

## **EXHIBIT 62**

1                   IN THE UNITED STATES DISTRICT COURT  
2                   FOR THE NORTHERN DISTRICT OF  
3                   ILLINOIS EASTERN DIVISION  
4                   MASTER DOCKET CASE NO. 19-CV-01717

ORIGINAL

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8                   IN RE: WATTS COORDINATED  
9                   PRETRIAL PROCEEDINGS  
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DEPONENT: MICHAEL SPAARGAREN  
DATE: MARCH 7, 2022  
REPORTER: MARGARET THORNTON

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15			to take the deposition of Michael Spaargaren in the
16			11 matter of Enri Watts, coordinated pretrial
17			12 proceedings, pending in the United States District
18			13 Court for the Northern district of Illinois, Eastern
19			14 Division. Master -- master docket, case number
20			15 19CB01717. Will everyone but the witness please
21			16 state your appearance, how you are attending, and
22			17 the location from which you're attending, starting
23			18 with Plaintiff's counsel?
24			19 MS. KLEINHAUS: Good morning. Theresa
25			20 Kleinhaus on behalf of the Loevy plaintiffs,
			21 attending remotely from Chicago, Illinois.
			22 MR. FLAXMAN: This is Joel Flaxman, for the
			23 Flaxman plaintiffs, attending remotely from Chicago,
			24 Illinois.
			25 MR. DAFFADA: James Daffada on behalf of

<p style="text-align: right;">Page 10</p> <p>1 Michael Spaargaren.</p> <p>2 MR. MICHALIK: Paul Michalik representing</p> <p>3 Defendant, City of Chicago, and some municipal</p> <p>4 supervisors, attending remotely from Chicago.</p> <p>5 MR. BAZAREK: It's William Bazarek. I'm in</p> <p>6 Chicago. I represent the individual defendants</p> <p>7 represented by Hale &amp; Monico, and Ms. Court</p> <p>8 Reporter, I think you misspoke as to what today's</p> <p>9 date is.</p> <p>10 COURT REPORTER: Oh, I apologize. It's March</p> <p>11 7, 2022, for the record.</p> <p>12 MS. DOI: Katherine Doi on behalf of Kallatt</p> <p>13 Mohammed, appearing remotely from Chicago, Illinois.</p> <p>14 MR. KOSOKO: Ahmed Kosoko on behalf of Ronald</p> <p>15 Watts, appearing remotely, Chicago, Illinois,</p> <p>16 MR. LEINENWEBER: Tom Leinenweber appearing</p> <p>17 remotely on behalf of the deponent, appearing from</p> <p>18 Wilmette, Illinois.</p> <p>19 COURT REPORTER: All right. I believe that was</p> <p>20 everybody. Mr. Spaargaren, will you please state</p> <p>21 your full name for the record?</p> <p>22 THE WITNESS: Michael Thomas Spaargaren.</p> <p>23 COURT REPORTER: Okay, and do all parties agree</p> <p>24 that the witness is in fact Michael Spaargaren?</p> <p>25 MS. KLEINHAUS: We agree.</p>	<p style="text-align: right;">Page 12</p> <p>1 A I'm doing well, thanks.</p> <p>2 Q As I said before, my name's Tess Kleinhaus. I</p> <p>3 represent the Loevy plaintiffs in these coordinated</p> <p>4 proceedings. Where are you appearing from?</p> <p>5 A A hotel in San Jose, Costa Rica.</p> <p>6 Q And have you given a deposition before?</p> <p>7 A Yes.</p> <p>8 Q How many times have you done that?</p> <p>9 A I believe twice, maybe three times.</p> <p>10 Q What did you do to prepare for today's</p> <p>11 deposition?</p> <p>12 A Met with my attorney, Jim Daffada.</p> <p>13 Q How many times did you meet with Mr. Daffada</p> <p>14 to prepare?</p> <p>15 A I don't recall how many times. Probably six</p> <p>16 times altogether.</p> <p>17 Q Just to make our time today go more smoothly,</p> <p>18 I'm going to go over some of the ground rules for the</p> <p>19 deposition. So if you answer my question, I'll assume</p> <p>20 that you understood my question; is that fair?</p> <p>21 A Yes.</p> <p>22 Q If I ask a bad question that doesn't make</p> <p>23 sense to you, please let me know that and I'll try to</p> <p>24 ask it better, okay?</p> <p>25 A Okay.</p>
<p style="text-align: right;">Page 11</p> <p>1 MS. DOI: Yes.</p> <p>2 COURT REPORTER: Okay, and Mr. Spaargaren, will</p> <p>3 you please raise your right hand so I can swear you</p> <p>4 in? Do you solemnly swear or affirm that the</p> <p>5 testimony you're about to give will be the truth,</p> <p>6 the whole truth, and nothing but the truth?</p> <p>7 THE WITNESS: Yes.</p> <p>8 COURT REPORTER: Okay. Then we're ready to</p> <p>9 begin.</p> <p>10 MS. KLEINHAUS: All right. Maggie, are you</p> <p>11 able to change the name that appears beneath the</p> <p>12 deponent?</p> <p>13 COURT REPORTER: I think they have to do that</p> <p>14 on their end. I can see if I can do it. I might be</p> <p>15 able to.</p> <p>16 MR. DAFFADA: You want me to do it?</p> <p>17 COURT REPORTER: No, I can do it. Never mind.</p> <p>18 Sorry. Apologies.</p> <p>19 MR. DAFFADA: Oh, thanks.</p> <p>20 COURT REPORTER: All right, is it fixed on your</p> <p>21 end? Can you see it?</p> <p>22 MS. KLEINHAUS: Yes. Thank you.</p> <p>23 DIRECT EXAMINATION</p> <p>24 BY MS. KLEINHAUS:</p> <p>25 Q Good morning, Mr. Spaargaren. How are you?</p>	<p style="text-align: right;">Page 13</p> <p>1 Q Because we're doing this remotely and</p> <p>2 sometimes Zoom freezes, if you can do your best not to</p> <p>3 talk over me, I'll do my best not to talk over you. And</p> <p>4 if anything freezes for you, please just stop and we'll</p> <p>5 fix it; is that fair?</p> <p>6 A Yes.</p> <p>7 Q Are you on any medications that would prevent</p> <p>8 you from providing accurate testimony today?</p> <p>9 A No.</p> <p>10 Q Do you have any medical conditions that would</p> <p>11 prevent you from providing accurate testimony today?</p> <p>12 A Not that I'm aware of.</p> <p>13 Q Do you currently work?</p> <p>14 A Yes.</p> <p>15 Q What do you do for work?</p> <p>16 A I'm a property inspector.</p> <p>17 Q And where do you do property inspections?</p> <p>18 A In Costa Rica.</p> <p>19 Q Do you live full-time in Costa Rica?</p> <p>20 A I'm sorry. What -- what -- what was the</p> <p>21 question?</p> <p>22 Q Do you live full-time in Costa Rica?</p> <p>23 A Yes.</p> <p>24 Q Okay. How often do you come back to the</p> <p>25 United States?</p>

<p>1 A It -- it varies.</p> <p>2 Q Prior to the pandemic, did you live in Costa Rica?</p> <p>3 A Yes.</p> <p>5 Q How often would you return to the States, prior to the pandemic?</p> <p>7 A Once, maybe twice a year.</p> <p>8 Q What's the highest level of education that you have?</p> <p>10 A I have an AAS.</p> <p>11 Q And what does that stand for?</p> <p>12 A Associates of Arts and Science.</p> <p>13 Q And where did you receive your AAS from?</p> <p>14 A From Richard J. Daley, a community college in Chicago.</p> <p>16 Q When did you graduate from Daley?</p> <p>17 A I believe it was in '93.</p> <p>18 Q In what year were you hired by the Chicago Police Department?</p> <p>20 A '95.</p> <p>21 Q Prior to your employment with CPD, did you ever work in law enforcement? And I'm using that term as broadly as you can imagine. So it includes, like, if you're a correctional officer, if you're a probation officer, if you worked security. Did you ever work in</p>	<p>Page 14</p> <p>1 Q And where did you serve during your time in the Navy?</p> <p>3 A I did boot camp at the Great Lakes Naval Training Center. After that, I went to Millington, Tennessee to learn how to do aircraft maintenance. And then after that, I got assigned to -- you call it NAS. Naval Air Station, Whidbey Island, Washington State, where I served the rest of my time. Approximately three years.</p> <p>10 Q For the entirety of your time in the US Navy, where you within the United States?</p> <p>12 A No.</p> <p>13 Q Were you deployed abroad at any point?</p> <p>14 A Yes.</p> <p>15 Q Where did you go?</p> <p>16 A We did two what they call med cruises. Each was a six month deployment. The Mediterranean Sea.</p> <p>18 Q Were you ever part of any active combat when you were part of the US Navy?</p> <p>20 A I know there was some conflicts that we were in, but I worked on the ship. So, my job was support. So, I mean -- honestly, I mean, I don't know when the aircraft were flying, because most of it was confidential. So, I really couldn't say.</p> <p>25 Q Okay. After you were discharged from the</p>
<p>1 law enforcement before you were hired by CPD?</p> <p>2 A No.</p> <p>3 Q Before you were hired by CPD, what did you do for work?</p> <p>5 A Prior to CPD, I worked part time at -- at a restaurant, delivering pizzas on the weekend, and then I also worked at Midway Airlines.</p> <p>8 Q What did you do for Midway Airlines?</p> <p>9 A I was a -- basically, like a mechanics helper.</p> <p>10 Q And was that mechanics for airplanes?</p> <p>11 A Correct.</p> <p>12 Q How long did you work for Midway Airlines?</p> <p>13 A Just about 12 months.</p> <p>14 Q What other employment did you have, prior to becoming employed by CPD?</p> <p>16 A I was in the US Navy, active duty, for four years.</p> <p>18 Q Were you honorably discharged?</p> <p>19 A Yes.</p> <p>20 Q And when were you honorably discharged from the Navy?</p> <p>22 A June of 1990.</p> <p>23 Q Did you join the Navy right out of high school?</p> <p>25 A Yes.</p>	<p>Page 15</p> <p>1 Navy, before you worked at Midway Airlines, what did you do for work?</p> <p>3 A Oh, after I got discharged from the Navy, the first job that I had was Midway Airlines.</p> <p>5 Q Okay. Have we talked about all the employment that you had from when you graduated high school until you joined CPD?</p> <p>8 A I believe that covers all the employment that I had.</p> <p>10 Q What year -- I'm sorry. Strike that please.</p> <p>11 When did you graduate from the police academy?</p> <p>12 A Approximately April of '96.</p> <p>13 Q At any point in your career with CPD, did you take the test to become a sergeant?</p> <p>15 A Yes.</p> <p>16 Q How many times did you take the test?</p> <p>17 A Once.</p> <p>18 Q And when was that?</p> <p>19 A I don't recall.</p> <p>20 Q Do you recall how you did on it?</p> <p>21 A No.</p> <p>22 Q Did you ever take the test to become a detective or apply to become a detective?</p> <p>24 A I believe I started the process. I applied, but -- but I don't recall taking the test.</p>

<p style="text-align: right;">Page 18</p> <p>1 Q And do you know approximately when you started 2 the process? 3 A I don't recall. 4 Q What was your first assignment within CPD when 5 you came out of the academy? 6 A First assignment was the 7th District. 7 Q And geographically, what part of town was the 8 7th District in at that time? 9 A The 7th District ran -- well, the station was 10 at 61st and Racine at the time. It's since moved. 11 Essentially, the district ran from Garfield Boulevard to 12 approximately 70 -- 74th or 75th street, north and 13 south. And then east west, it went from Western Avenue 14 to the -- to the Dan Ryan Expressway. 15 Q For how long were you assigned to the 7th 16 District? 17 A Approximately two years. 18 Q So, approximately spring of '96 until spring 19 of '98? Does that sound right? 20 A It -- it sounds about right. 21 Q What were your duties in the 7th District? 22 A I was assigned as a patrol officer on the 23 third watch. 24 Q Did you have a regular partner during that 25 time period, when you were assigned to the 7th District?</p>	<p style="text-align: right;">Page 20</p> <p>1 A Yes. 2 Q Was that Frenzel and Hansen again? 3 A Yes. 4 Q And I'm sorry if you said this already, were 5 you working patrol in 12th District? 6 A Yes. 7 Q Okay. What's the next assignment that you 8 had, after the 12th District? 9 A Going to Public Housing South. 10 Q And did you request to go to Public Housing 11 South? 12 A Yes. 13 Q And why was that? 14 A I was -- well, I was invited to go, and I 15 went. 16 Q Okay. Who invited you to go? 17 A Officer Shannon Spalding. 18 Q And was Shannon Spalding already assigned to 19 Public Housing South when she invited you? 20 A No. 21 Q Where was she assigned at the time that she 22 talked to you about going over to Public Housing South? 23 A She was assigned to the 2nd District. 24 Q Did she tell you why she thought Public 25 Housing South would be a good assignment?</p>
<p style="text-align: right;">Page 19</p> <p>1 A Yes. 2 Q And who was that? 3 A I worked with Officer Eric Frenzel and Officer 4 Brian Hansen. 5 Q What was the next assignment that you had 6 within CPD? 7 A I went to the 12th District. 8 Q And was that something that you requested? Or 9 were you just moved over to the 12th District? 10 A I bid there. 11 Q And why did you bid to go to the 12th 12 District? 13 A Because both of my partners, Officer Frenzel 14 and Officer Hansen, had bid there. And they said it was 15 a nice district and they basically invited me to come to 16 the district with them. 17 Q And where approximately, geographically, was 18 the 12th District at that time? 19 A It was -- it was on West Monroe Street. I 20 want to say about 1200 West Monroe. 21 Q And how long were you assigned to the 12th 22 District? 23 A Approximately a year. 24 Q Did you have a regular partner or regular 25 partners during that time?</p>	<p style="text-align: right;">Page 21</p> <p>1 A I don't remember the reason why. I don't 2 recall. 3 Q Okay. Do you know a reason why she wanted to 4 go to Public Housing South? 5 A I don't recall. 6 Q How did you first meet Shannon Spalding? 7 A She stopped into a RadioShack that a friend of 8 mine was a manager at, and she was buying a police 9 scanner, and she wanted to learn how to program it. So, 10 my friend knew that I had a police scanner and he called 11 me up and asked me if I -- if I could help her do this, 12 as a favor. So I met her before she came on the job. 13 Q And were you already part of CPD at the time 14 that you were asked to do this favor for her? 15 A No. 16 Q Had you applied to become part of CPD at that 17 point? 18 A Yes. 19 Q So, I'm trying to understand the timeframe. 20 So, you had applied but you hadn't attended the academy 21 yet; is that right? 22 A Correct. 23 Q Okay. Were you and Shannon Spalding at the 24 police academy at the same time? 25 A We -- we -- yes.</p>

<p style="text-align: right;">Page 22</p> <p>1 Q Okay. Do you know if you graduated at the 2 same time?</p> <p>3 A No.</p> <p>4 Q Okay. Who graduated first?</p> <p>5 A I did.</p> <p>6 Q Okay. But there was some overlap where you 7 were there and she was there?</p> <p>8 A Correct.</p> <p>9 Q Okay. How long was the academy when you 10 attended?</p> <p>11 A To the best of my recollection, about six 12 months.</p> <p>13 Q After you met Shannon Spalding to help her 14 with the police scanner, did the two of you stay in 15 touch?</p> <p>16 A Yes.</p> <p>17 Q And would you see her often?</p> <p>18 A Define often?</p> <p>19 Q Would you see her socially once a month?</p> <p>20 A I don't recall how many times I saw her, but 21 it was a few times.</p> <p>22 Q Okay. Would the two of you spend time 23 socially? And by socially, I mean like time together, 24 out of the academy or outside of work?</p> <p>25 A Yes.</p>	<p style="text-align: right;">Page 24</p> <p>1 South already?</p> <p>2 A I -- I don't recall the arrangement that she 3 had made.</p> <p>4 Q Okay. Do you know whether she had requested 5 it, or had been just told to do it?</p> <p>6 A I -- I don't recall.</p> <p>7 Q So, it was your understanding that she knew 8 she was going and that she had an opportunity to invite 9 someone to go as her partner?</p> <p>10 A Correct.</p> <p>11 Q And did you accept?</p> <p>12 A Yes.</p> <p>13 Q And why did you accept the invitation to go to 14 Public Housing South?</p> <p>15 A It -- it was a -- just a chance to do 16 something different.</p> <p>17 Q Up to that point in your career, had Frenzel 18 and Hansen consistently been your regular partners?</p> <p>19 A On -- on several occasions, we were partners.</p> <p>20 Q Okay. Did either of them go over to Public 21 Housing South when you did?</p> <p>22 A No.</p> <p>23 Q What was your assignment when you went to 24 Public Housing South?</p> <p>25 A We were assigned to work the -- one of the</p>
<p style="text-align: right;">Page 23</p> <p>1 Q Okay, and would other people join you when you 2 would spend time together socially?</p> <p>3 A Yes.</p> <p>4 Q Am I right that you would've met her around 5 1996, then?</p> <p>6 A It -- it broke up. What?</p> <p>7 Q Am I correct that you would've met her around 8 1996?</p> <p>9 A No, '95.</p> <p>10 Q '95. Did you consider her a friend at that 11 time?</p> <p>12 A An acquaintance.</p> <p>13 Q You said earlier that Shannon Spalding had 14 invited you to go to Public Housing South, correct?</p> <p>15 A Yes.</p> <p>16 Q Tell me what you mean by that, that she 17 invited you.</p> <p>18 A We had kept in contact during the period of 19 about three years just as -- as friends. And she called 20 me and asked me, "I have an opening, or -- or an invite 21 to go to public housing. Would -- would you like to 22 come with me and be my partner?"</p> <p>23 Q So, was it your understanding that she had 24 already -- strike that, please. Do you know whether she 25 had requested, at that point, to go to Public Housing</p>	<p style="text-align: right;">Page 25</p> <p>1 tactical teams.</p> <p>2 Q And did you have any particular interest in 3 being part of a tactical team at that point in your 4 career?</p> <p>5 A I -- I -- I don't recall.</p> <p>6 Q Up to that point, you had only worked patrol, 7 right?</p> <p>8 A Correct.</p> <p>9 Q Can you explain the difference between what 10 tactical team members were expected to do, versus what 11 officers assigned to patrol were expected to do?</p> <p>12 A Officers on patrol would typically be in a 13 marked car, in uniform, and fly or respond to 911 calls 14 and in-progress calls and high visibility. To where a 15 tactical officer, you were in an unmarked car, you were 16 plain clothes, and you had a lot more freedom to kind of 17 do what -- what -- what you wanted to. Like your own 18 type of -- you know, I don't know how else to describe 19 it. You -- you're -- you're -- you were kind of on your 20 own. You didn't have to listen to the radio for -- for 21 every call. You -- you went out and did your own thing, 22 in other words.</p> <p>23 Q Okay. So instead of being dispatched, you had 24 a little bit more autonomy to define your own missions 25 or the work you were going to do?</p>

