

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

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3 (9 to 12)

	9		11
1	P R O C E E D I N G S	1	Q Do you have a job?
2	(Mr. Kosoko and Ms. Baker were not	2	A Yes.
3	present.)	3	Q What do you do for a living?
4	THE VIDEOGRAPHER: This is the video	4	A Truck driver.
5	deposition of Kallatt Mohammed taken by Loevy &	5	Q How long have you been a truck driver for?
6	Loevy in the matter of the Watts coordinated	6	A About five years.
7	pretrial proceedings, Master Docket Case	7	Q Is that a full-time job?
8	No. 19-cv-01717, held at Loevy & Loevy, 311 North	8	A Yes.
9	Aberdeen Street, Chicago, Illinois.	9	Q What company do you work for?
10	Today is November 18th, 2019. The time	10	A It's EKCC.
11	is 10:12.	11	Q Is it a long-haul -- long-haul trucking?
12	The court reporter is Melanie Sonntag,	12	A No. It's -- they haul garbage.
13	Certified Realtime Reporter, with Planet Depos,	13	Q Where do you work?
14	and the videographer is Rick Kosberg.	14	A What do you mean?
15	The counsel can now introduce themselves,	15	Q Are you located -- are you -- are you
16	16 and the court reporter is free to administer the	16	based in a certain area?
17	17 oath.	17	A From Markham, Illinois.
18	MR. RAUSCHER: Scott Rauscher for the	18	Q How much money do you make?
19	19 plaintiffs represented by Loevy & Loevy in the	19	A As far as? A year? A month?
20	20 coordinated proceedings.	20	Q A year.
21	MR. TEPFER: Josh Tepfer for the	21	A Probably about 80,000.
22	22 plaintiffs, the Loevy plaintiffs.	22	Q That's from EKCC?
23	MR. FLAXMAN: Joel Flaxman for the Flaxman	23	A Uh-huh -- yes.
24	24 plaintiffs.	24	Q And I should remind you -- that's a good
	10		12
1	MR. MICHALIK: Paul Michalik for	1	1 reminder.
2	Defendants City of Chicago and various police	2	As we go through today, please try to make
3	department supervisors.	3	sure you answer verbally, yes or no, not uh-huh.
4	MR. SCHALKA: Michael Schalka for	4	A Yes.
5	Defendants Spaargaren and Cadman.	5	Q And if you don't answer -- if you don't
6	MR. BAZAREK: William E. Bazarek for	6	understand one of my questions, let me know and
7	defendants represented by Hale & Monico.	7	I'll do my best to rephrase it. Okay?
8	MR. GAINER: Brian Gainer on behalf of	8	A I will.
9	Defendant Watts.	9	Q If you don't do that, I'm going to assume
10	MR. PALLE: Eric Palles and Gary Ravitz	10	10 that you understood. Is that fair?
11	on behalf of Kallatt Mohammed.	11	A That's fair.
12	MS. KLEINHAUS: Theresa Kleinhaus on	12	Q So you have made about 80,000 a year for
13	behalf of the Loevy plaintiffs.	13	13 the last five years as a truck driver?
14	THE COURT REPORTER: Would you raise your	14	A Yes.
15	right hand, please.	15	Q Do you have any other sources of income?
16	(Witness sworn.)	16	A No.
17	THE COURT REPORTER: Thank you.	17	Q Did you receive any money from the City of
18	KALLATT MOHAMMED, II,	18	18 Chicago?
19	having been duly sworn, testified as follows:	19	A No.
20	EXAMINATION BY COUNSEL FOR THE LOEVY PLAINTIFFS	20	Q What was the last job you had before you
21	BY MR. RAUSCHER:	21	21 worked at EKCC?
22	Q Say and spell your name, please.	22	A Chicago police officer.
23	A Kallatt, K-a-l-l-a-t-t, Mohammed,	23	Q When did you leave the police department?
24	M-o-h-a-m-m-e-d, II.	24	A 2011 I believe it was.

