 6 Report lists Officer Jones and Officer Smith as the 7 arresting -- as the arresting officers. 8 Do you remember that? 9 A Yes. 10 Q And it's your testimony that at some point 11 during the day those officers were involved in the 12 reverse sting? 13 A Yes. 14 Q And the Vice Case Report that you looked at, 15 which is also part of Exhibit 4, lists certain other 16 officers, including yourself. And that's the report 17 for Mr. White. 18 Do you remember looking at that? 19 A Yes. 20 Q Are the -- all the officers listed on this 21 Vice Case Report related to Mr. White's arrest also 22 officers who were involved in the reverse sting on 23 that same day? 24 A Yes.
210	1 mean you didn't have anything to do with Lionel 2 White, Senior's arrest? 3 A Because I would have been focused on the 4 reverse sting part of the operation. 5 Q How do you know that? 6 A Because I would have been part -- like I 7 stated earlier, I would have been part of the 8 processing or enforcement team. 9 Q But with no independent recollection of what 10 you did that day, how do you know that you were more 11 involved with the reverse sting than with Lionel 12 White, Senior's arrest? 13 A How do I know that? 14 Q Yeah. 15 A Off of my head, off of my memory, I can't 16 answer it. 17 MR. RAUSCHER: I don't have anything else. 18 RECROSS-EXAMINATION BY COUNSEL FOR CERTAIN PLAINTIFFS 19 BY MR. FLAXMAN: 20 Q Were the officers arresting Mr. White 21 involved in the reverse sting? 22 A At some point, yes. 23 Q But then at some other point they arrested 24 Mr. White?	212	1 MR. RAUSCHER: I'm sorry. I said I was 2 done, but I have just a couple more related to that. 3 FURTHER RECROSS-EXAMINATION 4 BY COUNSEL FOR CERTAIN PLAINTIFFS 5 BY MR. RAUSCHER: 6 Q Who played what role in the reverse sting 7 that day? 8 A Like I stated earlier, most likely the 9 African American officers would be the pretend drug 10 dealers. 11 Q So who would have been that -- who would 12 that have been that day? 13 A It would have been Officer Smith, Officer 14 Mohammed, Officer Jones. And then Officer Leano, 15 Bolton, Gonzalez and I would have been the 16 enforcement processing team. 17 MR. RAUSCHER: Okay. I don't have any more 18 questions. 19 MR. ZECCHIN: Just two quick ones. 20 RECROSS-EXAMINATION BY COUNSEL FOR CERTAIN DEFENDANTS 21 BY MR. ZECCHIN: 22 Q Your name's not listed anywhere on this 23 Arrest Report for Mr. Lionel White; is that correct? 24 The Arrest Report I'm speaking --

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213 1 A The Arrest report? 2 MR. RAUSCHER: Object to form. 3 A No. 4 Q And you didn't write the Vice Case Report in 5 this case either, did you? 6 A No, I did not. 7 MR. ZECCHIN: No other questions. 8 MR. RAUSCHER: I think we're done. 9 THE VIDEOGRAPHER: This concludes the 10 deposition. Time, 3:39. 11 MR. ZECCHIN: I'm going to reserve, please. 12 (Off the record at 3:39 p.m.) 13 14 15 16 17 18 19 20 21 22 23 24	215 1 CERTIFICATE OF SHORTHAND REPORTER 2 3 I, Kimberly R. Christopher, the officer 4 before whom the foregoing proceedings were taken, do 5 certify that the foregoing transcript is a true and 6 correct record of the proceedings, that said 7 proceedings were taken by me stenographically and 8 thereafter reduced to typewriting under my 9 supervision, and that I am neither counsel for, 10 related to, nor employed by any of the parties to 11 this case and have no interest, financial or 12 otherwise, in its outcome. 13 IN WITNESS WHEREOF, I have hereunto set my 14 hand this 10th day of October 2019. 15 16 17  18 _____ 19 C.S.R. Certificate No. 084-002752 20 21 22 23 24
214 1 ACKNOWLEDGMENT OF DEPONENT 2 3 4 I, MANUEL LEANO, do hereby acknowledge that 5 I have read and examined the foregoing testimony, 6 and the same is a true, correct, and complete 7 transcription of the testimony given by me and any 8 corrections appear on the attached errata sheet 9 signed by me. 10 11 12 13 _____ 14 (DATE) (SIGNATURE) 15 16 17 18 19 20 21 22 23 24	

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