<p style="text-align: right;">Page 26</p> <p>1 A Correct.</p> <p>2 Q When you were assigned to the tactical team in</p> <p>3 Public Housing South, who was your supervisor?</p> <p>4 A Initially, I remember it being Tony Ceja.</p> <p>5 Q Do you recall how to spell his last name?</p> <p>6 A Yes.</p> <p>7 Q What is it?</p> <p>8 A C-E-J-A.</p> <p>9 Q And who else besides you and Shannon Spalding</p> <p>10 was part of Sergeant Ceja's tactical team?</p> <p>11 A The -- the only people, name wise, I remember</p> <p>12 was Mike Birmingham and then Bernard Ross.</p> <p>13 Q And how long did you work on a tactical team</p> <p>14 at Public Housing South under Sergeant Ceja?</p> <p>15 A I don't remember.</p> <p>16 Q Do you know if it was less than two years, or</p> <p>17 more than two years?</p> <p>18 A I don't remember.</p> <p>19 Q What was the next assignment that you had in</p> <p>20 CPD?</p> <p>21 A The 22nd District.</p> <p>22 Q And when did you move over to the 22nd</p> <p>23 District?</p> <p>24 A I -- I don't recall the date.</p> <p>25 Q Did you have other supervisors in Public</p>	<p style="text-align: right;">Page 28</p> <p>1 A I don't recall.</p> <p>2 Q Do you remember any of the sergeants that you</p> <p>3 had on tactical teams at Public Housing South?</p> <p>4 A I can remember faces, but I -- I can't</p> <p>5 remember names. I -- of course, I remember Watts.</p> <p>6 Q Was Watts the last sergeant that you had at</p> <p>7 Public Housing South?</p> <p>8 A Yes.</p> <p>9 Q How many years total were you assigned to</p> <p>10 Public Housing South?</p> <p>11 A I -- I don't remember exactly how many years</p> <p>12 it was.</p> <p>13 Q When you were first assigned to Public Housing</p> <p>14 South, was Shannon Spalding your partner?</p> <p>15 A Yes.</p> <p>16 Q And for how long was she your partner?</p> <p>17 A I don't recall how long we were assigned as</p> <p>18 partners.</p> <p>19 Q Did she remain in Public Housing South for the</p> <p>20 entire time that you were assigned there?</p> <p>21 A I don't remember now.</p> <p>22 Q At some point, the two of you were no longer</p> <p>23 partners at Public Housing South?</p> <p>24 A Correct.</p> <p>25 Q And what was the reason for that change?</p>
<p style="text-align: right;">Page 27</p> <p>1 Housing South besides Sergeant Ceja?</p> <p>2 A Yes.</p> <p>3 Q Who was the next supervisor that you had in</p> <p>4 Public Housing South?</p> <p>5 A I -- I -- I don't remember.</p> <p>6 Q Did you remain on the -- on tactical teams,</p> <p>7 while you were assigned to Public Housing South?</p> <p>8 A The -- the roles changed several times.</p> <p>9 Q Okay. What were the roles that you had within</p> <p>10 Public Housing South besides being a member of a</p> <p>11 tactical team?</p> <p>12 A I -- I honestly don't remember what they</p> <p>13 called it, but we went from tactical for -- for a while,</p> <p>14 into vans, in uniform, where we would have like -- you</p> <p>15 know, eight -- eight officers in a long, like stretch</p> <p>16 van, and we were in uniforms.</p> <p>17 Q And when you were assigned to the van, would</p> <p>18 you be responding assignments from dispatch?</p> <p>19 A I don't recall. No.</p> <p>20 Q At some point, did you switch to -- or strike</p> <p>21 that, please. I think you said earlier that you were --</p> <p>22 first had as your sergeant -- initially, your sergeant</p> <p>23 was Ceja; is that right?</p> <p>24 A Yes.</p> <p>25 Q Who was the next sergeant that you had?</p>	<p style="text-align: right;">Page 29</p> <p>1 A I -- I -- I don't remember.</p> <p>2 Q Who else did you have as an assigned partner</p> <p>3 when you were assigned to Public Housing South?</p> <p>4 A Officer Robert Gonzalez.</p> <p>5 Q And he was your partner after Spalding, right?</p> <p>6 A Correct.</p> <p>7 Q Do you recall any other partners you had at</p> <p>8 Public Housing South, besides Spalding and Gonzalez?</p> <p>9 A Bobby's the only one who I remember being a</p> <p>10 specific partner, because people came and went all the</p> <p>11 time.</p> <p>12 Q Okay, and do you know for how long you and</p> <p>13 Gonzalez were partners?</p> <p>14 A I don't remember.</p> <p>15 Q Would it have been years?</p> <p>16 A I would say at least a year.</p> <p>17 Q Am I correct that you had a break in service</p> <p>18 between when you were assigned to Public Housing South</p> <p>19 and when you went to the 22nd District?</p> <p>20 A Correct.</p> <p>21 Q And we'll talk more about that later, but for</p> <p>22 how long was it that you were -- that you had a break in</p> <p>23 your service to CPD?</p> <p>24 A It was approximately a year and a half.</p> <p>25 Q And when you were assigned to the 22nd</p>

<p>1      District, what were your duties there?</p> <p>2      A      Patrol officer.</p> <p>3      Q      And where, geographically, was the 22nd</p> <p>4      District at that time?</p> <p>5      A      Located at 1900 West Monterey.</p> <p>6      Q      Who was your supervisor when you were assigned</p> <p>7      to the 22nd District?</p> <p>8      A      It was various sergeants.</p> <p>9      Q      And what shift did you work?</p> <p>10     A      Afternoons. The third watch.</p> <p>11     Q      Did you have a regular partner when you were</p> <p>12     assigned to the 22nd District?</p> <p>13     A      No.</p> <p>14     Q      When you came back after your break and</p> <p>15     service, did you request the 22nd District as your</p> <p>16     assignment?</p> <p>17     A      Yes.</p> <p>18     Q      And why did you request the 22nd District?</p> <p>19     A      Because it was close to home.</p> <p>20     Q      For how long were you assigned to the 22nd</p> <p>21     District?</p> <p>22     A      I don't recall.</p> <p>23     Q      Approximately when were you first assigned</p> <p>24     there?</p> <p>25     A      I don't remember the date.</p>	<p>Page 30</p> <p>1      Q      Did you ever work on a tactical team again</p> <p>2      after you left Public Housing South?</p> <p>3      A      No.</p> <p>4      Q      And so after you left Public Housing South,</p> <p>5      were all your assignments patrol assignments until you</p> <p>6      completed your service with CPD?</p> <p>7      A      Yes.</p> <p>8      Q      What was the next assignment that you had</p> <p>9      after the 9th District?</p> <p>10     A      The 19th District.</p> <p>11     Q      And did you move over to the 19th District at</p> <p>12     your request?</p> <p>13     A      Yes.</p> <p>14     Q      Why did you ask to move over to the 19th</p> <p>15     District?</p> <p>16     A      It's arguably a better district to work in.</p> <p>17     Q      What made it arguably better than the 9th</p> <p>18     District?</p> <p>19     A      It's a lot more restaurants was the big</p> <p>20     reason. There's not a lot of -- a lot more places to go</p> <p>21     eat.</p> <p>22     Q      Better food options?</p> <p>23     A      Yes.</p> <p>24     Q      And how long were you assigned to the 19th</p> <p>25     District?</p>
<p>Page 31</p> <p>1      Q      What was the next assignment that you had</p> <p>2      after the 22nd District?</p> <p>3      A      I believe I went to 9.</p> <p>4      Q      The 9th District?</p> <p>5      A      Yes.</p> <p>6      Q      And were you working patrol in the 9th</p> <p>7      District?</p> <p>8      A      Yes.</p> <p>9      Q      Did you request to move from the 22nd District</p> <p>10     to the 9th District?</p> <p>11     A      Yes.</p> <p>12     Q      And why did you request that change?</p> <p>13     A      Because I wanted to work days.</p> <p>14     Q      And were you assigned to the day shift when</p> <p>15     you got to the 9th District?</p> <p>16     A      I eventually made it to days. Yes.</p> <p>17     Q      And did you have a regular partner in the 9th</p> <p>18     District?</p> <p>19     A      No. When you're on days, you work alone.</p> <p>20     Q      How long were you assigned to the 9th</p> <p>21     District?</p> <p>22     A      I don't recall.</p> <p>23     Q      Was Shannon Spalding ever your partner after</p> <p>24     you were assigned to Public Housing South?</p> <p>25     A      No.</p>	<p>Page 33</p> <p>1      A      I think about two years.</p> <p>2      Q      What was your next assignment after that?</p> <p>3      A      I had gotten injured and then I went to 311.</p> <p>4      Q      Were you injured on duty?</p> <p>5      A      Yes.</p> <p>6      Q      And what was the nature of the injury?</p> <p>7      A      I hurt my back.</p> <p>8      Q      And were you off work for a period of time</p> <p>9      after that?</p> <p>10     A      Yes.</p> <p>11     Q      How long were you out with your back injury?</p> <p>12     A      I don't recall now.</p> <p>13     Q      Was it a matter of months?</p> <p>14     A      I honestly don't recall how long it was now.</p> <p>15     Q      When you came back from being out with that</p> <p>16     injury, you were assigned to 311?</p> <p>17     A      Correct.</p> <p>18     Q      Were you put on desk duty at that time?</p> <p>19     A      Well, 311 is desk duty. It's report writing.</p> <p>20     Q      Okay. Let me see if I can ask it a better</p> <p>21     way. Were you assigned to 311 because you were on --</p> <p>22     you were put on desk duty?</p> <p>23     MR. MICHALIK: This is Michalik. Object to the</p> <p>24     form of the question.</p> <p>25     A      Can you ask it in a different way? I don't</p>

<p>1 understand it.</p> <p>2 Q Yeah. Sure. Were you -- to the best of your 3 knowledge, why were you assigned to 311?</p> <p>4 A Because I was light duty.</p> <p>5 Q Because you were light duty from your back?</p> <p>6 A Yes.</p> <p>7 Q Okay. How long were you assigned to 311?</p> <p>8 A Approximately two years.</p> <p>9 Q What's the next assignment that you had?</p> <p>10 A Moving to Costa Rica.</p> <p>11 Q It's a good assignment.</p> <p>12 A I retired after that.</p> <p>13 Q Okay. What year did you retire?</p> <p>14 A I would have to check my ID, but I believe it 15 was 2017.</p> <p>16 Q Do you receive a or do -- sorry. Strike that, 17 please. Do you currently or do you expect to receive a 18 pension from the city of Chicago?</p> <p>19 MR. DAFFADA: Object to the form. You can 20 answer.</p> <p>21 A I do receive a pension.</p> <p>22 Q Did that start as soon as you retired?</p> <p>23 A No.</p> <p>24 Q When did that start?</p> <p>25 A I believe like four months later.</p>	<p>Page 34</p> <p>1 A I don't recall the specific allegations.</p> <p>2 Q Who was the Plaintiff in the matter where you 3 were sued as a police officer?</p> <p>4 A His name was Johnny Jenkins.</p> <p>5 Q And you don't recall what he alleged that you 6 did?</p> <p>7 MR. DAFFADA: Objection. Form.</p> <p>8 A I don't recall his complaint, the specifics.</p> <p>9 Q Do you recall anything about what his 10 allegations were?</p> <p>11 A I don't. I don't recall his specific 12 complaints.</p> <p>13 Q I know you've said you don't recall the 14 specifics. Do you recall anything about what he was 15 alleging?</p> <p>16 A I believe he stated we stopped him for no 17 reason.</p> <p>18 Q Do you know what the outcome of that lawsuit 19 was?</p> <p>20 A Yes.</p> <p>21 Q What was it?</p> <p>22 A It was ruled on our -- in our favor. It was 23 dismissed. Not liable.</p> <p>24 Q What was the lawsuit where you were sued not 25 in your role as a police officer?</p>
<p>Page 35</p> <p>1 Q Why did you decide to retire in 2017?</p> <p>2 A Because I had my 20 years. I was done.</p> <p>3 Q When you were assigned to 311, where would you 4 report to for that role?</p> <p>5 A I don't recall the address of the center, but 6 it was the 311 center. It was on the west side.</p> <p>7 Q When you became part of the tactical team in 8 Public Housing South, did you receive any training on 9 how to be part of a tactical team?</p> <p>10 A I don't recall.</p> <p>11 Q Other than the Watts coordinated proceedings 12 that we're here to talk about today, have you been a 13 defendant in a lawsuit before?</p> <p>14 A Yes.</p> <p>15 Q How many times have you been sued?</p> <p>16 A Twice.</p> <p>17 Q Were both of those related to your job as a 18 police officer?</p> <p>19 A No.</p> <p>20 Q Were either of them related to your job as a 21 police officer?</p> <p>22 A To clarify, one was from the police and one 23 was not.</p> <p>24 Q And what were the accusations against you for 25 the one where you were in your role as a police officer?</p>	<p>Page 37</p> <p>1 A For my home inspection --</p> <p>2 MR. DAFFADA: Objection. Form. You can 3 answer.</p> <p>4 A Regarding my home inspection business.</p> <p>5 Q And who sued you regarding your home 6 inspection business?</p> <p>7 A I don't remember the name now.</p> <p>8 Q What were the allegations in that lawsuit?</p> <p>9 A That I missed a plumbing issue in a crawl 10 space.</p> <p>11 Q And is that lawsuit now resolved?</p> <p>12 A Yes.</p> <p>13 MS. KLEINHAUS: (coughs) Excuse me.</p> <p>14 MR. DAFFADA: Theresa, do you want to take five 15 minute break so I can get some water?</p> <p>16 MS. KLEINHAUS: Sure. Thanks.</p> <p>17 COURT REPORTER: All right. Off the record at 18 11:53 a.m.</p> <p>19 (OFF THE RECORD)</p> <p>20 COURT REPORTER: We're back on record for the 21 deposition of Michael Spaargaren being conducted by 22 videoconference. Today is March 7, 2022. The time 23 is 11:58 a.m. Eastern Standard Time.</p> <p>24 BY MS. KLEINHAUS:</p> <p>25 Q Sir, I want to turn your attention back to the</p>

