

# **EXHIBIT 58**



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# Transcript of Kallatt Mohammed

**Date:** November 18, 2019

**Case:** Watts Coordinated Cases

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Transcript of Kallatt Mohammed  
Conducted on November 18, 2019

1 (1 to 4)

1	<p>1 UNITED STATES DISTRICT COURT</p> <p>2 NORTHERN DISTRICT OF ILLINOIS</p> <p>3 EASTERN DIVISION</p> <p>4 - - - - - x</p> <p>5 In Re: WATTS COORDINATED : Master Docket</p> <p>6 CASES. : Case No. 19-cv-01717</p> <p>7 - - - - - x</p> <p>8</p> <p>9 Videotaped Deposition of</p> <p>10 KALLATT MOHAMMED, II, Volume I</p> <p>11 Chicago, Illinois</p> <p>12 Monday, November 18, 2019</p> <p>13 10:12 a.m.</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21 Job No.: 266047</p> <p>22 Pages: 1 - 190</p> <p>23 Reported by: Melanie L. Humphrey-Sonntag,</p> <p>24 CSR, RDR, CRR, CRC, FAPR</p>	3
2	<p>1 A P P E A R A N C E S</p> <p>2 ON BEHALF OF CERTAIN PLAINTIFFS:</p> <p>3 SCOTT R. RAUSCHER, ESQUIRE</p> <p>4 THERESA KLEINHAUS, ESQUIRE</p> <p>5 JOSHUA TEPFER, ESQUIRE</p> <p>6 LOEVY &amp; LOEVY</p> <p>7 311 North Aberdeen Street</p> <p>8 Third Floor</p> <p>9 Chicago, Illinois 60607</p> <p>10 (312) 243-5900</p> <p>11</p> <p>12 ON BEHALF OF CERTAIN PLAINTIFFS:</p> <p>13 JOEL FLAXMAN, ESQUIRE</p> <p>14 KENNETH N. FLAXMAN, PC</p> <p>15 200 South Michigan Avenue</p> <p>16 Suite 201</p> <p>17 Chicago, Illinois 60604</p> <p>18 (312) 427-3200</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>	4
2	<p>1 Videotaped deposition of KALLATT MOHAMMED, II,</p> <p>2 Volume I, held at the location of:</p> <p>3</p> <p>4</p> <p>5 LOEVY &amp; LOEVY</p> <p>6 311 North Aberdeen Street</p> <p>7 Third Floor</p> <p>8 Chicago, Illinois 60607</p> <p>9 (312) 243-5900</p> <p>10</p> <p>11</p> <p>12 Pursuant to notice before Melanie L.</p> <p>13 Humphrey-Sonntag, a Certified Shorthand Reporter,</p> <p>14 Registered Diplomat Reporter, Certified Realtime</p> <p>15 Reporter, and a Notary Public in and for the State</p> <p>16 of Illinois.</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>	4
2	<p>1 A P P E A R A N C E S C O N T I N U E D</p> <p>2 ON BEHALF OF DEFENDANTS CITY OF CHICAGO AND</p> <p>3 VARIOUS POLICE DEPARTMENT SUPERVISORS:</p> <p>4 PAUL A. MICHALIK, ESQUIRE</p> <p>5 REITER BURNS, LLP</p> <p>6 311 South Wacker Drive</p> <p>7 Suite 5200</p> <p>8 Chicago, Illinois 60606</p> <p>9 (312) 982-0090</p> <p>10</p> <p>11 ON BEHALF OF THE DEFENDANT WATTS:</p> <p>12 BRIAN P. GAINER, ESQUIRE</p> <p>13 AHMED A. KOSOKO, ESQUIRE</p> <p>14 JOHNSON &amp; BELL, LTD.</p> <p>15 33 West Monroe Street</p> <p>16 Suite 2700</p> <p>17 Chicago, Illinois 60603</p> <p>18 (312) 372-0770</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>	4

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2 (5 to 8)

5	7
1 A P P E A R A N C E S C O N T I N U E D	1 C O N T E N T S
2 ON BEHALF OF THE DEFENDANT MOHAMMED:	2 EXAMINATION OF KALLATT MOHAMMED, II PAGE
3 ERIC PALLES, ESQUIRE	3 By Mr. Rauscher 10
4 GARY RAVITZ, ESQUIRE	4
5 RAVITZ & PALLES, PC	5 E X H I B I T S
6 203 North LaSalle Street	6 (Attached to transcript.)
7 Suite 2100	7 MOHAMMED DEPOSITION EXHIBITS PAGE
8 Chicago, Illinois 60601	8 Exhibit 1 Landon Allen Arrest Report 55
9 (312) 558-1689	9 Exhibit 2 Landon Allen Arrest Report 59
10	10 Exhibit 3 George Almond Arrest Report 64
11 ON BEHALF OF THE DEFENDANTS SPAARGAREN	11 Exhibit 4 George Almond Arrest Report 70
12 AND CADMAN:	12 Exhibit 5 George Almond Inventory 74
13 MICHAEL J. SCHALKA, ESQUIRE	13 Sheet
14 LEINENWEBER, BARONI & DAFFADA, LLC	14 Exhibit 6 Elgin Pierce Inventory Sheet 77
15 203 North LaSalle Street	15 Exhibit 7 Darron Byrd Vice Case Report 82
16 Suite 1620	16 Exhibit 8 Raynard Carter Arrest Report 93
17 Chicago, Illinois 60601	17 Exhibit 9 Leonard Gipson Arrest Report 100
18 (866) 786-3705	18 Exhibit 10 Leonard Gipson Arrest Report 104
19	19 Exhibit 11 Allen Jackson Arrest Report 111
20	20 Exhibit 12 Shaun James Vice Case Report 118
21	21 Exhibit 13 Shaun James Arrest Report 120
22	22 Exhibit 14 Andre McNairy Arrest Report 124
23	23 Exhibit 15 Jamell Sanders Arrest Report 129
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6	8
1 A P P E A R A N C E S C O N T I N U E D	1 E X H I B I T S C O N T I N U E D
2 ON BEHALF OF CERTAIN DEFENDANT OFFICERS:	2 (Attached to transcript.)
3 WILLIAM E. BAZAREK, ESQUIRE	3 MOHAMMED DEPOSITION EXHIBITS PAGE
4 HALE & MONICO	4 Exhibit 16 Frank Saunders Arrest Report 149
5 53 West Jackson Street	5 Exhibit 17 Frank Saunders Inventory 156
6 Suite 337	6 Sheet
7 Chicago, Illinois 60604	7 Exhibit 18 Christopher Scott Arrest 157
8 (312) 870-6902	8 Report
9	9 Exhibit 19 Christopher Scott Inventory 162
10 ALSO PRESENT:	10 Sheet
11 CLARISSA GLENN BAKER	11 Exhibit 20 Phillip Thomas Arrest Report 175
12 ANDREW SEGAL	12 Exhibit 21 Phillip Thomas Vice Case 180
13 RICK KOSBERG, Videographer	13 Report
14	14 Exhibit 22 Lionel White Arrest Report 181
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16	16 Exhibit 24 Fifth Amendment Statement 188
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3 (9 to 12)

9	<p>1 PROCEEDINGS</p> <p>2 (Mr. Kosoko and Ms. Baker were not</p> <p>3 present.)</p> <p>4 THE VIDEOGRAPHER: This is the video</p> <p>5 deposition of Kallatt Mohammed taken by Loevy &amp;</p> <p>6 Loevy in the matter of the Watts coordinated</p> <p>7 pretrial proceedings, Master Docket Case</p> <p>8 No. 19-cv-01717, held at Loevy &amp; Loevy, 311 North</p> <p>9 Aberdeen Street, Chicago, Illinois.</p> <p>10 Today is November 18th, 2019. The time</p> <p>11 is 10:12.</p> <p>12 The court reporter is Melanie Sonntag,</p> <p>13 Certified Realtime Reporter, with Planet Depos,</p> <p>14 and the videographer is Rick Kosberg.</p> <p>15 The counsel can now introduce themselves,</p> <p>16 and the court reporter is free to administer the</p> <p>17 oath.</p> <p>18 MR. RAUSCHER: Scott Rauscher for the</p> <p>19 plaintiffs represented by Loevy &amp; Loevy in the</p> <p>20 coordinated proceedings.</p> <p>21 MR. TEPFER: Josh Tepfer for the</p> <p>22 plaintiffs, the Loevy plaintiffs.</p> <p>23 MR. FLAXMAN: Joel Flaxman for the Flaxman</p> <p>24 plaintiffs.</p>	11
10	<p>1 Q Do you have a job?</p> <p>2 A Yes.</p> <p>3 Q What do you do for a living?</p> <p>4 A Truck driver.</p> <p>5 Q How long have you been a truck driver for?</p> <p>6 A About five years.</p> <p>7 Q Is that a full-time job?</p> <p>8 A Yes.</p> <p>9 Q What company do you work for?</p> <p>10 A It's EKCC.</p> <p>11 Q Is it a long-haul -- long-haul trucking?</p> <p>12 A No. It's -- they haul garbage.</p> <p>13 Q Where do you work?</p> <p>14 A What do you mean?</p> <p>15 Q Are you located -- are you -- are you</p> <p>16 based in a certain area?</p> <p>17 A From Markham, Illinois.</p> <p>18 Q How much money do you make?</p> <p>19 A As far as? A year? A month?</p> <p>20 Q A year.</p> <p>21 A Probably about 80,000.</p> <p>22 Q That's from EKCC?</p> <p>23 A Uh-huh -- yes.</p> <p>24 Q And I should remind you -- that's a good</p>	12
10	<p>1 reminder.</p> <p>2 As we go through today, please try to make</p> <p>3 sure you answer verbally, yes or no, not uh-huh.</p> <p>4 A Yes.</p> <p>5 Q And if you don't answer -- if you don't</p> <p>6 understand one of my questions, let me know and</p> <p>7 I'll do my best to rephrase it. Okay?</p> <p>8 A I will.</p> <p>9 Q If you don't do that, I'm going to assume</p> <p>10 that you understood. Is that fair?</p> <p>11 A That's fair.</p> <p>12 Q So you have made about 80,000 a year for</p> <p>13 the last five years as a truck driver?</p> <p>14 A Yes.</p> <p>15 Q Do you have any other sources of income?</p> <p>16 A No.</p> <p>17 Q Did you receive any money from the City of</p> <p>18 Chicago?</p> <p>19 A No.</p> <p>20 Q What was the last job you had before you</p> <p>21 worked at EKCC?</p> <p>22 A Chicago police officer.</p> <p>23 Q When did you leave the police department?</p> <p>24 A 2011 I believe it was.</p>	12

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4 (13 to 16)

<p style="text-align: right;">13</p> <p>1 Q What did you do in between when you left</p> <p>2 the police department and when you started at</p> <p>3 EKCC?</p> <p>4 <b>A Oh, I was in -- went to prison.</b></p> <p>5 Q What prison did you go to?</p> <p>6 <b>A Can't remember right -- I think -- it was</b></p> <p>7 <b>in Minnesota.</b></p> <p>8 Q Was it Federal prison?</p> <p>9 <b>A Yes, Federal prison.</b></p> <p>10 Q Why did you go to prison?</p> <p>11 <b>A Because of wrongdoing on the police</b></p> <p>12 <b>department.</b></p> <p>13 Q You went to a Federal prison in Minnesota</p> <p>14 because you engaged in wrongdoing as a police</p> <p>15 officer?</p> <p>16 <b>A Yes.</b></p> <p>17 Q What exactly did you do that was wrong as</p> <p>18 a police officer that landed you in prison?</p> <p>19 <b>A I --</b></p> <p>20 MR. PALLES: Go ahead.</p> <p>21 If you know.</p> <p>22 <b>A (Continuing.) -- took money.</b></p> <p>23 Q Who did you take money from?</p> <p>24 MR. PALLES: Yeah.</p>	<p style="text-align: right;">15</p> <p>1 question.</p> <p>2 Q Your attorneys are going to -- certain</p> <p>3 attorneys may object to the questions. Unless</p> <p>4 someone instructs you not to answer, you should</p> <p>5 still answer the question.</p> <p>6 MR. PALLES: Yeah.</p> <p>7 <b>A For wrongdoing.</b></p> <p>8 Q Were you ever told that you were taken off</p> <p>9 the street because you had a weapons restriction,</p> <p>10 a restriction that prohibited you from carrying a</p> <p>11 weapon?</p> <p>12 <b>A Don't -- no.</b></p> <p>13 Q How long were you a police officer with</p> <p>14 the Chicago Police Department?</p> <p>15 <b>A 14 years.</b></p> <p>16 Q Tell me what years.</p> <p>17 <b>A From '96 to 2011.</b></p> <p>18 Q What roles did you have as a police</p> <p>19 officer from 1996 to 2011? At a high level.</p> <p>20 MR. PALLES: I object to the form.</p> <p>21 But go ahead.</p> <p>22 <b>A Traffic stops, answering calls, domestic</b></p> <p>23 <b>calls.</b></p> <p>24 Q What was your title over the years?</p>
<p style="text-align: right;">14</p> <p>1 <b>A Fifth Amendment.</b></p> <p>2 MR. PALLES: We can --</p> <p>3 <b>A (Continuing.) Because I am concerned that</b></p> <p>4 <b>the mere act of testifying to matters arising from</b></p> <p>5 <b>this incident may cause me to be criminally</b></p> <p>6 <b>indicted by the US Attorney's office and/or the</b></p> <p>7 <b>Cook County State's Attorney's office, I am going</b></p> <p>8 <b>to decline to answer any questions about certain</b></p> <p>9 <b>aspects of my conduct as a Chicago police officer,</b></p> <p>10 <b>based upon the rights guaranteed to me by the</b></p> <p>11 <b>Fifth Amendment of the United States Constitution.</b></p> <p>12 <b>From this point forward when I say "Fifth"</b></p> <p>13 <b>or "Fifth Amendment," I am referring to and</b></p> <p>14 <b>incorporating this statement.</b></p> <p>15 Q So you are refusing to answer who you</p> <p>16 stole money from which led to your indictment?</p> <p>17 <b>A Fifth Amendment.</b></p> <p>18 Q The official reason you -- well, what was</p> <p>19 the official reason given by the Chicago Police</p> <p>20 Department as to why you stopped being on the</p> <p>21 street as a police officer?</p> <p>22 MR. PALLES: Objection; lack of</p> <p>23 foundation.</p> <p>24 MR. MICHALIK: Object to the form of the</p>	<p style="text-align: right;">16</p> <p>1 <b>A Police officer.</b></p> <p>2 Q Did you ever get any promotions?</p> <p>3 <b>A I was a tac officer, but that's not a</b></p> <p>4 <b>promotion.</b></p> <p>5 Q How long were you a tac officer?</p> <p>6 <b>A I believe -- I'm not for sure.</b></p> <p>7 Q What's your best estimate for how long you</p> <p>8 were a tac officer?</p> <p>9 <b>A Maybe six years.</b></p> <p>10 Q And what years did -- did you serve as a</p> <p>11 tac officer?</p> <p>12 <b>A Let me see. From -- I believe it was --</b></p> <p>13 <b>might have been longer than six years. About from</b></p> <p>14 <b>2003, I believe, to 2011.</b></p> <p>15 Q As a tac officer were you serving in a</p> <p>16 certain area of the city?</p> <p>17 <b>A Ida B. Wells.</b></p> <p>18 Q Where was Ida B. Wells located?</p> <p>19 <b>A 35th and King Drive.</b></p> <p>20 Q What was your star number?</p> <p>21 <b>A 14122.</b></p> <p>22 Q Was 14122 always your star number?</p> <p>23 <b>A Yes.</b></p> <p>24 Q Did you have a separate employee</p>

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5 (17 to 20)

17	<p>1 ID number?</p> <p>2 <b>A No.</b></p> <p>3 Q Did you have a separate computer log-in</p> <p>4 number?</p> <p>5 <b>A Yes.</b></p> <p>6 Q And what was the computer log-in number?</p> <p>7 <b>A I don't remember.</b></p> <p>8 Q What did you use the computer log-in</p> <p>9 number for?</p> <p>10 <b>A For running background checks and names.</b></p> <p>11 Q When you say "running" names, what do you</p> <p>12 mean by that?</p> <p>13 <b>A Well, seeing if you had a warrant or --</b></p> <p>14 Q Did you ever use anyone else's computer</p> <p>15 log-in number?</p> <p>16 <b>A No.</b></p> <p>17 Q Did -- did you ever give your computer</p> <p>18 log-in number for anyone else and authorize them</p> <p>19 to use it?</p> <p>20 <b>A No.</b></p> <p>21 Q What were your main responsibilities as a</p> <p>22 tac officer in Ida B. Wells?</p> <p>23 <b>A Find out who was selling drugs and doing</b></p> <p>24 <b>reverse stings.</b></p>	19
18	<p>1 Q Anything else?</p> <p>2 <b>A Not that I could remember -- recall.</b></p> <p>3 Q Did you work on a particular shift as a</p> <p>4 tac officer?</p> <p>5 <b>A We had two shifts, one in the morning and</b></p> <p>6 <b>one at night.</b></p> <p>7 Q What were the hours of the morning shift?</p> <p>8 <b>A I don't recall.</b></p> <p>9 Q What were the hours of the night shift?</p> <p>10 <b>A Pardon me?</b></p> <p>11 Q What were the hours of the night shift?</p> <p>12 <b>A Night shift was -- they varied so</b></p> <p>13 <b>I don't -- I don't recall that, either. I know</b></p> <p>14 <b>that --</b></p> <p>15 Q Go ahead.</p> <p>16 <b>A -- the ending of the shift would be at</b></p> <p>17 <b>two o'clock in the morning.</b></p> <p>18 Q Do you know the ending of the morning</p> <p>19 shift?</p> <p>20 <b>A That varied, too. Almost -- probably</b></p> <p>21 <b>about six o'clock.</b></p> <p>22 Q Six o'clock p.m.?</p> <p>23 <b>A P.m., yes.</b></p> <p>24 Q So is it fair to say the morning shift</p>	20

1 basically covered the day?

2 **A Yes.**

3 Q How frequently did it change -- did your

4 shift change?

5 So how often did you go from morning to

6 night or vice versa?

7 **A Well, it -- it -- it would depend --**

8 Q What would --

9 **A -- on -- on what was going on that they**

10 **would change the shift.**

11 Q Who decided what shift you worked on?

12 **A The commander.**

13 Q Who -- who was or who were the commanders

14 in your area when you were on the tac team?

15 **A I don't recall.**

16 Q You don't recall any of them?

17 **A No.**

18 Q Were you in a certain unit when you were

19 on the tac team?

20 **A No.**

21 Q Did you have partners over the years when

22 you were a tac officer?

23 **A I had -- maybe three partners.**

24 Q Who were your three partners over

1 the years as a tac officer?

2 **A Monica Lewis --**

3 Q Is it Lamonica Lewis?

4 **A Lamonica Lewis.**

5 **Dorian Smith. And Elsworth.**

6 Q What was Els- -- Elsworth's --

7 **A I can't think of --**

8 Q Smith?

9 **A Smith, yes. Yes, that's his name.**

10 Q Did any of them have -- any of those three

11 people have a nickname?

12 **A No.**

13 Q Was Lamonica Lewis ever referred to as

14 Coco?

15 **A Yes.**

16 Q Did other officers call her Coco?

17 **A Yes. Yes.**

18 Q Did you call her Coco?

19 **A I called her Lamonica.**

20 Q How -- what years were you partners with

21 Lamonica Lewis?

22 **A It might have been a year. I don't**

23 **remember. I can't remember.**

24 Q Do you remember what year it was?

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6 (21 to 24)

21	<p>1 <b>A No.</b></p> <p>2 Q How long were you partners with Dorian</p> <p>3 Smith?</p> <p>4 <b>A I was partners with Dorian Smith maybe</b></p> <p>5 <b>two years.</b></p> <p>6 Q Which years were you partners with Dorian</p> <p>7 Smith?</p> <p>8 <b>A From -- I believe it was 2009 to 2011.</b></p> <p>9 Q How long were you partners with Elsworth</p> <p>10 Smith?</p> <p>11 <b>A About a year.</b></p> <p>12 Q Which year were you partners with Elsworth</p> <p>13 Smith?</p> <p>14 <b>A About 2008, I believe.</b></p> <p>15 Q Why did you stop being partners with</p> <p>16 Lamonica Lewis?</p> <p>17 <b>A She wanted to go to the morning shift.</b></p> <p>18 Q So during the time you were partners with</p> <p>19 Lamonica Lewis, you were on the -- the night</p> <p>20 shift?</p> <p>21 <b>A Yes, when it changed over night and day</b></p> <p>22 <b>shift.</b></p> <p>23 Q What do you mean by that?</p> <p>24 <b>A You know, whenever they saw a need to move</b></p>	23
22	<p>1 <b>us up and down, that's when we worked the same</b></p> <p>2 <b>shift.</b></p> <p>3 Q How would her switching partners make her</p> <p>4 be on the morning shift?</p> <p>5 <b>A No, I -- I never said she switched</b></p> <p>6 <b>partners.</b></p> <p>7 <b>When I said she wanted to go to the day</b></p> <p>8 <b>shift, she went to the -- to the patrol car</b></p> <p>9 <b>working days. Not in tac -- tactical officer.</b></p> <p>10 Q So she switched her role?</p> <p>11 <b>A Right.</b></p> <p>12 Q Okay. Do you remember what year you were</p> <p>13 partners with her?</p> <p>14 <b>A No, I don't.</b></p> <p>15 Q Was it before you were partners with</p> <p>16 Elsworth Smith?</p> <p>17 <b>A I can't remember.</b></p> <p>18 Q Did you have a period of time when you</p> <p>19 didn't have a partner on the tac team?</p> <p>20 <b>A Only a brief period.</b></p> <p>21 Q About how long?</p> <p>22 <b>A Maybe about -- I don't -- I'm not for</b></p> <p>23 <b>sure. But it wasn't that long.</b></p> <p>24 Q So if we have Lamonica Lewis for a year</p>	24
	<p>1 and then you start with Elsworth Smith and Dorian</p> <p>2 Smith and that goes from 2008 to 2011, are we</p> <p>3 missing someone who was a partner of yours?</p> <p>4 <b>A No, not that I could recall.</b></p> <p>5 Q Is it possible that your -- your memory of</p> <p>6 when you were partners with those people is off?</p> <p>7 MR. PALLES: Objection; lack of</p> <p>8 foundation.</p> <p>9 <b>A No.</b></p> <p>10 Q It's not possible?</p> <p>11 <b>A Let me see.</b></p> <p>12 <b>No.</b></p> <p>13 Q Who -- who were you partners with from</p> <p>14 about 2007 through 2000- -- I'm sorry. Let me</p> <p>15 rephrase that.</p> <p>16 Who were you partners with from about 2003</p> <p>17 when you started as a tac officer until about</p> <p>18 2008?</p> <p>19 <b>A I don't recall. I don't recall.</b></p> <p>20 Q But do you know it was one of Lamonica</p> <p>21 Lewis, Dorian Smith, or Elsworth Smith?</p> <p>22 <b>A No. It wasn't -- it wasn't Lamonica. It</b></p> <p>23 <b>wasn't Elsworth.</b></p> <p>24 <b>I don't recall. I don't recall.</b></p>	

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7 (25 to 28)

<p>25</p> <p>1 <b>A I can't recall.</b></p> <p>2 Q You mentioned something called a reverse</p> <p>3 sting; is that right?</p> <p>4 <b>A Yes.</b></p> <p>5 Q What is a reverse sting?</p> <p>6 <b>A A reversal sting is that we posed as drug</b></p> <p>7 <b>dealers and people would come in and ask us for</b></p> <p>8 <b>whatever they wanted, and then they would be</b></p> <p>9 <b>arrested.</b></p> <p>10 Q When you say "We posed as drug dealers,"</p> <p>11 who are you referring to?</p> <p>12 <b>A The Chicago police.</b></p> <p>13 Q And who on the Chicago Police Department</p> <p>14 did you specifically work with on reverse stings?</p> <p>15 <b>A I don't recall. It was more than</b></p> <p>16 <b>20 people.</b></p> <p>17 Q All right. Tell me everybody who you do</p> <p>18 recall who you worked on reverse stings with.</p> <p>19 <b>A Bolton. Gonzalez, Leano, Smith, Elsworth</b></p> <p>20 <b>Smith, and Lamonica. Al Jones. And those are the</b></p> <p>21 <b>only guys I remember that was on my team that we</b></p> <p>22 <b>worked for.</b></p> <p>23 Q Are there other teams you know of that did</p> <p>24 reverse stings?</p>	<p>27</p> <p>1 <b>A I don't recall.</b></p> <p>2 Q Did he participate in reverse stings?</p> <p>3 <b>A Yes.</b></p> <p>4 Q Why didn't you include him on the list of</p> <p>5 people who participated in reverse stings when</p> <p>6 I first asked you?</p> <p>7 <b>A Because I -- I didn't think you was</b></p> <p>8 <b>talking about him.</b></p> <p>9 Q Okay.</p> <p>10 <b>A Yeah.</b></p> <p>11 <b>Because you asked me for officers. You</b></p> <p>12 <b>didn't --</b></p> <p>13 Q And what was Watts' role?</p> <p>14 <b>A He was a sergeant.</b></p> <p>15 Q So was there anybody else on the Chicago</p> <p>16 Police Department who worked with you on reverse</p> <p>17 stings, officers, sergeants, or any other title?</p> <p>18 <b>A Don't -- don't recall.</b></p> <p>19 Q Did -- did Brad, the other supervisor who</p> <p>20 you mentioned, work on reverse stings?</p> <p>21 <b>A Oh, no. No.</b></p> <p>22 Q All right.</p> <p>23 So walk -- walk me through a reverse</p> <p>24 sting -- sting from start to finish including any</p>
<p>26</p> <p>1 <b>A Yes.</b></p> <p>2 Q What other teams can you tell me about?</p> <p>3 <b>A I don't -- I don't have their names.</b></p> <p>4 Q When you say your "team," can you tell me</p> <p>5 what you mean by that?</p> <p>6 <b>A The team of officers that we worked for</b></p> <p>7 <b>under Ronald Watts.</b></p> <p>8 Q So tell me that. Who -- who would you say</p> <p>9 was on Watts' team over the years while you were</p> <p>10 on the team?</p> <p>11 <b>A Those people I just named.</b></p> <p>12 Q So Bolton, Gonzalez, Leano, Lamonica</p> <p>13 Lewis, Al Jones, Elsworth Smith?</p> <p>14 <b>A Yes.</b></p> <p>15 Q Anyone else you can think of?</p> <p>16 <b>A No.</b></p> <p>17 Q All right. Tell me how reverse stings</p> <p>18 worked. Who had what role?</p> <p>19 <b>A Well, there was -- you had the arresting</b></p> <p>20 <b>officers, and then you had the ones that would</b></p> <p>21 <b>stage up to be the drug dealers. And that's it.</b></p> <p>22 <b>And enforcers.</b></p> <p>23 Q What role did Ronald Watts take in the</p> <p>24 reverse stings?</p>	<p>28</p> <p>1 planning that you'd do beforehand.</p> <p>2 <b>A I don't recall.</b></p> <p>3 MR. PALLES: I'm going to object to the</p> <p>4 form.</p> <p>5 (Mr. Tepfer left the proceedings.)</p> <p>6 <b>A I don't recall.</b></p> <p>7 Q You don't recall?</p> <p>8 <b>A No.</b></p> <p>9 Q What don't you recall?</p> <p>10 <b>A Of -- to walk you through it. I don't --</b></p> <p>11 <b>don't recall.</b></p> <p>12 Q Do you remember the steps that you'd take</p> <p>13 to carry out a reverse sting?</p> <p>14 <b>A Well, that's been a while so, no, I don't</b></p> <p>15 <b>recall.</b></p> <p>16 Q What was your role typically in a reverse</p> <p>17 sting, arresting, staging, or enforcer?</p> <p>18 <b>A I was outside staging.</b></p> <p>19 Q And what -- what is the staging officer's</p> <p>20 role in reverse stings?</p> <p>21 <b>A I just watch. If anybody tried to get</b></p> <p>22 <b>away or run, I would be the one to catch them.</b></p> <p>23 <b>Try to, anyway.</b></p> <p>24 Q All right. What is the arresting</p>