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4 (13 to 16)

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

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5 (17 to 20)

	17		19
1	ID number?	1	basically covered the day?
2	A No.	2	A Yes.
3	Q Did you have a separate computer log-in	3	Q How frequently did it change -- did your
4	number?	4	shift change?
5	A Yes.	5	So how often did you go from morning to
6	Q And what was the computer log-in number?	6	night or vice versa?
7	A I don't remember.	7	A Well, it -- it -- it would depend --
8	Q What did you use the computer log-in	8	Q What would --
9	number for?	9	A -- on -- on what was going on that they
10	A For running background checks and names.	10	would change the shift.
11	Q When you say "running" names, what do you	11	Q Who decided what shift you worked on?
12	mean by that?	12	A The commander.
13	A Well, seeing if you had a warrant or --	13	Q Who -- who was or who were the commanders
14	Q Did you ever use anyone else's computer	14	15 in your area when you were on the tac team?
15	log-in number?	15	A I don't recall.
16	A No.	16	Q You don't recall any of them?
17	Q Did -- did you ever give your computer	17	A No.
18	log-in number for anyone else and authorize them	18	Q Were you in a certain unit when you were
19	to use it?	19	15 on the tac team?
20	A No.	20	A No.
21	Q What were your main responsibilities as a	21	Q Did you have partners over the years when
22	tac officer in Ida B. Wells?	22	22 you were a tac officer?
23	A Find out who was selling drugs and doing	23	A I had -- maybe three partners.
24	reverse stings.	24	Q Who were your three partners over
	18		20
1	Q Anything else?	1	the years as a tac officer?
2	A Not that I could remember -- recall.	2	A Monica Lewis --
3	Q Did you work on a particular shift as a	3	Q Is it Lamonica Lewis?
4	tac officer?	4	A Lamonica Lewis.
5	A We had two shifts, one in the morning and	5	Dorian Smith. And Elsworth.
6	one at night.	6	Q What was Els- -- Elsworth's --
7	Q What were the hours of the morning shift?	7	A I can't think of --
8	A I don't recall.	8	Q Smith?
9	Q What were the hours of the night shift?	9	A Smith, yes. Yes, that's his name.
10	A Pardon me?	10	Q Did any of them have -- any of those three
11	Q What were the hours of the night shift?	11	11 people have a nickname?
12	A Night shift was -- they varied so	12	A No.
13	I don't -- I don't recall that, either. I know	13	Q Was Lamonica Lewis ever referred to as
14	that --	14	Coco?
15	Q Go ahead.	15	A Yes.
16	A -- the ending of the shift would be at	16	Q Did other officers call her Coco?
17	two o'clock in the morning.	17	A Yes. Yes.
18	Q Do you know the ending of the morning	18	Q Did you call her Coco?
19	shift?	19	A I called her Lamonica.
20	A That varied, too. Almost -- probably	20	Q How -- what years were you partners with
21	about six o'clock.	21	21 Lamonica Lewis?
22	Q Six o'clock p.m.?	22	A It might have been a year. I don't
23	A P.m., yes.	23	remember. I can't remember.
24	Q So is it fair to say the morning shift	24	Q Do you remember what year it was?

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6 (21 to 24)

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

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7 (25 to 28)

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

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8 (29 to 32)