<p style="text-align: right;">Page 38</p> <p>1 training that you received at the Chicago Police    2 Academy. Did you receive some training on police for    3 report writing when you were there?    4 A I don't recall.    5 Q You don't know whether you did or you didn't?    6 A I don't recall specific training for report    7 writing.    8 Q Okay. When you were a member of the Chicago    9 Police Department, did you have an understanding of what    10 it meant for or someone to be listed as the first    11 arresting officer?    12 A Yes.    13 Q What did it mean for someone to be the first    14 arresting officer?    15 A That was typically the person who had the most    16 amount of knowledge about the arrest.    17 Q And would the first arresting officer be the    18 person to write up the narrative portion of the report?    19 A I'm sorry. Ask the question again, please.    20 Q Would the first arresting officer be the    21 person to write up the narrative portion of the report?    22 MR. BAZAREK: I'd object to the form of the    23 question and lack of foundation.    24 A To answer your question, yes. It was typical    25 that the box one officer wrote the narrative.</p>	<p style="text-align: right;">Page 40</p> <p>1 ever sign your name on a report?    2 A Not that I can recall.    3 Q Do you recall the -- (coughs) excuse me -- the    4 designation of the attesting officer?    5 MR. DAFFADA: Objection. Form.    6 A I'm sorry. I don't understand the question.    7 Q Have you heard the term attesting officer    8 before?    9 A I -- honestly -- I mean, I don't remember that    10 term.    11 Q When you were attending the Chicago Police    12 Academy, did you receive any training on how to testify    13 in court?    14 MR. KOSOKO: Object to the form of the    15 question.    16 A I don't recall.    17 Q Did you testify in court as part of your    18 duties as a Chicago police officer?    19 A Yes.    20 Q On how many occasions did you do that?    21 A Honestly, I don't remember.    22 Q Would it have been dozens of times?    23 A Yes.    24 Q Prior to being assigned to Public Housing    25 South, were you familiar with Ronald Watts at all?</p>
<p style="text-align: right;">Page 39</p> <p>1 Q And was the box one officer typically the    2 officer who would testify in court about the arrest, if    3 necessary?    4 A Yes.    5 Q What was your understanding of what it meant    6 to be listed as the second arresting officer?    7 A It was usually the person who was the partner    8 of the arresting officer.    9 Q And what about the officers listed as the    10 assisting officers? What did that signify in your    11 experience?    12 A It could have meant several things.    13 Q What were the things it could mean?    14 A It could have been that you transported an    15 arrestee into the station, could have been that you did    16 perimeter security. Sometimes it just meant that you    17 happened to be on site and didn't necessarily, you know,    18 contribute. You were just there.    19 Q When you were a Chicago police officer, did    20 you ever sign anyone else's name on a police report?    21 A No.    22 Q And why not?    23 A I don't know. I only signed my own name on my    24 own reports.    25 Q Did you -- in your experience, did anyone else</p>	<p style="text-align: right;">Page 41</p> <p>1 A No.    2 Q When did you first become familiar with Watts?    3 A When he came to Housing and was assigned as    4 our sergeant.    5 Q And when was that?    6 A I don't recall.    7 Q How was it that you came to be part of the    8 Watts tactical team?    9 A I don't recall.    10 Q Okay. Do you know whether you requested to be    11 part of his tactical team?    12 A I don't remember.    13 Q Did he ever ask you to be part of his tactical    14 team?    15 A I don't remember him asking me to come on the    16 team.    17 COURT REPORTER: Pardon the interruption, but    18 we have a Megan McGrath joining us. Just wanted to    19 notify everyone.    20 BY MS. KLEINHAUS:    21 Q Was Shannon Spalding working for Sergeant    22 Watts before you were on his team?    23 A I don't know.    24 Q At any point when you were assigned to Public    25 Housing South or the 2nd District, did you request to</p>

<p style="text-align: right;">Page 42</p> <p>1 move from one team to another, or one assignment within 2 that area to another?</p> <p>3 A Can you repeat --</p> <p>4 MR. DAFFADA: I don't understand the question.</p> <p>5 A Yeah, I don't understand the question.</p> <p>6 Q Okay. Am I right that there was a period of 7 time where you were assigned to Public Housing South?</p> <p>8 A Yes.</p> <p>9 Q And was there a time where that was considered 10 an assignment to the 2nd District?</p> <p>11 A I don't know.</p> <p>12 Q Okay. At any point between when you moved 13 over to Public Housing South and before you took a break 14 in your service, did you ever request to move from one 15 team or assignment to another team or another 16 assignment?</p> <p>17 A I don't remember.</p> <p>18 Q Before Watts was your supervisor, were you 19 familiar with his reputation at all?</p> <p>20 A No.</p> <p>21 Q Did you have any information about him before 22 he was your sergeant?</p> <p>23 A No.</p> <p>24 Q Who were the other members of the tactical 25 team when you were being supervised by Sergeant Watts?</p>	<p style="text-align: right;">Page 44</p> <p>1 identified, Jones, Mohammed, Young, Bolton, Cadman, 2 Gonzalez, were any of them people that you considered 3 friends of yours outside of work?</p> <p>4 A Just one.</p> <p>5 Q And who's that?</p> <p>6 A Officer Matt Cadman.</p> <p>7 Q And what would you and Officer Cadman do 8 outside of work?</p> <p>9 A We had done barbecues at each other's house a 10 few times.</p> <p>11 Q Anything else?</p> <p>12 A Not that I can recall.</p> <p>13 Q Did you attend any family events like weddings 14 or birthdays or that sort of thing for anyone on the 15 team?</p> <p>16 A I don't recall.</p> <p>17 Q Did you know Matthew Cadman before you were 18 assigned to Sergeant Watts' tactical team?</p> <p>19 A I don't remember when we met under what 20 sergeant.</p> <p>21 Q Okay. Did you meet him when you were assigned 22 to Public Housing South?</p> <p>23 A Yes.</p> <p>24 Q After you left Public Housing South, did you 25 stay in touch with Matthew Cadman?</p>
<p style="text-align: right;">Page 43</p> <p>1 A To the best of my recollection, Al Jones, 2 Kallatt Mohammed, Brian Bolton, Matt Cadman, Robert 3 Gonzalez. Those are all I can think of right now.</p> <p>4 Q Besides Gonzalez, were any of the individuals 5 that you just identified ever your regular partner?</p> <p>6 A Yes.</p> <p>7 Q Who was that?</p> <p>8 A We worked on a team, so you constantly were 9 switching with people. If someone took a day off and 10 someone was, you know, in court, you worked with the 11 other person. So, essentially everyone.</p> <p>12 Q Okay. Other than you and Gonzalez, were there 13 any other regular pairs of partners?</p> <p>14 A I don't understand. That I worked with?</p> <p>15 Q Or that worked with each other.</p> <p>16 A To the best of my recollection, Bolton and 17 Cadman were partners. I remember -- oh, then there was 18 another guy, Kenny Young. I just remembered. Kenny 19 Young. And Kenny Young, Kallatt Mohammed, and Jones, I 20 remember them essentially working together. I don't 21 remember who was whose partner.</p> <p>22 Q Were any women part of the tactical team 23 supervised by Sergeant Watts when you were part of it?</p> <p>24 A I don't recall.</p> <p>25 Q The members of the team that you just</p>	<p style="text-align: right;">Page 45</p> <p>1 A I don't recall speaking with him afterwards.</p> <p>2 Q When was the last time that you had contact 3 with him?</p> <p>4 A I don't remember.</p> <p>5 Q More than a year?</p> <p>6 A Yes.</p> <p>7 Q More than five years?</p> <p>8 A I believe so. Yes.</p> <p>9 Q Have you spoken with Al Jones in the last five 10 years?</p> <p>11 A No.</p> <p>12 Q When was the last time that you were in 13 contact with Jones?</p> <p>14 A I have no recollection of our last 15 conversation.</p> <p>16 Q Would it have been when you were still 17 employed by the Chicago Police Department?</p> <p>18 A Yes.</p> <p>19 Q And same question as to Brian Bolton. When 20 was the last time that you were in touch with him?</p> <p>21 A Same response. I have no recollection of the 22 last time we spoke.</p> <p>23 Q Okay. Would it have been when you were still 24 employed by CPD?</p> <p>25 A Yes.</p>

<p style="text-align: right;">Page 46</p> <p>1 Q Same question as to Gonzalez. When was the 2 last time that you were in contact with him? 3 A Same answer. 4 MR. DAFFADA: I didn't hear. 5 A The answer is I -- I don't remember the last 6 time I spoke with him. 7 Q Okay. Would it have been before you retired? 8 A Yeah, it would've been before I retired. 9 Q And was Gonzalez someone that you spent time 10 with outside of work? 11 A Other than a barbecue once, we -- I don't 12 remember hanging out with him outside of work, other 13 than that. 14 Q Okay. What about Ken Young? When was the 15 last time that you spoke with him? 16 A I can't remember. 17 Q Would it have been before you retired? 18 A Yes. 19 Q And what about Officer Mohammed? When was the 20 last time that you spoke with him? 21 A Last I remember was when I left Housing. 22 Q And what about Sergeant Watts? When was the 23 last time that you spoke with him? 24 A The same time. 25 Q When you left Housing?</p>	<p style="text-align: right;">Page 48</p> <p>1 about the pending lawsuits? 2 A I -- the only conversation really was, you 3 know, "Have you heard anything else?" "No." And that 4 was it. 5 Q Who left Public or -- I'm sorry. Strike that, 6 please. Did Matthew Cadman leave the Watts tactical 7 team before you did? 8 A Yes. 9 Q Why did he leave the team? 10 A I don't know. 11 MR. KOSOKO: Object to form. 12 Q Go ahead, sir. 13 A I don't -- 14 MR. DAFFADA: No question pending. 15 A Okay. 16 MS. KLEINHAUS: Sorry. I couldn't hear what 17 you said, Jim. 18 MR. DAFFADA: I said there's no question 19 pending. 20 BY MS. KLEINHAUS: 21 Q Okay. I'll repeat it. Why did Cadman leave 22 the Watts tactical team? 23 MR. KOSOKO: Same question. Same objection. I 24 apologize. 25 A I don't remember his exact reason why.</p>
<p style="text-align: right;">Page 47</p> <p>1 A Yes. 2 Q Have you spoken with any of the members of the 3 team that you've identified about the pending lawsuits? 4 MR. DAFFADA: Objection. Form. Go ahead. 5 A I don't have any recollection of speaking with 6 anyone about the lawsuit. 7 Q Have you spoken with anyone besides your 8 attorneys about the Watts coordinated lawsuits? 9 A Just Shannon Spalding. 10 Q Anyone else? 11 A Other than my wife, no one I can recall. 12 Q And what did your conversation with Shannon 13 Spalding about the pending lawsuits consist of? 14 A Nothing in particular that I can remember. 15 Just general talk. What do you think's going to happen? 16 Things -- speculative talk. 17 Q Okay, and on how many occasions have you 18 spoken with Shannon Spalding about the pending lawsuits? 19 A I don't recall. Not many. 20 Q When was the last time that you were in 21 contact with Shannon Spalding? 22 A Around the holidays. 23 Q So a few months ago? 24 A Yes. 25 Q At that time, did you have any conversation</p>	<p style="text-align: right;">Page 49</p> <p>1 Q Do you remember anything about why he left? 2 A I don't remember now what his reason was. 3 Q Did he ever speak with you about why he was 4 leaving the team? 5 A I don't remember now. 6 Q Did Officer Young leave the team before you 7 left Public Housing South? 8 A I don't remember. 9 Q Did you ever hear that Officer Young was 10 dumped from the team? 11 A I don't remember hearing that. 12 Q Are you familiar with the idea of someone 13 being dumped from a tactical team? 14 A Yes. 15 Q And what does that mean? 16 A Well, being on a tactical team is an appointed 17 position, basically, and being dumped as you get, 18 essentially, fired from the spot. 19 Q Were there any members of the Watts tactical 20 team that you understood were dumped from the team? 21 A Not that I can recall. 22 Q Was there anyone on the team that you admired 23 or considered a mentor? 24 A Nobody comes to mind. 25 Q Was there anyone that you perceived to be a</p>

<p>1 favorite of Sergeant Watts?</p> <p>2 A Can you repeat the question?</p> <p>3 MR. KOSOKO: Object to form.</p> <p>4 A I didn't hear the question. I'm sorry. It</p> <p>5 kind of broke up.</p> <p>6 Q No problem. I can repeat it. Was there</p> <p>7 anyone on the team that you perceived to be a favorite</p> <p>8 of Sergeant Watts?</p> <p>9 MR. KOSOKO: Object to form.</p> <p>10 A I can't say.</p> <p>11 Q And what do you mean by that?</p> <p>12 A I can't think of anybody being his favorite.</p> <p>13 Q Can you think of anybody that he seemed to</p> <p>14 particularly dislike?</p> <p>15 MR. KOSOKO: Object to form.</p> <p>16 A I don't remember.</p> <p>17 Q Did you ever consider Mohammed to be</p> <p>18 particularly close with Watts?</p> <p>19 MR. KOSOKO: Object to form.</p> <p>20 A Well, typically, when Watts went out, in my</p> <p>21 recollection, he jumped in with either Mohammed or -- or</p> <p>22 Jones.</p> <p>23 Q So when he would leave the station and get in</p> <p>24 someone's car, he would usually jump in with Mohammed or</p> <p>25 Jones?</p>	<p>Page 50</p> <p>1 district?</p> <p>2 MR. KOSOKO: Object to form. Foundation.</p> <p>3 MR. BAZAREK: Join. Hey, Tess, so we're not</p> <p>4 repeating objections. Plaintiff agrees that any</p> <p>5 objections made by any defense counsel will be</p> <p>6 applicable to all defendants. Is that acceptable?</p> <p>7 MS. KLEINHAUS: That's acceptable to me.</p> <p>8 MR. BAZAREK: Okay. Is that -- Joel, is that</p> <p>9 okay?</p> <p>10 MR. DAFFADA: It's okay for us.</p> <p>11 MR. FLAXMAN: Yes, that's okay. I thought we</p> <p>12 had that agreement for a pretty long time.</p> <p>13 MR. BAZAREK: Okay. Yeah, I was just getting</p> <p>14 it on the record.</p> <p>15 MS. KLEINHAUS: Maggie, can you read back the</p> <p>16 last question please?</p> <p>17 COURT REPORTER: Yes. Just one moment. Let me</p> <p>18 --</p> <p>19 (REPORTER PLAYS BACK THE REQUESTED TESTIMONY)</p> <p>20 A I don't recall.</p> <p>21 BY MS. KLEINHAUS:</p> <p>22 Q Did he seem to be out in the district more</p> <p>23 than other sergeants that he worked for in public</p> <p>24 housing?</p> <p>25 MR. KOSOKO: Object to form. Foundation.</p>
<p>1 A Yes.</p> <p>2 MR. KOSOKO: Form. Foundation.</p> <p>3 MR. BAZAREK: Yeah. Join the objection.</p> <p>4 MS. KLEINHAUS: Maggie, would you be able to</p> <p>5 pin the witness for Zoom purposes?</p> <p>6 COURT REPORTER: He's pinned on my end. If</p> <p>7 it's not pinned on your screen --</p> <p>8 MS. KLEINHAUS: My mistake. Helping him.</p> <p>9 COURT REPORTER: Okay.</p> <p>10 THE WITNESS: Pin me?</p> <p>11 MS. KLEINHAUS: All right. He's pinned.</p> <p>12 MR. DAFFADA: What does that mean? I asked</p> <p>13 what pinned means.</p> <p>14 COURT REPORTER: It just means that because</p> <p>15 he's pinned, the video will focus on him and no one</p> <p>16 else. It makes him the largest on the screen.</p> <p>17 BY MR. KLEINHAUS:</p> <p>18 Q Do you know if anyone who is a member of the</p> <p>19 Watts tactical team grew up in the 2nd District?</p> <p>20 A I have no recollection of where the other</p> <p>21 members grew up.</p> <p>22 Q You mentioned earlier that Watts would, when</p> <p>23 he would go out, he would jump in with Mohammed or</p> <p>24 Jones. Did you -- or strike that, please. Did Watts</p> <p>25 frequently go out with the tactical team out into the</p>	<p>Page 51</p> <p>1 A I don't remember.</p> <p>2 Q What shift did you work when you were assigned</p> <p>3 to the Watts team?</p> <p>4 A I don't remember exactly because we worked</p> <p>5 days and afternoons. We kind of bounced around.</p> <p>6 Q So it would vary what shift you worked?</p> <p>7 A Because it's a management position, we would</p> <p>8 start at different times. One day 8:00, the next day,</p> <p>9 10:00. I don't remember the exact hours that we worked.</p> <p>10 Q What was your understanding of who would</p> <p>11 decide the hours that you would be working in a</p> <p>12 particular week?</p> <p>13 A It came out on the sheets. Every day, a sheet</p> <p>14 came out, so it was from the office.</p> <p>15 Q Do you know whether or not your sergeant had</p> <p>16 input into what hours you'd be working?</p> <p>17 MR. DAFFADA: Object to form. Foundation.</p> <p>18 A I know he would tell us if we were going to do</p> <p>19 an early morning start at 4:00 in the morning or</p> <p>20 something to that effect, he would tell us all, so he</p> <p>21 would make that decision.</p> <p>22 Q Where would you report to at the beginning of</p> <p>23 your shift?</p> <p>24 A To the -- to the station that we were assigned</p> <p>25 to.</p>