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8 (29 to 32)

29	<p>1 officer's role?</p> <p>2 <b>A To go to court.</b></p> <p>3 Q So they don't have a role in the actual</p> <p>4 sting?</p> <p>5 <b>A Yeah. They would be out there, but they</b></p> <p>6 <b>would go to court.</b></p> <p>7 Q What was their role in the reverse sting,</p> <p>8 the day of the reverse sting? What would the</p> <p>9 arresting officer do?</p> <p>10 <b>A I don't recall.</b></p> <p>11 Q Did they arrest people?</p> <p>12 <b>A I'm sure they did, but I couldn't tell you</b></p> <p>13 <b>what role they played.</b></p> <p>14 Q So is -- is one of the roles in the</p> <p>15 reverse sting arresting people?</p> <p>16 <b>A That's what it is, yes.</b></p> <p>17 Q Okay. So is that the job of the arresting</p> <p>18 officer?</p> <p>19 <b>A Yes.</b></p> <p>20 Q Did the arresting --</p> <p>21 <b>A He was the court officer.</b></p> <p>22 Q He was the court officer?</p> <p>23 <b>A Yes.</b></p> <p>24 Q Why was he called the arresting officer?</p>	31
30	<p>1 <b>A Because that's -- when he arrested, he</b></p> <p>2 <b>would be the one to go to court.</b></p> <p>3 Q And what was his job in court? What was</p> <p>4 he going to court to do?</p> <p>5 MR. BAZAREK: I just object to the form of</p> <p>6 the question, along with foundation.</p> <p>7 <b>A Go to court.</b></p> <p>8 Q And to do what?</p> <p>9 <b>A To testify against what -- what was on the</b></p> <p>10 <b>paper, what happened.</b></p> <p>11 Q And whose job was it to fill out the</p> <p>12 paperwork after reverse stings?</p> <p>13 <b>A It was the arresting officer.</b></p> <p>14 Q And what -- how would the arresting</p> <p>15 officer go about filling out the paperwork? How</p> <p>16 would they know what to include?</p> <p>17 <b>A I -- I couldn't tell you.</b></p> <p>18 Q Were you ever the arresting officer in a</p> <p>19 reverse sting?</p> <p>20 <b>A No.</b></p> <p>21 Q Who assigned the roles to people during</p> <p>22 reverse stings?</p> <p>23 <b>A The sergeant would.</b></p> <p>24 Q So that would be Watts?</p>	32
	<p>1 <b>A Yes.</b></p> <p>2 Q So we know arresting officers arrested</p> <p>3 people; right?</p> <p>4 <b>A Yes.</b></p> <p>5 Q And they filled out the paperwork?</p> <p>6 <b>A Yes.</b></p> <p>7 Q So arrest reports, incident reports, that</p> <p>8 sort of thing?</p> <p>9 <b>A Well, it was a group -- if I could</b></p> <p>10 <b>remember, it was -- you had -- whatever somebody</b></p> <p>11 <b>attempted to -- what they would ask for.</b></p> <p>12 <b>They would -- that would be written down,</b></p> <p>13 <b>what they asked for, and that would be -- somebody</b></p> <p>14 <b>would fill out the paperwork for that, that -- on</b></p> <p>15 <b>that call.</b></p> <p>16 Q Who is the "somebody"?</p> <p>17 <b>A Well, whoever arrested -- whoever was</b></p> <p>18 <b>assigned that -- to do that.</b></p> <p>19 Q And was the person assigned to do that the</p> <p>20 arresting officer?</p> <p>21 <b>A Yes.</b></p> <p>22 Q And then you said there were staging</p> <p>23 officers?</p> <p>24 <b>A Yes.</b></p>	

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9 (33 to 36)

<p>33</p> <p>1 <b>You asked me if there were -- what my</b> 2 <b>role was.</b> 3 Q Yeah. I -- I understand. You said you 4 were a staging officer; right? 5 <b>A Right.</b> 6 Q Now I'm just trying to move on to -- was 7 there anything else that staging officers do? 8 <b>A No.</b> 9 Q Okay. So then the other role I think you 10 mentioned, the third role, was enforcer. Is that 11 right? 12 <b>A Right. Uh-huh.</b> 13 Q And what do the enforcers do? 14 <b>A Well, if they -- somebody on the in- --</b> 15 <b>well, if somebody tried to get away, they would</b> 16 <b>grab them.</b> 17 Q And how is the enforcer role different 18 than the staging officer? 19 <b>A Well, they're working inside, where people</b> 20 <b>come in the building.</b> 21 Q Why were they called enforcers? 22 <b>A That's what they called them.</b> 23 Q What were they enforcing? 24 MR. MICHALIK: Object to the form of the</p>	<p>35</p> <p>1 Q So if someone asked to buy drugs on the 2 outside, tell me what would happen. 3 <b>A No, no, no.</b> 4 <b>This is -- how people buy drugs, they just</b> 5 <b>walk up -- they know where to go to get them.</b> 6 <b>So whoever they saw standing outside,</b> 7 <b>that's who they would approach. And ask "What are</b> 8 <b>they selling today?"</b> 9 Q And then how would the person get caught 10 up in the reverse sting? 11 <b>A Well, they get -- what do you mean?</b> 12 Q Someone walks up and they happen to see 13 you as a staging officer, they'd ask you for 14 drugs, and then they'd go inside and get arrested? 15 <b>A No.</b> 16 MR. PALLES: Objection. 17 Boy, that really twisted what was -- 18 MR. RAUSCHER: It's a question. 19 MR. PALLES: Go ahead. 20 <b>A (Continuing.) No.</b> 21 Q Okay. So tell me how it worked. 22 <b>A This is -- this is sideways.</b> 23 <b>If someone wanted to buy drugs, there's</b> 24 <b>always somebody standing outside hollering "Nike"</b></p>
<p>34</p> <p>1 question. 2 <b>A That people not get away.</b> 3 <b>At that time. Once they had them.</b> 4 Q Were officers also the people trying to or 5 pretending to sell drugs? 6 <b>A Yes.</b> 7 Q What was that officer called -- what 8 role -- or did that officer have a title? 9 <b>A Not really. Because they didn't know who</b> 10 <b>they were.</b> 11 Q What do you mean? 12 <b>A The people who were coming to buy drugs</b> 13 <b>didn't know who they were.</b> 14 Q What -- so tell me -- how did it work for 15 a person on the outside? They would go in and do 16 what? 17 <b>A You mean people coming to buy drugs?</b> 18 Q Yeah. 19 <b>A They do what they do, coming to buy drugs.</b> 20 Q Tell me -- 21 <b>A They don't know who they are buying drugs</b> 22 <b>from.</b> 23 Q Who were they asking to buy drugs? 24 <b>A Anybody they saw outside.</b></p>	<p>36</p> <p>1 <b>or "Oprah" or "Obama."</b> 2 <b>So when they hear that, they go inside.</b> 3 <b>And whoever they saw inside they say, "Give me one</b> 4 <b>or two." And then once they tell them that, they</b> 5 <b>say, "Walk over there."</b> 6 <b>Once they walk over in the direction of an</b> 7 <b>officer, that's when they were arrested.</b> 8 Q So when they walked inside and said "Give 9 me one or two," who were they saying that to 10 during a reverse sting? Was that police officers 11 or civilians? 12 <b>A I -- I just told you that. It's police</b> 13 <b>officers.</b> 14 Q So there were police officers inside. 15 Were those the staging officers, the enforcers -- 16 <b>A They're not staging officers. They're --</b> 17 <b>they're enforcers or just police officers who were</b> 18 <b>in there.</b> 19 Q So there were also other police 20 officers -- 21 <b>A Right.</b> 22 Q -- around? 23 <b>A Yes.</b> 24 Q And were they also wearing plain clothes?</p>

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10 (37 to 40)

<p>37</p> <p>1 A Yes.</p> <p>2 Q And were they part of the reverse sting?</p> <p>3 A Yes.</p> <p>4 Q Did they have a role?</p> <p>5 A I don't know what their role was but they</p> <p>6 were there.</p> <p>7 Q And so once someone was inside, they asked</p> <p>8 for drugs, and then they'd get told to go</p> <p>9 somewhere else and then they'd get arrested?</p> <p>10 A Right.</p> <p>11 Q And was there an exchange of money that</p> <p>12 happened?</p> <p>13 A No.</p> <p>14 Q So just -- they just asked for drugs and</p> <p>15 that was enough?</p> <p>16 A Yeah. Before they can get their money</p> <p>17 out, they was arrested.</p> <p>18 Q Did any of the officers during reverse</p> <p>19 stings have drugs on them?</p> <p>20 A No.</p> <p>21 Q Never?</p> <p>22 A Never.</p> <p>23 Q That includes Watts?</p> <p>24 A Never.</p>	<p>39</p> <p>1 Q Did Watts ever pull people into the hall</p> <p>2 during a reverse sting?</p> <p>3 A No.</p> <p>4 Q Did he ever pull people away from a crowd</p> <p>5 during a reverse sting?</p> <p>6 A No.</p> <p>7 (An off-the-record discussion was held.)</p> <p>8 Q Did you ever frame anyone during a reverse</p> <p>9 sting?</p> <p>10 A Taking the Fifth.</p> <p>11 Q And you're taking the Fifth because you</p> <p>12 fear being prosecuted if you answer truthfully?</p> <p>13 A Yes.</p> <p>14 Q Did Watts ever frame anyone during a</p> <p>15 reverse sting?</p> <p>16 A Taking the Fifth.</p> <p>17 MR. MICHALIK: Objection; foundation.</p> <p>18 Q How many years did you -- did you work</p> <p>19 under Sergeant Watts?</p> <p>20 A I don't recall. Let me see -- I don't</p> <p>21 recall.</p> <p>22 Q The whole time you were on the tac team</p> <p>23 though; right?</p> <p>24 A Yeah.</p>
<p>38</p> <p>1 Q That includes you?</p> <p>2 A Take the Fifth.</p> <p>3 Q You're taking the Fifth because your</p> <p>4 lawyer signaled for you to take the Fifth on that</p> <p>5 question?</p> <p>6 A Yes.</p> <p>7 Q And that's because you fear being</p> <p>8 criminally prosecuted if you answer honestly?</p> <p>9 A Yes.</p> <p>10 Q How do you know that Watts never had drugs</p> <p>11 on him during a reverse sting?</p> <p>12 A If he did, I never saw it.</p> <p>13 Q What -- what did Sergeant Watts do during</p> <p>14 reverse stings?</p> <p>15 MR. PALLES: Asked and answered.</p> <p>16 And lack of foundation.</p> <p>17 A He was supervising.</p> <p>18 Q How was he supervising?</p> <p>19 A Just making sure everybody was doing what</p> <p>20 their -- what their part was.</p> <p>21 Q Did he ever arrest people?</p> <p>22 A No.</p> <p>23 Q Ever pull people into a hall?</p> <p>24 A Are you asking --</p>	<p>40</p> <p>1 Q And were you --</p> <p>2 A Yes.</p> <p>3 Q Did you see Watts every day when you</p> <p>4 worked during that time period as long as he was</p> <p>5 also working?</p> <p>6 A Not every day.</p> <p>7 Q So there were days when you both would</p> <p>8 work and you wouldn't see him?</p> <p>9 A Yes.</p> <p>10 Q How fre- --</p> <p>11 A Whenever -- whenever he took off or I took</p> <p>12 off I wouldn't see him.</p> <p>13 Q So I'm saying -- when you both worked, if</p> <p>14 you were both on, you'd see him every one of</p> <p>15 those days; right?</p> <p>16 A Yes.</p> <p>17 Q So you named, I think, six other officers</p> <p>18 who you remember working on reverse stings.</p> <p>19 Let's start with Bolton. Can you tell me</p> <p>20 what Brian Bolton's role was in reverse stings?</p> <p>21 A Bolton's role was usually arresting</p> <p>22 people.</p> <p>23 Q Can I ask you to just move your hand --</p> <p>24 A Bolton was usually arresting people.</p>

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11 (41 to 44)

41	<p>1 Q What about Gonzalez?</p> <p>2 <b>A Same thing, arresting people. Walking</b></p> <p>3 <b>them to the paddy wagon.</b></p> <p>4 Q Are we talking about -- let -- first</p> <p>5 names. Can we say their first names?</p> <p>6 Is it Brian Bolton?</p> <p>7 <b>A Brian Bolton.</b></p> <p>8 Q Robert Gonzalez?</p> <p>9 <b>A Right.</b></p> <p>10 Q And what's Leano's first name?</p> <p>11 <b>A Manny.</b></p> <p>12 Q Or Manuel?</p> <p>13 <b>A Manuel.</b></p> <p>14 Q All right.</p> <p>15 Do you know why Bolton and Gonzalez were</p> <p>16 arresting officers on reverse stings?</p> <p>17 <b>A No, I don't.</b></p> <p>18 Q Did anyone ever tell you why?</p> <p>19 <b>A No.</b></p> <p>20 Q What about Leano? What was his role in</p> <p>21 reverse stings?</p> <p>22 <b>A Same -- same thing.</b></p> <p>23 Q Arresting?</p> <p>24 <b>A Yes.</b></p>	43	<p>1 reason?</p> <p>2 <b>A Take the Fifth.</b></p> <p>3 MR. BAZAREK: Object to the form of the</p> <p>4 question, foundation.</p> <p>5 MR. MICHALIK: Join.</p> <p>6 Q You took the Fifth on that?</p> <p>7 <b>A Yes.</b></p> <p>8 Q And that's because you fear being</p> <p>9 prosecuted if you answer truthfully?</p> <p>10 MR. BAZAREK: Object to the form of the</p> <p>11 question, foundation.</p> <p>12 MR. MICHALIK: Join.</p> <p>13 <b>A Yes.</b></p> <p>14 Q You never intervened to stop Al Jones from</p> <p>15 beating someone for no reason?</p> <p>16 MR. BAZAREK: Object to the form of the</p> <p>17 question, foundation.</p> <p>18 <b>A Take the Fifth.</b></p> <p>19 MR. MICHALIK: Assumes facts not in</p> <p>20 evidence.</p> <p>21 Q You're taking the Fifth on that question</p> <p>22 because you fear being prosecuted if you answer</p> <p>23 truthfully?</p> <p>24 MR. BAZAREK: Object to the form of the</p>
42	<p>1 Q What about Lamonica Lewis?</p> <p>2 <b>A Same thing, arresting.</b></p> <p>3 Q What was Al Jones' role during reverse</p> <p>4 stings?</p> <p>5 <b>A He was arresting, also.</b></p> <p>6 Q Would you agree that Al Jones frequently</p> <p>7 used executive force against civilians?</p> <p>8 MR. MICHALIK: Object to the form of the</p> <p>9 question.</p> <p>10 <b>A Take the Fifth.</b></p> <p>11 Q And you're taking the Fifth because you</p> <p>12 fear being prosecuted if you answer truthfully?</p> <p>13 MR. BAZAREK: Object to the form of the</p> <p>14 question.</p> <p>15 MR. MICHALIK: Join.</p> <p>16 <b>A Yes.</b></p> <p>17 Q Al Jones frequently beat people up for no</p> <p>18 reason?</p> <p>19 MR. BAZAREK: Object to the --</p> <p>20 <b>A Take the Fifth.</b></p> <p>21 MR. BAZAREK: -- form of the question,</p> <p>22 foundation.</p> <p>23 MR. MICHALIK: Join.</p> <p>24 Q Al Jones frequently beat people up for no</p>	44	<p>1 question, foundation.</p> <p>2 MR. MICHALIK: Join.</p> <p>3 <b>A Yes.</b></p> <p>4 Q What was Al Jones' role in the reverse</p> <p>5 stings?</p> <p>6 MR. PALLES: Objection; asked and</p> <p>7 answered.</p> <p>8 MR. RAUSCHER: I'm sorry if I did.</p> <p>9 Q But can you answer it again?</p> <p>10 <b>A He was arresting officer.</b></p> <p>11 Q Was he ever the enforcer?</p> <p>12 <b>A The arresting officer.</b></p> <p>13 Q What about Elsworth Smith?</p> <p>14 <b>A He was arresting officer, also.</b></p> <p>15 Q So were you the only member of Watts' team</p> <p>16 who had a role other than arresting officer during</p> <p>17 reverse stings?</p> <p>18 <b>A No. That's the role I took.</b></p> <p>19 Q You were arresting, also?</p> <p>20 <b>A Yes.</b></p> <p>21 Q Who were the staging officers?</p> <p>22 <b>A Well, it's staging, arresting -- I mainly</b></p> <p>23 <b>was a staging and arresting officer. Because if I</b></p> <p>24 <b>had to go catch somebody, then I had to arrest</b></p>



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12 (45 to 48)

<p style="text-align: right;">45</p> <p>1 <b>them.</b></p> <p>2 Q So were -- all these other people who you</p> <p>3 just named and said they were arresting officers,</p> <p>4 were they also staging officers?</p> <p>5 <b>A Whichever role they wanted to play, yes.</b></p> <p>6 Q But they did both?</p> <p>7 <b>A Yes.</b></p> <p>8 Q And then who were the enforcers?</p> <p>9 <b>A Well, whoever wanted to work -- anybody</b></p> <p>10 <b>that worked in the back were enforcers that would</b></p> <p>11 <b>catch people from leaving. Sometimes you got in a</b></p> <p>12 <b>fight; sometimes you didn't.</b></p> <p>13 Q What do you mean by that?</p> <p>14 <b>A People would want to get away.</b></p> <p>15 Q And sometimes you would get in fights with</p> <p>16 them?</p> <p>17 <b>A Well, not really a physical fight, but</b></p> <p>18 <b>they would struggle to get away.</b></p> <p>19 Q And so then you became an enforcer when</p> <p>20 there was a physical struggle?</p> <p>21 MR. MICHALIK: Object to -- object to the</p> <p>22 form of the question, argumentative.</p> <p>23 MR. BAZAREK: Join the objection.</p> <p>24 MR. PALLES: Join.</p>	<p style="text-align: right;">47</p> <p>1 question.</p> <p>2 MR. MICHALIK: Join.</p> <p>3 MR. SCHALKA: Join.</p> <p>4 <b>A Take the Fifth.</b></p> <p>5 <b>BY MR. RAUSCHER:</b></p> <p>6 Q What's the difference between arresting</p> <p>7 officer, staging officer, and enforcer?</p> <p>8 <b>A They're all the same roles. It's just</b></p> <p>9 <b>what role you choose to be in.</b></p> <p>10 Q If they're the same, why do you choose</p> <p>11 anything?</p> <p>12 <b>A Well, it's where you want to be at.</b></p> <p>13 Q It's just based on location?</p> <p>14 <b>A Right.</b></p> <p>15 Q But you don't know why it was called</p> <p>16 enforcer?</p> <p>17 <b>A No.</b></p> <p>18 Q Did everyone call it enforcer?</p> <p>19 MR. MICHALIK: Object to the form.</p> <p>20 Q Did everyone on the tac team call it</p> <p>21 enforcer?</p> <p>22 MR. MICHALIK: Objection; foundation.</p> <p>23 <b>A No.</b></p> <p>24 Q What did other people on the tac team call</p>
<p style="text-align: right;">46</p> <p>1 THE WITNESS: The question again?</p> <p>2 Q Did you become an enforcer when you got in</p> <p>3 a physical --</p> <p>4 <b>A No.</b></p> <p>5 Q -- altercation with somebody?</p> <p>6 <b>A No.</b></p> <p>7 Q So what does an enforcer do?</p> <p>8 <b>A Well, just -- like -- again, like I said,</b></p> <p>9 <b>just make sure people don't get away, nobody gets</b></p> <p>10 <b>hurt.</b></p> <p>11 Q The enforcer's job is to make sure no one</p> <p>12 gets hurt?</p> <p>13 <b>A Nobody gets hurt.</b></p> <p>14 Q And how does the enforcer make sure no one</p> <p>15 gets hurt?</p> <p>16 <b>A The -- that nobody gets out of line.</b></p> <p>17 Q How does the enforcer --</p> <p>18 <b>A 9 out of 10 people knew what they were</b></p> <p>19 <b>getting arrested for.</b></p> <p>20 Q The tenth didn't because they were getting</p> <p>21 framed?</p> <p>22 MR. BAZAREK: Objection.</p> <p>23 MR. PALLES: Object to the form.</p> <p>24 MR. BAZAREK: Object to the form of the</p>	<p style="text-align: right;">48</p> <p>1 the role that you're referring to as enforcer?</p> <p>2 <b>A I don't know.</b></p> <p>3 Q Well, how do you know they didn't call it</p> <p>4 enforcer?</p> <p>5 <b>A Because I never heard them say it.</b></p> <p>6 Q Did you ever hear anybody say it?</p> <p>7 <b>A Yes.</b></p> <p>8 Q Okay. Who --</p> <p>9 <b>A I couldn't tell you who. There were other</b></p> <p>10 <b>officers in it.</b></p> <p>11 Q What do you mean?</p> <p>12 <b>A Other officers that participated, that</b></p> <p>13 <b>I had no idea who they were.</b></p> <p>14 (Ms. Glenn Baker joined the proceedings.)</p> <p>15 Q They're the ones who used the term</p> <p>16 "enforcer"?</p> <p>17 <b>A Yes.</b></p> <p>18 Q So Bolton, Gonzalez, Leano, Lamonica</p> <p>19 Lewis, Al Jones, Elsworth Smith, and Watts never</p> <p>20 used the word "enforcer" to describe one of the</p> <p>21 roles on the reverse stings?</p> <p>22 <b>A No.</b></p> <p>23 Q No, they didn't or --</p> <p>24 <b>A They -- I didn't hear them say it. I'm --</b></p>

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13 (49 to 52)

49	<p>1 <b>I used that word.</b></p> <p>2 Q You used it? Okay.</p> <p>3 <b>A Right.</b></p> <p>4 Q Who did you use it to? Did you ever use</p> <p>5 it in front of anybody?</p> <p>6 <b>A No.</b></p> <p>7 Q Have you ever said it before today?</p> <p>8 <b>A Yes.</b></p> <p>9 Q When did you previously use the word</p> <p>10 "enforcer" --</p> <p>11 <b>A Whenever --</b></p> <p>12 Q -- to describe a role on a reverse sting?</p> <p>13 <b>A Whenever we would do a sting.</b></p> <p>14 Q What would the context be where you'd say</p> <p>15 "enforcer" during a sting?</p> <p>16 <b>A Well, it would be before we would start,</b></p> <p>17 <b>what role you wanted to play.</b></p> <p>18 Q And did you assign roles to -- for reverse</p> <p>19 stings?</p> <p>20 <b>A No, I didn't.</b></p> <p>21 Q And would you sometimes volunteer to be</p> <p>22 the enforcer?</p> <p>23 <b>A No.</b></p> <p>24 Q Well, then who would you be saying</p>	51	<p>1 Q Somewhere between 20 and 50?</p> <p>2 <b>A Between 10 and 20.</b></p> <p>3 Q Okay. Who decided that there should be a</p> <p>4 reverse sting?</p> <p>5 <b>A I don't know where that would come from.</b></p> <p>6 <b>I just was told we were doing one.</b></p> <p>7 Q When -- how would you be told that you</p> <p>8 were going to be doing a reverse sting?</p> <p>9 <b>A In roll call.</b></p> <p>10 Q Who led roll call?</p> <p>11 <b>A The sergeant.</b></p> <p>12 Q So that would be Watts?</p> <p>13 <b>A Yes.</b></p> <p>14 Q How long would roll call -- how long did</p> <p>15 roll call take?</p> <p>16 <b>A Depends. No more than 30 minutes.</b></p> <p>17 Q And what sort of things did Watts cover</p> <p>18 during roll call?</p> <p>19 <b>A I don't remember.</b></p> <p>20 Q Can you tell me generally what was covered</p> <p>21 during roll call?</p> <p>22 <b>A No. I don't remember.</b></p> <p>23 Q What was the point of roll call?</p> <p>24 MR. PALLES: Objection; lack of</p>
50	<p>1 "enforcer" to? What would the context be?</p> <p>2 <b>A Well, it would be in the building, whoever</b></p> <p>3 <b>was working enforcement. When they asked me what</b></p> <p>4 <b>you were doing -- "No, I'm working outside."</b></p> <p>5 Q Who would ask you what -- "What are you</p> <p>6 doing?"</p> <p>7 <b>A Well, other officers.</b></p> <p>8 Q And you would say "I'm working outside"?</p> <p>9 <b>A Right.</b></p> <p>10 Q And you would also say "I'm not working as</p> <p>11 an enforcer"?</p> <p>12 <b>A Right.</b></p> <p>13 Q How many reverse stings did you</p> <p>14 participate in as a member of the Watts team?</p> <p>15 <b>A Numerous.</b></p> <p>16 Q More than 10?</p> <p>17 <b>A Could have been more than 10.</b></p> <p>18 Q More than a hundred?</p> <p>19 <b>A No.</b></p> <p>20 Q More than 20?</p> <p>21 <b>A More than 20.</b></p> <p>22 Q Did you participate in more than</p> <p>23 50 reverse stings as a member of the Watts team?</p> <p>24 <b>A No.</b></p>	52	<p>1 foundation.</p> <p>2 MR. MICHALIK: Join.</p> <p>3 <b>A Roll call was basically for everybody to</b></p> <p>4 <b>sign in. You know, when you sign in in the</b></p> <p>5 <b>morning, see who was working the day.</b></p> <p>6 Q What did you sign in on?</p> <p>7 <b>A Well, we didn't sign in. We was checked</b></p> <p>8 <b>off in roll call.</b></p> <p>9 Q Do you know what you were checked off on?</p> <p>10 <b>A It was a computer.</b></p> <p>11 Q Was it always a computer?</p> <p>12 <b>A Yep -- yes.</b></p> <p>13 Q Do you know how many commendations or</p> <p>14 awards you got as a Chicago Police Department</p> <p>15 officer over the years?</p> <p>16 <b>A More -- more than a hundred.</b></p> <p>17 Q Does 136 sound right?</p> <p>18 <b>A Probably.</b></p> <p>19 Q And what did you win awards or</p> <p>20 commendations for?</p> <p>21 <b>A I don't recall.</b></p> <p>22 Q Do you recall any?</p> <p>23 <b>A No.</b></p> <p>24 Q How much money were you making as a police</p>

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14 (53 to 56)