	29		31
1	officer's role?	1	A Yes.
2	A To go to court.	2	Q So we know arresting officers arrested
3	Q So they don't have a role in the actual	3	people; right?
4	sting?	4	A Yes.
5	A Yeah. They would be out there, but they	5	Q And they filled out the paperwork?
6	would go to court.	6	A Yes.
7	Q What was their role in the reverse sting,	7	Q So arrest reports, incident reports, that
8	the day of the reverse sting? What would the	8	sort of thing?
9	arresting officer do?	9	A Well, it was a group -- if I could
10	A I don't recall.	10	remember, it was -- you had -- whatever somebody
11	Q Did they arrest people?	11	attempted to -- what they would ask for.
12	A I'm sure they did, but I couldn't tell you	12	They would -- that would be written down,
13	what role they played.	13	what they asked for, and that would be -- somebody
14	Q So is -- is one of the roles in the	14	would fill out the paperwork for that, that -- on
15	reverse sting arresting people?	15	that call.
16	A That's what it is, yes.	16	Q Who is the "somebody"?
17	Q Okay. So is that the job of the arresting	17	A Well, whoever arrested -- whoever was
18	officer?	18	assigned that -- to do that.
19	A Yes.	19	Q And was the person assigned to do that the
20	Q Did the arresting --	20	arresting officer?
21	A He was the court officer.	21	A Yes.
22	Q He was the court officer?	22	Q And then you said there were staging
23	A Yes.	23	officers?
24	Q Why was he called the arresting officer?	24	A Yes.
	30		32
1	A Because that's -- when he arrested, he	1	Q What did staging officers do?
2	would be the one to go to court.	2	A They sat outside like I did, stood outside
3	Q And what was his job in court? What was	3	and watched everybody come in.
4	he going to court to do?	4	Q And how would you know if you were
5	MR. BAZAREK: I just object to the form of	5	supposed to be chasing someone down?
6	the question, along with foundation.	6	A Because they would call on the radio. And
7	A Go to court.	7	I would see them running.
8	Q And to do what?	8	Q Who would call on the radio?
9	A To testify against what -- what was on the	9	A One of the officers.
10	paper, what happened.	10	Q What would they say?
11	Q And whose job was it to fill out the	11	A "We got one leaving."
12	paperwork after reverse stings?	12	Q How would you know who they were talking
13	A It was the arresting officer.	13	about? Would they describe the person?
14	Q And what -- how would the arresting	14	A They would give a description of what they
15	officer go about filling out the paperwork? How	15	wore and which direction they were headed in.
16	would they know what to include?	16	Q And you said there were enforcers?
17	A I -- I couldn't tell you.	17	A No, I didn't say that.
18	Q Were you ever the arresting officer in a	18	Q You didn't say enforcers were the third
19	reverse sting?	19	role?
20	A No.	20	A Pardon me?
21	Q Who assigned the roles to people during	21	Q You didn't say that enforcers were the
22	reverse stings?	22	third role?
23	A The sergeant would.	23	A I said there were enforcers, but, no, the
24	Q So that would be Watts?	24	enforcer wasn't the one that called.

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9 (33 to 36)

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

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10 (37 to 40)

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

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11 (41 to 44)

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

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12 (45 to 48)

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

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13 (49 to 52)

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

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14 (53 to 56)

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

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15 (57 to 60)

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

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16 (61 to 64)

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

Transcript of Kallatt Mohammed
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17 (65 to 68)

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

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18 (69 to 72)

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

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19 (73 to 76)

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

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20 (77 to 80)

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

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21 (81 to 84)

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

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22 (85 to 88)

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

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23 (89 to 92)

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

Transcript of Kallatt Mohammed
Conducted on November 18, 2019

24 (93 to 96)

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

Transcript of Kallatt Mohammed
Conducted on November 18, 2019

25 (97 to 100)

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

Transcript of Kallatt Mohammed
Conducted on November 18, 2019

26 (101 to 104)

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

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27 (105 to 108)

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

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28 (109 to 112)

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

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29 (113 to 116)

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

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30 (117 to 120)

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

Transcript of Kallatt Mohammed
Conducted on November 18, 2019

31 (121 to 124)

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

Transcript of Kallatt Mohammed
Conducted on November 18, 2019

32 (125 to 128)

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

Transcript of Kallatt Mohammed
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33 (129 to 132)

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

Transcript of Kallatt Mohammed
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34 (133 to 136)

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

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35 (137 to 140)

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

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36 (141 to 144)

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

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37 (145 to 148)

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

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38 (149 to 152)

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

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39 (153 to 156)

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

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40 (157 to 160)

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

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41 (161 to 164)

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

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42 (165 to 168)

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

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43 (169 to 172)

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

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44 (173 to 176)

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

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45 (177 to 180)

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

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46 (181 to 184)

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

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47 (185 to 188)

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

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48 (189 to 192)

189

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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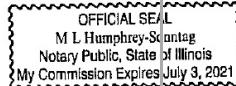
1 CERTIFICATE OF COURT REPORTER - NOTARY PUBLIC

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 *M.L. Humphrey-Sonntag*
22
23 MELANIE L. HUMPHREY-SONNTAG
24 NOTARY PUBLIC IN AND FOR ILLINOIS