<p style="text-align: right;">Page 54</p> <p>1 Q Okay, and within that station, did the 2 tactical team have any assigned area? 3 A I don't recall. 4 Q At the beginning of your shift, would you 5 typically attend a roll call? 6 A Yes. 7 Q And what would happen in the roll call? 8 MR. DAFFADA: Object to form. 9 A It was basically -- they would essentially 10 take attendance to see who was here, give out radios, 11 give out cars, and discuss any objectives for the day. 12 Q And would your sergeant typically be the one 13 to run the roll call? 14 A To the best of my recollection, yes. 15 Q Would this sergeant make assignments in terms 16 of who's going in cars together? 17 A I don't recall. 18 Q When you were assigned to Public Housing 19 South, was writing police reports part of your assigned 20 duties? 21 A Yes. 22 Q And where would you do that? 23 A It just depended. 24 Q What did it depend on? 25 A Sometimes, we would do the reports in the</p>	<p style="text-align: right;">Page 55</p> <p>1 A Yes. 2 Q What would Sergeant Watts wear? 3 MR. KOSOKO: Objection. Foundation. 4 A To the best of my recollection, like, the same 5 thing. We all typically wore blue jeans and then just a 6 regular shirt. It's the best way I could describe it. 7 Q Did anybody on the Watts tactical team smoke 8 cigars? 9 MR. KOSOKO: Object to foundation and form. 10 A I don't recall. 11 Q Did anybody on the Watts tactical team gamble? 12 MR. KOSOKO: Object to form and foundation. 13 A I don't know. 14 Q Do you ever recall Sergeant Watts talking 15 about gambling? 16 A I have no recollection of that. 17 Q Did anybody on the tactical team have a 18 drinking problem that you were aware of? 19 MR. KOSOKO: Object to form. 20 A Yes. 21 Q And who was that? 22 A Officer Cadman and Officer Gonzalez. 23 Q How did you become aware that Officer Cadman 24 had a drinking problem? 25 A Just my opinion.</p>
<p style="text-align: right;">Page 55</p> <p>1 Housing station. Sometimes, we would do them in the 2nd 2 District. 3 Q Did you have any assigned area for completing 4 your reports? 5 A Again, the assigned area would've been either 6 the 2nd District or the housing station that you made 7 the arrest at. 8 Q And when you say housing station, what do you 9 mean? 10 A There was two different locations for Housing 11 South. One was at, I believe it was 47th and State. 12 They called it a satellite office. And then another 13 station was Ida B. Wells. 14 Q Did Watts have a designated work area in 15 either of those locations? 16 A I don't recall. 17 Q Did Watts have an assigned desk in either of 18 those areas? 19 A I don't recall. 20 Q When you were assigned to the Watts tactical 21 team, what clothing would you wear? 22 A We called it soft clothes, which was basically 23 like blue jeans and then -- (coughs) excuse me. Like a 24 shirt like I would have on now, a t-shirt or whatever. 25 Q So civilian clothing?</p>	<p style="text-align: right;">Page 57</p> <p>1 Q Was it from your own observation? 2 A Yes. 3 Q And how did you become aware that Officer 4 Gonzalez had a drinking problem? 5 A Again, it was my opinion. He went out after 6 work a lot and you could see the difference when he 7 would come into work in the morning. 8 Q Did you ever perceive Officer Cadman or 9 Officer Gonzalez to be inebriated at work? 10 A No. 11 Q Did anyone on the Watts tactical team have any 12 nicknames that you were aware of? 13 A No. 14 Q During your career at CPD, did you have any 15 nicknames? 16 A No. 17 Q What was your star number when you a member of 18 the Chicago Police Department? 19 A I had two. One was 5595 and the other one -- 20 I'm not 100 percent sure on the other one. I had it for 21 a short time. 22 Q When you were assigned to the Watts tactical 23 team, how would you communicate with the other members 24 of the team when you weren't in the same location? 25 MR. DAFFADA: Object to form.</p>

<p>1 A Typically by cell phone.</p> <p>2 Q Did you have an assigned work cell phone at</p> <p>3 that time?</p> <p>4 A No.</p> <p>5 Q Would the members of the team use their</p> <p>6 personal cell phones to communicate?</p> <p>7 MR. KOSOKO: Object to form. Foundation.</p> <p>8 A I don't know.</p> <p>9 Q Did you have a personal cell phone when you</p> <p>10 were assigned to Public Housing South?</p> <p>11 A Yes.</p> <p>12 Q Would you communicate with other members of</p> <p>13 the Watts tactical team using your personal cell phone?</p> <p>14 A Yes.</p> <p>15 Q Did Sergeant Watts have a cell phone when you</p> <p>16 were assigned to his team?</p> <p>17 A I don't recall.</p> <p>18 Q Other than cell phones, how else would you</p> <p>19 communicate with other members of your tactical team</p> <p>20 when you weren't in the same location?</p> <p>21 MR. KOSOKO: Object to foundation.</p> <p>22 A With the police radio.</p> <p>23 Q Can you describe your physical appearance</p> <p>24 during the time period that you were assigned to Public</p> <p>25 Housing South?</p>	<p>Page 58</p> <p>1 A No, I don't recall.</p> <p>2 Q Were there instances where Sergeant Watts told</p> <p>3 you who to arrest?</p> <p>4 A I don't remember.</p> <p>5 Q Were there occasions where Watts told you not</p> <p>6 to plant drugs on people?</p> <p>7 MR. KOSOKO: Object to the form of the</p> <p>8 question.</p> <p>9 A Can you repeat the question again, please?</p> <p>10 Q Sure. Were there occasions Sergeant Watts</p> <p>11 told you not to plant drugs on people?</p> <p>12 MR. KOSOKO: Object to the form of the</p> <p>13 question.</p> <p>14 A I don't recall that being said.</p> <p>15 Q Were there times when Watts told you not to</p> <p>16 frame people for crimes they didn't commit?</p> <p>17 MR. KOSOKO: Object to the form of the</p> <p>18 question.</p> <p>19 A I don't recall having that conversation.</p> <p>20 Q Did Watts ever tell you not to take money off</p> <p>21 of civilians and fail to inventory it?</p> <p>22 MR. KOSOKO: Object to the form of the</p> <p>23 question.</p> <p>24 A I don't recall him saying that.</p> <p>25 Q Was there ever a time when you were assigned</p>
<p>Page 59</p> <p>1 A I'm sorry? I mean, I don't understand the</p> <p>2 question. My physical appearance?</p> <p>3 Q What was your approximate height and weight</p> <p>4 during that time period?</p> <p>5 A Well, my height hasn't changed and my weight,</p> <p>6 I was probably, I don't know, maybe ten, 15 pounds</p> <p>7 lighter.</p> <p>8 Q Okay. How tall are you?</p> <p>9 A 6'2".</p> <p>10 Q And during the time period you were assigned</p> <p>11 to Public Housing South, about how much did you weigh?</p> <p>12 A Probably guessing about 195 pounds.</p> <p>13 Q Did you wear glasses at that time?</p> <p>14 A No.</p> <p>15 Q Did you ever have facial hair during that time</p> <p>16 period?</p> <p>17 A I don't remember.</p> <p>18 Q So you may have or may not have?</p> <p>19 A I may have. I just don't remember.</p> <p>20 Q During the time period that you were assigned</p> <p>21 to the Watts tactical team, did Sergeant Watts conduct</p> <p>22 performance reviews for you?</p> <p>23 A I don't remember.</p> <p>24 Q Do you recall having conversations with him</p> <p>25 about your performance on the team?</p>	<p>Page 61</p> <p>1 to Public Housing South that you were aware that Watts</p> <p>2 had requested a different assignment?</p> <p>3 A I don't understand your question.</p> <p>4 Q Were you ever aware of a time where Watts was</p> <p>5 asking for a different assignment besides being the</p> <p>6 sergeant of a tactical team?</p> <p>7 A I don't know.</p> <p>8 Q When you were part of the Watts tactical team,</p> <p>9 did you participate in surveillance operations?</p> <p>10 A Yes.</p> <p>11 Q And how would you get that assignment?</p> <p>12 MR. DAFFADA: Object to form.</p> <p>13 A I don't remember.</p> <p>14 Q Did you perform surveillance operations at Ida</p> <p>15 B. Wells?</p> <p>16 A Yes.</p> <p>17 Q And were those assignments given to you by</p> <p>18 Sergeant Watts?</p> <p>19 A I don't remember.</p> <p>20 Q Do you recall what your specific role was in</p> <p>21 surveillance?</p> <p>22 A I usually drove the car.</p> <p>23 Q And tell me what you mean by that.</p> <p>24 A When we'd go to a surveillance spot, I was</p> <p>25 usually the guy who stayed with the car and would drive</p>

<p style="text-align: right;">Page 62</p> <p>1 to and from and give chase.</p> <p>2 Q And why were you usually the guy that drove</p> <p>3 the car?</p> <p>4 A Because I was arguably the best driver on the</p> <p>5 team.</p> <p>6 Q Was there consensus that you were the best?</p> <p>7 A It was pretty much hands down I was the best</p> <p>8 driver.</p> <p>9 Q Okay. Were you usually assigned to be the</p> <p>10 driver or did you to be the driver?</p> <p>11 A I was usually asked to be the driver.</p> <p>12 Q And what type of vehicle would you use for</p> <p>13 surveillance operations at Ida B. Wells?</p> <p>14 A Typically, an unmarked police car, either a</p> <p>15 Chevy or a Ford. A Chevy Caprice or a Ford Crown Vic.</p> <p>16 Q When you were a member of the Watts tactical</p> <p>17 team, did you ever receive confidential information from</p> <p>18 confidential informants?</p> <p>19 A I don't recall.</p> <p>20 Q Did you ever have any regular sources of</p> <p>21 information at Ida B. Wells?</p> <p>22 A I personally didn't.</p> <p>23 Q To the best of your knowledge, did other</p> <p>24 members of the team have regular sources of information?</p> <p>25 A Yes.</p>	<p style="text-align: right;">Page 64</p> <p>1 through the buildings and seeing if there was people</p> <p>2 trespassing in the building.</p> <p>3 Q And how would you check to see if people were</p> <p>4 trespassing?</p> <p>5 A I -- I -- I don't remember now.</p> <p>6 Q When you would arrive at Ida B. Wells for a</p> <p>7 premise check or a walk down or any other purpose, would</p> <p>8 you search the people standing outside of the Wells?</p> <p>9 MR. DAFFADA: Object to form.</p> <p>10 A I don't remember now.</p> <p>11 Q Would you search individuals standing in the</p> <p>12 lobby?</p> <p>13 MR. DAFFADA: Object to form.</p> <p>14 A I don't have any recollection.</p> <p>15 Q When you would arrive at Ida B. Wells as a</p> <p>16 member of the Watts practical team, would you run into</p> <p>17 the housing buildings?</p> <p>18 MR. DAFFADA: Object to form.</p> <p>19 A I believe there was a few times where we ran</p> <p>20 into the building as a team.</p> <p>21 Q And why did you do that?</p> <p>22 A I don't recall now.</p> <p>23 Q Was it your practice to always run into the</p> <p>24 building?</p> <p>25 MR. DAFFADA: Object to form.</p>
<p style="text-align: right;">Page 63</p> <p>1 Q And which members of the team had regular</p> <p>2 sources of information in Ida B. Wells?</p> <p>3 A I don't recall now.</p> <p>4 Q Do you recall who any of the sources were from</p> <p>5 Ida B. Wells?</p> <p>6 A No.</p> <p>7 Q When you were assigned to the Watts tactical</p> <p>8 team, did you know anyone in -- who worked for the</p> <p>9 Chicago Housing Authority in Ida B. Wells?</p> <p>10 A Not that I can recall.</p> <p>11 Q Were you assigned to conduct checks at Ida B.</p> <p>12 Wells?</p> <p>13 A Yes.</p> <p>14 Q What was it? A premise check?</p> <p>15 A I remember going and checking to see if a</p> <p>16 vacant unit was vacant, make sure there wasn't somebody</p> <p>17 squatting in the unit.</p> <p>18 Q And were premise checks at the request of</p> <p>19 Chicago Housing Authority management?</p> <p>20 A I don't remember who ordered the request.</p> <p>21 Q Were you ever assigned to do building walk</p> <p>22 downs?</p> <p>23 A Yes.</p> <p>24 Q What was a walk down?</p> <p>25 A To the best of my recollection, it was going</p>	<p style="text-align: right;">Page 65</p> <p>1 A No.</p> <p>2 Q When you or members of your team would make</p> <p>3 arrests at Ida B. Wells, would you try transport</p> <p>4 arrestees back to the station in your -- in the vehicle</p> <p>5 that you'd arrived in?</p> <p>6 MR. KOSOKO: Object to foundation.</p> <p>7 A Can you repeat the question, please?</p> <p>8 Q Yeah, let me see if I can ask it better. I</p> <p>9 think you said earlier you would usually be driving an</p> <p>10 unmarked Chevy or Crown Vic; is that right?</p> <p>11 A Yes.</p> <p>12 Q If you made arrests at Ida B. Wells, would you</p> <p>13 take the arrestees back to the station in whatever car</p> <p>14 you came in?</p> <p>15 MR. DAFFADA: Object to form.</p> <p>16 A Typically, we would call for either a</p> <p>17 transport car or a wagon.</p> <p>18 Q And would the transport car be a marked</p> <p>19 vehicle?</p> <p>20 MR. DAFFADA: Object to form.</p> <p>21 A Yes.</p> <p>22 Q Did the unmarked vehicles that you would drive</p> <p>23 as a member of the tactical team have a cage or a</p> <p>24 separation between the back seat and the front seat?</p> <p>25 A No.</p>

<p style="text-align: right;">Page 66</p> <p>1 Q Do you know what a reverse sting is?</p> <p>2 A Yes.</p> <p>3 Q What is a reverse sting?</p> <p>4 A Where unmarked officers would set up at a</p> <p>5 location and pose as drug dealers.</p> <p>6 Q And did you participate in reverse stings when</p> <p>7 you were a member of the Watts tactical team?</p> <p>8 A I don't recall.</p> <p>9 Q Did other members of the Watts tactical team</p> <p>10 participate in reverse stings?</p> <p>11 MS. DOI: Objection. Foundation. This is</p> <p>12 Kathryn.</p> <p>13 A I don't recall if they happened on the Watts</p> <p>14 team or another team.</p> <p>15 Q Did you participate in reverse stings when you</p> <p>16 were assigned to Public Housing South?</p> <p>17 A Yes.</p> <p>18 Q And what was your role in the reverse stings?</p> <p>19 A Typically, what I would refer to as perimeter</p> <p>20 security.</p> <p>21 Q And what did doing perimeter security consist</p> <p>22 of?</p> <p>23 A Typically -- usually, I and another officer</p> <p>24 would be in the unmarked car and we would hold back,</p> <p>25 maybe, I don't know, sometimes, almost a half a block</p>	<p style="text-align: right;">Page 68</p> <p>1 MS. DOI: Also, foundation.</p> <p>2 A Yes.</p> <p>3 BY MS. KLEINHAUS:</p> <p>4 Q Did you consider the reverse sting an</p> <p>5 effective method of law enforcement when you were part</p> <p>6 of Public Housing South?</p> <p>7 A I don't know.</p> <p>8 Q Who on the Watts tactical team would pose as</p> <p>9 drug dealers?</p> <p>10 MR. DAFFADA: I'm sorry, I didn't hear your</p> <p>11 question.</p> <p>12 Q Sure. I'll repeat it. Who on the Watts</p> <p>13 tactical team would pose as drug dealers for the reverse</p> <p>14 sting operation?</p> <p>15 MR. DAFFADA: Objection. Form and foundation.</p> <p>16 A I don't remember at this time.</p> <p>17 Q Are you familiar with a reverse sting kit?</p> <p>18 A No.</p> <p>19 Q In your experience as a Chicago police</p> <p>20 officer, did you ever write out the narrative portion of</p> <p>21 a police report or an arrest report before going out to</p> <p>22 complete the arrest?</p> <p>23 A No.</p> <p>24 Q Were you trained that prosecutors would rely</p> <p>25 on the police reports that you and your colleagues</p>
<p style="text-align: right;">Page 67</p> <p>1 away. And then, if somebody ran, our job was to give</p> <p>2 chase.</p> <p>3 Q So did you ever act as one of the officers</p> <p>4 posing as a drug dealer?</p> <p>5 A No. No.</p> <p>6 Q Did you ever have concerns that having</p> <p>7 officers who regularly patrolled or were present at the</p> <p>8 housing projects pose as drug dealers would, I guess,</p> <p>9 fail to trick the residents?</p> <p>10 MR. BAZAREK: Object to the form of the</p> <p>11 question. Foundation. Vague. Ambiguous.</p> <p>12 Incomplete hypothetical. Confusing. Assumes facts</p> <p>13 not in evidence.</p> <p>14 BY MS. KLEINHAUS:</p> <p>15 Q Do you remember the question?</p> <p>16 A I was just going to ask if you could repeat</p> <p>17 the question one more time, please.</p> <p>18 Q Sure. I'll see if I can ask it better and</p> <p>19 then we'll catch the same objections. But did you ever</p> <p>20 have concerns that having the officers who were</p> <p>21 regularly in the housing projects as Tac team members</p> <p>22 pose drug dealers would fail to trick the drug buyers?</p> <p>23 MR. BAZAREK: Object to the form of the</p> <p>24 question. Vague. Compound. Confusing. Incomplete</p> <p>25 hypothetical.</p>	<p style="text-align: right;">Page 69</p> <p>1 generated?</p> <p>2 A I don't recall that training.</p> <p>3 Q Were you aware as a member of the Chicago</p> <p>4 Police Department, that prosecutors would make charging</p> <p>5 decisions based on the police reports that you and your</p> <p>6 colleagues generated?</p> <p>7 MR. KOSOKO: Object to form. Foundation. Calls</p> <p>8 for legal conclusion.</p> <p>9 THE WITNESS: Sorry. Can you ask the question</p> <p>10 again please?</p> <p>11 MS. KLEINHAUS: Maggie, could you read it back</p> <p>12 for us?</p> <p>13 COURT REPORTER: Yeah. Just one moment.</p> <p>14 (REPORTER PLAYS BACK REQUESTED TESTIMONY)</p> <p>15 A Yes.</p> <p>16 BY MS. KLEINHAUS:</p> <p>17 Q And did you rely on the police reports when</p> <p>18 you would prepare to testify in court?</p> <p>19 MR. DAFFADA: Objection. Form.</p> <p>20 A Yes.</p> <p>21 Q Did you ever testify in court during the time</p> <p>22 period that you were a member of the Watts tactical</p> <p>23 team?</p> <p>24 A I'm sorry, what was the -- what was your</p> <p>25 question?</p>