53	<p>1 officer when you left the force?</p> <p>2 <b>A Maybe 86- -- I think 86,000.</b></p> <p>3 Q Do you ever expect to collect a pension</p> <p>4 from the City of Chicago?</p> <p>5 <b>A Yes.</b></p> <p>6 Q And why do you expect to collect a pension</p> <p>7 from the City of Chicago?</p> <p>8 <b>A Are you --</b></p> <p>9 MR. PALLES: I misunderstood the question</p> <p>10 before. I thought you said "Did you ever."</p> <p>11 MR. RAUSCHER: No. I said "Do you ever."</p> <p>12 Q Do you still expect to collect a pension?</p> <p>13 <b>A No.</b></p> <p>14 Q And -- but there was a time when you were</p> <p>15 a police officer when you did expect to collect a</p> <p>16 pension --</p> <p>17 <b>A Yes.</b></p> <p>18 Q -- is that right?</p> <p>19 Why do you think you will not collect a</p> <p>20 pension?</p> <p>21 <b>A I have no idea. Didn't -- I didn't</b></p> <p>22 <b>even try.</b></p> <p>23 Q Did anyone tell you you were not eligible</p> <p>24 for a pension?</p>	55
54	<p>1 <b>A Never discussed it.</b></p> <p>2 Q How long did you spend in Federal prison?</p> <p>3 <b>A 11 months.</b></p> <p>4 Q When you were out after that, did you have</p> <p>5 any period of supervised release?</p> <p>6 <b>A Yes.</b></p> <p>7 Q And tell me -- tell me about that. How</p> <p>8 long was it? What were the conditions?</p> <p>9 <b>A I don't remember.</b></p> <p>10 Q Are you in any -- are you under any sort</p> <p>11 of restrictions at the moment?</p> <p>12 <b>A No.</b></p> <p>13 Q Would you agree that you abused your power</p> <p>14 as a Chicago police officer?</p> <p>15 <b>A I'll take the Fifth.</b></p> <p>16 Q How many people did you frame over</p> <p>17 the years as a Chicago police officer?</p> <p>18 <b>A Take the Fifth.</b></p> <p>19 Q Did you frame more than a hundred people?</p> <p>20 <b>A I take the Fifth.</b></p> <p>21 Q And you're refusing to answer that</p> <p>22 question because you fear if you answer truthfully</p> <p>23 you'll be prosecuted?</p> <p>24 <b>A Yes. Take the Fifth.</b></p>	56
	<p>1 Q Do you remember someone named Landon</p> <p>2 Allen?</p> <p>3 <b>A No.</b></p> <p>4 Q All right. We're going to mark Exhibit 1,</p> <p>5 which is Bates-stamped PL Joint 028982 and then</p> <p>6 PL Joint 028984.</p> <p>7 There's a -- there was one -- the one in</p> <p>8 between was a different report.</p> <p>9 (Mohammed Deposition Exhibit 1 marked for</p> <p>10 identification and attached to the transcript.)</p> <p>11 Q Let me know when you've had a chance to</p> <p>12 look that over.</p> <p>13 Have you had a chance to look it over?</p> <p>14 <b>A Yeah.</b></p> <p>15 Q You see your name is listed on here?</p> <p>16 <b>A Yes.</b></p> <p>17 Q You were involved in arresting Landon</p> <p>18 Allen?</p> <p>19 <b>A Yes.</b></p> <p>20 Q It says here that --</p> <p>21 <b>A Take the Fifth.</b></p> <p>22 Q On what?</p> <p>23 MR. RAVITZ: He -- he hasn't asked a</p> <p>24 question.</p>	

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15 (57 to 60)

57	<p>1 Q That's false?</p> <p>2 <b>A Take the Fifth.</b></p> <p>3 MR. BAZAREK: Object to the form of the</p> <p>4 question.</p> <p>5 Q It says Landon Allen had a clear plastic</p> <p>6 bag with numerous items inside in his right hand?</p> <p>7 MR. BAZAREK: Object to the form of the</p> <p>8 question.</p> <p>9 <b>A I take the Fifth.</b></p> <p>10 Q That's what it says; right?</p> <p>11 <b>A Take the Fifth.</b></p> <p>12 Q Yeah. That's not true? He didn't have a</p> <p>13 clear plastic bag?</p> <p>14 MR. BAZAREK: Object to the form of the --</p> <p>15 <b>A I take the Fifth.</b></p> <p>16 MR. BAZAREK: Object to the form of the</p> <p>17 question.</p> <p>18 Q All right. It says Landon Allen dropped</p> <p>19 the clear bag to the ground when the reporting</p> <p>20 officers announced their office?</p> <p>21 MR. BAZAREK: Object to the form of the</p> <p>22 question.</p> <p>23 <b>A Take the Fifth.</b></p> <p>24 Q That's false? He didn't do that?</p>	59	<p>1 record.</p> <p>2 MR. MICHALIK: Join.</p> <p>3 Q Landon Allen was framed on January 29th,</p> <p>4 2004?</p> <p>5 <b>A Take the Fifth.</b></p> <p>6 MR. BAZAREK: Object to the form of the</p> <p>7 question, mischaracterizes the evidence in the</p> <p>8 record.</p> <p>9 MR. MICHALIK: Join.</p> <p>10 MR. RAUSCHER: What's wrong with the form?</p> <p>11 MR. BAZAREK: I made my objection,</p> <p>12 Counsel.</p> <p>13 MR. RAUSCHER: I know. I want to know</p> <p>14 what's wrong with the form so I can see if I can</p> <p>15 clear it up.</p> <p>16 MR. BAZAREK: I've -- I've already said.</p> <p>17 I think it mischaracterizes the record and the</p> <p>18 evidence. That's exactly what it does.</p> <p>19 MR. RAUSCHER: Okay. I'm going to mark</p> <p>20 Exhibit 2, Bates Stamp City-BG-051481.</p> <p>21 (Mohammed Deposition Exhibit 2 marked for</p> <p>22 identification and attached to the transcript.)</p> <p>23 BY MR. RAUSCHER:</p> <p>24 Q Have you had a chance to look this one</p>
58	<p>1 MR. BAZAREK: Object to the form of the</p> <p>2 question.</p> <p>3 <b>A Take the Fifth.</b></p> <p>4 Q He did not have any drugs with him?</p> <p>5 MR. BAZAREK: Object to the form of the</p> <p>6 question.</p> <p>7 <b>A Take the Fifth.</b></p> <p>8 Q There was no plastic bag recovered from</p> <p>9 Landon Allen that day?</p> <p>10 MR. BAZAREK: Object to the form of the</p> <p>11 question --</p> <p>12 <b>A Take the Fifth.</b></p> <p>13 MR. BAZAREK: -- mischaracterizes the</p> <p>14 evidence.</p> <p>15 Q There was no heroin recovered from Landon</p> <p>16 Allen?</p> <p>17 <b>A Take the Fifth.</b></p> <p>18 MR. BAZAREK: Object to the form of the</p> <p>19 question, mischaracterizes the evidence.</p> <p>20 Q This is a fabricated report, the one</p> <p>21 you're looking at?</p> <p>22 <b>A Take the Fifth.</b></p> <p>23 MR. BAZAREK: Object to the form of the</p> <p>24 question, mischaracterizes the evidence in the</p>	60	<p>1 over?</p> <p>2 <b>A Yes.</b></p> <p>3 Q This is another report of Landon Allen's</p> <p>4 arrest on January 29, 2004?</p> <p>5 <b>A Yes.</b></p> <p>6 Q And this is another fabricated report?</p> <p>7 MR. BAZAREK: Object to the form of the</p> <p>8 question --</p> <p>9 <b>A Take the Fifth.</b></p> <p>10 MR. BAZAREK: -- mischaracterizes the</p> <p>11 evidence --</p> <p>12 MR. MICHALIK: Join.</p> <p>13 MR. BAZAREK: -- in the record in this</p> <p>14 case.</p> <p>15 MR. PALLES: Now --</p> <p>16 <b>A Take the Fifth.</b></p> <p>17 Q And you're taking the Fifth because you</p> <p>18 believe answering truthfully may lead to your</p> <p>19 prosecution?</p> <p>20 <b>A Yes.</b></p> <p>21 Q Mr. Allen was wrongfully prosecuted based</p> <p>22 on this false arrest?</p> <p>23 MR. BAZAREK: Object to the form of the</p> <p>24 question, mischaracterizes the evidence in the</p>

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16 (61 to 64)

61	<p>1 record in this case.</p> <p>2 MR. MICHALIK: Join.</p> <p>3 <b>A Take --</b></p> <p>4 MR. MICHALIK: Foundation, also.</p> <p>5 <b>A (Continuing.) Take the Fifth on advice of</b></p> <p>6 <b>my attorneys.</b></p> <p>7 Q And what advice did they give you on</p> <p>8 taking the Fifth?</p> <p>9 MR. PALLES: Objection; privileged.</p> <p>10 Move on.</p> <p>11 MR. BAZAREK: Objection.</p> <p>12 MR. PALLES: Instruct him not to answer.</p> <p>13 Q Are you going to follow your attorney's</p> <p>14 advice not to answer?</p> <p>15 <b>A Yes, I am.</b></p> <p>16 Q Your attorney's advised you that you can</p> <p>17 be prosecuted if you answer truthfully?</p> <p>18 MR. RAVITZ: Objection. It's</p> <p>19 attorney-client privilege.</p> <p>20 MR. PALLES: Instruct him not to answer.</p> <p>21 MR. RAUSCHER: He invoked your advice.</p> <p>22 I think I'm allowed to ask about it.</p> <p>23 MR. PALLES: He's invoked our advice. We</p> <p>24 advise him not to answer.</p>	63	<p>1 he's entitled to take the Fifth.</p> <p>2 Okay? From now on I'm instructing him not</p> <p>3 to answer that last question.</p> <p>4 MR. RAUSCHER: On what grounds?</p> <p>5 MR. PALLES: I told you.</p> <p>6 MR. RAUSCHER: I'm not even asking him</p> <p>7 right now what you have advised him. I'm asking</p> <p>8 him if he believes that answering truthfully will</p> <p>9 lead to his prosecution.</p> <p>10 MR. PALLES: Fine. And I'm telling you</p> <p>11 that he's taking the Fifth on the advice of</p> <p>12 counsel.</p> <p>13 Whatever judgment he's made about it is</p> <p>14 irrelevant. He's following the advice of counsel.</p> <p>15 MR. RAUSCHER: I mean, now you're</p> <p>16 testifying for him.</p> <p>17 MR. PALLES: I'm not testifying for him.</p> <p>18 I'm telling him that he will not answer that</p> <p>19 anymore. Okay?</p> <p>20 You know that it's the advice of counsel;</p> <p>21 he's said it's the advice of counsel. Okay?</p> <p>22 If you want to discuss his objective</p> <p>23 thoughts about any number of these things, you'll</p> <p>24 have to bring it up at a later time.</p>
62	<p>1 Go ahead.</p> <p>2 BY MR. RAUSCHER:</p> <p>3 Q Are you going to follow your attorney's</p> <p>4 advice and not answer that question?</p> <p>5 <b>A Yes.</b></p> <p>6 Q Would you agree that it's a gross abuse of</p> <p>7 authority to falsely arrest someone and claim they</p> <p>8 had drugs that they didn't have?</p> <p>9 MR. BAZAREK: Object to the form of the</p> <p>10 question.</p> <p>11 <b>A Take the Fifth.</b></p> <p>12 Q When you framed people, did you give any</p> <p>13 thought to what impact that would have on their</p> <p>14 lives?</p> <p>15 MR. PALLES: Object to form.</p> <p>16 MR. BAZAREK: Object to form of the</p> <p>17 question.</p> <p>18 <b>A Take the Fifth.</b></p> <p>19 Q And you're taking the Fifth because you</p> <p>20 believe that answering truthfully will lead to</p> <p>21 your prosecution?</p> <p>22 MR. PALLES: Just so we're clear, he's</p> <p>23 taking the Fifth on the advice of counsel. Okay?</p> <p>24 Counsel has made -- we have made a judgment that</p>	64	<p>1 BY MR. RAUSCHER:</p> <p>2 Q Are you going to follow your counsel's</p> <p>3 advice and refuse to answer that as to why you are</p> <p>4 invoking the Fifth?</p> <p>5 <b>A Yes.</b></p> <p>6 Q Do you know George Almond?</p> <p>7 <b>A No.</b></p> <p>8 Q Do you remember ever being involved in the</p> <p>9 arrest of George Almond?</p> <p>10 <b>A I don't remember.</b></p> <p>11 Q All right. The next exhibit's going to be</p> <p>12 City-BG-051507 to 508.</p> <p>13 (Mohammed Deposition Exhibit 3 marked for</p> <p>14 identification and attached to the transcript.)</p> <p>15 MR. PALLES: Can we get it, please?</p> <p>16 MR. RAUSCHER: Sorry. I gave it all to</p> <p>17 them.</p> <p>18 MR. BAZAREK: I've got an extra.</p> <p>19 MR. PALLES: Thank you.</p> <p>20 BY MR. RAUSCHER:</p> <p>21 Q Have you had a chance to review this?</p> <p>22 <b>A Yes.</b></p> <p>23 Q This is a fabricated police report?</p> <p>24 MR. BAZAREK: Object to the form of the</p>

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17 (65 to 68)

65	<p>1 question, mischaracterizes the evidence in the</p> <p>2 record on this case.</p> <p>3 <b>A Take the Fifth.</b></p> <p>4 Q You signed this report; right?</p> <p>5 <b>A Take the Fifth.</b></p> <p>6 Q Is that your signature in the bottom</p> <p>7 left-hand box?</p> <p>8 <b>A Take the Fifth.</b></p> <p>9 Q Is that Al Jones' signature next to yours?</p> <p>10 MR. PALLES: Lack of -- objection; lack of</p> <p>11 foundation.</p> <p>12 <b>A Take the Fifth.</b></p> <p>13 Q Did you ever authorize somebody to sign a</p> <p>14 report for you?</p> <p>15 <b>A Take the Fifth.</b></p> <p>16 Q Did you authorize someone to sign this</p> <p>17 report for you?</p> <p>18 <b>A Take the Fifth.</b></p> <p>19 Q Did you sign this report for Jones?</p> <p>20 <b>A Take the Fifth.</b></p> <p>21 Q Did Jones sign the report for you?</p> <p>22 <b>A Take the Fifth.</b></p> <p>23 Q Do you see Sergeant Watts' signature on</p> <p>24 there?</p>	67	<p>1 record in this case.</p> <p>2 MR. MICHALIK: Join.</p> <p>3 <b>A Taking the Fifth.</b></p> <p>4 Q George Almond did not have any drugs on</p> <p>5 him when he was arrested?</p> <p>6 MR. BAZAREK: Object to the form of the</p> <p>7 question, mischaracterizes the evidence in the</p> <p>8 record in this case.</p> <p>9 MR. MICHALIK: Join.</p> <p>10 <b>A Taking the Fifth.</b></p> <p>11 Q 20 bags of heroin were not recovered on or</p> <p>12 near George Almond January 4th, 2006?</p> <p>13 MR. BAZAREK: Object to the form of the</p> <p>14 question, mischaracterizes the -- the evidence and</p> <p>15 the record in this case.</p> <p>16 MR. MICHALIK: Join.</p> <p>17 <b>A Taking the Fifth.</b></p> <p>18 Q Every accusation against George Almond in</p> <p>19 this report is fabricated?</p> <p>20 MR. BAZAREK: Object to the form of the</p> <p>21 question, mischaracterizes the evidence and the</p> <p>22 record in this case.</p> <p>23 MR. MICHALIK: Join.</p> <p>24 <b>A Tak- -- taking the Fifth.</b></p>
66	<p>1 <b>A Take the Fifth.</b></p> <p>2 MR. PALLES: Same.</p> <p>3 <b>A (Continuing.) Yeah, same.</b></p> <p>4 Q You're taking the Fifth on whether that's</p> <p>5 Sergeant Watts' signature?</p> <p>6 <b>A I don't know.</b></p> <p>7 Q You don't know if it is?</p> <p>8 <b>A Take the Fifth.</b></p> <p>9 Q You don't know or you're taking the Fifth?</p> <p>10 <b>A I'm taking the Fifth.</b></p> <p>11 Q George Almond was wrongfully arrested on</p> <p>12 August 4th, 2006?</p> <p>13 MR. BAZAREK: Object to the form of the</p> <p>14 question, mischaracterizes the evidence in the</p> <p>15 record in this case.</p> <p>16 MR. MICHALIK: Join.</p> <p>17 <b>A Taking the Fifth.</b></p> <p>18 Q You participated in the arrest of</p> <p>19 George Almond on January 4th, 2006?</p> <p>20 <b>A Taking the Fifth.</b></p> <p>21 Q George Almond had no drugs on him on</p> <p>22 January 4th, 2006?</p> <p>23 MR. BAZAREK: Object to the form of the</p> <p>24 question, mischaracterizes the evidence in the</p>	68	<p>1 Q You're taking the Fifth on that series of</p> <p>2 questions because you believe you'll be prosecuted</p> <p>3 if you testify truthfully?</p> <p>4 MR. PALLES: Objection; instruct him not</p> <p>5 to answer, violates the attorney-client and work</p> <p>6 product exceptions.</p> <p>7 Q Are you going to follow your attorney's</p> <p>8 advice and not answer that question?</p> <p>9 <b>A Yes, I am.</b></p> <p>10 Q If I continue to ask you that question</p> <p>11 throughout the day, are you going to continue to</p> <p>12 refuse to answer it on the advice of counsel?</p> <p>13 <b>A Yes, I am.</b></p> <p>14 Q Are you familiar with the term "attesting</p> <p>15 officer" on a police report?</p> <p>16 <b>A Yes.</b></p> <p>17 Q What is the role of the attesting officer?</p> <p>18 <b>A I can't remember.</b></p> <p>19 <b>I remember the word "attesting" but</b></p> <p>20 <b>I can't remember.</b></p> <p>21 <b>Do you have something that might refresh</b></p> <p>22 <b>my memory?</b></p> <p>23 Q Whose job was it to fill out reports after</p> <p>24 an arrest?</p>

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18 (69 to 72)

<p>69</p> <p>1 <b>A Whoever the arresting officer was.</b></p> <p>2 Q And who is the arresting officer?</p> <p>3 <b>A Whoever made the arrest.</b></p> <p>4 Q And why are there two signatures on the</p> <p>5 report that we just looked at?</p> <p>6 MR. PALLES: Objection; lack of</p> <p>7 foundation.</p> <p>8 Q I'm not saying they're from two different</p> <p>9 people. There are just two signatures, Jones and</p> <p>10 Mohammed.</p> <p>11 Why is that the case?</p> <p>12 <b>A Those are the two officers who made the</b></p> <p>13 <b>arrest.</b></p> <p>14 Q And then why is there also a signature of</p> <p>15 Ronald Watts?</p> <p>16 <b>A He's the sergeant.</b></p> <p>17 Q What's the sergeant's job in reviewing and</p> <p>18 signing off on reports?</p> <p>19 MR. MICHALIK: Objection; foundation.</p> <p>20 MR. BAZAREK: Join.</p> <p>21 <b>A Reading them.</b></p> <p>22 Q Just reading them?</p> <p>23 <b>A Reading them and make sure everything is</b></p> <p>24 <b>correct.</b></p>	<p>71</p> <p>1 Q Can you tell me what this is a report of?</p> <p>2 <b>A Looks like a narcotics report -- arrest.</b></p> <p>3 Q For George Almond from August 4th, 2006?</p> <p>4 <b>A Yes.</b></p> <p>5 Q And do you know why -- well, who's the</p> <p>6 other -- who's the second arresting officer on</p> <p>7 here?</p> <p>8 <b>A Elsworth Smith.</b></p> <p>9 Q Do you know why Elsworth Smith is listed</p> <p>10 as the second arresting officer in this report but</p> <p>11 Al Jones is listed as the second reporting officer</p> <p>12 on the one we just looked at?</p> <p>13 <b>A I have no idea.</b></p> <p>14 Q Do you know who created the report we just</p> <p>15 looked at, Exhibit 3?</p> <p>16 <b>A No.</b></p> <p>17 Q No?</p> <p>18 When this says to "R/Os," this report that</p> <p>19 we're looking at right now, Exhibit 4, is that</p> <p>20 referring to you?</p> <p>21 <b>A It says -- say --</b></p> <p>22 Q When it says "R/Os" in the narrative</p> <p>23 part --</p> <p>24 <b>A Right.</b></p>
<p>70</p> <p>1 Q And when you say "correct," you mean true</p> <p>2 or that it's filled out properly?</p> <p>3 <b>A I take the Fifth on that.</b></p> <p>4 Q All right. We're going to mark the next</p> <p>5 one. I think we're on Exhibit 4, City-BG-51485</p> <p>6 to 489.</p> <p>7 (Mohammed Deposition Exhibit 4 marked for</p> <p>8 identification and attached to the transcript.)</p> <p>9 Q Have you had a chance to look this report</p> <p>10 over?</p> <p>11 <b>A Yes.</b></p> <p>12 Q Do you see on the third page, which is</p> <p>13 Bates-stamped City-BG-051487, you're listed as the</p> <p>14 first arresting officer?</p> <p>15 <b>A Yes.</b></p> <p>16 Q What does it mean to be the first</p> <p>17 arresting officer?</p> <p>18 <b>A That would be the first arresting officer</b></p> <p>19 <b>that would go to court.</b></p> <p>20 Q And how did you decide who would be the</p> <p>21 first versus the second arresting officer?</p> <p>22 <b>A Whoever decided to go.</b></p> <p>23 Q When would that decision be made?</p> <p>24 <b>A When you make the arrest.</b></p>	<p>72</p> <p>1 Q -- are you one of the reporting officers?</p> <p>2 <b>A Yes, I am.</b></p> <p>3 Q Who else is it referring to?</p> <p>4 <b>A Elsworth Smith.</b></p> <p>5 Q And what about Al Jones?</p> <p>6 <b>A He's not on here.</b></p> <p>7 Q He's on the other one though; right?</p> <p>8 <b>A Yes.</b></p> <p>9 Q So is it referring to him, also?</p> <p>10 <b>A Not in this report.</b></p> <p>11 (Mr. Kosoko joined the proceedings.)</p> <p>12 Q It says the R/Os observed the above</p> <p>13 offender, which is George Almond, pass another</p> <p>14 offender two clear plastic Baggies with suspect</p> <p>15 heroin in exchange for money.</p> <p>16 Do you see that --</p> <p>17 <b>A Take the --</b></p> <p>18 Q -- the narrative portion?</p> <p>19 <b>A Take the Fifth.</b></p> <p>20 Q That is not a true statement? You did not</p> <p>21 witness that happen?</p> <p>22 MR. BAZAREK: Object to the form of the</p> <p>23 question.</p> <p>24 <b>A Take the Fifth.</b></p>

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19 (73 to 76)

73	<p>1 Q What's Beat 264D?</p> <p>2 <b>A That's a described beat number.</b></p> <p>3 Q And is it your beat?</p> <p>4 <b>A Yes, that day.</b></p> <p>5 Q Was it frequently your beat?</p> <p>6 <b>A I don't remember.</b></p> <p>7 Q What does it -- what does it mean to --</p> <p>8 what does "264D" signify? Is that a car or is</p> <p>9 that --</p> <p>10 <b>A It's a car.</b></p> <p>11 Q And so it means you were using that car</p> <p>12 the day that George Almond was arrested?</p> <p>13 <b>A No. 264 David is the car that you're</b></p> <p>14 <b>going to be riding in, meaning the two officers.</b></p> <p>15 <b>It's 264 Adam, 264 Boy, 264 Charlie, 264D.</b></p> <p>16 Q And did it rotate within a daily basis?</p> <p>17 <b>A No.</b></p> <p>18 Q And so during this time period, you were</p> <p>19 at 264D with Elsworth Smith?</p> <p>20 <b>A Yes.</b></p> <p>21 Q Does that mean that in the 2006 time frame</p> <p>22 Elsworth Smith was your partner?</p> <p>23 <b>A Yes.</b></p> <p>24 Q Okay. All right. The next exhibit, 5,</p>	75	<p>1 evidence in this case.</p> <p>2 <b>A Take the Fifth.</b></p> <p>3 Q You didn't see Elsworth Smith recover any</p> <p>4 narcotics from George Almond?</p> <p>5 <b>A Take the Fifth.</b></p> <p>6 Q What is an electronic signature?</p> <p>7 I'm sorry. Let me rephrase that.</p> <p>8 There's a signature block here. It says</p> <p>9 "Electronic Approval."</p> <p>10 Do you see that?</p> <p>11 <b>A Yep.</b></p> <p>12 Q What does the --</p> <p>13 <b>A Yes.</b></p> <p>14 Q What does the "Electronic Approval" mean</p> <p>15 in the signature space?</p> <p>16 MR. PALLES: Objection; lack of</p> <p>17 foundation.</p> <p>18 <b>A Not for certain.</b></p> <p>19 Q You're not sure?</p> <p>20 <b>A No.</b></p> <p>21 Q Did Elsworth Smith have any role in</p> <p>22 creating this particular report?</p> <p>23 MR. BAZAREK: Object to the form of the</p> <p>24 question, also foundation.</p>
74	<p>1 City-BG-051524.</p> <p>2 (Mohammed Deposition Exhibit 5 marked for</p> <p>3 identification and attached to the transcript.)</p> <p>4 (An off-the-record discussion was held.)</p> <p>5 Q Have you had a chance to look at this?</p> <p>6 <b>A Yes.</b></p> <p>7 Q Did you create this report?</p> <p>8 <b>A Yes.</b></p> <p>9 Q This report says that narcotics were</p> <p>10 recovered from George Almond?</p> <p>11 Do you see that?</p> <p>12 <b>A Yes.</b></p> <p>13 Q And this is a false report that you</p> <p>14 created?</p> <p>15 <b>A Take --</b></p> <p>16 MR. BAZAREK: Object to the form of the</p> <p>17 question, mischaracterizes the evidence in the</p> <p>18 record in this case.</p> <p>19 MR. MICHALIK: Join.</p> <p>20 <b>A (Continuing.) Take the Fifth.</b></p> <p>21 Q You didn't recover any narcotics from</p> <p>22 George Almond, did you?</p> <p>23 MR. BAZAREK: Object to the form of the</p> <p>24 question, mischaracterizes the record and the</p>	76	<p>1 MR. PALLES: Join on the foundation.</p> <p>2 <b>A Take the Fifth.</b></p> <p>3 Q Take the Fifth?</p> <p>4 <b>A Yes.</b></p> <p>5 Q Did you authorize Elsworth Smith to create</p> <p>6 this report for you?</p> <p>7 <b>A Take the Fifth.</b></p> <p>8 Q Did Elsworth Smith authorize you to create</p> <p>9 this report for him?</p> <p>10 MR. BAZAREK: Object -- object to form and</p> <p>11 foundation.</p> <p>12 <b>A Take the Fifth.</b></p> <p>13 Q Did you authorize Elsworth Smith to</p> <p>14 electronically sign this document for you?</p> <p>15 MR. BAZAREK: Object to form and</p> <p>16 foundation.</p> <p>17 <b>A Take the Fifth.</b></p> <p>18 Q Did Elsworth Smith authorize you to</p> <p>19 electronically sign for him?</p> <p>20 <b>A Taking the Fifth.</b></p> <p>21 MR. BAZAREK: Object to form and</p> <p>22 foundation.</p> <p>23 MR. RAUSCHER: What's wrong with the</p> <p>24 foundation?</p>



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20 (77 to 80)

77	<p>1 MR. BAZAREK: I -- I stated my objection.</p> <p>2 MR. RAUSCHER: I'm going to mark</p> <p>3 Exhibit 6, City-BG-51520.</p> <p>4 (Mohammed Deposition Exhibit 6 marked for</p> <p>5 identification and attached to the transcript.)</p> <p>6 BY MR. RAUSCHER:</p> <p>7 Q This report lists you as the investigating</p> <p>8 officer.</p> <p>9 Do you see that? Just to the left of</p> <p>10 "First Officer's Name."</p> <p>11 A Yes.</p> <p>12 Q And the -- the Exhibit 5 we just looked at</p> <p>13 also listed you as the investigating officer?</p> <p>14 A Yes.</p> <p>15 Q What did it mean to be the investigating</p> <p>16 officer on this report?</p> <p>17 A It meant the officer who was writing the</p> <p>18 report.</p> <p>19 Q Were you investigating anything?</p> <p>20 A Yes.</p> <p>21 Q What were you investigating?</p> <p>22 A Narcotics sales.</p> <p>23 Q And what's -- particularly what narcotic</p> <p>24 sales were you investigating with respect to</p>	79	<p>1 A Take the Fifth.</p> <p>2 Q You knew that George Almond was not being</p> <p>3 arrested because you had seen him selling drugs in</p> <p>4 Ida B. Wells?</p> <p>5 MR. BAZAREK: Object to the --</p> <p>6 A Take --</p> <p>7 MR. BAZAREK: -- form of the question,</p> <p>8 misstates the evidence in the record in this case.</p> <p>9 A (Continuing.) Take the Fifth.</p> <p>10 Q No part of the narrative description in</p> <p>11 the arrest reports for George Almond is accurate?</p> <p>12 MR. BAZAREK: Object to the form of the</p> <p>13 question, misstates the evidence in the record in</p> <p>14 this case.</p> <p>15 MR. MICHALIK: Join.</p> <p>16 A Take the Fifth.</p> <p>17 MR. PALLES: If we're moving on, may we</p> <p>18 take a break?</p> <p>19 MR. RAUSCHER: Yeah. Of course.</p> <p>20 MR. PALLES: Great. Thanks.</p> <p>21 THE VIDEOGRAPHER: Off the record at 11:27.</p> <p>22 (A recess was taken from 11:27 a.m. to</p> <p>23 11:39 a.m.)</p> <p>24 ///</p>
78	<p>1 George Almond's arrest?</p> <p>2 A Narcotic sales.</p> <p>3 Q So after you fabricated the report, you</p> <p>4 were still conducting an investigation?</p> <p>5 MR. BAZAREK: Object to the --</p> <p>6 A I take --</p> <p>7 MR. BAZAREK: -- form of the question,</p> <p>8 mischaracterizes the --</p> <p>9 A (Continuing.) I take the Fifth.</p> <p>10 MR. BAZAREK: -- evidence in the record in</p> <p>11 this case.</p> <p>12 MR. MICHALIK: Join.</p> <p>13 Q You were not actually investigating</p> <p>14 anything with respect to George Almond?</p> <p>15 MR. BAZAREK: Object to the form of the</p> <p>16 question.</p> <p>17 A Take the Fifth.</p> <p>18 Q George Almond was arrested and brought to</p> <p>19 the police station and then you put drugs on the</p> <p>20 table and told him he was being arrested for those</p> <p>21 drugs; right?</p> <p>22 MR. BAZAREK: Object to the form of the</p> <p>23 question.</p> <p>24 MR. MICHALIK: Join.</p>	80	<p>1 (Mr. Gainer and Ms. Kleinhaus left the</p> <p>2 proceedings.)</p> <p>3 THE VIDEOGRAPHER: Back on the record, 11:39.</p> <p>4 MR. PALLES: Before we go any further, may</p> <p>5 we spread of record, since the -- at the beginning</p> <p>6 of this deposition there have been some</p> <p>7 individuals other than the counsel of record who</p> <p>8 have come into the room.</p> <p>9 Would you please identify them for the</p> <p>10 record.</p> <p>11 MR. RAUSCHER: Yeah. You beat me to it.</p> <p>12 That's what I was going to do.</p> <p>13 So Clarissa Glenn has arrived, and she is</p> <p>14 one of the plaintiffs in the coordinated</p> <p>15 proceedings.</p> <p>16 I think she's the only person other -- and</p> <p>17 Joel's paralegal.</p> <p>18 MR. FLAXMAN: And my paralegal, Andrew</p> <p>19 Segal, S-e-g-a-l, has also been present for the</p> <p>20 deposition.</p> <p>21 MR. PALLES: Okay. Thank you.</p> <p>22 MR. KOSOKO: I'm also here.</p> <p>23 MR. FLAXMAN: We also have a new attorney.</p> <p>24 MR. KOSOKO: I'm substituting for Brian</p>

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21 (81 to 84)

81	<p>1 Gainer. My name is Ahmed Kosoko on behalf of</p> <p>2 Ronald Watts.</p> <p>3 BY MR. RAUSCHER:</p> <p>4 Q We've discussed the arrests of Landon</p> <p>5 Allen and George Almond. If I asked you</p> <p>6 additional questions about their arrests, would</p> <p>7 you continue to take the Fifth?</p> <p>8 MR. PALLES: I object to the vagueness of</p> <p>9 the question.</p> <p>10 <b>A I don't know.</b></p> <p>11 Q Is there anything you can tell me about</p> <p>12 the arrest of Landon Allen?</p> <p>13 <b>A No.</b></p> <p>14 Q Is there anything you can tell me about</p> <p>15 the arrest of George Almond?</p> <p>16 <b>A I'm going to take the Fifth.</b></p> <p>17 Q Is anything in the narrative describing</p> <p>18 either of those arrests accurate?</p> <p>19 MR. BAZAREK: Object to the form of the</p> <p>20 question.</p> <p>21 <b>A Because I am concerned that the mere act</b></p> <p>22 <b>of testifying to this subject matter, this</b></p> <p>23 <b>incident, may cause me to be criminally indicted</b></p> <p>24 <b>by the US Attorney's Office and/or the Cook County</b></p>	83	<p>1 <b>A A report created for narcotics.</b></p> <p>2 Q And you are one of the reporting officers</p> <p>3 on this vice case report?</p> <p>4 <b>A Yes.</b></p> <p>5 Q This is documenting the arrest of, among</p> <p>6 others, Darron Byrd and Raynard Carter on</p> <p>7 April 11th, 2007?</p> <p>8 <b>A Yes. That's what it says, yes.</b></p> <p>9 Q And you took part in creating this report?</p> <p>10 <b>A Yes.</b></p> <p>11 Q Is this an accurate report?</p> <p>12 <b>A Because I am concerned that the mere act</b></p> <p>13 <b>of testifying to this subject matter, this</b></p> <p>14 <b>incident, may cause me to be criminally indicted</b></p> <p>15 <b>by the US Attorney's Office and/or the Cook County</b></p> <p>16 <b>State's Attorney's Office, on the advice of</b></p> <p>17 <b>counsel -- any questions about -- I'm going to</b></p> <p>18 <b>decline to answer any questions about certain</b></p> <p>19 <b>aspects of my conduct as a Chicago police officer,</b></p> <p>20 <b>based upon the rights guaranteed to me by the</b></p> <p>21 <b>Fifth Amendment of the United States Constitution.</b></p> <p>22 Q And you're not going to disclose what the</p> <p>23 advice of counsel was that led you to make that</p> <p>24 decision?</p>
82	<p>1 <b>State's Attorney's Office, on the advice of</b></p> <p>2 <b>counsel I am going to decline to answer any</b></p> <p>3 <b>questions about certain aspects of my conduct as a</b></p> <p>4 <b>Chicago police officer, based upon the rights</b></p> <p>5 <b>guaranteed to me by the Fifth Amendment of the</b></p> <p>6 <b>United States Constitution.</b></p> <p>7 Q And that invocation of the Fifth covers</p> <p>8 the last question I just asked you about George</p> <p>9 Almond and Landon Allen reports?</p> <p>10 <b>A Yes.</b></p> <p>11 Q And you're still maintaining your decision</p> <p>12 not to answer why you're taking the Fifth or what</p> <p>13 the advice of counsel was; is that correct?</p> <p>14 <b>A Yes.</b></p> <p>15 Q Do you know who Darron Byrd is?</p> <p>16 <b>A No.</b></p> <p>17 Q All right. The next exhibit's going to be</p> <p>18 PL Joint 030465 to 466, Exhibit 7.</p> <p>19 (Mohammed Deposition Exhibit 7 marked for</p> <p>20 identification and attached to the transcript.)</p> <p>21 Q Have you had a chance to look at this</p> <p>22 document?</p> <p>23 <b>A Yes.</b></p> <p>24 Q What's a vice case report?</p>	84	<p>1 <b>A I take the Fifth.</b></p> <p>2 Q You're not going to tell us why -- what</p> <p>3 counsel told you that led you to take the Fifth;</p> <p>4 is that correct?</p> <p>5 <b>A On the advice of my counsel, I take the</b></p> <p>6 <b>Fifth.</b></p> <p>7 Q This is a false report --</p> <p>8 MR. BAZAREK: Object to the form of the</p> <p>9 question, mischaracterizes the evidence in the</p> <p>10 record in this case.</p> <p>11 MR. MICHALIK: Join.</p> <p>12 <b>A Because I am concerned that the mere act</b></p> <p>13 <b>of testifying to this subject matter, this</b></p> <p>14 <b>incident, may cause me to be criminally indicted</b></p> <p>15 <b>by the US Attorney's Office and/or Cook County</b></p> <p>16 <b>State's Attorney's Office, on the advice of</b></p> <p>17 <b>counsel I am going to decline to answer any</b></p> <p>18 <b>questions about certain aspects of my conduct as a</b></p> <p>19 <b>Chicago police officer, based upon the rights</b></p> <p>20 <b>guaranteed to me by the Fifth Amendment of the</b></p> <p>21 <b>United States Constitution.</b></p> <p>22 Q You're declining to answer whether this is</p> <p>23 a false report?</p> <p>24 MR. BAZAREK: Object -- object to the form</p>

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22 (85 to 88)

<p style="text-align: right;">85</p> <p>1 of the question.</p> <p>2 MR. PALLES: Asked and answered.</p> <p>3 <b>A Fifth Amendment.</b></p> <p>4 Q This said that reporting officer, on</p> <p>5 entering the lobby of a building in Ida B. Wells,</p> <p>6 saw Darron Carter -- saw Darron Byrd and Raynard</p> <p>7 Carter holding clear plastic bags with suspect</p> <p>8 narcotics.</p> <p>9 Do you see that?</p> <p>10 <b>A Fifth Amendment.</b></p> <p>11 Q That is a false statement?</p> <p>12 MR. BAZAREK: Object to the form of the</p> <p>13 question --</p> <p>14 <b>A Because I am --</b></p> <p>15 MR. BAZAREK: -- mischaracterizes the</p> <p>16 evidence in the record in this case.</p> <p>17 MR. MICHALIK: Join.</p> <p>18 <b>A (Continuing.) Because I am concerned that</b></p> <p>19 <b>the mere act of testifying to this subject matter,</b></p> <p>20 <b>this incident, may cause me to be criminally</b></p> <p>21 <b>indicted by the US Attorney's Office and/or the</b></p> <p>22 <b>Cook County State's Attorney's Office, on the</b></p> <p>23 <b>advice of counsel I am going to decline to answer</b></p> <p>24 <b>any questions about certain aspects of my conduct</b></p>	<p style="text-align: right;">87</p> <p>1 <b>United States Constitution.</b></p> <p>2 Q And, again, when you say "certain</p> <p>3 aspects," you're declining to answer specifically</p> <p>4 about this report?</p> <p>5 MR. PALLES: Objection; asked and</p> <p>6 answered.</p> <p>7 <b>A Take the Fifth.</b></p> <p>8 Q Every factual statement -- or every</p> <p>9 statement purporting to be a fact about Byrd and</p> <p>10 Carter in this report is false?</p> <p>11 MR. BAZAREK: Object to the form of the</p> <p>12 question, misstates the evidence in the record in</p> <p>13 this case.</p> <p>14 MR. MICHALIK: Join and foundation.</p> <p>15 <b>A Take the Fifth.</b></p> <p>16 Q Byrd and Carter were not seen selling</p> <p>17 drugs on April 11th, 2007?</p> <p>18 MR. BAZAREK: Object to the form of the</p> <p>19 question, misstates the evidence in the record in</p> <p>20 this case.</p> <p>21 MR. MICHALIK: Join and foundation.</p> <p>22 <b>A Take the Fifth.</b></p> <p>23 Q You didn't see Byrd or Carter selling</p> <p>24 drugs on April 11th, 2007?</p>
<p style="text-align: right;">86</p> <p>1 <b>as a Chicago police officer, based upon the rights</b></p> <p>2 <b>guaranteed to me by the Fifth Amendment of the</b></p> <p>3 <b>United States Constitution.</b></p> <p>4 Q And when you say you're declining to</p> <p>5 answer about certain aspects of your conduct,</p> <p>6 you're including answering whether this report is</p> <p>7 a false report?</p> <p>8 MR. BAZAREK: Object to the form of the</p> <p>9 question.</p> <p>10 <b>A Take the Fifth Amendment.</b></p> <p>11 Q All right.</p> <p>12 This says that reporting officers observed</p> <p>13 Darron Byrd and Raynard Carter give bags of</p> <p>14 narcotics to another offender.</p> <p>15 That's -- do you see that?</p> <p>16 <b>A Because I am concerned that the mere act</b></p> <p>17 <b>of testifying to this subject matter, this</b></p> <p>18 <b>incident, may cause me to be criminally indicted</b></p> <p>19 <b>by the US Attorney's Office and/or Cook County</b></p> <p>20 <b>State's Attorney's Office, on the advice of</b></p> <p>21 <b>counsel I am going to decline to answer any</b></p> <p>22 <b>questions about certain aspects of my conduct as a</b></p> <p>23 <b>Chicago police officer, based upon the rights</b></p> <p>24 <b>guaranteed to me by the Fifth Amendment of the</b></p>	<p style="text-align: right;">88</p> <p>1 <b>A Take the Fifth.</b></p> <p>2 Q Lamonica Lewis didn't see them selling</p> <p>3 drugs on April 11th, 2007?</p> <p>4 MR. BAZAREK: Object to -- object to the</p> <p>5 form of the question, calls for speculation,</p> <p>6 foundation, mischaracterizes the evidence in the</p> <p>7 record in this case.</p> <p>8 MR. MICHALIK: Join.</p> <p>9 MR. PALLES: Join.</p> <p>10 <b>A Take the Fifth.</b></p> <p>11 Q Was Lamonica Lewis your partner on</p> <p>12 April 11th, 2007?</p> <p>13 <b>A Yes.</b></p> <p>14 Q Were you with her during your shift on</p> <p>15 April 11, 2007?</p> <p>16 <b>A Yes.</b></p> <p>17 Q So is it fair to say that if you didn't</p> <p>18 see someone selling drugs, she didn't see them</p> <p>19 selling drugs, either?</p> <p>20 MR. BAZAREK: Object to the form of the</p> <p>21 question, calls for speculation, mischaracterizes</p> <p>22 the evidence in the record in this case.</p> <p>23 MR. PALLES: Join.</p> <p>24 MR. MICHALIK: Join.</p>



Transcript of Kallatt Mohammed  
Conducted on November 18, 2019

23 (89 to 92)

<p style="text-align: right;">89</p> <p>1 <b>A Because I am concerned that the mere act</b>  2 <b>of testifying to this subject matter, this</b>  3 <b>incident, may cause me to be criminally indicted</b>  4 <b>by the US Attorney's Office and/or the Cook County</b>  5 <b>State's Attorney's Office, on the advice of</b>  6 <b>counsel -- any questions about certain aspects of</b>  7 <b>my conduct as a Chicago police officer, based upon</b>  8 <b>the rights guaranteed to me by the Fifth Amendment</b>  9 <b>of the United States Constitution.</b>  10 Q Lamonica Lewis signed off on a false  11 report, this Exhibit 7?  12 MR. BAZAREK: Object to the form of the  13 question, misstates -- mis- -- and  14 mischaracterizes the evidence in this case.  15 MR. PALLES: Lack of foundation.  16 <b>A Take the Fifth.</b>  17 MR. MICHALIK: Join.  18 Q And Ronald Watts signed off on a false  19 report, this Exhibit 7?  20 MR. KOSOKO: Objection; form of the  21 question, calls for speculation, foundation.  22 <b>A Take the Fifth.</b>  23 MR. MICHALIK: Join.  24 Q Why is your name in Box No. 46 on this</p>	<p style="text-align: right;">91</p> <p>1 MR. SCHALKA: Objection --  2 MR. KOSOKO: Objection; form of the  3 question.  4 MR. SCHALKA: -- foundation.  5 <b>A Take the Fifth.</b>  6 MR. MICHALIK: Join.  7 (An off-the-record discussion was held.)  8 <b>A (Continuing.) Take the Fifth.</b>  9 Q When people denied knowing where drugs  10 were, Al Jones assaulted them?  11 MR. BAZAREK: Object to the form of the  12 question, mischaracterizes the evidence in the  13 record in this case.  14 MR. SCHALKA: And foundation.  15 MR. MICHALIK: Join.  16 <b>A Because I am concerned that the mere act</b>  17 <b>of testifying to this subject matter, this</b>  18 <b>incident, may cause me to be criminally indicted</b>  19 <b>by the United States Attorney's Office and/or the</b>  20 <b>Cook County State's Attorney's Office, on the</b>  21 <b>advice of counsel I am going to decline to answer</b>  22 <b>any questions about certain aspects of my conduct</b>  23 <b>as a Chicago police officer, based upon the rights</b>  24 <b>guaranteed to me by the Fifth Amendment of the</b></p>
<p style="text-align: right;">90</p> <p>1 report?  2 MR. PALLES: Objection; lack of  3 foundation.  4 <b>A Take the Fifth.</b>  5 Q Did you know Darron Byrd before April 11,  6 2007?  7 <b>A No.</b>  8 Q Did you know Raynard Carter before  9 April 11, 2007?  10 <b>A No.</b>  11 Q Raynard Carter and Darron Byrd were lined  12 up on a wall with other civilians April 11th,  13 2007?  14 <b>A Because I am concerned that the mere act</b>  15 <b>of testifying to this subject matter, this</b>  16 <b>incident, may cause me to be criminally indicted</b>  17 <b>by the US Attorney's Office and/or the Cook County</b>  18 <b>State's Attorney's Office, on the advice of</b>  19 <b>counsel -- any questions about certain aspects of</b>  20 <b>my conduct as a police officer, based upon the</b>  21 <b>rights guaranteed to me by the Fifth Amendment of</b>  22 <b>the United States Constitution.</b>  23 Q Watts asked everyone in the line where the  24 drugs were?</p>	<p style="text-align: right;">92</p> <p>1 <b>United States Constitution.</b>  2 Q On April 11, 2007, did Al Jones assault  3 civilians who denied having knowledge of drugs?  4 MR. BAZAREK: Object to the form of the  5 question.  6 <b>A Take the Fifth.</b>  7 Q Was Darron Byrd one of your neighbors?  8 <b>A No.</b>  9 Q Did you know him at all?  10 <b>A No.</b>  11 Q Have you ever seen him in the  12 neighborhood?  13 <b>A No.</b>  14 Q What neighborhood did you live in in 2007?  15 <b>A Avalon Park.</b>  16 Q Did you tell Darron Byrd on April 11,  17 2007, that he was only going to be charging with  18 trespassing?  19 <b>A Take the Fifth.</b>  20 Q Did you tell Darron Byrd and Raynard  21 Carter they could get out of being arrested on  22 April 11, 2007, if they gave Watts what he wanted?  23 MR. KOSOKO: Objection; form of the  24 question, foundation.</p>

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24 (93 to 96)

93	<p>1 <b>A Take -- take the Fifth.</b></p> <p>2 Q Do you remember being involved in</p> <p>3 arresting Raynard Carter on February 17th, 2006?</p> <p>4 <b>A I don't recall.</b></p> <p>5 MR. RAUSCHER: I'm going to mark this as</p> <p>6 Exhibit 8, which is City-BG-053369 through 73.</p> <p>7 (Mohammed Deposition Exhibit 8 marked for</p> <p>8 identification and attached to the transcript.)</p> <p>9 (An off-the-record discussion was held.)</p> <p>10 MR. BAZAREK: That's 8?</p> <p>11 MR. RAUSCHER: Yeah. The Bates Stamp got</p> <p>12 cut off a little bit.</p> <p>13 (An off-the-record discussion was held.)</p> <p>14 BY MR. RAUSCHER:</p> <p>15 Q Have you had a chance to look at this</p> <p>16 report?</p> <p>17 <b>A Yes.</b></p> <p>18 Q And do you see your name is listed as an</p> <p>19 assisting arresting officer on the last page?</p> <p>20 <b>A Yes.</b></p> <p>21 Q What does "PC0R964" next to your name on</p> <p>22 the last page stand for?</p> <p>23 <b>A It's a PC number.</b></p> <p>24 Q And what does that mean? What does it</p>	95	<p>1 Q All right. Well, is that what it says on</p> <p>2 the last page?</p> <p>3 <b>A That's what it says.</b></p> <p>4 Q And was Brian Bolton ever your partner?</p> <p>5 <b>A That day, yep.</b></p> <p>6 Q And you were involved in arresting Raynard</p> <p>7 Carter February 17th, 2006?</p> <p>8 <b>A Because I am concerned that the mere act</b></p> <p>9 <b>of testifying to this subject matter, this</b></p> <p>10 <b>incident, may cause me to be criminally indicted</b></p> <p>11 <b>by the US Attorney's Office and/or the Cook County</b></p> <p>12 <b>State's Attorney's Office, on the advice of</b></p> <p>13 <b>counsel I am going to decline to answer any</b></p> <p>14 <b>questions about certain aspects of my conduct as a</b></p> <p>15 <b>Chicago police officer, based upon the rights</b></p> <p>16 <b>guaranteed to me by the Fifth Amendment of the</b></p> <p>17 <b>United States Constitution.</b></p> <p>18 Q Is the narrative description in this</p> <p>19 report accurate?</p> <p>20 MR. MICHALIK: Object to form, foundation.</p> <p>21 MR. BAZAREK: Join.</p> <p>22 <b>A Take the Fifth.</b></p> <p>23 Q This is a false report?</p> <p>24 MR. BAZAREK: Object to the form of the</p>
94	<p>1 mean?</p> <p>2 <b>A How you log into the system.</b></p> <p>3 Q Could you log into the system from your</p> <p>4 house? Or do you have to be on-site?</p> <p>5 <b>A You had to be on-site.</b></p> <p>6 Q And so could -- for -- where a form calls</p> <p>7 for your electronic signature, like an inven- --</p> <p>8 inventory sheet we looked at earlier, did you have</p> <p>9 to be on-site to fill those out?</p> <p>10 <b>A Yes.</b></p> <p>11 Q How do you log -- how did you log into</p> <p>12 your computer? What did you have to do?</p> <p>13 <b>A Well, you have to go to work, be at work.</b></p> <p>14 Q And then --</p> <p>15 <b>A -- log in.</b></p> <p>16 Q Do you have a log-in number and a</p> <p>17 password?</p> <p>18 <b>A Yes.</b></p> <p>19 Q And how long -- was PC0R964 exclusively</p> <p>20 your computer?</p> <p>21 <b>A Yes.</b></p> <p>22 Q And then were you Beat 264B in</p> <p>23 February 2006?</p> <p>24 <b>A I don't recall.</b></p>	96	<p>1 question, mischaracterizes the evidence in the</p> <p>2 record in this case.</p> <p>3 MR. MICHALIK: Join, no foundation.</p> <p>4 MR. KOSOKO: Join.</p> <p>5 MR. PALLES: Join.</p> <p>6 <b>A Fifth Amendment.</b></p> <p>7 <b>BY MR. RAUSCHER:</b></p> <p>8 Q This report says that Raynard Carter was</p> <p>9 observed holding drugs and selling drugs but</p> <p>10 that's not true?</p> <p>11 MR. BAZAREK: Object to the form of the</p> <p>12 question, foundation, mischaracterizes the --</p> <p>13 the evidence in the record in this case.</p> <p>14 MR. MICHALIK: Join.</p> <p>15 MR. KOSOKO: Join.</p> <p>16 <b>A Fifth Amendment.</b></p> <p>17 Q Ronald Watts slapped Raynard Carter for no</p> <p>18 reason in February of 2006?</p> <p>19 MR. KOSOKO: Objection; form of the</p> <p>20 question, foundation.</p> <p>21 <b>A Fifth Amendment.</b></p> <p>22 Q When Raynard Carter was brought to the</p> <p>23 police station February 2006, you told him that he</p> <p>24 could get out of being arrested if he came up with</p>

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25 (97 to 100)

<p style="text-align: right;">97</p> <p>1 a gun?</p> <p>2 <b>A Fifth Amendment.</b></p> <p>3 Q And I should be more specific.</p> <p>4 When Raynard Carter was brought to the</p> <p>5 police station on February 17th, 2006, you told</p> <p>6 him he could avoid being arrested or charged if he</p> <p>7 came up with a gun for you?</p> <p>8 <b>A Fifth Amendment.</b></p> <p>9 Q And we already covered this when we talked</p> <p>10 about Darron Byrd, but you were also involved in</p> <p>11 framing Raynard Carter, April 11th, 2007?</p> <p>12 MR. BAZAREK: Object to the form of the</p> <p>13 question, foundation, mischaracterizes the</p> <p>14 evidence in the record in this case.</p> <p>15 MR. KOSOKO: Join.</p> <p>16 <b>A Because I am concerned that the mere act</b></p> <p>17 <b>of testifying to this subject matter, this</b></p> <p>18 <b>incident, may cause me to be criminally indicted</b></p> <p>19 <b>by the US Attorney's Office and/or Cook County</b></p> <p>20 <b>State's Attorney's Office, on the advice of</b></p> <p>21 <b>counsel I am going to decline to answer any</b></p> <p>22 <b>questions about certain aspects of my conduct as a</b></p> <p>23 <b>Chicago police officer, based upon the rights</b></p> <p>24 <b>guaranteed to me by the Fifth Amendment of the</b></p>	<p style="text-align: right;">99</p> <p>1 <b>A Yes.</b></p> <p>2 Q What do you remember about meeting Leonard</p> <p>3 Gipson?</p> <p>4 <b>A Don't recall.</b></p> <p>5 Q When you say you "heard of him," who told</p> <p>6 you about him?</p> <p>7 <b>A Residents.</b></p> <p>8 Q And how did you hear about him?</p> <p>9 <b>A That he was one of the dealers.</b></p> <p>10 Q And which residents told you he was one of</p> <p>11 the dealers?</p> <p>12 <b>A I don't recall.</b></p> <p>13 Q What specifically did they tell you?</p> <p>14 <b>A That he was selling narcotics.</b></p> <p>15 Q And did they tell you what kind of</p> <p>16 narcotics?</p> <p>17 <b>A No.</b></p> <p>18 Q And did they tell you when he was selling</p> <p>19 narcotics?</p> <p>20 <b>A No.</b></p> <p>21 Q And did they tell you how much</p> <p>22 narcotics -- how -- did they tell you how much</p> <p>23 narcotics he sold?</p> <p>24 <b>A No.</b></p>
<p style="text-align: right;">98</p> <p>1 <b>United States Constitution.</b></p> <p>2 Q When you were a police officer, did you</p> <p>3 have a belief as to whether it was legal or</p> <p>4 illegal to falsely claim that you arrested people</p> <p>5 for having drugs even though they did not have any</p> <p>6 drugs?</p> <p>7 <b>A Fifth Amendment.</b></p> <p>8 Q When you were a Chicago police officer,</p> <p>9 did you have a belief as to whether it was illegal</p> <p>10 to steal money from civilians?</p> <p>11 <b>A Fifth Amendment.</b></p> <p>12 Q When you were a Chicago police officer,</p> <p>13 did you have an understanding that it was illegal</p> <p>14 to plant drugs on civilians?</p> <p>15 <b>A Fifth Amendment.</b></p> <p>16 Q When did you first start framing people?</p> <p>17 <b>A Fifth Amendment.</b></p> <p>18 MR. MICHALIK: I'd ask you to read that</p> <p>19 question back. I didn't catch that.</p> <p>20 MR. RAUSCHER: I said, "When did you first</p> <p>21 start framing people?" and he took the Fifth.</p> <p>22 Q Do you know who Leonard Gipson is?</p> <p>23 <b>A I heard of him.</b></p> <p>24 Q Did you ever meet him?</p>	<p style="text-align: right;">100</p> <p>1 Q Would you agree that as a police officer</p> <p>2 it's not appropriate to frame people for drugs</p> <p>3 even if you think they're drug dealers?</p> <p>4 <b>A Fifth Amendment.</b></p> <p>5 Q Would you agree that as a police officer</p> <p>6 it's not appropriate to steal money from people</p> <p>7 even if you think it's drug money?</p> <p>8 <b>A Because I am concerned that the mere act</b></p> <p>9 <b>of testifying to this subject matter, this</b></p> <p>10 <b>incident, may cause me to be criminally indicted</b></p> <p>11 <b>by the US Attorney's Office and/or the Cook County</b></p> <p>12 <b>State's Attorney's Office, on advice of counsel</b></p> <p>13 <b>I am going to decline to answer any questions</b></p> <p>14 <b>about certain aspects of my conduct as a Chicago</b></p> <p>15 <b>police officer, based upon the rights guaranteed</b></p> <p>16 <b>to me by the Fifth Amendment of the United States</b></p> <p>17 <b>Constitution.</b></p> <p>18 MR. RAUSCHER: I'm going to mark the next</p> <p>19 exhibit. I think it's 9.</p> <p>20 The Bates Stamp got cut off when printing,</p> <p>21 but it's DO-Joint 005371 to 72.</p> <p>22 (Mohammed Deposition Exhibit 9 marked for</p> <p>23 identification and attached to the transcript.)</p> <p>24 (An off-the-record discussion was held.)</p>