<p style="text-align: right;">Page 70</p> <p>1 Q Let me ask it better. Did you ever testify in    2 court about an arrest you were part of as part of the    3 Watts tactical team?</p> <p>4 MR. DAFFADA: Objection. Form.</p> <p>5 A I don't recall.</p> <p>6 MR. DAFFADA: Need water in here.</p> <p>7 THE WITNESS: Yeah. Thirsty.</p> <p>8 MR. DAFFADA: Yeah.</p> <p>9 MS. KLEINHAUS: At some point -- sorry, what    10 was that?</p> <p>11 MR. DAFFADA: We're just commenting. He needs    12 to go to the restroom so...</p> <p>13 MS. KLEINHAUS: Okay. We can take -- do you    14 want to take a short break now?</p> <p>15 THE WITNESS: Yeah, that'd be great.</p> <p>16 MS. KLEINHAUS: Okay. Let's take a five-    17 minute break.</p> <p>18 COURT REPORTER: Okay. We're off the record.    19 The time is 1:00 p.m.</p> <p>20 (OFF THE RECORD)</p> <p>21 COURT REPORTER: We are back on record for the    22 deposition of Michael Spaargaren being conducted by    23 videoconference. Today is March 7, 2022. The time    24 is 1:14 p.m.</p> <p>25 BY MR. KLEINHAUS:</p>	<p style="text-align: right;">Page 72</p> <p>1 Q When did you go to the -- or I'm sorry, strike    2 that, please. Did you contact the FBI or did they    3 contact you?</p> <p>4 A I contacted them.</p> <p>5 Q And when did you contact them?</p> <p>6 A Within a day or two of the incident.</p> <p>7 Q And what happened when you contacted them?</p> <p>8 MR. DAFFADA: Objection. Form.</p> <p>9 A We had an interview.</p> <p>10 Q Where did the interview take place?</p> <p>11 A At the home I was living in at the time.</p> <p>12 Q So they came to your house?</p> <p>13 A Correct.</p> <p>14 Q Was anyone else present for the interview    15 besides you and the two FBI agents?</p> <p>16 A Not that I recall.</p> <p>17 Q And what happened when they came to your house    18 for the interview?</p> <p>19 MR. DAFFADA: Objection. Form. You can    20 answer.</p> <p>21 A They asked me my version of the events.</p> <p>22 Q And what was that?</p> <p>23 A I explained that I saw two officers on the    24 arrest. That basically they -- there was essentially a    25 stack of money and when the inventory was done, it was -</p>
<p style="text-align: right;">Page 71</p> <p>1 Q Sir, at some point when you were assigned to    2 Public Housing South, did you speak with agents from the    3 FBI?</p> <p>4 A Yes.</p> <p>5 Q Who did you speak with?</p> <p>6 A I don't remember the agents' names anymore.</p> <p>7 Q How many agents did you speak with?</p> <p>8 A There was two.</p> <p>9 Q Does the name Ken Samuels ring a bell at all    10 for you?</p> <p>11 A Yeah, that was one of them. Yes.</p> <p>12 Q Okay, and do you know the name of the other    13 person?</p> <p>14 A No.</p> <p>15 Q Was it a male agent?</p> <p>16 A Yes.</p> <p>17 Q What did you speak with Ken Samuels and the    18 other agent about?</p> <p>19 A About some corruption in the unit that I had    20 witnessed.</p> <p>21 Q And what do you mean by that?</p> <p>22 A There was an instance to where there was an    23 arrest and there was money and narcotics that were    24 seized, and all of the money did not get inventoried    25 during the arrest.</p>	<p style="text-align: right;">Page 73</p> <p>1 - less than half of the stack got inventoried and I    2 explained that to him.</p> <p>3 Q And when did the incident with a portion of    4 the money not being inventoried, when did that occur?</p> <p>5 A Shortly after arriving to Housing.</p> <p>6 Q And who were the officers involved?</p> <p>7 A I don't recall their names.</p> <p>8 Q How many officers were involved?</p> <p>9 A It was two.</p> <p>10 Q I'm sorry. Did you say at least two?</p> <p>11 A No. There was two.</p> <p>12 Q There were two. And were either of that --    13 were either of them members of the Watts tactical team?</p> <p>14 A No.</p> <p>15 Q How did you first contact the FBI about what    16 you had</p> <p>17 A By phone.</p> <p>18 Q How long did the interview at your home with    19 the FBI agents last?</p> <p>20 A I don't remember now.</p> <p>21 Q During that interview at your home with the    22 FBI agents, did you discuss Ronald Watts at all?</p> <p>23 A No.</p> <p>24 Q Did you discuss any officers besides the two    25 that you believed had failed to inventory some money?</p>

<p>1 A No.</p> <p>2 Q Where was the arrest where money was seized</p> <p>3 and the two officers failed to inventory it?</p> <p>4 A It was somewhere on Federal or State Street,</p> <p>5 one of the high-rise buildings.</p> <p>6 Q And were you one of the officers who</p> <p>7 participated in the arrest?</p> <p>8 A Yes.</p> <p>9 Q And what was your role?</p> <p>10 A Assisting officer.</p> <p>11 Q Who was arrested?</p> <p>12 A I don't -- honestly, I don't recall now if it</p> <p>13 was an arrest or it was just an inventory situation. I</p> <p>14 don't remember.</p> <p>15 Q Do you have an independent recollection of</p> <p>16 being on Federal or State Street in a high rise?</p> <p>17 MR. DAFFADA: Objection.</p> <p>18 Q Sorry. Let me ask it better. Do you have an</p> <p>19 independent recollection of being part of an incident</p> <p>20 that led you to report to the FBI?</p> <p>21 MR. DAFFADA: Object to form.</p> <p>22 A Yes.</p> <p>23 Q Tell me what you remember.</p> <p>24 A I remember being at the -- at the property and</p> <p>25 coming across what I considered a large sum of money.</p>	<p>Page 74</p> <p>1 names of the two officers that you reported to the FBI</p> <p>2 for this incident, right?</p> <p>3 A Right.</p> <p>4 Q Can you describe what they looked like?</p> <p>5 A Male whites.</p> <p>6 Q Anything else that you can describe about</p> <p>7 them?</p> <p>8 A No, I don't remember.</p> <p>9 Q Were they members of a tactical team?</p> <p>10 A I don't recall.</p> <p>11 Q Did you speak with anyone in Internal Affairs</p> <p>12 about what you had observed?</p> <p>13 A No.</p> <p>14 Q And why not?</p> <p>15 A I didn't feel comfortable.</p> <p>16 Q And tell me what you mean by that.</p> <p>17 A I felt that the officers knew people at</p> <p>18 Internal Affairs.</p> <p>19 Q Were you concerned about retaliation if you</p> <p>20 reported to Internal Affairs?</p> <p>21 A I don't remember having that feeling. I don't</p> <p>22 -- I don't know.</p> <p>23 Q When you said you felt that the officers knew</p> <p>24 people at Internal Affairs, were you concerned that</p> <p>25 Internal Affairs would not adequately investigate the</p>
<p>Page 75</p> <p>1 And I remember going back to the station and when it was</p> <p>2 inventoried, it was a lot less than what I originally</p> <p>3 saw.</p> <p>4 Q Was anyone with you when you came across the</p> <p>5 large sum of money?</p> <p>6 A I don't recall.</p> <p>7 Q Who was assigned to inventory it?</p> <p>8 A I don't remember.</p> <p>9 Q What caused you to check the inventory?</p> <p>10 MR. DAFFADA: Objection. Form. Foundation.</p> <p>11 A It was -- it was just obvious due to the sum,</p> <p>12 the physical amount, not the dollar amount. But the</p> <p>13 best way I can describe it was, when I saw the initial</p> <p>14 amount, it was, you know -- it was -- in my opinion, it</p> <p>15 was a big, huge stack. Again, I don't know the dollar</p> <p>16 amount, but when it was inventoried, the amount, the</p> <p>17 physical amount, was less than half the size. It was --</p> <p>18 it was an apparent amount.</p> <p>19 Q So the disparity was obvious to you?</p> <p>20 A Yes.</p> <p>21 Q Did you speak with anyone at CPD about that</p> <p>22 disparity before you contacted the FBI?</p> <p>23 A No. Actually, I don't recall if I spoke with</p> <p>24 anyone else.</p> <p>25 Q Can you -- I know you said you don't know the</p>	<p>Page 77</p> <p>1 incident?</p> <p>2 MR. MICHALIK: Michalik. Object to the form of</p> <p>3 the question.</p> <p>4 A I don't remember now.</p> <p>5 Q Why did the fact that the officers may have</p> <p>6 known people at Internal Affairs deter you from</p> <p>7 reporting it to Internal Affairs?</p> <p>8 MR. DAFFADA: Objection. Form.</p> <p>9 A I don't -- I don't know.</p> <p>10 Q What was the outcome of your interview with</p> <p>11 the two FBI agents at your home about this incident?</p> <p>12 MR. DAFFADA: Objection. Form.</p> <p>13 A There was no arrest or indictment made.</p> <p>14 Q Did the agents ever speak with you after that</p> <p>15 interview about what you had observed?</p> <p>16 A Yes.</p> <p>17 Q Tell me what happened when they spoke with you</p> <p>18 again about what you observed.</p> <p>19 MR. DAFFADA: Objection. Form.</p> <p>20 A It was basically just a follow-up call to ask</p> <p>21 me if I had seen anything else.</p> <p>22 Q And what did you say?</p> <p>23 A No.</p> <p>24 Q Other than the follow-up -- well strike that,</p> <p>25 please. Do you recall which one of them followed up via</p>

<p>1 telephone with you?</p> <p>2 A I remember speaking with Ken Samuel. That was 3 the name that rang a bell. I remember speaking with him 4 more often than the other person.</p> <p>5 Q Okay. Did you speak with Ken Samuel multiple 6 times about corruption at Public Housing South?</p> <p>7 A It was regarding the same incident.</p> <p>8 Q Okay.</p> <p>9 A It was -- it was follow-up calls.</p> <p>10 Q Okay. Over what period of time did Ken Samuel 11 follow up with you about this incident that you 12 observed?</p> <p>13 A I don't remember.</p> <p>14 Q Is it fair to say he followed up with you 15 multiple times?</p> <p>16 A More than once.</p> <p>17 Q Did he ever indicate to you that he had other 18 sources of information about this incident that you had 19 reported?</p> <p>20 A No.</p> <p>21 Q Did he ever indicate to you that he was 22 through -- or finished investigating the incident that 23 you had reported?</p> <p>24 A Yes.</p> <p>25 Q And did he explain any outcome of his</p>	<p>Page 78</p> <p>1 employees that the FBI agents might want to talk to?</p> <p>2 A I don't remember.</p> <p>3 Q Did you ever direct -- or strike that. Did 4 you ever suggest to Shannon Spalding or to the agents 5 that they should speak with one another?</p> <p>6 MR. DAFFADA: Objection. Form.</p> <p>7 A I don't remember now.</p> <p>8 Q Do you know whether Ken Samuel was 9 investigating any other incidents from the 2nd District?</p> <p>10 A I don't know.</p> <p>11 Q Did you have any other in-person interviews 12 with the FBI agents about this failure to inventory 13 incident in person?</p> <p>14 A I don't recall.</p> <p>15 Q At some point, did you discuss concerns about 16 corruption in the 2nd District with Shannon Spalding?</p> <p>17 A I'm sorry. Repeat the question.</p> <p>18 Q Sure. At some point, did you discuss concerns 19 about corruption with Shannon Spalding?</p> <p>20 MR. BAZAREK: Objection. Foundation. Form of 21 the question.</p> <p>22 A I don't remember if we talked at about that.</p> <p>23 Q You don't remember if you talked about that 24 specific incident or whether you talked about corruption 25 generally with Shannon Spalding?</p>
<p>1 investigation?</p> <p>2 MR. DAFFADA: Objection. Form. You can 3 answer.</p> <p>4 A Our last call from my recollection was -- he 5 said that -- words to the effect that they didn't get 6 anything else. They didn't get anything. It was a 7 negative outcome, and they were closing the books on it 8 basically.</p> <p>9 Q Were you satisfied with that result?</p> <p>10 A No.</p> <p>11 Q And why not?</p> <p>12 A I don't know. I felt that they didn't wait 13 long enough.</p> <p>14 Q And when you say you felt they didn't wait 15 long enough, did you feel they could have gathered more 16 evidence if they'd continued?</p> <p>17 A I don't -- I don't know.</p> <p>18 Q Did you ever tell anyone at CPD that you had 19 reported that incident to the FBI?</p> <p>20 A I don't remember.</p> <p>21 Q Did you ever tell Shannon Spalding that you 22 had reported that incident to the FBI?</p> <p>23 A I don't remember if we spoke about that.</p> <p>24 Q Did you ever tell the FBI agents to speak -- 25 or strike that, please. Did you ever identify any CPD</p>	<p>Page 79</p> <p>1 A You're talking about corruption in the 2nd 2 District?</p> <p>3 Q Or within Public Housing South.</p> <p>4 A I don't remember.</p> <p>5 Q At some point, did you discuss concerns about 6 corruption within CPD with Shannon Spalding?</p> <p>7 MR. DAFFADA: Can you repeat the question? I'm 8 sorry.</p> <p>9 MS. KLEINHAUS: Maggie, could you play it back?</p> <p>10 MR. DAFFADA: Thank you.</p> <p>11 (REPORTER PLAYS BACK REQUESTED TESTIMONY)</p> <p>12 A We may have. I don't remember.</p> <p>13 BY MS. KLEINHAUS:</p> <p>14 Q Did any arrestees that you came into contact 15 with from Ida B. Wells ever complain to you that drugs 16 had been planted on them?</p> <p>17 MR. DAFFADA: Object to form.</p> <p>18 A Yes.</p> <p>19 Q And tell me about the occasions when that 20 occurred.</p> <p>21 MR. DAFFADA: Objection. Form.</p> <p>22 A During arrest the arrestees had said to me on 23 various occasions that the drugs that was being 24 inventoried during the arrest wasn't theirs.</p> <p>25 Q And are there any specific arrestees that you</p>

<p>1 recall telling you that?</p> <p>2 A No.</p> <p>3 Q Did arrestees from Ida B. Wells ever complain</p> <p>4 to you about the conduct of Sergeant Watts or members of</p> <p>5 his tactical team?</p> <p>6 MR. BAZAREK: Objection. Foundation. Form of</p> <p>7 the question.</p> <p>8 A I don't remember.</p> <p>9 Q Did any arrestees from -- or residents from</p> <p>10 Ida B. Wells ever complain to you that Watts or members</p> <p>11 of his team were trying to shake them down for money?</p> <p>12 MR. BAZAREK: Objection. Foundation. Form of</p> <p>13 the question.</p> <p>14 A I don't recall.</p> <p>15 Q Do you know who [REDACTED] (phonetic) is?</p> <p>16 A No.</p> <p>17 Q Do you know who Stacy Graham (phonetic) is?</p> <p>18 A No.</p> <p>19 Q Were you aware of any civilians who were</p> <p>20 paying money to Sergeant Watts?</p> <p>21 A No.</p> <p>22 Q Were you aware of any drug dealers who were</p> <p>23 paying Sergeant Watts in order to be able to operate</p> <p>24 their drug lines in Ida B. Wells?</p> <p>25 A No.</p>	<p>Page 82</p> <p>1 A Yes.</p> <p>2 Q Who's Mr. Stegmiller?</p> <p>3 A Another police officer that was in Housing.</p> <p>4 Q Was he a sergeant?</p> <p>5 A No.</p> <p>6 Q Did you ever have any concerns about whether</p> <p>7 Stegmiller was involved in corruption?</p> <p>8 A No recollection of that.</p> <p>9 Q At some point you developed concerns that</p> <p>10 Sergeant Watts was involved in corruption, right?</p> <p>11 A Yes.</p> <p>12 Q How did you first become concerned that</p> <p>13 Sergeant Watts was involved in corruption?</p> <p>14 A I had just suspicions.</p> <p>15 Q When did you first become suspicious?</p> <p>16 A I don't remember the date.</p> <p>17 Q Was it shortly after you became a member of</p> <p>18 the Watts tactical team?</p> <p>19 A Probably within a couple of months.</p> <p>20 Q And what made you suspicious?</p> <p>21 A I don't know.</p> <p>22 Q Did you observe anything that made you</p> <p>23 concerned about what was going on on the team?</p> <p>24 MR. BAZAREK: Object to the form -- wait.</p> <p>25 Object to the form of the question. Foundation.</p>
<p>Page 83</p> <p>1 Q Did you ever observe Sergeant Watts or any</p> <p>2 members of his tactical team request that civilians give</p> <p>3 them money?</p> <p>4 A No.</p> <p>5 Q Did you ever observe Watts or any member of</p> <p>6 the tactical team tell an arrestee that if they could</p> <p>7 provide information about someone else that they would</p> <p>8 be let go and would not be arrested?</p> <p>9 MR. DAFFADA: Objection. Form.</p> <p>10 A I don't recall.</p> <p>11 Q Do you know Fred Waller?</p> <p>12 A Yes.</p> <p>13 Q Who's Fred Waller?</p> <p>14 A He's a retired police officer.</p> <p>15 Q Was he ever a supervisor when you were in</p> <p>16 Public Housing?</p> <p>17 A Yes.</p> <p>18 Q And what was his rank?</p> <p>19 A Sergeant.</p> <p>20 Q Was he ever your supervisor?</p> <p>21 A Yes.</p> <p>22 Q Did you ever have any concerns about any</p> <p>23 corruption by Fred Waller?</p> <p>24 A No.</p> <p>25 Q Do you know who Bob Stegmiller is?</p>	<p>Page 85</p> <p>1 Incomplete hypothetical. Vague and ambiguous. And</p> <p>2 the loaded term, "what was going on on the team."</p> <p>3 That's my objection.</p> <p>4 BY MS. KLEINHAUS:</p> <p>5 Q Go ahead, sir.</p> <p>6 A I'm sorry. Can you have the reporter repeat</p> <p>7 it or can you repeat it?</p> <p>8 MS. KLEINHAUS: Yeah. Can you play it back,</p> <p>9 Maggie?</p> <p>10 (REPORTER PLAYS BACK REQUESTED TESTIMONY)</p> <p>11 MR. BAZAREK: Same objection.</p> <p>12 A Just the fact that people had said that the</p> <p>13 drugs we were inventorying weren't their drugs.</p> <p>14 BY MS. KLEINHAUS:</p> <p>15 Q So when you testified earlier that during</p> <p>16 arrests, arrestees would say that what was being</p> <p>17 inventoried wasn't theirs, that caused you some concern;</p> <p>18 is that right?</p> <p>19 A Yes.</p> <p>20 Q Had you ever heard that when you were part of</p> <p>21 any other team within the Chicago Police Department?</p> <p>22 A Yes.</p> <p>23 Q And after you heard that when you were on the</p> <p>24 Watts team, what was the next thing that caused you to</p> <p>25 be concerned about corruption on the team?</p>

<p style="text-align: right;">Page 86</p> <p>1           MR. MICHALIK: I object to the form of the 2        question. 3           MR. DAFFADA: I hear Paul object as well. 4           A    I don't recall. 5    BY MS. KLEINHAUS: 6           Q    Did you ever observe members of the Watts team 7        fail to inventory money or drugs that was seized? 8           A    Yes. 9           Q    Okay. Tell me about the first time that you 10       observed that. 11          MR. DAFFADA: Objection. Form. 12          A    I don't remember the first time. 13          Q    It happened multiple times, right? 14          MR. BAZAREK: Objection. Foundation. Form of 15        the question. 16          MR. DAFFADA: Same. 17          A    I don't recall how many times. 18    BY MS. KLEINHAUS: 19          Q    Is it fair to say it happened several times? 20          MR. BAZAREK: Object to the form of the 21        question. Foundation. 22          A    I can say more than once. 23    BY MS. KLEINHAUS: 24          Q    Tell me what led you to believe that members 25        of the Watts team failed to inventory money or drugs</p>	<p style="text-align: right;">Page 88</p> <p>1        understanding you correctly, members of the team would 2        seize narcotics, but there would be no arrest of the 3        person who had the drugs; is that right? 4           MR. BAZAREK: Object to the form of the 5        question. Lacks foundation. Vague. Ambiguous. 6           A    Yeah. I saw situations where there was 7        suspect narcotics recovered and then people weren't 8        arrested. 9           Q    Did you observe situations where money was 10       seized and not all of the money was inventoried? 11          MR. BAZAREK: Object to the form of the 12        question. Foundation. 13          A    Yes. 14          Q    During the instances where you observed that a 15        small amount of narcotics would be seized but no arrest 16        would result, which police officers were involved in 17        those arrests? 18          A    I recall it being Sergeant Watts. 19          Q    Anyone else? 20          A    I don't recall. 21          Q    It could have been other people, but you don't 22        know; is that right? 23          MR. BAZAREK: Objection. Calls for speculation 24        to the question. 25          A    I just -- I remember it happening when</p>
<p style="text-align: right;">Page 87</p> <p>1        that they had seized. 2          MR. BAZAREK: Object -- you're 3        mischaracterizing this testimony. I'm objecting to 4        that first. And then also, I'm objecting to the 5        form of the question. And also, I'm objecting 6        further to the lack of foundation. 7          MS. KLEINHAUS: Go ahead. 8          MR. DAFFADA: What was the question again? I'm 9        sorry. I don't remember. 10       MS. KLEINHAUS: Maggie, can you play it back? 11       COURT REPORTER: Yes. 12        (REPORTER PLAYS BACK REQUESTED TESTIMONY) 13       A    There were instances where there were small 14       amounts of narcotics that were seized from what should 15       have been an arrest. And it was basically a suspicion 16       that -- that it should have been inventoried, but the 17       person was essentially let go. 18    BY MS. KLEINHAUS: 19          Q    So instead of the seizure of the drugs 20        resulting in an arrest, the person wasn't arrested, and 21       the members of the Watts team took the narcotics? 22          MR. KOSOKO: Object to the form of the 23        question. Misquotes the witness. 24          A    What -- what is the question again? 25          Q    Let me see if I can ask it better. If I'm</p>	<p style="text-align: right;">Page 89</p> <p>1        Sergeant Watts was there. 2          Q    Over what period of time did you observe these 3        instances where narcotics were seized and no arrest was 4        made, or money was seized and not all of it was 5        inventoried? 6          MR. BAZAREK: Object to the form of the 7        question. Foundation. 8          A    I don't recall. 9          Q    Do you know if it was over a period of years? 10       A    This is hard to say. I don't recall. 11       Q    Was it throughout the time that you were 12       assigned to Sergeant Watts' tactical team? 13       A    Yes. 14       Q    How did you come to realize that there were 15       instances where narcotics were seized but no arrest was 16       made? 17       A    I saw it happen. 18       Q    And how did you come to realize that there 19       were occasions where money was seized, but not all of it 20       was inventoried? 21          MR. BAZAREK: Object to the form of the 22        question. Foundation. 23       A    Because there was a time when we had seized 24        contraband and money, and Sergeant Watts let the team go 25        home early and subsequently, it wasn't inventoried.</p>

<p style="text-align: right;">Page 90</p> <p>1 Q And where were you when the contraband and 2 money was seized? 3 A I don't recall now. 4 Q Were you at Ida B. Wells? 5 A I don't remember. 6 Q Do you know from whom the contraband and money 7 was seized? 8 A No. 9 Q Was Watts present when the contraband and 10 money were seized? 11 A Yes. 12 Q Who else was present besides you and Sergeant 13 Watts? 14 MR. BAZAREK: Objection. Foundation. Form of 15 the question. 16 A I don't remember now. 17 Q You said he let the team go home early? 18 A Correct. 19 Q And was that something that happened on other 20 occasions when there was a seizure of contraband without 21 an arrest? 22 MR. BAZAREK: Objection. Foundation. Form of 23 the question. 24 A Yes. 25 Q And was that unusual in your experience as a</p>	<p style="text-align: right;">Page 92</p> <p>1 A The next time I was back at work. 2 Q And what did you do to check? 3 A I went into the book and looked. 4 Q And when you say the book, what do you mean by 5 that? 6 A At that time there was an inventory book and 7 the -- and the book had lines for -- what was ever 8 inventoried. And there was -- there was nothing there 9 for that date. 10 Q What was your impression of how big the bust 11 had been for that incident? 12 MR. BAZAREK: Object to the form of the 13 question. Foundation. Got an RD number or 14 anything? 15 MS. KLEINHAUS: Counsel, no need to 16 editorialize. Just the objection is fine. 17 MR. BAZAREK: Okay. There's a standing 18 objection to all these questions that there's no 19 specificity, we don't know what year, when it 20 happened, or in fact if anyone was arrested. So 21 that's my objection. 22 MS. KLEINHAUS: Okay. You can stick to just 23 the category of objection. So form, foundation. 24 There's no need to editorialize, Counsel. Go ahead, 25 sir.</p>
<p style="text-align: right;">Page 91</p> <p>1 member of the Chicago Police Department to have a 2 sergeant tell you to go home early after making a bust? 3 A I don't remember. 4 Q Did Watts tell you that he would do the 5 inventory? 6 A Yes. 7 Q And was Mohammed assigned to assist him with 8 it? 9 A Yes. 10 Q At some point, did you check the inventory 11 that Watts and Mohammed were supposed to complete? 12 A Yes. 13 Q What caused you to go back to check it? 14 A Because after we were released, we got back to 15 the station -- the team, Watts, everybody. I recall him 16 telling us we could leave. Everybody left in their cars 17 besides Watts and Mohammed, and I drove from the station 18 and drove a short period. And I had a phone call and I 19 had to pull over to take the call. And shortly after I 20 was pulled over, I recall seeing Watts and Mohammed 21 leaving separately in their cars. And I felt that there 22 was no way they could have inventoried what they had in 23 that amount of time. It wasn't possible. 24 Q And so, did you check the inventory the next 25 day?</p>	<p style="text-align: right;">Page 93</p> <p>1 THE WITNESS: I forgot the question now. 2 MS. KLEINHAUS: I think that's probably the 3 point of the speaking objections. So Maggie, can 4 you play the question back? 5 (REPORTER READS BACK REQUESTED TESTIMONY) 6 MR. BAZAREK: Same objection. 7 A I don't recall on the size of the bust, the 8 quantity of the money, or anything like that. 9 BY MS. KLEINHAUS: 10 Q Okay. You testified earlier that the incident 11 that you, spoke with Ken Samuel about you had an 12 impression that the stack of cash was quite substantial, 13 right? 14 A Correct. 15 Q Did you have any impression like that for the 16 bust that you were just describing that Watts and 17 Mohammed failed to inventory? 18 A No. I don't recall. 19 Q The incident that you were just describing, 20 where you were dismissed to go home early, and then you 21 realized that Watson and Mohammed left shortly 22 thereafter, do you know whether that was the first of 23 the several incidents where money was not inventoried? 24 Or in the middle of several incidents or the last 25 incident?</p>

<p style="text-align: right;">Page 94</p> <p>1           MR. BAZAREK: Object to the form of the 2        question. Foundation.</p> <p>3           MR. KOSOKO: Also misquotes the witness and is 4        compound.</p> <p>5    BY MS. KLEINHAUS:</p> <p>6       Q    Go ahead, sir.</p> <p>7       A    Well, I remember that being the time where I 8        felt I confirmed what happened. The other times were 9        suspicious that I had kind of learned after the fact, 10       looking back.</p> <p>11       Q    Okay, and so, was the incident that you just 12        described, where members of the team were dismissed and 13        you realized that Watts and Mohammed couldn't have 14        inventoried in that time period, was that the incident 15        that caused you to actually confront Sergeant Watts?</p> <p>16       MR. DAFFADA: Objection. Form.</p> <p>17       A    Yes.</p> <p>18       Q    And the previous incidents where you had some 19        suspicious, did you check the inventory log on those 20        occasions?</p> <p>21       A    No.</p> <p>22       Q    What made you suspicious on those other 23        occasions?</p> <p>24       A    I mean, to clarify, I wasn't suspicious at 25        that time when I saw those other incidents happen. It</p>	<p style="text-align: right;">Page 96</p> <p>1           MR. BAZAREK: Object to the form of the 2        question as well. Foundation.</p> <p>3       A    When the -- when the other times happened, I 4        didn't -- I didn't make an association. I didn't 5        realize what was happening at the time.</p> <p>6    BY MS. KLEINHAUS:</p> <p>7       Q    And how did you realize later that those other 8        incidents were also suspicious?</p> <p>9       MR. KOSOKO: Object to the form of the 10       question.</p> <p>11       A    Again, I felt that this was kind of a pattern 12        of practice that I'd seen before, but now it was 13        confirmed.</p> <p>14       Q    What parts of the pattern had you seen before?</p> <p>15       A    Where drugs and/or money was basically 16        recovered from an incident, and there was no arrest made 17        and then we were let go.</p> <p>18       Q    How long after you checked the inventory log 19        did you speak with Sergeant Watts about the incident?</p> <p>20       A    I don't recall the timeframe.</p> <p>21       Q    Was it the same shift or no?</p> <p>22       A    No. We had been released.</p> <p>23       Q    I'm sorry. So if I understood you correctly, 24        after the shift where you were released, the next time 25        you came into work, you looked at the inventory log</p>
<p style="text-align: right;">Page 95</p> <p>1       wasn't until I saw the final incident, where I kind of 2        felt -- I -- basically, I had an aha moment at that 3        time. And then I looked back and realized that, oh, 4        this -- this is not the first time I've seen this. Now 5        it makes sense. So I didn't have the suspicion at the 6        time before. The suspicion wasn't until that incident 7        happened and I kind of discovered it accidentally, is 8        the best way I can describe it.</p> <p>9       Q    Okay, and so, is it fair to say that in 10        previous incidents, maybe you noted something confusing 11        about the way the arrest or the inventory happened, but 12        you didn't have an understanding of exactly what had 13        transpired?</p> <p>14       MR. BAZAREK: Object to the form.</p> <p>15       MR. KOSOKO: Object to the form.</p> <p>16       MR. BAZAREK: Foundation.</p> <p>17       A    I'm sorry. Repeat the question again, please.</p> <p>18    BY MS. KLEINHAUS:</p> <p>19       Q    If I'm understanding you correctly, there were 20        some previous incidents where maybe something struck you 21        about the way that drugs or money wasn't inventoried, 22        but you didn't have an understanding of exactly what had 23        happened.</p> <p>24       MR. DAFFADA: Objection. That mischaracterizes 25        his testimony.</p>	<p style="text-align: right;">Page 97</p> <p>1       book, right?</p> <p>2       A    Yes.</p> <p>3       Q    And you noted that for the date in question 4        there was nothing there, right?</p> <p>5       A    Yes.</p> <p>6       Q    On -- during that shift where you realized 7        there wasn't anything in the inventory log, did you 8        speak with Sergeant Watts about it then?</p> <p>9       A    I don't recall how soon after -- how soon 10        afterwards.</p> <p>11       Q    Did you speak with anyone other than Sergeant 12        Watts at CPD about your concerns, that there was nothing 13        in the inventory log for that bust?</p> <p>14       A    Yes.</p> <p>15       Q    Who did you speak with?</p> <p>16       A    Lieutenant Spratt.</p> <p>17       Q    Did you speak with anyone at CPD before you 18        spoke with Sergeant Watts and Lieutenant Spratt?</p> <p>19       A    Not that I remember.</p> <p>20       Q    Did you mention your concerns to any other 21        members of the Watts tactical team?</p> <p>22       A    I don't remember.</p> <p>23       Q    What happened when you spoke with Sergeant 24        Watts about what you had observed?</p> <p>25       A    He basically told me he was in the process of</p>