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Transcript of Kallatt Mohammed  
Conducted on November 18, 2019

26 (101 to 104)

101	<p>1 Q This is a report documenting the arrest of</p> <p>2 Leonard Gipson on January 4th, 2003?</p> <p>3 <b>A Yes.</b></p> <p>4 Q The substantive narrative in this report</p> <p>5 is false?</p> <p>6 MR. BAZAREK: Object to the form of the</p> <p>7 question and foundation. It also mischaracterizes</p> <p>8 the evidence in the record in this case.</p> <p>9 MR. SCHALKA: Join.</p> <p>10 MR. MICHALIK: Join.</p> <p>11 MR. PALLES: I'll join.</p> <p>12 MR. KOSOKO: Join.</p> <p>13 <b>A Fifth Amendment.</b></p> <p>14 Q Leonard Gipson was not observed reaching</p> <p>15 into his -- his pants to take out a clear plastic</p> <p>16 bag of drugs?</p> <p>17 MR. BAZAREK: Object to the form of the</p> <p>18 question, foundation, mischaracterizes the</p> <p>19 evidence in the record in this case.</p> <p>20 MR. KOSOKO: Join.</p> <p>21 MR. SCHALKA: Join.</p> <p>22 MR. MICHALIK: Join.</p> <p>23 MR. PALLES: Join.</p> <p>24 <b>A Fifth Amendment.</b></p>	103	<p>1 question and foundation, mischaracterizes the</p> <p>2 evidence in the record in this case.</p> <p>3 MR. MICHALIK: Join.</p> <p>4 MR. PALLES: Join.</p> <p>5 <b>A Fifth Amendment.</b></p> <p>6 Q Is anything in the narrative description</p> <p>7 in this report accurate?</p> <p>8 MR. BAZAREK: Object to the form of the</p> <p>9 question.</p> <p>10 MR. MICHALIK: And foundation.</p> <p>11 MR. KOSOKO: Join.</p> <p>12 <b>A Fifth Amendment.</b></p> <p>13 Q You observed Leonard Gipson get arrested</p> <p>14 on January 4th, 2003?</p> <p>15 <b>A Fifth Amendment.</b></p> <p>16 Q And you observed Watts plant drugs on</p> <p>17 Leonard Gipson January 4th, 2003?</p> <p>18 MR. KOSOKO: Objection to the form of the</p> <p>19 question.</p> <p>20 <b>A Fifth Amendment.</b></p> <p>21 Q Did you observe Ronald Watts plant drugs</p> <p>22 on Leonard Gipson January 4th, 2003?</p> <p>23 MR. KOSOKO: Objection to the form of the</p> <p>24 question.</p>
102	<p>1 Q Sergeant Watts planted drugs on Leonard</p> <p>2 Gipson on January 4th, 2003, and you saw it</p> <p>3 happen?</p> <p>4 MR. KOSOKO: Objection to the form of the</p> <p>5 question, argumentative, foundation.</p> <p>6 MR. MICHALIK: Join.</p> <p>7 MR. BAZAREK: Join.</p> <p>8 MR. PALLES: Join.</p> <p>9 MR. SCHALKA: Join.</p> <p>10 <b>A Fifth Amendment.</b></p> <p>11 Q You knew on January 4th, 2003, that</p> <p>12 Leonard Gipson was being framed when he was</p> <p>13 arrested?</p> <p>14 MR. BAZAREK: Object to the form of the</p> <p>15 question, foundation, mischaracterizes the</p> <p>16 evidence in the record in this case.</p> <p>17 MR. SCHALKA: Join.</p> <p>18 MR. MICHALIK: Join.</p> <p>19 MR. KOSOKO: Join.</p> <p>20 MR. PALLES: Join.</p> <p>21 <b>A Fifth Amendment.</b></p> <p>22 Q You know, sitting here today, that Leonard</p> <p>23 Gipson was framed on January 4th, 2003?</p> <p>24 MR. BAZAREK: Object to the form of the</p>	104	<p>1 <b>A Fifth Amendment.</b></p> <p>2 Q Leonard Gipson was framed multiple times?</p> <p>3 MR. BAZAREK: Object to the form of the</p> <p>4 question, foundation, mischaracterizes the</p> <p>5 evidence in the record in this case.</p> <p>6 MR. SCHALKA: Join.</p> <p>7 MR. MICHALIK: Join.</p> <p>8 MR. KOSOKO: Join.</p> <p>9 <b>A Fifth Amendment.</b></p> <p>10 Q Well, was Leonard Gipson framed multiple</p> <p>11 times?</p> <p>12 <b>A Fifth Amendment.</b></p> <p>13 Q Was Leonard Gipson framed on May 8th,</p> <p>14 2003?</p> <p>15 <b>A Fifth Amendment.</b></p> <p>16 MR. RAUSCHER: We're going to mark</p> <p>17 Exhibit 10, which is City-BG-31563, a single page.</p> <p>18 (Mohammed Deposition Exhibit 10 marked for</p> <p>19 identification and attached to the transcript.)</p> <p>20 (An off-the-record discussion was held.)</p> <p>21 Q This is a report documenting the arrest of</p> <p>22 Leonard Gipson on May 8th, 2003?</p> <p>23 <b>A Yes.</b></p> <p>24 Q And you are listed as one of the assisting</p>

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27 (105 to 108)

105	<p>1 arresting officers?</p> <p>2 <b>A Yes.</b></p> <p>3 Q Did you assist in the arrest of Leonard</p> <p>4 Gipson on May 8th, 2003?</p> <p>5 <b>A Fifth Amendment.</b></p> <p>6 Q Is this report -- does this report</p> <p>7 accurately reflect Leonard Gipson -- Leonard</p> <p>8 Gipson's actions on May 8th, 2003?</p> <p>9 <b>A Fifth --</b></p> <p>10 MR. MICHALIK: Object to foundation.</p> <p>11 <b>A (Continuing.) Fifth Amendment.</b></p> <p>12 Q The narrative report -- the narrative</p> <p>13 description in this report is false?</p> <p>14 MR. BAZAREK: Object to the form of the</p> <p>15 question, foundation, and mischaracterizes the</p> <p>16 evidence in the record in this case.</p> <p>17 MR. SCHALKA: Join.</p> <p>18 MR. MICHALIK: Join.</p> <p>19 MR. KOSOKO: Join.</p> <p>20 MR. PALLES: Join.</p> <p>21 <b>A Fifth Amendment.</b></p> <p>22 Q Leonard Gipson was not observed trying to</p> <p>23 throw a backpack of drugs out of a window?</p> <p>24 MR. BAZAREK: Object to the form of the</p>	107	<p>1 MR. SCHALKA: Join.</p> <p>2 MR. KOSOKO: Join.</p> <p>3 <b>A Fifth Amendment.</b></p> <p>4 Q Leonard Gipson had no drugs or no illegal</p> <p>5 substances whatsoever when you encountered him on</p> <p>6 May 8th, 2003?</p> <p>7 MR. BAZAREK: Object to the form of the</p> <p>8 question, foundation, mischaracterizes the</p> <p>9 evidence in the record in this case.</p> <p>10 MR. MICHALIK: Join.</p> <p>11 MR. SCHALKA: Join.</p> <p>12 MR. KOSOKO: Join.</p> <p>13 <b>A Fifth Amendment.</b></p> <p>14 Q The report stating that Leonard Gipson was</p> <p>15 seen with illegal drugs on May 8th, 2003, by</p> <p>16 Chicago Police Department officers is false?</p> <p>17 MR. BAZAREK: Object to the form of the</p> <p>18 question, foundation, mischaracterizes the</p> <p>19 evidence in the record in this case.</p> <p>20 MR. MICHALIK: Join.</p> <p>21 MR. SCHALKA: Join.</p> <p>22 MR. KOSOKO: Join.</p> <p>23 <b>A Fifth Amendment.</b></p> <p>24 Q Did you testify in connection with a</p>
106	<p>1 question, foundation, mischaracterizes the</p> <p>2 evidence in the record in this case.</p> <p>3 MR. SCHALKA: Join.</p> <p>4 MR. MICHALIK: Join.</p> <p>5 MR. KOSOKO: Join.</p> <p>6 MR. PALLES: Join.</p> <p>7 <b>A Fifth Amendment.</b></p> <p>8 Q Leonard Gipson was approached outside of</p> <p>9 apartments by you and other officers on May 8th,</p> <p>10 2003?</p> <p>11 MR. BAZAREK: Object to the form of the</p> <p>12 question and foundation.</p> <p>13 MR. SCHALKA: Join.</p> <p>14 MR. KOSOKO: Join.</p> <p>15 MR. MICHALIK: Join.</p> <p>16 <b>A Fifth Amendment.</b></p> <p>17 Q And it is false when the report says that</p> <p>18 inside of a backpack that Leonard Gipson had tried</p> <p>19 to get rid of was a large plastic bag with white</p> <p>20 powder, suspect heroin; correct?</p> <p>21 MR. BAZAREK: Object -- object to the form</p> <p>22 of the question, foundation, mischaracterizes the</p> <p>23 evidence in the record in this case.</p> <p>24 MR. MICHALIK: Join.</p>	108	<p>1 hearing regarding the May 8th, 2003, arrest of</p> <p>2 Leonard Gipson?</p> <p>3 <b>A I don't recall.</b></p> <p>4 Q Leonard Gipson was also framed in 2007?</p> <p>5 MR. BAZAREK: Object to the form of the</p> <p>6 question, foundation, mischaracterizes the</p> <p>7 evidence in the record in this case.</p> <p>8 MR. MICHALIK: Join.</p> <p>9 MR. SCHALKA: Join.</p> <p>10 MR. KOSOKO: Join.</p> <p>11 MR. PALLES: Join.</p> <p>12 <b>A Because I am concerned that the mere act</b></p> <p>13 <b>of testifying to this subject matter, this</b></p> <p>14 <b>incident, may cause me to be criminally indicted</b></p> <p>15 <b>by the US Attorney's Office and/or the Cook County</b></p> <p>16 <b>State's Attorney's Office, on the advice of</b></p> <p>17 <b>counsel -- any questions about certain aspects of</b></p> <p>18 <b>my conduct as a Chicago police officer, based upon</b></p> <p>19 <b>the rights guaranteed to me by the Fifth Amendment</b></p> <p>20 <b>of the United States Constitution.</b></p> <p>21 Q And because of the fear of prosecution,</p> <p>22 you're refusing to answer whether Leonard Gipson</p> <p>23 was framed in 2007?</p> <p>24 MR. PALLES: Objection; attorney-client/</p>



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28 (109 to 112)

<p>109</p> <p>1 work product.</p> <p>2 Instruct him not to answer.</p> <p>3 Q Are you going to follow your attorney's</p> <p>4 advice?</p> <p>5 <b>A Yes.</b></p> <p>6 Q Are you going to refuse to answer whether</p> <p>7 Leonard Gipson was framed on August 28th, 2007?</p> <p>8 <b>A Fifth Amendment.</b></p> <p>9 (An off-the-record discussion was held.)</p> <p>10 Q Do you know who Allen Jackson is?</p> <p>11 <b>A Heard of him.</b></p> <p>12 Q How did you hear of Allen Jackson?</p> <p>13 <b>A Residents.</b></p> <p>14 Q What did residents tell you about Allen</p> <p>15 Jackson?</p> <p>16 <b>A That he was selling narcotics.</b></p> <p>17 Q And which residents told you that Allen</p> <p>18 Jackson was selling narcotics?</p> <p>19 <b>A I don't recall.</b></p> <p>20 Q Do you recall when you learned that Allen</p> <p>21 Jackson -- when you were told that Allen Jackson</p> <p>22 was selling narcotics?</p> <p>23 <b>A No, I don't.</b></p> <p>24 Q Do you recall being told what kind of</p>	<p>111</p> <p>1 (Mohammed Deposition Exhibit 11 marked for</p> <p>2 identification and attached to the transcript.)</p> <p>3 Q Have you had a chance to look that report</p> <p>4 over?</p> <p>5 <b>A Yes.</b></p> <p>6 Q Did you know someone by the nickname of</p> <p>7 Shock while you were a police officer?</p> <p>8 <b>A Yes.</b></p> <p>9 Q Who is Shock?</p> <p>10 <b>A He was a resident.</b></p> <p>11 Q And beyond being a resident, who was he</p> <p>12 to you?</p> <p>13 <b>A Nobody but a resident.</b></p> <p>14 Q Did he have a -- do you know his name?</p> <p>15 <b>A No.</b></p> <p>16 Q Do you know whether Shock was involved in</p> <p>17 the drug trade?</p> <p>18 <b>A No.</b></p> <p>19 Q Did you ever hear that Shock was involved</p> <p>20 in the drug trade?</p> <p>21 <b>A No.</b></p> <p>22 Q Did Shock ever give money to you or Watts?</p> <p>23 <b>A No.</b></p> <p>24 Q Did you or Watts ever take money from</p>
<p>110</p> <p>1 narcotics Allen Jackson was selling?</p> <p>2 <b>A No.</b></p> <p>3 Q Would you agree that you shouldn't have</p> <p>4 framed Allen Jackson even if you believed he was</p> <p>5 selling narcotics?</p> <p>6 MR. MICHALIK: Objection --</p> <p>7 MR. KOSOKO: Objection --</p> <p>8 MR. BAZAREK: Object to the form of the</p> <p>9 question, foundation, mischaracterizes the</p> <p>10 evidence in the record in this case.</p> <p>11 MR. KOSOKO: We join.</p> <p>12 <b>A Take the Fifth Amendment.</b></p> <p>13 Q Is there something funny about the way I'm</p> <p>14 asking that question?</p> <p>15 <b>A No.</b></p> <p>16 <b>Why would you ask that?</b></p> <p>17 Q I'm sorry? What?</p> <p>18 <b>A Why would you ask that?</b></p> <p>19 Q It looked like you were smiling.</p> <p>20 <b>A No.</b></p> <p>21 MR. RAUSCHER: I'm going to mark this --</p> <p>22 are we at 11? -- Exhibit 11, PL Joint 026488</p> <p>23 through 92 -- through 26492.</p> <p>24 ///</p>	<p>112</p> <p>1 Shock?</p> <p>2 <b>A The Fifth.</b></p> <p>3 (An off-the-record discussion was held.)</p> <p>4 Q But he never -- Shock never paid you or</p> <p>5 Watts?</p> <p>6 <b>A The Fifth.</b></p> <p>7 Q Do you see your name is listed as one of</p> <p>8 the assisting arresting officers on this report?</p> <p>9 <b>A Yes.</b></p> <p>10 Q And this is a report documenting the</p> <p>11 arrest of Allen Jackson from January 16, 2006?</p> <p>12 <b>A Yes.</b></p> <p>13 Q This references -- the narrative</p> <p>14 references a narcotics investigation.</p> <p>15 Do you see that?</p> <p>16 <b>A Yes.</b></p> <p>17 Q And what narcotics investigation was being</p> <p>18 conducted January 14, 2006?</p> <p>19 I'm sorry -- January 16, 2006.</p> <p>20 <b>A Take the Fifth.</b></p> <p>21 Q The report says that Jackson was observed</p> <p>22 holding a clear plastic bag with suspect</p> <p>23 narcotics.</p> <p>24 Do you see that?</p>

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29 (113 to 116)

<p style="text-align: right;">113</p> <p><b>1 A Take the Fifth.</b></p> <p><b>2 Q</b> Was that accurate, to say in the report</p> <p><b>3</b> that Jackson was observed holding a clear plastic</p> <p><b>4</b> bag with suspect narcotics?</p> <p><b>5 A Fifth Amendment.</b></p> <p><b>6</b> MR. MICHALIK: Object to the form and</p> <p><b>7</b> foundation of the question.</p> <p><b>8 Q</b> In fact, the report was false? Jackson</p> <p><b>9</b> was not observed holding a bag of suspect</p> <p><b>10</b> narcotics?</p> <p><b>11</b> MR. BAZAREK: Object to the form of the</p> <p><b>12</b> question, foundation, mischaracterizes the</p> <p><b>13</b> evidence in the record in this case.</p> <p><b>14</b> MR. MICHALIK: Join.</p> <p><b>15</b> MR. KOSOKO: Join.</p> <p><b>16 A Fifth Amendment.</b></p> <p><b>17 Q</b> All right. Jackson was falsely arrested</p> <p><b>18</b> January 16, 2006?</p> <p><b>19</b> MR. BAZAREK: Object to the form of the</p> <p><b>20</b> question, foundation, mischaracterizes the</p> <p><b>21</b> evidence in the record in this case.</p> <p><b>22</b> MR. MICHALIK: Join.</p> <p><b>23</b> MR. SCHALKA: Join.</p> <p><b>24</b> MR. KOSOKO: Join.</p>	<p style="text-align: right;">115</p> <p><b>1</b> MR. KOSOKO: -- form of the question.</p> <p><b>2 Q</b> Watts told Jackson that Shock had paid for</p> <p><b>3</b> him to be arrested?</p> <p><b>4</b> MR. KOSOKO: Objection to the form of the</p> <p><b>5</b> question, foundation.</p> <p><b>6 A Fifth Amendment.</b></p> <p><b>7 Q</b> Did you get any of the money that Shock</p> <p><b>8</b> paid to Watts?</p> <p><b>9</b> MR. KOSOKO: Objection to the form of the</p> <p><b>10</b> question.</p> <p><b>11 A Fifth Amendment.</b></p> <p><b>12 Q</b> Is it true that Shock paid Watts?</p> <p><b>13</b> MR. KOSOKO: Objection to the form of the</p> <p><b>14</b> question.</p> <p><b>15 A Fifth Amendment.</b></p> <p><b>16 Q</b> And more specifically, is it true that</p> <p><b>17</b> Shock paid Watts to have Jackson -- Allen Jackson</p> <p><b>18</b> arrested?</p> <p><b>19</b> MR. KOSOKO: Objection to the form of the</p> <p><b>20</b> question.</p> <p><b>21 A Fifth Amendment.</b></p> <p><b>22 Q</b> Would you agree that it is illegal to take</p> <p><b>23</b> money from a civilian in exchange for an agreement</p> <p><b>24</b> to arrest a different civilian?</p>
<p style="text-align: right;">114</p> <p><b>1 A Fifth Amendment.</b></p> <p><b>2 Q</b> Jackson was arrested without cause on</p> <p><b>3</b> January 16th, 2006?</p> <p><b>4</b> MR. BAZAREK: Object to the form of the</p> <p><b>5</b> question, foundation, mischaracterizes the record</p> <p><b>6</b> and the evidence.</p> <p><b>7</b> MR. MICHALIK: Join.</p> <p><b>8</b> MR. SCHALKA: Join.</p> <p><b>9</b> MR. KOSOKO: Join.</p> <p><b>10 A Fifth Amendment.</b></p> <p><b>11</b> (Mr. Tepfer returned to the proceedings.)</p> <p><b>12 Q</b> You told Jackson that his false arrest was</p> <p><b>13</b> just straight business?</p> <p><b>14</b> MR. BAZAREK: Object to the form of the</p> <p><b>15</b> question.</p> <p><b>16 A Fifth Amendment.</b></p> <p><b>17 Q</b> You told Jackson that Shock had told you</p> <p><b>18</b> and Watts that he needed the real estate where</p> <p><b>19</b> Jackson was arrested?</p> <p><b>20 A Fifth Amendment.</b></p> <p><b>21 Q</b> Watts was with you when you had that</p> <p><b>22</b> conversation with Jackson?</p> <p><b>23</b> MR. KOSOKO: Objection --</p> <p><b>24 A Fifth Amendment.</b></p>	<p style="text-align: right;">116</p> <p><b>1 A Fifth Amendment.</b></p> <p><b>2 Q</b> Do you have any remorse for framing Allen</p> <p><b>3</b> Jackson?</p> <p><b>4</b> MR. MICHALIK: Object to the form of the</p> <p><b>5</b> question.</p> <p><b>6 A Fifth Amendment.</b></p> <p><b>7 Q</b> Do you have any remorse for framing any of</p> <p><b>8</b> the people you framed?</p> <p><b>9</b> MR. BAZAREK: Objection.</p> <p><b>10</b> MR. MICHALIK: Yeah.</p> <p><b>11</b> MR. BAZAREK: Objection to the form of the</p> <p><b>12</b> question --</p> <p><b>13 A Fifth Amendment.</b></p> <p><b>14</b> MR. BAZAREK: -- foundation,</p> <p><b>15</b> mischaracterizes the evidence in the record in</p> <p><b>16</b> this case.</p> <p><b>17</b> MR. RAVITZ: It's been asked and answered,</p> <p><b>18</b> too.</p> <p><b>19</b> MR. MICHALIK: Join.</p> <p><b>20</b> MR. SCHALKA: Join.</p> <p><b>21</b> MR. KOSOKO: Join.</p> <p><b>22</b> MR. FLAXMAN: Was there an answer to that</p> <p><b>23</b> question?</p> <p><b>24</b> ///</p>

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30 (117 to 120)

117	<p>1 BY MR. RAUSCHER:</p> <p>2 Q You took the Fifth; right?</p> <p>3 <b>A Yes, that's correct.</b></p> <p>4 Q Thank you.</p> <p>5 Do you have any remorse for committing the</p> <p>6 crime that you were federally prosecuted for?</p> <p>7 <b>A Fifth Amendment.</b></p> <p>8 Q Do you know who Shaun James is?</p> <p>9 <b>A Don't recall.</b></p> <p>10 Q Do you know whether Shaun James was framed</p> <p>11 on April 3rd, 2004?</p> <p>12 MR. MICHALIK: Object to foundation.</p> <p>13 <b>A Fifth Amendment.</b></p> <p>14 Q Do you know who Taurus Smith is?</p> <p>15 <b>A Don't recall.</b></p> <p>16 (Mr. Tepfer left the proceedings.)</p> <p>17 Q Do you know if Taurus Smith was framed on</p> <p>18 April 3rd, 2004?</p> <p>19 MR. BAZAREK: Object to the form of the</p> <p>20 question, foundation.</p> <p>21 MR. MICHALIK: Join.</p> <p>22 MR. KOSOKO: Join.</p> <p>23 MR. PALLES: Let -- let me ask -- if you</p> <p>24 don't mind -- we're not named in the Taurus Smith</p>	119	<p>1 <b>A Yes.</b></p> <p>2 Q Is anything in the substantive narrative</p> <p>3 description true?</p> <p>4 MR. BAZAREK: Object to the form of the</p> <p>5 question, foundation.</p> <p>6 MR. MICHALIK: Join.</p> <p>7 MR. KOSOKO: Join.</p> <p>8 <b>A Because I am concerned that the mere act</b></p> <p>9 <b>of testifying to this subject matter, this</b></p> <p>10 <b>incident, may cause me to be criminally indicted</b></p> <p>11 <b>by the US Attorney's Office and/or the Cook County</b></p> <p>12 <b>State's Attorney's Office, on the advice of</b></p> <p>13 <b>counsel I am going to decline to answer any</b></p> <p>14 <b>questions about certain aspects of my conduct as a</b></p> <p>15 <b>Chicago police officer, based upon the rights</b></p> <p>16 <b>guaranteed to me by the Fifth Amendment of the</b></p> <p>17 <b>United States Constitution.</b></p> <p>18 Q And you're going to refuse to answer</p> <p>19 whether the substantive narrative in this report</p> <p>20 is true?</p> <p>21 <b>A On the advice of counsel.</b></p> <p>22 Q I -- two of the people arrested as listed</p> <p>23 in this vice case report are Shaun James and</p> <p>24 Taurus Smith?</p>
118	<p>1 case. Is there some --</p> <p>2 MR. RAUSCHER: So he's on --</p> <p>3 MR. PALLES: Codefendant?</p> <p>4 MR. RAUSCHER: He's on -- yeah. Shaun</p> <p>5 James and Smith were arrested --</p> <p>6 MR. PALLES: Okay. All right.</p> <p>7 MR. RAUSCHER: -- together. He's on</p> <p>8 the -- Smith -- he's on the reports.</p> <p>9 MR. PALLES: Okay. Thank you.</p> <p>10 MR. RAUSCHER: All right. We're going to</p> <p>11 mark Exhibit 12, which is City-BG-052330 through 31.</p> <p>12 (Mohammed Deposition Exhibit 12 marked for</p> <p>13 identification and attached to the transcript.)</p> <p>14 (An off-the-record discussion was held.)</p> <p>15 MR. RAUSCHER: 12. Sorry. 12.</p> <p>16 BY MR. RAUSCHER:</p> <p>17 Q Have you had a chance to look this report</p> <p>18 over?</p> <p>19 <b>A Yes.</b></p> <p>20 Q And you were listed as having witnessed</p> <p>21 the events described?</p> <p>22 <b>A Yes.</b></p> <p>23 Q This is a report of, it looks like, about</p> <p>24 10 people being arrested.</p>	120	<p>1 <b>A Yes.</b></p> <p>2 Q And this is documenting an arrest that</p> <p>3 happened April 3rd, 2004?</p> <p>4 <b>A Yes.</b></p> <p>5 Q Do you know what unit you were in on</p> <p>6 April 3rd, 2004?</p> <p>7 <b>A Unit 715.</b></p> <p>8 Q Is that different than 4512A, B, C, or D?</p> <p>9 <b>A No.</b></p> <p>10 Q It is not different?</p> <p>11 <b>A I don't think so, no.</b></p> <p>12 Q Were you in Units 4512A, B, C, or D on</p> <p>13 April 3rd, 2004?</p> <p>14 <b>A I don't recall.</b></p> <p>15 Q What's Unit 715?</p> <p>16 <b>A It's public housing.</b></p> <p>17 MR. RAUSCHER: I'm going to mark</p> <p>18 Exhibit 13, which is City-BG-031622.</p> <p>19 (Mohammed Deposition Exhibit 13 marked for</p> <p>20 identification and attached to the transcript.)</p> <p>21 (An off-the-record discussion was held.)</p> <p>22 Q Do you recognize any of the signatures on</p> <p>23 this report?</p> <p>24 <b>A No.</b></p>



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31 (121 to 124)