<p style="text-align: right;">Page 98</p> <p>1 trading up for better -- for better information. And    2 when I called him out on it, he told me I was a liar and    3 words to that effect, and an argument ensued and, you    4 know, things of that nature. And that's when he went up    5 to Lieutenant Spratt.</p> <p>6       <b>Q</b>   And what did you understand him to mean when    7 he said he was in the process of trading up?</p> <p>8       <b>A</b>   He basically stated he was holding onto the --    9 either holding onto the narcotics and money in inventory    10 and his found property so we could get better    11 information. For a better bust, in other words.</p> <p>12       <b>Q</b>   Did he tell you who he was trying to bust?</p> <p>13       <b>A</b>   He may have, but I don't recall.</p> <p>14       <b>Q</b>   And you said you called him out on it. What    15 do you mean by that?</p> <p>16       <b>A</b>   I basically told him I didn't believe him,    17 that he was a liar.</p> <p>18       <b>Q</b>   Why didn't you believe him?</p> <p>19       <b>A</b>   Because -- because it wasn't inventoried,    20 wasn't there.</p> <p>21       <b>Q</b>   So his explanation of trading up didn't make    22 sense to you.</p> <p>23       <b>A</b>   Correct.</p> <p>24       <b>Q</b>   Before this conversation with Sergeant Watts    25 about the inventory, had you ever had any kind of</p>	<p style="text-align: right;">Page 100</p> <p>1       <b>Q</b>   Did you ever just not show up for a shift?</p> <p>2       <b>A</b>   No. I always showed up for work.</p> <p>3           THE WITNESS: Can we take a quick five-minute    4 break?</p> <p>5           MS. KLEINHAUS: Sure. Let's keep it to five    6 minutes.</p> <p>7           THE WITNESS: Thanks.</p> <p>8           COURT REPORTER: Time is 2:09. We're off    9 record.</p> <p>10           (OFF THE RECORD)</p> <p>11           COURT REPORTER: We are back on record for the    12 deposition of Michael Spaargaren, being conducted by    13 videoconference. Today is March 7, 2022. The time    14 is</p> <p>15 2:57 EST.</p> <p>16 BY MS. KLEINHAUS:</p> <p>17       <b>Q</b>   Sir, I believe your testimony earlier was that    18 there were occasions where arrestees would complain to    19 you that they were being charged with drugs that weren't    20 theirs, right?</p> <p>21       <b>A</b>   Yes.</p> <p>22       <b>Q</b>   And when they said that, did they say it    23 openly? Out in the open so that people could hear it?</p> <p>24       <b>A</b>   Yes.</p> <p>25       <b>Q</b>   And so it wasn't something that was said</p>
<p style="text-align: right;">Page 99</p> <p>1 argument or disagreement with him before?</p> <p>2       <b>A</b>   Not that I recall.</p> <p>3       <b>Q</b>   Had he ever said anything negative to you    4 about your work performance?</p> <p>5       <b>A</b>   I don't recall.</p> <p>6       <b>Q</b>   Had he ever said anything to you about your    7 attendance at work?</p> <p>8       <b>A</b>   He mentioned that he felt I was taking off too    9 much time, but it was my time.</p> <p>10       <b>Q</b>   And so when you say he mentioned to you that    11 you're taking off too much time, would that be like paid    12 time off?</p> <p>13       <b>A</b>   Time due.</p> <p>14       <b>Q</b>   And what does time due mean?</p> <p>15       <b>A</b>   Like when you get a vacation day, a holiday or    16 you work overtime, you can either take money for it or    17 you can take the day off. So time in the bank, in other    18 words.</p> <p>19       <b>Q</b>   So when you say it was your time, it was time    20 off that you had already accumulated, right?</p> <p>21       <b>A</b>   Yes.</p> <p>22       <b>Q</b>   Were there ever occasions when you worked on    23 Sergeant Watts' tactical team, where you took time that    24 wasn't your time due?</p> <p>25       <b>A</b>   I don't understand the question.</p>	<p style="text-align: right;">Page 101</p> <p>1       <b>Q</b>   privately just to you, right?</p> <p>2       <b>A</b>   Correct.</p> <p>3       <b>Q</b>   It was something that they were loudly    4 complaining about, right?</p> <p>5       <b>A</b>   Yes.</p> <p>6       <b>Q</b>   And do you have any reason to believe that you    7 were the only police officer that they complained to    8 about that?</p> <p>9           MR. BAZAREK: Objection. Foundation. Calls    10 for speculation.</p> <p>11       <b>A</b>   I don't recall.</p> <p>12       <b>Q</b>   Before the break, you were testifying about a    13 conversation that you had with Sergeant Watts about    14 contraband missing from the inventory, right?</p> <p>15       <b>A</b>   Yes.</p> <p>16       <b>Q</b>   Where did that conversation with Sergeant    17 Watts take place?</p> <p>18       <b>A</b>   In the Ida B. Wells station.</p> <p>19       <b>Q</b>   And can you describe what the layout of that    20 station was?</p> <p>21           MR. DAFFADA: Object to form. Go ahead.</p> <p>22       <b>A</b>   I don't remember. It was a long time ago. The    23 building's gone.</p> <p>24       <b>Q</b>   Was anyone else present for your conversation    25 with Watts?</p>

<p>1 A I don't recall.</p> <p>2 Q Was Officer Mohammed present for your 3 conversation with Sergeant Watts?</p> <p>4 A I don't recall.</p> <p>5 Q How long did you speak with Watts about this 6 issue with the inventory?</p> <p>7 A I remember it being a brief conversation.</p> <p>8 Q At some point in that conversation, did he 9 make reference to your safety working in the housing 10 projects?</p> <p>11 A Yes.</p> <p>12 Q And what was said?</p> <p>13 A He made mention that the housing projects is a 14 dangerous place, that I should be careful. Words to 15 that effect.</p> <p>16 Q And what did you take that to mean in the 17 context of the conversation you were having with him?</p> <p>18 A I felt it was a threat.</p> <p>19 Q Did he ever make any threats to report you to 20 Internal Affairs?</p> <p>21 A I don't remember.</p> <p>22 Q Do you recall him making reference to putting 23 any kind of papers or cases on you?</p> <p>24 A Yes.</p> <p>25 Q And tell me what was said.</p>	<p>Page 102</p> <p>1 Q Did you have -- when Watts told you to go to 2 speak with Lieutenant Spratt, did you have any 3 understanding of why you were being told to go speak 4 with Spratt?</p> <p>5 A I don't remember.</p> <p>6 Q What was -- what did your conversation with 7 Lieutenant Spratt consist of?</p> <p>8 A I don't remember the exact verbiage at this 9 point.</p> <p>10 Q Do you remember generally what was said?</p> <p>11 A Something to the effect that he asked me what 12 happened. I told him about the failure to have things 13 inventoried.</p> <p>14 Q Did you tell him anything else?</p> <p>15 A I don't recall.</p> <p>16 Q Did you tell him that you believed there were 17 other incidents where narcotics were seized and no 18 arrest was made?</p> <p>19 A I don't remember.</p> <p>20 Q Did you tell him there were other occasions 21 where money was seized and not inventoried?</p> <p>22 MR. BAZAREK: Objection. Foundation.</p> <p>23 A I don't remember.</p> <p>24 Q What did Lieutenant Spratt say to you?</p> <p>25 A That he thought I was the one who was corrupt.</p>
<p>Page 103</p> <p>1 A It was -- actually, I'm sorry. I misspoke. I 2 believe that was when I was talking with Lieutenant 3 Spratt.</p> <p>4 Q Okay, and I apologize if I asked this earlier, 5 but was your conversation with Lieutenant Spratt the 6 same day that you spoke with Watts?</p> <p>7 A Yes.</p> <p>8 Q Where did your conversation with Lieutenant 9 Spratt take place?</p> <p>10 A In his office.</p> <p>11 Q And where was his office?</p> <p>12 A In the Ida B. Wells building.</p> <p>13 Q And was anyone else present for your 14 conversation with Lieutenant Spratt?</p> <p>15 A I don't recall.</p> <p>16 Q Did Sergeant Watts tell you to speak with 17 Lieutenant Spratt?</p> <p>18 A Yes.</p> <p>19 Q And prior to this conversation with Lieutenant 20 Spratt, had you ever had any one-on-one meetings with 21 him before?</p> <p>22 A I don't recall.</p> <p>23 Q Did you have any impression up to that point 24 of his relationship with Sergeant Watts?</p> <p>25 A No.</p>	<p>Page 105</p> <p>1 Q Did he seem angry to you?</p> <p>2 A Yes.</p> <p>3 Q Did you have any idea why he would say that he 4 thought you were the one who was corrupt?</p> <p>5 MR. MICHALIK: Object to the form of the 6 question. Michalik.</p> <p>7 A I don't know.</p> <p>8 Q Were you surprised when he told you that he 9 thought you were corrupt?</p> <p>10 A Yes.</p> <p>11 Q Did he make any threats to you in your 12 conversation with him?</p> <p>13 A He told me to pack my bags, that I was going 14 to be leaving.</p> <p>15 Q And what did you understand that to mean?</p> <p>16 A That I was getting dumped out of the unit.</p> <p>17 Q Did you have an impression or an understanding 18 of where you'd be sent?</p> <p>19 A I don't recall.</p> <p>20 Q Other than threatening to sending -- or I'm 21 sorry. Strike that, please. Other than telling you 22 that you would have to pack your bags, did Lieutenant 23 Spratt make any other threats towards you?</p> <p>24 A Well, he told me not to go to IAD.</p> <p>25 Q Okay, and what did he say about IAD?</p>

<p style="text-align: right;">Page 106</p> <p>1 A Not to bother, that he knows everybody over 2 there.</p> <p>3 Q Did he also make threats about your personal 4 safety?</p> <p>5 A I don't recall.</p> <p>6 Q And at the conclusion of your conversation 7 with Spratt, were you concerned about your safety and 8 your career?</p> <p>9 MR. MICHALIK: Object to the form of the 10 question. Compound.</p> <p>11 A I don't recall.</p> <p>12 Q Do you recall, Lieutenant Spratt, telling you 13 words to the effect of, "You better keep your mouth 14 shut. You don't want to lose your life over this. If 15 you report a sergeant to IAD, how long do you think you 16 will last?"</p> <p>17 A Yes.</p> <p>18 Q And did you take that as a threat to your 19 personal safety?</p> <p>20 A To my personal safety and to my career.</p> <p>21 Q Is there anything else in your conversation 22 with Lieutenant Brett that you recall that we haven't 23 talked about yet?</p> <p>24 A Not at this time.</p> <p>25 Q Did you have a conversation with Shannon</p>	<p style="text-align: right;">Page 108</p> <p>1 A Yes.</p> <p>2 Q And was -- she was employed by CPD at the 3 time?</p> <p>4 A Yes.</p> <p>5 Q And what did you tell Jacqueline about your 6 conversations with Watts and Spratt?</p> <p>7 A I don't remember now.</p> <p>8 Q Was there anyone else within CPD that you told 9 about your conversations with Watts and Spratt besides 10 Jacqueline Spaargaren and Shannon Spalding?</p> <p>11 A I don't recall.</p> <p>12 Q Did you ever speak with any other members of 13 the Watts tactical team about your conversations with 14 Watts -- or let's start there -- about your conversation 15 with Watts?</p> <p>16 A Yes.</p> <p>17 Q Who did you speak with?</p> <p>18 A Officer Mohammed.</p> <p>19 Q And what did that conversation consist of?</p> <p>20 A Words to the effect that you can't call out 21 the boss and not expect something to happen.</p> <p>22 Q Is that what Mohammed said to you?</p> <p>23 A Yes.</p> <p>24 Q Was anyone else present when Mohammed told you 25 that?</p>
<p style="text-align: right;">Page 107</p> <p>1 Spalding about Watts and Spratt?</p> <p>2 A Yes.</p> <p>3 Q And when in time in relation to those 4 conversations, did you tell or talk to Shannon about 5 what had happened?</p> <p>6 A I don't remember.</p> <p>7 Q Do you know if it was the same shift where you 8 spoke with Watts and Spratt that you spoke with Shannon?</p> <p>9 A I don't recall if it was the same shift.</p> <p>10 Q What did your conversation with Shannon 11 consist of?</p> <p>12 A She asked me what happened.</p> <p>13 Q And what did you tell her?</p> <p>14 A What happened.</p> <p>15 Q And what was her reaction to that?</p> <p>16 A I don't remember now.</p> <p>17 Q Did you tell anyone else within CPD about what 18 had happened with Watts and Spratt besides Shannon 19 Spalding?</p> <p>20 A Yes.</p> <p>21 Q Who else did you tell?</p> <p>22 A My now ex-wife.</p> <p>23 Q And what is her name?</p> <p>24 A Jacqueline.</p> <p>25 Q Did she have your same last name, Spaargaren?</p>	<p style="text-align: right;">Page 109</p> <p>1 A I don't remember.</p> <p>2 Q Did you ever speak with any other members of 3 the Watts tactical team about your confrontation with 4 Watts?</p> <p>5 A I don't remember.</p> <p>6 Q Did you ever speak with any other members of 7 the Watts tactical team about your conversation with 8 Spratt?</p> <p>9 A I don't remember.</p> <p>10 Q Did you ever raise concerns about narcotics 11 being seized and no arrests being made with any other 12 members of the Watts tactical team besides Watts?</p> <p>13 MR. DAFFADA: Objection to form.</p> <p>14 A No.</p> <p>15 Q And why not?</p> <p>16 A Because at this point, when I realized that 17 the narcotics and the money wasn't being inventoried, I 18 was now dumped off the team and was leaving shortly 19 afterwards. And the other times that I had seen, I 20 didn't realize that that was going on until after I 21 had the inventory issue then. So the other times was -- 22 it wasn't really a suspicion until afterwards, you know? 23 So at that point it was kind of a moot point, because I 24 was leaving the unit.</p> <p>25 Q Did any other members of the Watts tactical</p>

<p style="text-align: right;">Page 110</p> <p>1 team ever raise concerns with you that people were being    2 were -- strike that, please. Did anyone ever raise any    3 concerns with you about corruption or misconduct on the    4 Watts tactical team?</p> <p>5 A Officer Cadman.</p> <p>6 Q And what did Officer Cadman raise with you?</p> <p>7 A It was just one comment when he left the unit.    8 He said he was leaving the unit because he didn't want    9 to go to jail.</p> <p>10 Q And did you ask him what he meant by that?</p> <p>11 A I don't remember.</p> <p>12 Q Have you ever spoken with him about what he    13 meant by that?</p> <p>14 A I don't remember.</p> <p>15 Q Other than Officer Cadman. Were there any    16 other officers on the Watts tactical team who raised    17 concerns with you about corruption or misconduct on the    18 team?</p> <p>19 A I don't remember.</p> <p>20 Q After your discussion with Lieutenant Spratt,    21 did you report anything about the Watts tactical team to    22 Internal Affairs?</p> <p>23 A No.</p> <p>24 Q And why not?</p> <p>25 A I felt it was pointless.</p>	<p style="text-align: right;">Page 112</p> <p>1 office located?</p> <p>2 A 35th and State Street.</p> <p>3 Q Had you ever taken a leave of absence from the    4 Chicago Police Department before this?</p> <p>5 A No.</p> <p>6 Q In order to complete the paperwork, were you    7 required to give a reason for the leave of absence?</p> <p>8 A I don't recall.</p> <p>9 Q When you completed the -- strike that, please.    10 When you did the request for leave of absence, did you    11 indicate to either in writing or in any other way to    12 anyone at CPD about -- that the reason was your    13 conversations with Watts and Spratt?</p> <p>14 A No.</p> <p>15 Q And why not?</p> <p>16 A Because I just wanted to leave.</p> <p>17 Q Did you have a plan for what you would do    18 during your leave of absence?</p> <p>19 A No.</p> <p>20 Q Was your leave of absence paid or unpaid?</p> <p>21 A Unpaid.</p> <p>22 Q Did you have any conversation with Watts about    23 your leave of absence request?</p> <p>24 A I don't remember.</p> <p>25 Q Did you have a conversation with any other</p>
<p style="text-align: right;">Page 111</p> <p>1 Q After your discussion with Lieutenant Spratt,    2 did you request a leave of absence?</p> <p>3 A Yes.</p> <p>4 Q Prior to your discussion with Spratt, did you    5 have any plans to take a leave of absence?</p> <p>6 A No.</p> <p>7 Q How long after you spoke with Spratt, did you    8 request your leave of absence?</p> <p>9 A I don't remember.</p> <p>10 Q Why did you decide to request a leave of    11 absence?</p> <p>12 A Because I felt that my life and my career was    13 threatened. And I needed to get out of there -- out of    14 the unit as soon as possible.</p> <p>15 Q Did you consider requesting a transfer to a    16 different unit?</p> <p>17 A I don't remember.</p> <p>18 Q What was the process you had to go through in    19 order to request a leave of absence?</p> <p>20 A Go to personnel and fill out a leave of    21 absence form.</p> <p>22 Q So did you have to go to the personnel office    23 in person to complete paperwork?</p> <p>24 A Yes.</p> <p>25 Q Where was person -- where is the personnel</p>	<p style="text-align: right;">Page 113</p> <p>1 members of the tactical team of your leave of absence    2 request?</p> <p>3 A I don't remember.</p> <p>4 Q Given the comments that Watts and Spratt had    5 made about your safety and your career. Were you    6 concerned about retaliation, if you told people the real    7 reason for your leave of absence?</p> <p>8 MR. MICHALIK: Object to the form of the    9 question.</p> <p>10 A I don't remember.</p> <p>11 Q Did you discuss your decision to take a leave    12 of absence with your wife, Jacqueline, wife at the time?</p> <p>13 A I don't remember if we discussed it.</p> <p>14 Q Okay. I'm going to show you what we'll mark    15 as Exhibit 1. Just give me a second to pull it up.    16 Well, while I'm getting that, did you review any    17 documents to prepare for your deposition today?</p> <p>18 A Yes.</p> <p>19 Q What did you review?</p> <p>20 A Rush reports, case reports.</p> <p>21 Q Anything else?</p> <p>22 A I don't recall. I remember looking at those.</p> <p>23 Q Whoops. Okay. Strike that. I'm not going to    24 show you something on the screen. Do you -- I'll    25 represent to you that in your leave of absence request</p>