121	<p>1 Q Do you know what Al Jones' signature looks</p> <p>2 like?</p> <p>3 A No.</p> <p>4 Q Do you know who Star 743 was?</p> <p>5 A No.</p> <p>6 Q This report is another report documenting</p> <p>7 the same arrest that we just looked at that you're</p> <p>8 listed as a witness to for Shaun James; is that</p> <p>9 correct?</p> <p>10 A Yes.</p> <p>11 Q This report says that Shaun James was</p> <p>12 observed on the third floor of a -- 574 East</p> <p>13 36th Street during a narcotics investigation and</p> <p>14 he was holding a clear plastic bag with suspect</p> <p>15 narcotics.</p> <p>16 Do you see that?</p> <p>17 A Yes.</p> <p>18 Q Is that true?</p> <p>19 A Take the Fifth.</p> <p>20 Q That is not true, is it?</p> <p>21 A Take the Fifth.</p> <p>22 MR. BAZAREK: Object to the form of the</p> <p>23 question, foundation.</p> <p>24 MR. MICHALIK: Join.</p>	123	<p>1 Q Watts decided that Shaun James and Taurus</p> <p>2 Smith should be arrested without cause on</p> <p>3 April 3rd, 2004?</p> <p>4 MR. KOSOKO: Object to the form of the</p> <p>5 question, foundation, argumentative.</p> <p>6 MR. MICHALIK: Join.</p> <p>7 MR. BAZAREK: Join.</p> <p>8 A Fifth Amendment.</p> <p>9 Q You had the chance to intervene to stop a</p> <p>10 wrongful arrest that day?</p> <p>11 MR. KOSOKO: Object to the form of the</p> <p>12 question.</p> <p>13 A Fifth Amendment.</p> <p>14 Q You declined to stop the wrongful arrests</p> <p>15 of Taurus Smith and Shaun James on April 3rd,</p> <p>16 2004?</p> <p>17 A Fifth Amendment.</p> <p>18 Q Do you know who Taurus Smith is?</p> <p>19 A No.</p> <p>20 Q Did you ever harass Taurus Smith?</p> <p>21 A Fifth Amendment.</p> <p>22 Q Did you ever see other officers harass</p> <p>23 Taurus Smith?</p> <p>24 A Fifth Amendment.</p>
122	<p>1 MR. SCHALKA: Join.</p> <p>2 MR. KOSOKO: Join.</p> <p>3 Q Shaun James was not observed with</p> <p>4 narcotics by the police on April 3rd, 2004?</p> <p>5 MR. BAZAREK: Object to the form of the</p> <p>6 question, foundation, mischaracterizes the</p> <p>7 evidence in the record in this case.</p> <p>8 MR. MICHALIK: Join.</p> <p>9 MR. SCHALKA: Join.</p> <p>10 MR. KOSOKO: Join.</p> <p>11 A Fifth Amendment.</p> <p>12 Q Watts and one or more other officers</p> <p>13 demanded money from Shaun James on April 3rd,</p> <p>14 2004, to avoid arrest?</p> <p>15 MR. BAZAREK: Object to the form of the</p> <p>16 question, foundation.</p> <p>17 MR. MICHALIK: Join.</p> <p>18 MR. KOSOKO: Join.</p> <p>19 MR. BAZAREK: And further mischaracterizes</p> <p>20 the record and the evidence in this case.</p> <p>21 MR. MICHALIK: Join.</p> <p>22 MR. SCHALKA: Join.</p> <p>23 MR. KOSOKO: Join.</p> <p>24 A Fifth Amendment.</p>	124	<p>1 Q Would you agree it's not appropriate for</p> <p>2 police officers to harass civilians?</p> <p>3 MR. MICHALIK: Object to the form, vague.</p> <p>4 A Fifth Amendment.</p> <p>5 Q Did you understand the question?</p> <p>6 A Yes.</p> <p>7 Q Do you know who Andre McNairy is?</p> <p>8 A No.</p> <p>9 Q Did you participate in framing Andre</p> <p>10 McNairy?</p> <p>11 A Fifth --</p> <p>12 MR. MICHALIK: Object to the form,</p> <p>13 foundation.</p> <p>14 MR. BAZAREK: Join.</p> <p>15 MR. SCHALKA: Join.</p> <p>16 MR. KOSOKO: Join.</p> <p>17 A Fifth Amendment.</p> <p>18 MR. RAUSCHER: All right. The next</p> <p>19 exhibit's going to be DO-Joint 005795 through 99.</p> <p>20 (Mohammed Deposition Exhibit 14 marked for</p> <p>21 identification and attached to the transcript.)</p> <p>22 Q Have you had a chance to review</p> <p>23 Exhibit 14?</p> <p>24 A Yes.</p>

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32 (125 to 128)

<p>125</p> <p>1 Q Do you see it's a report documenting the</p> <p>2 arrest of Andre McNairy on September 15, 2008?</p> <p>3 A Yes.</p> <p>4 Q And you are listed as one of the assisting</p> <p>5 arresting officers?</p> <p>6 A Yes.</p> <p>7 Q Take a look at the second -- well, third</p> <p>8 page. It's DO-Joint 5797. And there's a row for</p> <p>9 "Attesting Officer."</p> <p>10 Do you see that?</p> <p>11 A Yes.</p> <p>12 Q And I'd asked you earlier if you knew what</p> <p>13 an attesting officer was, and I think you asked to</p> <p>14 see a document.</p> <p>15 A Yes.</p> <p>16 Q Does looking at this document refresh your</p> <p>17 recollection as to the role of the attesting</p> <p>18 officer?</p> <p>19 A No.</p> <p>20 Q Having looked at this report, do you have</p> <p>21 any understanding of what the role of the</p> <p>22 attesting officer is?</p> <p>23 A Don't recall.</p> <p>24 Q What are the Washington Park homes?</p>	<p>127</p> <p>1 containing a white powder substance, suspect</p> <p>2 heroin.</p> <p>3 Is that true?</p> <p>4 A Fifth Amendment.</p> <p>5 Q You talked to McNairy the day he was</p> <p>6 arrested?</p> <p>7 A Fifth Amendment.</p> <p>8 Q And you -- you actually told Watts he</p> <p>9 didn't have any drugs on him?</p> <p>10 MR. KOSOKO: Objection to the form of the</p> <p>11 question, argumentative.</p> <p>12 A Fifth Amendment.</p> <p>13 Q Did you tell Watts on September 15th,</p> <p>14 2008, that Andre McNairy did not have any drugs</p> <p>15 on him?</p> <p>16 A Fifth Amendment.</p> <p>17 Q Did you search Andre McNairy September 15th,</p> <p>18 2008?</p> <p>19 A Fifth Amendment.</p> <p>20 Q Did you take any steps to ensure that</p> <p>21 Andre McNairy wasn't wrongfully arrested on</p> <p>22 September 15th, 2008?</p> <p>23 MR. BAZAREK: Object to the form of the</p> <p>24 question, foundation, mischaracterizes the</p>
<p>126</p> <p>1 A I don't remember.</p> <p>2 Q Was that a different location than</p> <p>3 Ida B. Wells?</p> <p>4 A Might be. I don't --</p> <p>5 Q This report says that Andre McNairy was</p> <p>6 observed dropping to the ground one clear plastic</p> <p>7 bag containing numerous bags, suspect narcotics.</p> <p>8 Do you see that?</p> <p>9 A Yes.</p> <p>10 Q And that is not true, is it?</p> <p>11 MR. BAZAREK: Object to the form of the</p> <p>12 question, foundation, mischaracterizes the</p> <p>13 evidence in the record in this case.</p> <p>14 MR. MICHALIK: Join.</p> <p>15 MR. KOSOKO: Join.</p> <p>16 A Fifth Amendment.</p> <p>17 Q It says that Officer Nichols immediately</p> <p>18 recovered the bag and placed McNairy into custody.</p> <p>19 Do you see that?</p> <p>20 A Yes.</p> <p>21 Q Is that true?</p> <p>22 A Fifth Amendment.</p> <p>23 Q It says McNairy was searched and Nichols</p> <p>24 found another bag with 25 Ziploc bags, each</p>	<p>128</p> <p>1 evidence in the record in this case.</p> <p>2 MR. KOSOKO: Join.</p> <p>3 MR. MICHALIK: Join.</p> <p>4 A Because I am concerned that the mere act</p> <p>5 of testifying to this subject matter, this</p> <p>6 incident, may cause me to be criminally indicted</p> <p>7 by the US Attorney's Office and/or the Cook County</p> <p>8 State's Attorney's Office, on the advice of</p> <p>9 counsel I am going to decline to answer any</p> <p>10 questions about certain aspects of my conduct as a</p> <p>11 Chicago police officer, based upon the rights</p> <p>12 guaranteed to me by the Fifth Amendment of the</p> <p>13 United States Constitution.</p> <p>14 Q What was your exact role as the -- as an</p> <p>15 assisting arresting officer for Mr. McNairy's</p> <p>16 September 15th, 2008, arrest?</p> <p>17 A Fifth Amendment.</p> <p>18 Q Do you know who Jamell Sanders is?</p> <p>19 A No.</p> <p>20 Q Do you know whether you were involved in</p> <p>21 arresting him on June 4th, 2006?</p> <p>22 A I don't recall.</p> <p>23 Q Do you know what unit you were in</p> <p>24 January -- June 4th, 2006?</p>

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33 (129 to 132)

<p style="text-align: right;">129</p> <p>1     <b>A No.</b></p> <p>2     Q Had you harassed Mr. Sanders before</p> <p>3 June 4th, 2006?</p> <p>4     <b>A Fifth Amendment.</b></p> <p>5         MR. RAUSCHER: I'm going to mark 15 as</p> <p>6 DO-Joint 006042 through 46.</p> <p>7         (Mohammed Deposition Exhibit 15 marked for</p> <p>8 identification and attached to the transcript.)</p> <p>9     Q Have you had a chance to look at this</p> <p>10 document?</p> <p>11    <b>A Yes.</b></p> <p>12    Q Does looking at this document refresh your</p> <p>13 recollection as to whether you were involved in</p> <p>14 arresting Jamell Sanders June 4th, 2006?</p> <p>15    <b>A No, it doesn't.</b></p> <p>16    Q Looking at his picture on the front, does</p> <p>17 that refresh your recollection as to whether you</p> <p>18 knew who he was or had seen him around?</p> <p>19    <b>A No, it doesn't.</b></p> <p>20    Q Would you expect your name to be listed</p> <p>21 somewhere on the report if you had been involved</p> <p>22 in the arrest?</p> <p>23    <b>A Fifth Amendment.</b></p> <p>24    Q Have you seen reports that were incomplete</p>	<p style="text-align: right;">131</p> <p>1     <b>A No.</b></p> <p>2     Q And who are they supposed to list?</p> <p>3     <b>A Just who's involved in the arrest.</b></p> <p>4     Q Is -- should a -- so let's use this as an</p> <p>5 example, Exhibit 15.</p> <p>6     <b>A Uh-huh.</b></p> <p>7     Q Should this report list everybody who was</p> <p>8 involved in arresting Mr. Sanders?</p> <p>9     <b>A It does.</b></p> <p>10    Q Well, how do you know it does?</p> <p>11    <b>A It's on the paper here.</b></p> <p>12    Q Well, you -- if -- well, do you know</p> <p>13 whether this is a full, complete, accurate list of</p> <p>14 the people involved in the arrest?</p> <p>15    <b>A No, I don't.</b></p> <p>16    Q But it's -- but if -- if the report was</p> <p>17 filled out properly, according to standard</p> <p>18 operating procedure, then it would list everyone;</p> <p>19 is that fair?</p> <p>20    <b>A That's correct.</b></p> <p>21    Q And based on your training and experience,</p> <p>22 if someone is listed -- well, let me ask you this:</p> <p>23 If -- based on your training and experience, if</p> <p>24 someone is not listed as at least an assisting</p>
<p style="text-align: right;">130</p> <p>1 as to the officers involved?</p> <p>2     <b>A Could you state that again?</b></p> <p>3     Q Have you seen reports or are you aware</p> <p>4 of -- well, let me ask you this: Have you seen</p> <p>5 any police reports that failed to list all of the</p> <p>6 involved officers?</p> <p>7         MR. BAZAREK: Object to the form of the</p> <p>8 question and foundation.</p> <p>9         MR. KOSOKO: Join.</p> <p>10    Q I'm going to try that a third time,</p> <p>11 actually.</p> <p>12    Have you seen any arrest reports that did</p> <p>13 not list the full universe of officers who had</p> <p>14 been involved in the arrest?</p> <p>15    MR. BAZAREK: Object to the form of the</p> <p>16 question, foundation.</p> <p>17    MR. KOSOKO: Join.</p> <p>18    <b>A No.</b></p> <p>19    Q Are arrest reports supposed to include a</p> <p>20 full list of officers who were involved in the</p> <p>21 arrest?</p> <p>22    <b>A No.</b></p> <p>23    Q They're not supposed to list everyone</p> <p>24 involved?</p>	<p style="text-align: right;">132</p> <p>1 arresting officer or some other role, does that</p> <p>2 mean they did not participate in the arrest?</p> <p>3         MR. BAZAREK: Yeah, I'd object to form and</p> <p>4 foundation on that one, speculation.</p> <p>5         MR. PALLES: Object. Foundation, as well.</p> <p>6         MR. SCHALKA: Join.</p> <p>7         THE COURT REPORTER: I didn't hear the</p> <p>8 rest.</p> <p>9         MR. MICHALIK: Join.</p> <p>10    THE COURT REPORTER: Thank you.</p> <p>11    MR. KOSOKO: Watts.</p> <p>12    MR. PALLES: Answer again.</p> <p>13    THE WITNESS: Could you repeat that,</p> <p>14 please?</p> <p>15    MR. RAUSCHER: I'm not sure.</p> <p>16    MR. PALLES: Read it back, please.</p> <p>17    (The Reporter read the record as follows:</p> <p>18 "Question: And based on your training and</p> <p>19 experience, if someone is listed -- well, let me</p> <p>20 ask you this: Based on your training and</p> <p>21 experience, if someone is not listed as at least</p> <p>22 an assisting arresting officer or some other role,</p> <p>23 does that mean they did not participate in the</p> <p>24 arrest?")</p>

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34 (133 to 136)

<p style="text-align: right;">133</p> <p>1     <b>A Yes.</b></p> <p>2     <b>BY MR. RAUSCHER:</b></p> <p>3       Q And if they are listed as an assisting</p> <p>4 arresting officer or a reporting officer, does</p> <p>5 that mean, based on your experience and training,</p> <p>6 that they did participate in the arrest?</p> <p>7     <b>A Yes.</b></p> <p>8       Q Do you know what unit or what beat you had</p> <p>9 in June 2006?</p> <p>10    <b>A No, I don't. Don't recall.</b></p> <p>11      MR. RAUSCHER: Can we take another short</p> <p>12 break?</p> <p>13      MR. PALLES: Sure.</p> <p>14      MR. RAUSCHER: Thanks.</p> <p>15      THE VIDEOGRAPHER: Off the record, 12:41.</p> <p>16      (A recess was taken from 12:41 p.m. to</p> <p>17 12:57 p.m.)</p> <p>18      THE VIDEOGRAPHER: Back on the record,</p> <p>19 12:57.</p> <p>20 <b>BY MR. RAUSCHER:</b></p> <p>21       Q Do you remember the nicknames of any</p> <p>22 people who lived in Ida B. Wells or hung out there</p> <p>23 while you were a police officer?</p> <p>24    <b>A You have to show me.</b></p>	<p style="text-align: right;">135</p> <p>1     <b>A Yes.</b></p> <p>2       Q What color?</p> <p>3     <b>A I don't recall what color it was.</b></p> <p>4       Q Did you ever drive civilian cars while you</p> <p>5 were on duty?</p> <p>6     <b>A No.</b></p> <p>7       Q Did you ever get rides in civilian cars</p> <p>8 while on duty?</p> <p>9     <b>A No.</b></p> <p>10      Q When you were on the tac team, did you</p> <p>11 communicate with officers by cell phone while you</p> <p>12 were on duty?</p> <p>13    <b>A Yes.</b></p> <p>14      Q And how frequently would you communicate</p> <p>15 with other officers by cell phone?</p> <p>16    <b>A Not often.</b></p> <p>17      Q Every day? Every week?</p> <p>18    <b>A Like -- probably every week.</b></p> <p>19      Q Did you have a City-issued cell phone?</p> <p>20    <b>A No.</b></p> <p>21      Q Did you -- did the City pay for your cell</p> <p>22 phone services?</p> <p>23    <b>A No.</b></p> <p>24      Q What company did you use as your cell</p>
<p style="text-align: right;">134</p> <p>1       Q I'm just asking if you remember any</p> <p>2 offhand.</p> <p>3     <b>A No.</b></p> <p>4       Q Do you remember anyone called Smoke?</p> <p>5     <b>A Smoke?</b></p> <p>6       <b>Yeah, I remember that name, Smoke.</b></p> <p>7       Q And do you know who it was?</p> <p>8     <b>A No.</b></p> <p>9       Q Do you know what -- do you know anything</p> <p>10 about Smoke or had you heard anything about Smoke?</p> <p>11    <b>A No.</b></p> <p>12      Q Okay.</p> <p>13       Was there a kid named No Neck?</p> <p>14       Does that sound familiar to you?</p> <p>15 Nickname.</p> <p>16    <b>A No Neck? No, I don't --</b></p> <p>17      Q Any other nicknames you can think of?</p> <p>18    <b>A No.</b></p> <p>19      Q When you were on duty, did you drive a</p> <p>20 police-issued car?</p> <p>21    <b>A Yes.</b></p> <p>22      Q What kind of car did you have?</p> <p>23    <b>A It was a Crown Vic.</b></p> <p>24      Q Was it always a Crown Vic?</p>	<p style="text-align: right;">136</p> <p>1 phone provider?</p> <p>2    <b>A Back then I -- I don't remember.</b></p> <p>3       Q What was your cell phone number back then?</p> <p>4    <b>A I don't remember.</b></p> <p>5       Q You don't remember?</p> <p>6    <b>A Uh-uh.</b></p> <p>7       Q Do you still have the same number?</p> <p>8    <b>A No.</b></p> <p>9       Q What percentage would you say was</p> <p>10 communicating on cell phone with other officers</p> <p>11 versus by radio?</p> <p>12    <b>A About maybe 3 percent.</b></p> <p>13      Q 3 percent by cell phone?</p> <p>14    <b>A Yeah.</b></p> <p>15      Q 97 percent by radio?</p> <p>16    <b>A Yep -- yes.</b></p> <p>17      Q What area was Ida B. Wells in?</p> <p>18    <b>A What do you mean?</b></p> <p>19      Q Was there like a district, an area?</p> <p>20    <b>A It was a district.</b></p> <p>21      Q What district?</p> <p>22    <b>A Second District.</b></p> <p>23      Q Was it always the Second District while</p> <p>24 you were there?</p>

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35 (137 to 140)

<p style="text-align: right;">137</p> <p>1 <b>A Yes. Uh-huh.</b></p> <p>2 Q Was the Second District on a certain radio</p> <p>3 channel?</p> <p>4 <b>A Yes.</b></p> <p>5 Q And from -- during your time on the</p> <p>6 tac team in the Second District, what radio</p> <p>7 channel was the Second District on?</p> <p>8 <b>A I don't -- I don't remember.</b></p> <p>9 Q Was your radio preset to the correct</p> <p>10 channel?</p> <p>11 <b>A Yes.</b></p> <p>12 Q And do you know whether your</p> <p>13 communications on the radio were recorded?</p> <p>14 <b>A They probably were.</b></p> <p>15 Q But you're not sure either way?</p> <p>16 <b>A No. Uh-uh.</b></p> <p>17 Q Did you think they were recorded at the</p> <p>18 time you worked in the Second District?</p> <p>19 <b>A Could have been, yes.</b></p> <p>20 Q You thought that they could have been?</p> <p>21 <b>A Yes.</b></p> <p>22 Q But you weren't sure?</p> <p>23 <b>A Wasn't sure.</b></p> <p>24 Q Did anyone ever tell you whether any of</p>	<p style="text-align: right;">139</p> <p>1 insignia anywhere?</p> <p>2 <b>A No. It had lights on it, though.</b></p> <p>3 Q Was it designed to look like a civilian car?</p> <p>4 <b>A Yes.</b></p> <p>5 Q And were you in -- when you were on the</p> <p>6 tac team, were you plainclothes or officer -- or</p> <p>7 uniform?</p> <p>8 <b>A Plainclothes.</b></p> <p>9 Q And what clothes did you typically wear</p> <p>10 when you were there on duty?</p> <p>11 <b>A Blue jeans.</b></p> <p>12 Q And like a sweatshirt or something?</p> <p>13 T-shirt?</p> <p>14 <b>A Shirt, collared shirt, something like</b></p> <p>15 <b>yours.</b></p> <p>16 Q Okay. A button down collared shirt?</p> <p>17 <b>A Yeah, button down collared shirt.</b></p> <p>18 Q Did you have a bulletproof vest?</p> <p>19 <b>A Yes.</b></p> <p>20 Q Under your shirt?</p> <p>21 <b>A Yes.</b></p> <p>22 Q Did you wear different clothes during the</p> <p>23 reverse stings?</p> <p>24 <b>A When you say "different," what do you</b></p>
<p style="text-align: right;">138</p> <p>1 your communications on the radio were recorded?</p> <p>2 <b>A That was made to be understood that it</b></p> <p>3 <b>would be, yes.</b></p> <p>4 Q And who made you understand that?</p> <p>5 <b>A Well, when you -- in the academy they can</b></p> <p>6 <b>pull tapes and whatever.</b></p> <p>7 Q Did you listen to tapes --</p> <p>8 <b>A No.</b></p> <p>9 Q -- in the academy?</p> <p>10 <b>A No.</b></p> <p>11 Q And -- but they told you that there were</p> <p>12 tapes?</p> <p>13 <b>A They said there could be tapes.</b></p> <p>14 Q They told you in the academy that there</p> <p>15 could be tapes?</p> <p>16 <b>A Yes.</b></p> <p>17 Q You remember that specifically?</p> <p>18 <b>A Yes.</b></p> <p>19 Q Do you know if there were certain channels</p> <p>20 on the radio that were recorded versus others that</p> <p>21 weren't?</p> <p>22 <b>A No, I don't.</b></p> <p>23 Q The Crown Vic that you had, was that a --</p> <p>24 did it have lights on it? Did it have CPD</p>	<p style="text-align: right;">140</p> <p>1 <b>mean?</b></p> <p>2 Q Different than collared, button down shirt</p> <p>3 and jeans.</p> <p>4 <b>A Yes.</b></p> <p>5 Q What did you wear during reverse stings?</p> <p>6 <b>A Well, blue jeans, you know, just like they</b></p> <p>7 <b>would, what the other people would.</b></p> <p>8 <b>Long coats.</b></p> <p>9 Q When you say "they" would, you mean</p> <p>10 civilians?</p> <p>11 <b>A No -- well, yeah, civilians. The people</b></p> <p>12 <b>that lived down there. You know, the clothes</b></p> <p>13 <b>hanging off of them, kind of fit in to look like</b></p> <p>14 <b>them.</b></p> <p>15 Q Baggy clothes at the time?</p> <p>16 <b>A Right. Uh-huh.</b></p> <p>17 Q So were you trying to disguise yourself so</p> <p>18 people didn't recognize you?</p> <p>19 <b>A Right.</b></p> <p>20 Q Did people ever recognize you during</p> <p>21 reverse stings that you know of?</p> <p>22 <b>A No.</b></p> <p>23 Q Did you wear like a hoodie or anything</p> <p>24 like that to try to disguise your face or your</p>



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36 (141 to 144)

<p>141</p> <p>1 head at all?</p> <p>2 <b>A Sometimes.</b></p> <p>3 Q And I may have already asked you this.</p> <p>4 But were civilians ever working with you-all</p> <p>5 during reverse stings?</p> <p>6 <b>A No.</b></p> <p>7 Q Did you ever enter apartments during the</p> <p>8 reverse stings?</p> <p>9 <b>A What do you mean?</b></p> <p>10 Q Like did you ever enter any individual</p> <p>11 apartments during a reverse sting?</p> <p>12 <b>A No.</b></p> <p>13 Q Did other officers?</p> <p>14 <b>A Don't know.</b></p> <p>15 Q Okay. Did you ever see any other officers</p> <p>16 enter individual apartments?</p> <p>17 <b>A No.</b></p> <p>18 Q Did you at times, as a tac team officer,</p> <p>19 arrest people inside of apartments?</p> <p>20 <b>A Yes.</b></p> <p>21 Q And what was the protocol to get into</p> <p>22 someone's apartment?</p> <p>23 <b>A Knock on the door.</b></p> <p>24 Q And then if they let you in, they let</p>	<p>143</p> <p>1 <b>A Take it to the station and inventory it.</b></p> <p>2 Q And how did you inventory it?</p> <p>3 <b>A Through the computer.</b></p> <p>4 Q What did you do physically? What did you</p> <p>5 do with the physical evidence?</p> <p>6 <b>A Recover it, keep it in my possession until</b></p> <p>7 <b>I got to the station. Once I got to the station,</b></p> <p>8 <b>we then inventory it, count it, what it was, did</b></p> <p>9 <b>it -- put it in on the computer. And that's it.</b></p> <p>10 Q And when you put it -- after you put it in</p> <p>11 the computer, what did you do with it at the</p> <p>12 station?</p> <p>13 <b>A Then you put it -- take it and put it in a</b></p> <p>14 <b>lockbox.</b></p> <p>15 Q Where was the lockbox?</p> <p>16 <b>A Up -- up front.</b></p> <p>17 Q When you say "the station," which station</p> <p>18 are you talking about?</p> <p>19 <b>A Second District.</b></p> <p>20 Q And where was that located?</p> <p>21 <b>A 51st and Wentworth.</b></p> <p>22 Q And how many lockboxes were there?</p> <p>23 <b>A One.</b></p> <p>24 Q How big was the lockbox?</p>
<p>142</p> <p>1 you in?</p> <p>2 <b>A Yes.</b></p> <p>3 Q And if not, then you need a search</p> <p>4 warrant?</p> <p>5 <b>A Yes.</b></p> <p>6 Q Did any building managers or anyone</p> <p>7 associated with the buildings ever give you or</p> <p>8 Watts or anyone on the team keys to enter someone</p> <p>9 else's apartment?</p> <p>10 <b>A No.</b></p> <p>11 Q Did you ever participate, either at a</p> <p>12 reverse sting or any other time, searching people</p> <p>13 who were lined up outside of one of the buildings</p> <p>14 at Ida B. Wells?</p> <p>15 <b>A Take the Fifth.</b></p> <p>16 Q Did you ever participate in searching</p> <p>17 people lined up inside one of the Ida B. Wells</p> <p>18 buildings?</p> <p>19 <b>A Take the Fifth.</b></p> <p>20 Q Did you ever recover drugs or money while</p> <p>21 searching someone as a tactical team officer?</p> <p>22 <b>A Take the Fifth.</b></p> <p>23 Q Tell me what the protocol for inventorying</p> <p>24 drugs that you recovered was.</p>	<p>144</p> <p>1 <b>A Pretty big. It was pretty big.</b></p> <p>2 Q Can you give any sort of -- like you can</p> <p>3 make it with your hands or give a -- you know, a</p> <p>4 marker in here or something?</p> <p>5 <b>A Well, maybe about as wide as that chair</b></p> <p>6 <b>and about 4 feet high.</b></p> <p>7 Q And did it have a key or a code? Or how</p> <p>8 did you get into it?</p> <p>9 <b>A It has a flip where you could put it in</b></p> <p>10 <b>there, you turn the handle, and it goes down.</b></p> <p>11 Q Okay. And do you know where it goes?</p> <p>12 <b>A It goes in that box.</b></p> <p>13 Q And then --</p> <p>14 <b>A Then the mail person comes and recovers</b></p> <p>15 <b>it, takes it to wherever you take it.</b></p> <p>16 Q And then is the mail person a CPD</p> <p>17 employee?</p> <p>18 <b>A Yes.</b></p> <p>19 Q Is it an officer?</p> <p>20 <b>A No. Civilian employee.</b></p> <p>21 Q Civilian employee.</p> <p>22 Do you know where the civilian employee</p> <p>23 takes the evidence?</p> <p>24 <b>A No.</b></p>

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37 (145 to 148)

<p style="text-align: right;">145</p> <p>1 Q Do you know the names of any of the</p> <p>2 civilian employees who handled the lockbox</p> <p>3 evidence?</p> <p>4 A No.</p> <p>5 Q Did you -- was it standard protocol to</p> <p>6 alert Sergeant Watts when you put something in the</p> <p>7 lockbox?</p> <p>8 A No.</p> <p>9 Q And was it standard protocol to alert</p> <p>10 Watts when evidence was recovered in the field?</p> <p>11 A No.</p> <p>12 Q Was it standard protocol to call Watts on</p> <p>13 either a cell phone or radio to tell him people</p> <p>14 were being arrested if he wasn't there?</p> <p>15 A Yes.</p> <p>16 Q And did that happen every time people were</p> <p>17 arrested?</p> <p>18 A Yes. He would hear it.</p> <p>19 Q How would he hear it?</p> <p>20 A On the radio.</p> <p>21 Q And what if it was on cell phones? Would</p> <p>22 someone call him on his cell phone and tell him?</p> <p>23 A No, no.</p> <p>24 Q Would he typically show up at the scene if</p>	<p style="text-align: right;">147</p> <p>1 A Just sometime, yeah.</p> <p>2 Q Every day, sometime in the field?</p> <p>3 A Yes.</p> <p>4 Q Was it multiple hours a day that you</p> <p>5 know of?</p> <p>6 A Don't recall.</p> <p>7 Q Were there certain days he was out there</p> <p>8 more than others?</p> <p>9 A Yes.</p> <p>10 Q Did you ever see Watts participating in</p> <p>11 searching people at a lineup?</p> <p>12 A Yes.</p> <p>13 Q And did you ever see him recover evidence?</p> <p>14 A No.</p> <p>15 Q Did you ever see him recover drugs from a</p> <p>16 lineup?</p> <p>17 A No.</p> <p>18 Q Did you ever see him recover money at a</p> <p>19 lineup?</p> <p>20 A No.</p> <p>21 Q Did you ever see him plant drugs on</p> <p>22 somebody at a lineup?</p> <p>23 A Take the Fifth.</p> <p>24 Q Did you ever see him -- did you ever hear</p>
<p style="text-align: right;">146</p> <p>1 he heard people were being arrested?</p> <p>2 A No.</p> <p>3 Q What was the purpose of telling Watts that</p> <p>4 people were being arrested?</p> <p>5 A That we was coming in because --</p> <p>6 MR. KOSOKO: Objection to the form of the</p> <p>7 question, misstates the evidence that's been</p> <p>8 adduced.</p> <p>9 MR. PALLES: Go ahead.</p> <p>10 A (Continuing.) Because he had to sign his</p> <p>11 name and check the -- check the inventory and the</p> <p>12 arrest report.</p> <p>13 Q How much time did Watts spend in the field</p> <p>14 versus at the station?</p> <p>15 MR. PALLES: Objection --</p> <p>16 MR. KOSOKO: Objection --</p> <p>17 MR. PALLES: -- lack of foundation.</p> <p>18 MR. KOSOKO: Join.</p> <p>19 A Don't know.</p> <p>20 Q Did you see him every day out there while</p> <p>21 you were patrolling?</p> <p>22 A Not all the time, no.</p> <p>23 Q But did you see him at least sometime in</p> <p>24 the field?</p>	<p style="text-align: right;">148</p> <p>1 him threaten to plant drugs?</p> <p>2 A Take the Fifth.</p> <p>3 Q But you never saw him actually recover</p> <p>4 drugs?</p> <p>5 A No.</p> <p>6 Q No, you didn't?</p> <p>7 A I didn't, no.</p> <p>8 Q How many people did you see Sergeant Watts</p> <p>9 search over the years?</p> <p>10 A I don't have a number for you.</p> <p>11 Q More than 10?</p> <p>12 A Couldn't tell you.</p> <p>13 Q More than one?</p> <p>14 A Don't know.</p> <p>15 Q You don't know if it was more than one?</p> <p>16 A No.</p> <p>17 Q More than a hundred?</p> <p>18 A Wouldn't know.</p> <p>19 Q No estimate?</p> <p>20 A I don't -- no estimate, no.</p> <p>21 Q How many people did you search over</p> <p>22 the years as a tactical team officer?</p> <p>23 A Could have been more than -- hundreds.</p> <p>24 Q Hundreds?</p>

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38 (149 to 152)

<p style="text-align: right;">149</p> <p>1     <b>A Yeah.</b></p> <p>2     Q How many of those people did you find</p> <p>3 drugs on?</p> <p>4     <b>A I don't recall.</b></p> <p>5     Q How many of those people did you plant</p> <p>6 drugs on?</p> <p>7     <b>A Take the Fifth.</b></p> <p>8     Q Do you know the name Frank Saunders?</p> <p>9     <b>A I don't recall.</b></p> <p>10    MR. RAUSCHER: All right. We're going to</p> <p>11 mark Exhibit 16, which is DO-Joint 6076 to 6080.</p> <p>12    (Mohammed Deposition Exhibit 16 marked for</p> <p>13 identification and attached to the transcript.)</p> <p>14    (An off-the-record discussion was held.)</p> <p>15    Q Have you had a chance to review this</p> <p>16 report?</p> <p>17    <b>A Yes.</b></p> <p>18    Q Was it common to hear people yelling</p> <p>19 "cleanup" at the Ida B. Wells homes when you were</p> <p>20 patrolling there?</p> <p>21    <b>A Yes.</b></p> <p>22    Q What did "cleanup" mean?</p> <p>23    <b>A That the police were coming.</b></p> <p>24    Q You are listed as the first arresting</p>	<p style="text-align: right;">151</p> <p>1     MR. KOSOKO: Join.</p> <p>2     <b>A Fifth Amendment.</b></p> <p>3     Q Is it true that Frank Saunders was seen in</p> <p>4 the hallway of 574 East 36th Street holding crack</p> <p>5 cocaine?</p> <p>6     <b>A Fifth Amendment.</b></p> <p>7     MR. BAZAREK: Object to the form of the</p> <p>8 question.</p> <p>9     MR. RAUSCHER: What's wrong with that</p> <p>10 form?</p> <p>11    MR. BAZAREK: I made my objection.</p> <p>12    MR. RAUSCHER: I know. But the form</p> <p>13 objection is something I should be able to cure.</p> <p>14    MR. BAZAREK: Object to form, foundation.</p> <p>15 BY MR. RAUSCHER:</p> <p>16    Q Could you go to court to testify about</p> <p>17 something you didn't personally observe?</p> <p>18    MR. BAZAREK: Object to the form of the</p> <p>19 question, foundation.</p> <p>20    <b>A What was the question again?</b></p> <p>21    Q As a -- an arresting officer, would you go</p> <p>22 to court to testify about something you didn't</p> <p>23 observe?</p> <p>24    <b>A Would I go and testify against something</b></p>
<p style="text-align: right;">150</p> <p>1 officer on this report; correct?</p> <p>2     <b>A Yes.</b></p> <p>3     Q What does it mean to be the first</p> <p>4 arresting officer?</p> <p>5     <b>A This is one that's going to -- officer</b></p> <p>6 <b>that's going to court.</b></p> <p>7     Q That's something you would have decided</p> <p>8 between you and Lamonica Lewis?</p> <p>9     <b>A Yes.</b></p> <p>10    Q And you were Beat 264D at the time?</p> <p>11    <b>A Yes.</b></p> <p>12    Q And this is a report -- I should say -- of</p> <p>13 Frank Saunders' arrest from March 28, 2007?</p> <p>14    <b>A Yes.</b></p> <p>15    Q The narrative description of this report</p> <p>16 says that Frank Saunders was seen standing in the</p> <p>17 hallway of 574 East 36th Street with two plastic</p> <p>18 sandwich bags containing numerous rock-like</p> <p>19 substance, suspect crack cocaine.</p> <p>20    <b>A That's what it says, yes.</b></p> <p>21    Q That is false?</p> <p>22    MR. BAZAREK: Object to the form of the</p> <p>23 question, mischaracterizes the evidence in the</p> <p>24 record in this case.</p>	<p style="text-align: right;">152</p> <p>1 <b>that I didn't observe?</b></p> <p>2     Q Yeah.</p> <p>3     <b>A No.</b></p> <p>4     Q And so by listing yourself as the first</p> <p>5 arresting officer, you're saying "I observed the</p> <p>6 arrest of Frank Saunders"; correct?</p> <p>7     <b>A Yes.</b></p> <p>8     Q So you would have knowledge as to whether</p> <p>9 what is written in the narrative form is true or</p> <p>10 not true; correct?</p> <p>11    <b>A Yes.</b></p> <p>12    Q Is it true that Frank Saunders was seen</p> <p>13 standing in the hallway of 574 East 36th Street</p> <p>14 holding what appeared to be crack cocaine?</p> <p>15    MR. MICHALIK: Object to the form.</p> <p>16    You're asking by this witness?</p> <p>17    <b>A Fifth Amendment.</b></p> <p>18    Q Is what is written in the narrative part</p> <p>19 of this report where you were listed as the first</p> <p>20 arresting officer about Frank Saunders being</p> <p>21 observed holding crack cocaine true?</p> <p>22    <b>A Fifth Amendment.</b></p> <p>23    Q In fact, Mr. Saunders was not arrested for</p> <p>24 being observed holding two bags of crack cocaine?</p>



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39 (153 to 156)

153	<p>1 MR. BAZAREK: Object to the form of the</p> <p>2 question, foundation, mischaracterizes the</p> <p>3 evidence in the record in this case.</p> <p>4 <b>A Fifth Amendment.</b></p> <p>5 Q This is a false report?</p> <p>6 MR. BAZAREK: Object to the form of the</p> <p>7 question, foundation, mischaracterizes the record</p> <p>8 and the evidence in this case.</p> <p>9 <b>A Fifth Amendment.</b></p> <p>10 MR. MICHALIK: Join.</p> <p>11 MR. KOSOKO: Join.</p> <p>12 Q You handcuffed Frank Saunders on March 28,</p> <p>13 2007?</p> <p>14 <b>A Fifth Amendment.</b></p> <p>15 Q Watts hit him in the head with a gun?</p> <p>16 MR. KOSOKO: Objection --</p> <p>17 <b>A Fifth Amendment.</b></p> <p>18 MR. KOSOKO: -- form of the question,</p> <p>19 argumentative.</p> <p>20 Q You did not intervene to stop Frank</p> <p>21 Saunders from being hit in the head with a gun?</p> <p>22 MR. KOSOKO: Objection to form of the</p> <p>23 question, argumentative.</p> <p>24 <b>A Fifth Amendment.</b></p>	155	<p>1 MR. MICHALIK: Join and asked and</p> <p>2 answered.</p> <p>3 <b>A Fifth Amendment.</b></p> <p>4 Q Did you assault Frank Saunders on</p> <p>5 March 28, 2007?</p> <p>6 <b>A Fifth Amendment.</b></p> <p>7 MR. PALLES: I'll object to that, calls</p> <p>8 for a legal conclusion.</p> <p>9 Q Do you know what the worded "assault"</p> <p>10 means?</p> <p>11 <b>A Yes.</b></p> <p>12 Q Did you assault Mr. Saunders on March 28,</p> <p>13 2007?</p> <p>14 MR. RAVITZ: Objection; asked and</p> <p>15 answered.</p> <p>16 <b>A Fifth Amendment.</b></p> <p>17 Q Did you have any justification whatsoever</p> <p>18 for assaulting Mr. Saunders on March 28, 2007?</p> <p>19 MR. MICHALIK: Object to the form of the</p> <p>20 question, assumes facts not in evidence.</p> <p>21 <b>A Fifth Amendment.</b></p> <p>22 MR. RAUSCHER: I'm going to mark</p> <p>23 Exhibit 17, which is DO-Joint 006102.</p> <p>24 ///</p>
154	<p>1 Q You did not intervene to stop Frank</p> <p>2 Saunders from being falsely arrested?</p> <p>3 MR. KOSOKO: Objection; form of the</p> <p>4 question.</p> <p>5 MR. BAZAREK: Object further,</p> <p>6 mischaracterizes the evidence in the record in</p> <p>7 this case.</p> <p>8 MR. MICHALIK: Join.</p> <p>9 <b>A Because I am concerned that the mere act</b></p> <p>10 <b>of testifying to this subject matter, this</b></p> <p>11 <b>incident, may cause me to be criminally indicted</b></p> <p>12 <b>by the US Attorney's Office and/or Cook County</b></p> <p>13 <b>State's Attorney's Office, on the advice of</b></p> <p>14 <b>counsel I am going to decline to answer any</b></p> <p>15 <b>questions about certain aspects of my conduct as a</b></p> <p>16 <b>Chicago police officer, based upon the rights</b></p> <p>17 <b>guaranteed to me by the Fifth Amendment of the</b></p> <p>18 <b>United States Constitution.</b></p> <p>19 Q Did you intervene on March 28, 2007, to</p> <p>20 stop Frank Saunders from being falsely arrested?</p> <p>21 MR. BAZAREK: Object to the form of the</p> <p>22 question, foundation, mischaracterizes the</p> <p>23 evidence in the record in this case.</p> <p>24 MR. KOSOKO: Join.</p>	156	<p>1 (Mohammed Deposition Exhibit 17 marked for</p> <p>2 identification and attached to the transcript.)</p> <p>3 (An off-the-record discussion was held.)</p> <p>4 Q Have you had a chance to look over</p> <p>5 Exhibit 17?</p> <p>6 <b>A Yes.</b></p> <p>7 Q And this is an inventory sheet documenting</p> <p>8 drugs allegedly recovered from Frank Saunders on</p> <p>9 March 28, 2007?</p> <p>10 <b>A Yes.</b></p> <p>11 Q You are the investigating officer and the</p> <p>12 first officer listed?</p> <p>13 <b>A Yes.</b></p> <p>14 Q And it's got your electronic approval?</p> <p>15 <b>A Yes.</b></p> <p>16 Q This report falsely states that drugs were</p> <p>17 recovered from Mr. Saunders and inventoried?</p> <p>18 MR. BAZAREK: Object to the form of the</p> <p>19 question, foundation, mischaracterizes the</p> <p>20 evidence in the record in this case.</p> <p>21 MR. KOSOKO: Join.</p> <p>22 <b>A Fifth Amendment.</b></p> <p>23 Q The drugs listed here that were attributed</p> <p>24 to Mr. Saunders were not, in fact, recovered from</p>

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40 (157 to 160)

<p style="text-align: right;">157</p> <p>1 Mr. Saunders?</p> <p>2 MR. BAZAREK: Object to the form of the</p> <p>3 question, foundation, mischaracterizes the</p> <p>4 evidence in the record in this case.</p> <p>5 MR. KOSOKO: Join.</p> <p>6 MR. MICHALIK: Join.</p> <p>7 MR. PALLES: Join.</p> <p>8 <b>A Fifth Amendment.</b></p> <p>9 Q Did you, in fact, inventory the evidence</p> <p>10 listed on DO-Joint 6102?</p> <p>11 <b>A Fifth Amendment.</b></p> <p>12 Q Where did the narcotics listed on this</p> <p>13 report come from?</p> <p>14 <b>A Fifth Amendment.</b></p> <p>15 Q Do you know someone named Christopher</p> <p>16 Scott?</p> <p>17 <b>A I don't recall.</b></p> <p>18 Q All right.</p> <p>19 MR. RAUSCHER: We're going to mark</p> <p>20 Exhibit 18, which is City-BG-032187 through 190 --</p> <p>21 I'm sorry -- 191.</p> <p>22 (Mohammed Deposition Exhibit 18 marked for</p> <p>23 identification and attached to the transcript.)</p> <p>24 (An off-the-record discussion was held.)</p> <p style="text-align: right;">158</p>	<p style="text-align: right;">159</p> <p>1 <b>A They didn't -- they was coming in later or</b></p> <p>2 <b>they didn't come in that day.</b></p> <p>3 Q You just didn't have a partner that day --</p> <p>4 <b>A Just that day.</b></p> <p>5 Q -- but it wasn't like generally at the</p> <p>6 time you didn't have a partner?</p> <p>7 <b>A Just that day.</b></p> <p>8 Q But you did participate in the arrest of</p> <p>9 Christopher Scott?</p> <p>10 <b>A Yes.</b></p> <p>11 Q This report states that Christopher Scott</p> <p>12 was seen giving another offender two small Ziploc</p> <p>13 Baggies with suspect narcotics and that he was</p> <p>14 given money in exchange.</p> <p>15 Do you see that?</p> <p>16 <b>A That's what it says.</b></p> <p>17 Q And that is false?</p> <p>18 MR. BAZAREK: Object to the form of the</p> <p>19 question, foundation, mischaracterizes the</p> <p>20 evidence in the record in this case.</p> <p>21 MR. MICHALIK: Join.</p> <p>22 MR. KOSOKO: Join.</p> <p>23 <b>A Take the Fifth.</b></p> <p>24 Q Christopher Scott did not, in fact, have</p> <p style="text-align: right;">160</p>
<p>1 Q Have you had a chance to look this over?</p> <p>2 <b>A Yes.</b></p> <p>3 Q This is a report documenting the arrest of</p> <p>4 Christopher Scott on April 4, 2006?</p> <p>5 <b>A Yes.</b></p> <p>6 Q You are listed as one of the assisting</p> <p>7 arresting officers?</p> <p>8 <b>A Yes.</b></p> <p>9 Q And it shows you as -- in Beat 264A.</p> <p>10 Do you see that?</p> <p>11 <b>A Yes.</b></p> <p>12 Q And 26 -- was 264A your beat in April of</p> <p>13 2006?</p> <p>14 <b>A Yes.</b></p> <p>15 Q Do you know who your partner was at the</p> <p>16 time?</p> <p>17 <b>A No. I didn't have one.</b></p> <p>18 Q You did not have a partner?</p> <p>19 <b>A No.</b></p> <p>20 Q Do -- are you saying that because there</p> <p>21 isn't one listed here or you remember not having a</p> <p>22 partner?</p> <p>23 <b>A I didn't have a partner.</b></p> <p>24 Q Do you know why you didn't have a partner?</p>	<p>1 any narcotics on him --</p> <p>2 MR. BAZAREK: Object to --</p> <p>3 Q -- on April 4th, 2006?</p> <p>4 MR. BAZAREK: Object to the form of the</p> <p>5 question, foundation, mischaracterizes the</p> <p>6 evidence in the record in this case.</p> <p>7 MR. MICHALIK: Join.</p> <p>8 MR. KOSOKO: Join.</p> <p>9 <b>A Take the Fifth.</b></p> <p>10 Q Had you ever threatened Christopher Scott</p> <p>11 with arrest before April of 2006?</p> <p>12 <b>A Take the Fifth.</b></p> <p>13 Q You never saw any drugs on Christopher</p> <p>14 Scott on April 4, 2006?</p> <p>15 MR. BAZAREK: Object to the form of the</p> <p>16 question, foundation, mischaracterizes the</p> <p>17 evidence in the record in this case.</p> <p>18 <b>A Fifth Amendment.</b></p> <p>19 Q Did you see Christopher Scott with any</p> <p>20 drugs April 4th, 2006?</p> <p>21 <b>A Fifth Amendment.</b></p> <p>22 Q This report stating that drugs -- Scott</p> <p>23 was observed selling drugs on April 4, 2006, is a</p> <p>24 false report?</p>

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41 (161 to 164)

161	<p>1 MR. BAZAREK: Object to the form of the</p> <p>2 question, foundation, mischaracterizes the</p> <p>3 evidence in the record in this case.</p> <p>4 MR. MICHALIK: Join.</p> <p>5 MR. KOSOKO: Join.</p> <p>6 <b>A Because I am concerned that the mere act</b></p> <p>7 <b>of testifying to this subject matter, this</b></p> <p>8 <b>incident, may cause me to be criminally indicted</b></p> <p>9 <b>by the US Attorney's Office and/or the Cook County</b></p> <p>10 <b>State's Attorney's Office, on the advice of</b></p> <p>11 <b>counsel I am going to decline to answer any</b></p> <p>12 <b>questions about certain aspects of my conduct as a</b></p> <p>13 <b>Chicago police officer, based upon the rights</b></p> <p>14 <b>guaranteed to me by the Fifth Amendment of the</b></p> <p>15 <b>United States Constitution.</b></p> <p>16 Q On April 4, 2006, Christopher Scott tried</p> <p>17 to leave the area where you were in and you</p> <p>18 detained him for no reason?</p> <p>19 <b>A Take the Fifth.</b></p> <p>20 Q When he was arrested, Christopher Scott</p> <p>21 was not doing anything illegal on April 4, 2006?</p> <p>22 MR. BAZAREK: Object to the form of the</p> <p>23 question, foundation, mischaracterizes the</p> <p>24 evidence in the record in this case.</p>	163	<p>1 to you?</p> <p>2 <b>A No.</b></p> <p>3 Q Did you look at any documents to help you</p> <p>4 prepare for your deposition today?</p> <p>5 <b>A Yes.</b></p> <p>6 Q What documents did you look at to help</p> <p>7 prepare for your deposition today?</p> <p>8 <b>A I don't recall.</b></p> <p>9 Q Do you recall any of the documents you</p> <p>10 looked at?</p> <p>11 <b>A Not right off the top, no.</b></p> <p>12 Q Have we seen some of the documents today</p> <p>13 that you looked at to prepare for your deposition?</p> <p>14 <b>A Yes.</b></p> <p>15 Q And did looking -- well, do you remember</p> <p>16 which of those -- which ones you looked at today</p> <p>17 that you had seen before?</p> <p>18 And I'm sorry. Let me rephrase that.</p> <p>19 Do you remember which of the ones we</p> <p>20 looked at today you also looked at to prepare for</p> <p>21 your deposition today?</p> <p>22 <b>A Off the -- let me see.</b></p> <p>23 <b>Jamell Sanders.</b></p> <p>24 Q Which -- can you just -- which exhibit</p>
162	<p>1 MR. MICHALIK: Join.</p> <p>2 MR. KOSOKO: Join.</p> <p>3 <b>A Fifth Amendment.</b></p> <p>4 Q Did any other officers on April 4th tell</p> <p>5 you that they found drugs on Christopher Scott?</p> <p>6 <b>A Fifth Amendment.</b></p> <p>7 Q Did any other officers show you drugs that</p> <p>8 they claimed to have found on Christopher Scott</p> <p>9 April 4, 2006?</p> <p>10 <b>A Fifth Amendment.</b></p> <p>11 MR. RAUSCHER: We're going to mark</p> <p>12 DO-Joint 006168 as Exhibit 19.</p> <p>13 (Mohammed Deposition Exhibit 19 marked for</p> <p>14 identification and attached to the transcript.)</p> <p>15 Q Did any officers tell you that they</p> <p>16 recovered money from Christopher Scott April 4,</p> <p>17 2006?</p> <p>18 <b>A Fifth Amendment.</b></p> <p>19 Q And have you seen the document that's in</p> <p>20 front of you before?</p> <p>21 <b>A Yes.</b></p> <p>22 Q When did you see this document?</p> <p>23 <b>A Just now when you showed it to me.</b></p> <p>24 Q Have you seen it before I just showed it</p>	164	<p>1 number?</p> <p>2 <b>A That's 15.</b></p> <p>3 <b>4.</b></p> <p>4 <b>Excuse me.</b></p> <p>5 <b>That's all I remember.</b></p> <p>6 Q Did looking at Exhibit 4 or 15 refresh</p> <p>7 your recollection about any of the events</p> <p>8 described in those reports?</p> <p>9 <b>A No.</b></p> <p>10 Q Did any of the documents you reviewed</p> <p>11 refresh your recollection?</p> <p>12 <b>A No.</b></p> <p>13 Q Other than looking at some documents, did</p> <p>14 you do anything else to prepare for your</p> <p>15 deposition?</p> <p>16 <b>A Yes.</b></p> <p>17 Q And what else did you do to prepare for</p> <p>18 your deposition?</p> <p>19 <b>A Consult with my attorneys.</b></p> <p>20 Q And I don't want to -- I'm not going to</p> <p>21 ask you what you talked about with them, but how</p> <p>22 long did you meet with your attorneys for?</p> <p>23 <b>A Couple hours --</b></p> <p>24 Q Who was there?</p>

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42 (165 to 168)

<p style="text-align: right;">165</p> <p>1     <b>A -- days.</b></p> <p>2     <b>Pardon me?</b></p> <p>3     Q I'm sorry. I thought you were done.</p> <p>4     A couple of hours?</p> <p>5     <b>A That we met.</b></p> <p>6     Q And how many times?</p> <p>7     <b>A More than 10 times.</b></p> <p>8     Q You met a couple of hours a time 10-plus</p> <p>9 times to prepare for the deposition?</p> <p>10    <b>A No. We met a couple of hours over</b></p> <p>11 <b>10 times.</b></p> <p>12    <b>10 times over --</b></p> <p>13    Q A couple of hours total --</p> <p>14    <b>A Right.</b></p> <p>15    Q -- spread out over 10 meetings?</p> <p>16    <b>A 10 times, right.</b></p> <p>17    Q I got it.</p> <p>18    <b>A Right.</b></p> <p>19    Q And were you meeting with Mr. Palles and</p> <p>20 Mr. Ravitz?</p> <p>21    <b>A Yes.</b></p> <p>22    Q Were -- were anyone else -- was anyone</p> <p>23 else present?</p> <p>24    <b>A No.</b></p>	<p style="text-align: right;">167</p> <p>1     Q Did you ever talk to Brian Bolton about</p> <p>2 framing people?</p> <p>3     MR. BAZAREK: Object to the form of the</p> <p>4 question, foundation, mischaracterizes the</p> <p>5 evidence in the record in this case.</p> <p>6     MR. MICHALIK: Join.</p> <p>7     MR. KOSOKO: Join.</p> <p>8     <b>A Fifth Amendment.</b></p> <p>9     Q Did you ever talk to he Al Jones about</p> <p>10 framing people?</p> <p>11    MR. BAZAREK: Object to the form of the</p> <p>12 question, mischaracterizes the evidence in the</p> <p>13 record in this case.</p> <p>14    MR. MICHALIK: Join.</p> <p>15    MR. KOSOKO: Join.</p> <p>16    <b>A Fifth Amendment.</b></p> <p>17    Q Did you ever talk to -- do you know who</p> <p>18 Darrell Edwards is?</p> <p>19    <b>A Yes.</b></p> <p>20    Q Okay. Was Darrell Edwards part of</p> <p>21 Sergeant Watts' team?</p> <p>22    <b>A No.</b></p> <p>23    Q Did you ever talk to Lamonica Lewis about</p> <p>24 framing people?</p>
<p style="text-align: right;">166</p> <p>1     Q How frequently would you talk to Ronald</p> <p>2 Watts about framing people while you were a police</p> <p>3 officer?</p> <p>4     MR. KOSOKO: Objection to the form of the</p> <p>5 question, argumentative.</p> <p>6     MR. BAZAREK: Objection.</p> <p>7     <b>A Fifth Amendment.</b></p> <p>8     Q Did you ever talk to Robert Gonzalez about</p> <p>9 framing people while you were a police officer?</p> <p>10    MR. BAZAREK: Object to the form of the</p> <p>11 question, foundation.</p> <p>12    MR. KOSOKO: Join.</p> <p>13    MR. MICHALIK: Join.</p> <p>14    MR. BAZAREK: Mischaracterizes the</p> <p>15 evidence in the record in this case.</p> <p>16    <b>A Fifth Amendment.</b></p> <p>17    Q Did you ever talk to Manny Leano about</p> <p>18 framing people?</p> <p>19    MR. BAZAREK: Object to the form of the</p> <p>20 question, foundation, mischaracterizes the</p> <p>21 evidence in the record in this case.</p> <p>22    MR. MICHALIK: Join.</p> <p>23    MR. KOSOKO: Join.</p> <p>24    <b>A Fifth Amendment.</b></p>	<p style="text-align: right;">168</p> <p>1     MR. BAZAREK: Object to the form of the</p> <p>2 question, foundation, mischaracterizes the</p> <p>3 evidence in the record in this case.</p> <p>4     MR. KOSOKO: Join.</p> <p>5     MR. MICHALIK: Join.</p> <p>6     MR. SCHALKKA: Join.</p> <p>7     <b>A Fifth Amendment.</b></p> <p>8     Q Did you ever talk to Elsworth Smith about</p> <p>9 framing people?</p> <p>10    MR. BAZAREK: Object to the form of the</p> <p>11 question, foundation, mischaracterizes the</p> <p>12 evidence in the record in this case.</p> <p>13    MR. MICHALIK: Join.</p> <p>14    MR. SCHALKKA: Join.</p> <p>15    MR. KOSOKO: Join.</p> <p>16    <b>A Fifth Amendment.</b></p> <p>17    Q Do you know who Calvin Ridgell is?</p> <p>18    <b>A Yes.</b></p> <p>19    Q Was he ever a member of Sergeant Watts'</p> <p>20 team?</p> <p>21    <b>A Yes.</b></p> <p>22    Q Did you ever talk to Ridgell about framing</p> <p>23 people?</p> <p>24    MR. BAZAREK: Object to the form of the</p>

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43 (169 to 172)

169	<p>1 question, foundation, mischaracterizes the</p> <p>2 evidence in the record in this case.</p> <p>3 MR. MICHALIK: Join.</p> <p>4 MR. SCHALKA: Join.</p> <p>5 MR. KOSOKO: Join.</p> <p>6 <b>A Fifth Amendment.</b></p> <p>7 Q Did you ever talk to Jerome Summers about</p> <p>8 framing people?</p> <p>9 MR. BAZAREK: Object to the form of the</p> <p>10 question, foundation, mischaracterizes the</p> <p>11 evidence in the record in this case.</p> <p>12 MR. MICHALIK: Join.</p> <p>13 MR. SCHALKA: Join.</p> <p>14 MR. KOSOKO: Join.</p> <p>15 <b>A Fifth Amendment.</b></p> <p>16 Q Did you ever talk to Kenneth Young about</p> <p>17 framing people?</p> <p>18 MR. BAZAREK: Object to the form of the</p> <p>19 question, foundation, mischaracterizes the</p> <p>20 evidence in the record in this case.</p> <p>21 MR. MICHALIK: Join.</p> <p>22 MR. SCHALKA: Join.</p> <p>23 MR. KOSOKO: Join.</p> <p>24 <b>A Fifth Amendment.</b></p>	171	<p>1 MR. BAZAREK: Object to the form of the</p> <p>2 question, foundation, mischaracterizes the record</p> <p>3 and the evidence in this case.</p> <p>4 MR. MICHALIK: Join.</p> <p>5 MR. SCHALKA: Join.</p> <p>6 MR. KOSOKO: Join.</p> <p>7 MR. PALLES: Join.</p> <p>8 <b>A Fifth Amendment.</b></p> <p>9 Q Did Alvin Jones frame anybody?</p> <p>10 MR. BAZAREK: Object to the form of the</p> <p>11 question, foundation, mischaracterizes the</p> <p>12 evidence in the record in this case.</p> <p>13 MR. MICHALIK: Join.</p> <p>14 MR. SCHALKA: Join.</p> <p>15 MR. KOSOKO: Join.</p> <p>16 <b>A Fifth Amendment.</b></p> <p>17 Q Did Manny Leano frame anybody?</p> <p>18 MR. BAZAREK: Object to the form of the</p> <p>19 question, foundation, mischaracterizes the</p> <p>20 evidence in the record in this case.</p> <p>21 MR. MICHALIK: Join.</p> <p>22 MR. SCHALKA: Join.</p> <p>23 MR. KOSOKO: Join.</p> <p>24 <b>A Fifth Amendment.</b></p>
170	<p>1 Q Now, all the people I just asked you</p> <p>2 about, did you ever talk to any of them about</p> <p>3 falsely arresting people, claiming those people</p> <p>4 had drugs when they didn't?</p> <p>5 MR. BAZAREK: Object to the form of the</p> <p>6 question, foundation, compound, also</p> <p>7 mischaracterizes the evidence in the record in</p> <p>8 this case.</p> <p>9 MR. MICHALIK: Join.</p> <p>10 MR. SCHALKA: Join.</p> <p>11 MR. KOSOKO: Join.</p> <p>12 <b>A Fifth Amendment.</b></p> <p>13 Q Did Brian Bolton frame anybody?</p> <p>14 MR. BAZAREK: Object to the form of the</p> <p>15 question, foundation, mischaracterizes the</p> <p>16 evidence in the record in this case.</p> <p>17 MR. MICHALIK: Join.</p> <p>18 MR. SCHALKA: Join.</p> <p>19 MR. KOSOKO: Join.</p> <p>20 MR. PALLES: Join.</p> <p>21 <b>A Fifth Amendment.</b></p> <p>22 Q Did Darrell Edwards -- well, no, strike</p> <p>23 that.</p> <p>24 Did Ronald Gonzalez frame anybody?</p>	172	<p>1 Q Did Lamonica Lewis frame anybody?</p> <p>2 MR. BAZAREK: Object to the form of the</p> <p>3 question, foundation, mischaracterizes the</p> <p>4 evidence in the record in this case.</p> <p>5 MR. MICHALIK: Join.</p> <p>6 MR. SCHALKA: Join.</p> <p>7 MR. KOSOKO: Join.</p> <p>8 <b>A Fifth Amendment.</b></p> <p>9 Q Did Douglas Nichols frame anybody?</p> <p>10 MR. BAZAREK: Object to the form of the</p> <p>11 question, foundation, mischaracterizes the</p> <p>12 evidence in the record in this case.</p> <p>13 MR. MICHALIK: Join.</p> <p>14 MR. SCHALKA: Join.</p> <p>15 MR. KOSOKO: Join.</p> <p>16 <b>A Fifth Amendment.</b></p> <p>17 Q Did Calvin Ridgell ever frame anybody?</p> <p>18 MR. BAZAREK: Object to the form of the</p> <p>19 question, foundation, mischaracterizes the</p> <p>20 evidence in the record in this case.</p> <p>21 MR. MICHALIK: Join.</p> <p>22 MR. SCHALKA: Join.</p> <p>23 MR. KOSOKO: Join.</p> <p>24 <b>A Fifth Amendment.</b></p>



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44 (173 to 176)

173	<p>1 Q Did Elsworth Smith frame anybody?</p> <p>2 MR. BAZAREK: Object to the form of the</p> <p>3 question, foundation, mischaracterizes the</p> <p>4 evidence in the record in this case.</p> <p>5 MR. MICHALIK: Join.</p> <p>6 MR. SCHALKA: Join.</p> <p>7 MR. KOSOKO: Join.</p> <p>8 <b>A Fifth Amendment.</b></p> <p>9 Q Did Jerome Summers frame anybody?</p> <p>10 MR. BAZAREK: Object to the form of the</p> <p>11 question, foundation, mischaracterizes the</p> <p>12 evidence in the record in this case.</p> <p>13 MR. MICHALIK: Join.</p> <p>14 MR. SCHALKA: Join.</p> <p>15 MR. KOSOKO: Join.</p> <p>16 <b>A Fifth Amendment.</b></p> <p>17 Q Did Ronald Watts frame anybody?</p> <p>18 MR. KOSOKO: Objection to the form of the</p> <p>19 question, argumentative, foundation.</p> <p>20 <b>A Fifth Amendment.</b></p> <p>21 Q Did Kenneth Young frame anybody?</p> <p>22 MR. BAZAREK: Object to the form of the</p> <p>23 question, foundation, mischaracterizes the</p> <p>24 evidence in the record in this case.</p>	175	<p>1 not participate in framing civilians?</p> <p>2 MR. BAZAREK: Object -- object to the form</p> <p>3 of the question, foundation, mischaracterizes the</p> <p>4 evidence in the record in this case.</p> <p>5 MR. MICHALIK: Join.</p> <p>6 MR. SCHALKA: Join.</p> <p>7 MR. KOSOKO: Join.</p> <p>8 <b>A Fifth Amendment.</b></p> <p>9 <b>BY MR. RAUSCHER:</b></p> <p>10 Q Do you know who Phillip Thomas is?</p> <p>11 <b>A No.</b></p> <p>12 Q All right.</p> <p>13 MR. RAUSCHER: Are we on 20?</p> <p>14 I'm going to mark Exhibit 20 DO-Joint 007386</p> <p>15 to 7390.</p> <p>16 (Mohammed Deposition Exhibit 20 marked for</p> <p>17 identification and attached to the transcript.)</p> <p>18 Q Have you had a chance to review this</p> <p>19 report?</p> <p>20 <b>A Yes.</b></p> <p>21 Q This is a report documenting the arrest of</p> <p>22 Phillip Thomas on May 14th, 2007?</p> <p>23 <b>A Yes.</b></p> <p>24 Q And you participated in that arrest?</p>
174	<p>1 MR. KOSOKO: Join.</p> <p>2 MR. MICHALIK: Join.</p> <p>3 MR. SCHALKA: Join.</p> <p>4 <b>A Fifth Amendment.</b></p> <p>5 Q Do you have personal knowledge of any</p> <p>6 member of Sergeant Watts' team framing any</p> <p>7 civilians?</p> <p>8 MR. BAZAREK: Object to the form of the</p> <p>9 question, foundation, mischaracterizes the</p> <p>10 evidence in the record in this case.</p> <p>11 MR. MICHALIK: Join.</p> <p>12 MR. SCHALKA: Join.</p> <p>13 MR. KOSOKO: Join.</p> <p>14 <b>A Fifth Amendment.</b></p> <p>15 Q Tell me which of the team members from</p> <p>16 Sergeant Watts' team framed civilians.</p> <p>17 MR. BAZAREK: Object to the form of the</p> <p>18 question, foundation, mischaracterizes the</p> <p>19 evidence in the record in this case.</p> <p>20 MR. MICHALIK: Join.</p> <p>21 MR. SCHALKA: Join.</p> <p>22 MR. KOSOKO: Join.</p> <p>23 <b>A Fifth Amendment.</b></p> <p>24 Q Did any members of Sergeant Watts' team</p>	176	<p>1 <b>A Yes.</b></p> <p>2 Q Looking at Mr. Thomas' picture on the</p> <p>3 front of this report, does that refresh your</p> <p>4 recollection as to Mr. Thomas?</p> <p>5 <b>A No, it doesn't.</b></p> <p>6 Q Was there anyone in Ida B. Wells known by</p> <p>7 nicknames like Candy Man or Candy Lady?</p> <p>8 Does that sound familiar to you?</p> <p>9 <b>A Candy Man? Not -- not really, no.</b></p> <p>10 Q What about Candy Lady? The Candy Lady?</p> <p>11 <b>A Candy Lady? No.</b></p> <p>12 Q Were there people in Ida B. Wells who sold</p> <p>13 food to -- and candy to make extra money?</p> <p>14 <b>A Yes.</b></p> <p>15 Q And do you know who any of those people</p> <p>16 were?</p> <p>17 <b>A No.</b></p> <p>18 Q Do you know if Phillip Thomas was one of</p> <p>19 those people?</p> <p>20 <b>A No.</b></p> <p>21 Q Would you have arrested somebody for</p> <p>22 selling food?</p> <p>23 <b>A No.</b></p> <p>24 Q Would you have -- well -- okay.</p>



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45 (177 to 180)

<p style="text-align: right;">177</p> <p>1 Is anything in this report about the</p> <p>2 arrest of Phillip Thomas true?</p> <p>3 MR. BAZAREK: Object to the form of the</p> <p>4 question, foundation.</p> <p>5 MR. MICHALIK: Join.</p> <p>6 MR. KOSOKO: Join.</p> <p>7 <b>A Fifth Amendment.</b></p> <p>8 Q Was Phillip Thomas -- did Phillip Thomas</p> <p>9 have drugs in his possession on May 14, 2007?</p> <p>10 <b>A Fifth Amendment.</b></p> <p>11 MR. BAZAREK: Object to the form of the</p> <p>12 question, foundation.</p> <p>13 MR. MICHALIK: Join.</p> <p>14 MR. KOSOKO: Join.</p> <p>15 THE COURT REPORTER: I'm sorry. I didn't</p> <p>16 hear an answer.</p> <p>17 THE WITNESS: Oh. "Fifth Amendment."</p> <p>18 THE COURT REPORTER: Thank you.</p> <p>19 BY MR. RAUSCHER:</p> <p>20 Q Were four bags of drugs seized from</p> <p>21 Phillip Thomas on May 14, 2007?</p> <p>22 MR. BAZAREK: Object to the form of the</p> <p>23 question, foundation.</p> <p>24 MR. MICHALIK: Join.</p>	<p style="text-align: right;">179</p> <p>1 <b>A Fifth Amendment.</b></p> <p>2 Q Did you ever steal any money that</p> <p>3 Mr. Thomas had earned from selling food?</p> <p>4 <b>A Fifth Amendment.</b></p> <p>5 Q When Phillip Thomas was arrested on</p> <p>6 May 14, 2007, you knew he had not done anything</p> <p>7 wrong?</p> <p>8 MR. BAZAREK: Object to the form of the</p> <p>9 question, foundation, mischaracterizes the</p> <p>10 evidence in the record in this case.</p> <p>11 MR. MICHALIK: Join.</p> <p>12 MR. SCHALKA: Join.</p> <p>13 MR. KOSOKO: Join.</p> <p>14 <b>A Fifth Amendment.</b></p> <p>15 Q The narrative in this arrest report that</p> <p>16 we just looked at describing Phillip Thomas having</p> <p>17 drugs is false?</p> <p>18 MR. BAZAREK: Object to the form of the</p> <p>19 question, foundation, mischaracterizes the</p> <p>20 evidence in the record in this case.</p> <p>21 MR. MICHALIK: Join.</p> <p>22 MR. SCHALKA: Join.</p> <p>23 <b>A Fifth Amendment.</b></p> <p>24 MR. RAUSCHER: I'm going to mark</p>
<p style="text-align: right;">178</p> <p>1 MR. KOSOKO: Join.</p> <p>2 <b>A Fifth Amendment.</b></p> <p>3 Q Phillip Thomas did not have drugs on him</p> <p>4 on May 14th, 2007?</p> <p>5 MR. BAZAREK: Object to the form of the</p> <p>6 question, foundation, mischaracterizes the</p> <p>7 evidence in the record in this case.</p> <p>8 MR. MICHALIK: Join.</p> <p>9 MR. SCHALKA: Join.</p> <p>10 MR. KOSOKO: Join.</p> <p>11 <b>A Fifth Amendment.</b></p> <p>12 Q You participated in falsely arresting</p> <p>13 Phillip Thomas even though he had no drugs in his</p> <p>14 possession and was doing nothing illegal on</p> <p>15 May 14, 2007?</p> <p>16 MR. BAZAREK: Object to the form of the</p> <p>17 question, foundation, mischaracterizes the</p> <p>18 evidence in the record in this case.</p> <p>19 MR. MICHALIK: Join.</p> <p>20 MR. SCHALKA: Join.</p> <p>21 MR. KOSOKO: Join.</p> <p>22 <b>A Fifth Amendment.</b></p> <p>23 Q Did you ever steal food from Phillip</p> <p>24 Thomas?</p>	<p style="text-align: right;">180</p> <p>1 Exhibit 21 DO-Joint 007392 to 7393.</p> <p>2 (Mohammed Deposition Exhibit 21 marked for</p> <p>3 identification and attached to the transcript.)</p> <p>4 Q Have you had a chance to review this</p> <p>5 report?</p> <p>6 <b>A Yes.</b></p> <p>7 Q And this is another report documenting the</p> <p>8 arrest of Phillip Thomas?</p> <p>9 <b>A Yes.</b></p> <p>10 Q Do you know who wrote the signatures in on</p> <p>11 this report?</p> <p>12 <b>A No.</b></p> <p>13 Q This is another false report documenting</p> <p>14 Phillip Thomas' arrest?</p> <p>15 MR. BAZAREK: Object to the form of the</p> <p>16 question, foundation, mischaracterizes the</p> <p>17 evidence in the record in this case.</p> <p>18 MR. MICHALIK: Join.</p> <p>19 MR. KOSOKO: Join.</p> <p>20 <b>A Fifth Amendment.</b></p> <p>21 Q Is the narrative in this report true?</p> <p>22 MR. BAZAREK: Object to the form of the</p> <p>23 question, foundation.</p> <p>24 MR. MICHALIK: Join.</p>

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46 (181 to 184)

181	<p>1 MR. KOSOKO: Join.</p> <p>2 <b>A Fifth Amendment.</b></p> <p>3 Q Do you know anyone named Lionel White?</p> <p>4 <b>A Lionel White?</b></p> <p>5 <b>I don't -- I don't recall.</b></p> <p>6 Q Jr. or Sr.?</p> <p>7 <b>A Sr. -- if you've got a picture or</b></p> <p>8 <b>something --</b></p> <p>9 Q Did you ever arrest someone because their</p> <p>10 dad filed a complaint against any members of your</p> <p>11 team?</p> <p>12 <b>A Take the Fifth.</b></p> <p>13 MR. RAUSCHER: I'm going to mark</p> <p>14 Exhibit 22, DO-Joint 7439 to 7443.</p> <p>15 (Mohammed Deposition Exhibit 22 marked for</p> <p>16 identification and attached to the transcript.)</p> <p>17 Q Do you recognize the person who's shown on</p> <p>18 the front of this?</p> <p>19 <b>A No. No.</b></p> <p>20 Q This is a report documenting the arrest of</p> <p>21 Lionel White on July 23rd, 2006?</p> <p>22 <b>A Yes. That's what it says.</b></p> <p>23 MR. RAUSCHER: And for our record, because</p> <p>24 there's a White, Jr., and White, Sr., this is</p>	183	<p>1 MR. BAZAREK: Object to the form of the</p> <p>2 question, foundation, mischaracterizes the</p> <p>3 evidence in the record in this case.</p> <p>4 MR. MICHALIK: Join.</p> <p>5 MR. SCHALKKA: Join.</p> <p>6 MR. KOSOKO: Join.</p> <p>7 <b>A Take the Fifth.</b></p> <p>8 Q Did you know that you were going to be</p> <p>9 listed as the attesting officer in this report?</p> <p>10 <b>A Take the Fifth.</b></p> <p>11 Q Did you have to review this report before</p> <p>12 you were listed as the attesting officer?</p> <p>13 <b>A Take the Fifth.</b></p> <p>14 Q The narrative says that Lionel White was</p> <p>15 observed receiving money from a suspect now known</p> <p>16 as Southern, Larry, and he gave the subject, Larry</p> <p>17 Southern, a small Ziploc Baggie with white powder,</p> <p>18 suspect heroin, to exchange for that money.</p> <p>19 That's not true, is it?</p> <p>20 MR. BAZAREK: Object to the form of the</p> <p>21 question, foundation, mischaracterizes the</p> <p>22 evidence in the record in this case.</p> <p>23 MR. MICHALIK: Join.</p> <p>24 MR. KOSOKO: Join.</p>
182	<p>1 White, Jr.</p> <p>2 Q You're listed as the attesting officer?</p> <p>3 <b>A Yes.</b></p> <p>4 Q And under "Attesting Officer" it says,</p> <p>5 "I hereby declare and affirm, under penalty of</p> <p>6 perjury, that the facts stated herein are accurate</p> <p>7 to the best of my knowledge, information, and/or</p> <p>8 belief"; correct?</p> <p>9 <b>A Yes.</b></p> <p>10 Q What information, knowledge, and/or belief</p> <p>11 did you have that any of the facts in the incident</p> <p>12 were true?</p> <p>13 <b>A Take the Fifth.</b></p> <p>14 Q In fact, the narrative is completely</p> <p>15 false?</p> <p>16 MR. BAZAREK: Object to the form of the</p> <p>17 question, foundation, mischaracterizes the</p> <p>18 evidence in the record in this case.</p> <p>19 MR. MICHALIK: Join.</p> <p>20 MR. SCHALKKA: Join.</p> <p>21 MR. KOSOKO: Join.</p> <p>22 <b>A Take the Fifth.</b></p> <p>23 Q Did you knowingly sign -- did you</p> <p>24 knowingly sign a false report?</p>	184	<p>1 <b>A Fifth Amendment.</b></p> <p>2 Q Lionel White was not selling drugs when he</p> <p>3 was arrested on July 23, 2006?</p> <p>4 MR. BAZAREK: Object to the form of the</p> <p>5 question, foundation, mischaracterizes the record</p> <p>6 and the evidence in this case.</p> <p>7 <b>A Fifth Amendment.</b></p> <p>8 MR. MICHALIK: Join.</p> <p>9 MR. SCHALKKA: Join.</p> <p>10 MR. KOSOKO: Join.</p> <p>11 Q And when you agreed to be the attesting</p> <p>12 officer, saying that Lionel White was arrested for</p> <p>13 selling drugs, you knew that to be false?</p> <p>14 MR. BAZAREK: Object to the form of the</p> <p>15 question, foundation, mischaracterizes the</p> <p>16 evidence in the record in this case.</p> <p>17 MR. MICHALIK: Join.</p> <p>18 MR. SCHALKKA: Join.</p> <p>19 MR. KOSOKO: Join.</p> <p>20 <b>A Fifth Amendment.</b></p> <p>21 Q Was any suspected narcotics money taken</p> <p>22 from Lionel White?</p> <p>23 <b>A Fifth Amendment.</b></p> <p>24 Q Lionel White was arrested without cause on</p>

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47 (185 to 188)

185	<p>1 July 23rd, 2006?</p> <p>2 MR. BAZAREK: Object to the form of the</p> <p>3 question, foundation, mischaracterizes the</p> <p>4 evidence in the record in this case.</p> <p>5 MR. MICHALIK: Join.</p> <p>6 MR. SCHALKA: Join.</p> <p>7 MR. KOSOKO: Join.</p> <p>8 <b>A Fifth Amendment.</b></p> <p>9 Q Is it true, as stated in this report, that</p> <p>10 53 Ziploc Baggies with suspect heroin were</p> <p>11 recovered from Lionel White on July 23rd, 2006?</p> <p>12 MR. BAZAREK: Object to the form of the</p> <p>13 question, foundation.</p> <p>14 MR. MICHALIK: Join.</p> <p>15 MR. KOSOKO: Join.</p> <p>16 <b>A Fifth Amendment.</b></p> <p>17 Q No suspect heroin was found on Lionel</p> <p>18 White on July 23rd, 2006?</p> <p>19 MR. BAZAREK: Object to the form of the</p> <p>20 question, foundation, mischaracterizes the</p> <p>21 evidence in the record in this case.</p> <p>22 MR. MICHALIK: Join.</p> <p>23 MR. SCHALKA: Join.</p> <p>24 <b>A Fifth Amendment.</b></p>	187	<p>1 question, foundation, mischaracterizes the</p> <p>2 evidence in the record in this case.</p> <p>3 MR. MICHALIK: Join.</p> <p>4 MR. SCHALKA: Join.</p> <p>5 MR. KOSOKO: Join.</p> <p>6 <b>A Fifth Amendment.</b></p> <p>7 Q Did you hear Lionel White tell Sergeant</p> <p>8 Watts on July 23rd, 2006, that White didn't have</p> <p>9 any drugs on him?</p> <p>10 MR. BAZAREK: Object to the form of the</p> <p>11 question, foundation.</p> <p>12 MR. KOSOKO: Join.</p> <p>13 <b>A Fifth Amendment.</b></p> <p>14 Q You -- you never saw anybody recover drugs</p> <p>15 from Lionel White?</p> <p>16 MR. BAZAREK: Object to the form of the</p> <p>17 question, foundation.</p> <p>18 MR. KOSOKO: Join.</p> <p>19 <b>A Fifth Amendment.</b></p> <p>20 MR. RAUSCHER: Do you guys want to take</p> <p>21 another break and figure out where we're --</p> <p>22 MR. PALLES: Yeah. Yeah, let's do that.</p> <p>23 THE VIDEOGRAPHER: Off the record, 1:51.</p> <p>24 ///</p>
186	<p>1 MR. KOSOKO: Join.</p> <p>2 MR. RAUSCHER: I'm going to mark</p> <p>3 Exhibit 23 as DO-Joint 7471.</p> <p>4 (Mohammed Deposition Exhibit 23 marked for</p> <p>5 identification and attached to the transcript.)</p> <p>6 Q This is an inventory report documenting</p> <p>7 drugs allegedly recovered from Lionel White on</p> <p>8 July 23, 2006.</p> <p>9 <b>A Yes.</b></p> <p>10 Q And as the attesting officer on the report</p> <p>11 of his arrest, you know that this is a false</p> <p>12 report; right?</p> <p>13 MR. BAZAREK: Object to the form of the</p> <p>14 question, foundation, mischaracterizes the</p> <p>15 evidence in the record in this case.</p> <p>16 MR. MICHALIK: Join.</p> <p>17 MR. KOSOKO: Join.</p> <p>18 MR. PALLES: Join.</p> <p>19 <b>A Fifth Amendment.</b></p> <p>20 Q And you know that 53 Ziploc Baggies</p> <p>21 containing a white -- a white powder substance,</p> <p>22 suspect heroin, were not recovered from Lionel</p> <p>23 White on July 23rd, 2006?</p> <p>24 MR. BAZAREK: Object to the form of the</p>	188	<p>1 (A recess was taken from 1:51 p.m. to</p> <p>2 1:56 p.m.)</p> <p>3 THE VIDEOGRAPHER: This concludes Day 1 of</p> <p>4 the video deposition of Kallatt Mohammed. We will</p> <p>5 reconvene on Thursday.</p> <p>6 (A recess was taken from 1:56 p.m. to</p> <p>7 1:59 p.m.)</p> <p>8 (Mohammed Deposition Exhibit 24 marked for</p> <p>9 identification and attached to the transcript.)</p> <p>10 THE VIDEOGRAPHER: We're briefly back on</p> <p>11 the record at 1:59 on Monday.</p> <p>12 MR. RAUSCHER: And we are going back on</p> <p>13 the record just to mark as Exhibit 24 the piece of</p> <p>14 paper that Mr. Mohammed was reading from to invoke</p> <p>15 his Fifth Amendment rights.</p> <p>16 MR. FLAXMAN: Is that agreed by other</p> <p>17 counsel?</p> <p>18 Do you want him to sit down and we can</p> <p>19 question him about it?</p> <p>20 MR. RAVITZ: What's that?</p> <p>21 MR. FLAXMAN: I just want it on the record</p> <p>22 that this is --</p> <p>23 MR. RAVITZ: You've put it on the record.</p> <p>24 If I make an objection, I'll make an objection.</p>


Transcript of Kallatt Mohammed  
Conducted on November 18, 2019

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1 MR. FLAXMAN: Do you agree to what he just  
2 said that that was?  
3 MR. RAVITZ: Yes, I agree that's what  
4 it is.  
5 MR. FLAXMAN: Thank you.  
6 THE VIDEOGRAPHER: This concludes Day 1 of  
7 the deposition of Kallatt Mohammed. The time  
8 is two o'clock.  
9 (Off the record at 2:00 p.m.)  
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1 CERTIFICATE OF COURT REPORTER - NOTARY PUBLIC  
2  
3 I, Melanie L. Humphrey-Sonntag, Certified  
4 Shorthand Reporter No. 084-004299, CSR, RDR, CRR,  
5 CRC, FAPR, and a Notary Public in and for the  
6 County of Kane, State of Illinois, the officer  
7 before whom the foregoing deposition was taken, do  
8 hereby certify that the foregoing transcript is a  
9 true and correct record of the testimony given;  
10 that said testimony was taken by me and thereafter  
11 reduced to typewriting under my direction; that  
12 reading and signing was not requested; and that  
13 I am neither counsel for, related to, nor employed  
14 by any of the parties to this case and have no  
15 interest, financial or otherwise, in its outcome.  
16 IN WITNESS WHEREOF, I have hereunto set my  
17 hand and affixed my notarial seal this 12th day of  
18 December, 2019.  
19 My commission expires July 3, 2021.  
20  
21   
22  
23 MELANIE L. HUMPHREY-SONNTAG  
24 NOTARY PUBLIC IN AND FOR ILLINOIS