<p style="text-align: right;">Page 114</p> <p>1 form for CPD, you represented that the reason for the    2 request was family reasons. Do you recall that?    3 A No.    4 MR. BAZAREK: Hi, Tess. Can we get the Bates    5 number on it? I know what you're talking about.    6 Just so it's clear on the record, what you're    7 referring to.    8 MS. KLEINHAUS: Sure. I'm just having trouble    9 with my machine. Well, I can come back to it for    10 you on a break.    11 MR. KOSOKO: So are we going to mark that as    12 Exhibit 1?    13 MS. KLEINHAUS: No, we're not.    14 BY MR. KLEINHAUS:    15 Q Did you have family reasons at the time for    16 taking a leave of absence?    17 A I don't remember.    18 Q Was it ever your intention to disclose to CPD    19 that you were taking a leave of absence because of the    20 threats made to you by Watts and Spratt?    21 A No.    22 Q And why not?    23 A I don't know.    24 Q Okay. I mean, perhaps I'm being a bit obvious    25 here, but were you concerned about disclosing to CPD </p>	<p style="text-align: right;">Page 116</p> <p>1 Watts after the time that he threatened you and you left    2 his team?    3 MR. KOSOKO: Object to the form of the    4 question.    5 A Again, it's the same -- the same answer. I    6 don't recall doing any inspections for Watts.    7 Q When was the next time that you spoke to Watts    8 after the conversation where you confronted him about    9 the inventory?    10 A Well, I was still in the unit with him, so I    11 still saw him until I left.    12 Q Okay. Did you -- during your leave of    13 absence, did you have any communications with Watts?    14 A I don't have any recollection.    15 Q After your leave of absence, you returned to    16 CPD, right?    17 A Yes.    18 Q And after you came back to CPD, did you have    19 any conversations with Watts?    20 A Not that I recall.    21 Q When you came back after your leave of    22 absence, did you have an opportunity to request what    23 your assignment would be when you came back?    24 A Yes.    25 Q And what did you request? </p>
<p style="text-align: right;">Page 115</p> <p>1 that you'd been threatened by the Sergeant and the    2 Lieutenant that you worked under?    3 MR. KOSOKO: Object to the form of the    4 question.    5 A I guess to answer your question, I just didn't    6 want to go there with it. It was just easier for me to    7 just leave.    8 Q Did you ever tell Watts or members of his    9 tactical team that you were taking a leave of absence to    10 work on your home inspection business?    11 A I don't recall what reason I told him.    12 Q During the leave of absence, did you work on    13 your home inspection business?    14 A Yes.    15 Q Did you ever do a home inspection for Sergeant    16 Watts at a property of his in 1998?    17 A I don't recall everyone who I did inspections    18 for.    19 Q Just focusing on Sergeant Watts, so not    20 everyone that you did inspections for. But do you know    21 whether you ever did an inspection for Sergeant Watts    22 for a property that he owned?    23 A I don't recall. I might have. I just -- I    24 don't remember.    25 Q Did you ever do an inspection for Sergeant </p>	<p style="text-align: right;">Page 117</p> <p>1 A To go to the 22nd District.    2 Q And that request was fulfilled, right?    3 A Yes.    4 Q Why did you come back to CPD?    5 A For the pension.    6 Q And at the point that you requested the leave    7 of absence, you had close to a decade of service with    8 CPD; is that right?    9 A No, it was less.    10 Q Okay. What was your understanding of how many    11 years of service you had to complete to get the pension?    12 A 20.    13 Q Prior to your conversation with Watts, where    14 you confronted him about the inventory? Had you had any    15 plans to leave the tactical team?    16 A I don't recall.    17 Q Had you requested any transfers out of the    18 tactical team?    19 A Not that I remember.    20 Q You completed an affidavit that was included    21 in Shannon Spalding's litigation, correct?    22 A Yes.    23 Q When was the last time that you reviewed that    24 affidavit?    25 A I think like some month ago, two months ago. </p>

<p style="text-align: right;">Page 118</p> <p>1 Q And is everything in that affidavit truthful 2 and accurate to the best of your knowledge? 3 A Truthful, but I think there's something that 4 needs to be clarified. 5 Q Okay. What needs to be clarified? 6 A I need to see it. 7 MS. KLEINHAUS: Okay. Give me a second. 8 Actually, if everyone has a copy handy -- Jim, do 9 you have a copy you can hand to the deponent that's 10 a clean copy? 11 MR. DAFFADA: Mine is not clean. So I think 12 there's one here that's clean. Yeah. 13 BY MS. KLEINHAUS: 14 Q Okay. So we'll mark the affidavit as Exhibit 15 1. I assume everybody has a copy of this handy. It's a 16 four-page exhibit. I think it's been produced a number 17 of times. So can you -- sir, can you read at the 18 bottom, in the right hand corner, whatever name and 19 number you see there? 20 (LOEY PLAINTIFFS' EXHIBIT 1 MARKED FOR 21 IDENTIFICATION) 22 THE WITNESS: It says City-B, like, boy, G like 23 George-02664. 24 MS. KLEINHAUS: Okay. So that's the version 25 that he's looking at?</p>	<p style="text-align: right;">Page 120</p> <p>1 this point. So, again, just to be clear, I didn't see 2 it four more times after this. It was going back, 3 looking and realizing, oh, when we did it this time, and 4 this time, and this time, this was the same pattern. And 5 like I said, to be clear, I kind of just discovered this 6 on a fluke, on accident when I saw them leaving. And 7 that's when I kind of put it together. 8 Q Anything else in Exhibit 1 that you believe is 9 inaccurate or needs to be clarified? 10 A That's the only thing I can think of right now 11 is just that. 12 Q Okay. You can put that exhibit to the side. 13 Did you ever have a romantic relationship with Shannon 14 Spalding? 15 A No. 16 Q Do you know of any reason why Sergeant Watts 17 would say that you had a romantic or sexual relationship 18 with Shannon Spalding? 19 A No clue. 20 Q When did you first start your home inspection 21 business? 22 A Approximately like 2001, 2002. About 20 years 23 ago. 24 Q And was that a business that you conducted in 25 addition to your work for CPD?</p>
<p style="text-align: right;">Page 119</p> <p>1 THE WITNESS: Oh, but I'm looking at the second 2 page. 3 BY MS. KLEINHAUS: 4 Q Okay. Starting at 04. That's fine, so 5 that'll be Exhibit 1. What is it in that affidavit that 6 you would like to clarify? 7 A For number 7, where it says, "I continued to 8 observe this pattern on at least four occasions," that 9 was kind of taken out of context. Basically, what it 10 should say, is that after on number 8, where I talk 11 about, I confronted Sergeant Watts about their view of 12 no arrest and no inventories for narcotics and money. 13 After that section, basically, that is where I realized 14 that four other times this had happened. So this 15 basically makes it sound like, you know, I had this 16 incident and then I saw it four more times, but it was 17 basically -- this was after the incident where I 18 confronted him. And this is when I realized -- I had 19 like an aha moment is the best way for me to describe 20 it. This is when I kind of put two and two together in 21 my mind and realized that, you know what? All these 22 other times when he had let us go before, I had a 23 suspicion that it wasn't him being a nice guy. It was 24 him not inventorying the money, not inventorying the 25 drugs, and keeping it. This is when I realized that at</p>	<p style="text-align: right;">Page 121</p> <p>1 A Yes. 2 Q And were you required to report to CPD that 3 you had a side business of home inspection? 4 A I have no idea. 5 Q During your leave of absence, did you ever 6 speak with the FBI about your experience on the Watts 7 tactical team? 8 A I don't remember. 9 Q During your leave of absence, did you speak 10 with Internal Affairs about your experience on the Watts 11 tactical team? 12 A No. 13 Q Did you ever speak with Internal Affairs at 14 any point about your experience on the Watts tactical 15 team? 16 A Not that I can recall. 17 Q Did anyone from IAD ever request to speak with 18 you about your experience on the Watts tactical team? 19 A No. 20 Q On the other occasions that you realized in 21 retrospect, were part of the larger pattern of not 22 inventorying, were there any other officers, besides 23 Mohammed, who stayed back with Watts when everyone was 24 dismissed to go home? 25 MR. BAZAREK: Object to the form of the</p>

<p style="text-align: right;">Page 122</p> <p>1 question. Yeah. Also, to foundation. Incomplete 2 hypothetical. Vague and ambiguous. 3 A I don't remember. 4 BY MS. KLEINHAUS: 5 Q Did you ever have any suspicions that any 6 other members of the Watts tactical team besides 7 Mohammed were part of the scheme of not inventorying 8 narcotics or money? 9 MR. DAFFADA: Objection. Form. 10 A I don't recall having any other suspicions. 11 Q Did you have suspicions about Mohammed being 12 involved in the scheme to not inventory narcotics or 13 money? 14 MR. DAFFADA: Objection. 15 MS. DOI: Form. 16 MR. DAFFADA: Foundation. 17 A Can you repeat the question please? 18 MR. DAFFADA: Time and scope. 19 MS. KLEINHAUS: I'm sorry. I didn't hear what 20 you said, Jim. 21 MR. DAFFADA: I said, "Objection. Time and 22 scope." 23 MS. KLEINHAUS: Okay. Can you play the 24 question back? 25 COURT REPORTER: Yes.</p>	<p style="text-align: right;">Page 124</p> <p>1 Q Did you ever observe Watts or members of his 2 tactical team tell someone that if they gave 3 information, they would not be arrested? 4 MR. KOSOKO: Objection. Asked and answered. 5 A I don't remember. 6 Q Did you ever observe that tactic during your 7 time as a member of the Chicago Police Department? 8 MR. KOSOKO: Objection. Asked and answered. 9 A What is the question? 10 Q Did you ever see anyone use that tactic of 11 telling a civilian, if you give us information, you 12 won't be aware during your time with the Chicago Police 13 Department? 14 MR. KOSOKO: Objection. Asked and answered. 15 MS. KLEINHAUS: It has not been asked or 16 answered. 17 BY MS. KLEINHAUS: 18 Q Go ahead, sir. 19 MR. KOSOKO: I'm making my objection. It was 20 one of the initial questions asked and he did answer 21 that question. 22 MR. DAFFADA: And foundation. Object to 23 foundation. 24 BY MS. KLEINHAUS: 25 Q Go ahead, sir.</p>
<p style="text-align: right;">Page 123</p> <p>1 (REPORTER PLAYS BACK REQUESTED TESTIMONY) 2 A I don't recall. 3 BY MS. KLEINHAUS: 4 Q During your time on the Watts tactical team, 5 did you ever observe Sergeant Watts pull narcotics out 6 of his desk? 7 A Can you rephrase the question? I don't 8 understand the question. 9 Q Did you ever see Watts pull narcotics out of 10 his desk? 11 A No. 12 Q Did you ever see Watts pull drugs out of his 13 clothing? 14 A The only time I recall is after we get back to 15 the station and maybe pull it out and say, "This was 16 from today," so yes. 17 Q And on the occasions, when he would pull out 18 drugs and say, "This was from today," would he tell you 19 whose drugs they were? 20 A I don't recall. 21 Q Did you ever see Watts or any member of his 22 tactical team tell someone that if they gave up 23 information, they wouldn't be arrested? 24 MR. KOSOKO: Objection. Asked and answered. 25 A I'm sorry. Ask the question again.</p>	<p style="text-align: right;">Page 125</p> <p>1 A I don't remember. 2 Q Did you ever tell anyone that if they gave you 3 information, they could avoid being arrested? 4 A I don't remember. 5 Q Did you ever see Watts store narcotics 6 anywhere within Ida B. Wells? 7 A I don't recall. 8 Q Did you ever see Watts or any member of the 9 Watts tactical team threatened to plant drugs on 10 someone? 11 MR. MICHALIK: Object to the compound nature of 12 that question. 13 MR. DAFFADA: Yeah. 14 A Can you repeat the question, please? 15 BY MS. KLEINHAUS: 16 Q Sure. Let me rephrase it. Did you ever see 17 Watts threatened to plant drugs on a civilian? 18 A I don't remember. 19 Q Did you ever see any member of the Watts 20 tactical team threatened to plant drugs on a civilian? 21 A I don't remember. 22 Q Did you ever see Watts threatened to attribute 23 drugs to someone who didn't have drugs on them? 24 A I don't remember that. 25 Q Did you ever see any member of the Watts</p>

<p style="text-align: right;">Page 126</p> <p>1 tactical team tell someone words to the effect of, these    2 drugs are yours?</p> <p>3 MR. DAFFADA: Objection. Form.</p> <p>4 A I've seen after an arrest. You know, I mean,    5 I've seen -- after an arrest, the sergeant would say,    6 you know, "These are his." You know, "This is his    7 narcotics."</p> <p>8 Q Sure, like to other officers, these are his,    9 right?</p> <p>10 A Yeah. I mean, to clarify, you make an arrest    11 and you come later in the arrest and, you know, as like    12 someone whose kind of like third party to the arrest,    13 "These are his drugs. This is what he had."</p> <p>14 Q Sure. To another police officer explaining    15 who had what?</p> <p>16 A Exactly.</p> <p>17 Q But did you ever see a member of the Watts    18 tactical team say to someone who had been arrested,    19 "These drugs are yours," and attribute them to that    20 person?</p> <p>21 MR. DAFFADA: Objection. Form.</p> <p>22 A Again, I mean, the only time I've seen an    23 officer say, "These are his," is when I wasn't there and    24 inquiring as to what's going on, you know, as to being    25 an assisting officer, you know, "What's up? These are</p>	<p style="text-align: right;">Page 128</p> <p>1 Q And how did you learn that?    2 A I believe watching the news.</p> <p>3 Q Did you ever talk to any other officers who    4 had worked on the Watts tactical team about the fact    5 that Watts had been arrested?</p> <p>6 A I don't remember.</p> <p>7 Q Did you ever talk to any other officers that    8 were on the Watts tactical team with you about the fact    9 that Mohammed had been arrested?</p> <p>10 A I don't remember.</p> <p>11 Q Did anyone from CPD or -- let's start there.    12 Did anyone from CPD ever try to interview you about your    13 time on the Watts tactical team after Watts was    14 arrested?</p> <p>15 A I don't recall.</p> <p>16 Q Were you ever interviewed about any civilian    17 complaints about Watts?</p> <p>18 A I don't remember.</p> <p>19 Q Were you ever interviewed by -- do you know    20 what IPRA is?</p> <p>21 A Yes.</p> <p>22 Q Were you ever interviewed by IPRA about    23 allegations against Watts?</p> <p>24 A I don't believe I was.</p> <p>25 Q Do you know what COPA is?</p>
<p style="text-align: right;">Page 127</p> <p>1 his narcotics. This is his." Done like that.</p> <p>2 Q Did you ever threaten to plant drugs on    3 anyone?</p> <p>4 A No.</p> <p>5 Q Did you ever plant drugs on anyone?</p> <p>6 A No.</p> <p>7 Q Did you ever tell anyone that you were going    8 to put drugs on them or attribute drugs to them that    9 weren't theirs?</p> <p>10 A No.</p> <p>11 Q Did you ever frame anyone for a drug crime?</p> <p>12 A No.</p> <p>13 Q Did you ever intentionally fail to inventory    14 any drugs that you seized?</p> <p>15 A I don't recall.</p> <p>16 Q Did you ever intentionally fail to inventory    17 any money that you seized?</p> <p>18 A I don't recall.</p> <p>19 Q At some point after you came back to CPD,    20 after your leave of absence, did you learn that Watts    21 and Mohammed had been arrested?</p> <p>22 A I don't remember when I learned they were    23 arrested.</p> <p>24 Q Did you eventually learn that?</p> <p>25 A Yes.</p>	<p style="text-align: right;">Page 129</p> <p>1 A Yes.</p> <p>2 Q Have you ever given interview to COPA about    3 allegations against Sergeant Watts?</p> <p>4 A I don't think so.</p> <p>5 Q Do you -- sorry, is there some interference?    6 Did you ever have --</p> <p>7 MR. DAFFADA: It's clear on our end.</p> <p>8 MS. KLEINHAUS: What's that?</p> <p>9 MR. DAFFADA: It's clear on our end.</p> <p>10 BY MS. KLEINHAUS:</p> <p>11 Q Okay. Did you ever have any conversations    12 with Shannon Spalding when -- about Watts' arrest?</p> <p>13 A Yes.</p> <p>14 Q And what did that conversation consist of?</p> <p>15 A I don't remember what we talked about, in    16 particular.</p> <p>17 Q Did you feel vindicated at all when he was    18 ultimately arrested?</p> <p>19 A Yeah.</p> <p>20 Q Subsequent to your -- or strike that, please.    21 You testified earlier about conversations you had with    22 Ken Samuel of the FBI, back at the very beginning of    23 your time in public housing, right?</p> <p>24 A Yes.</p> <p>25 Q When was the next time that you were</p>

<p>1 interviewed by the FBI?</p> <p>2 A I don't remember.</p> <p>3 Q Were you interviewed by the FBI regarding the</p> <p>4 Watts tactical team?</p> <p>5 A Yes.</p> <p>6 Q And when did that take place?</p> <p>7 A Let me -- strike that. The DOJ.</p> <p>8 Q Okay, excuse me. So when did the DOJ speak</p> <p>9 with you about the Watts tactical team?</p> <p>10 A A few years ago.</p> <p>11 Q Does 2018 sound right?</p> <p>12 A I honestly don't remember the year.</p> <p>13 Q Who from the DOJ did you speak with?</p> <p>14 A Mark Bloomberg (phonetic).</p> <p>15 Q Did you speak with him in person?</p> <p>16 A Yes.</p> <p>17 Q And how many times did you speak with Mark</p> <p>18 Bloomberg?</p> <p>19 A We spoke twice.</p> <p>20 Q Was that in person?</p> <p>21 A Yes.</p> <p>22 Q Where did those meetings take place?</p> <p>23 A At the Chicago FBI office.</p> <p>24 Q Was anyone else present for those</p> <p>25 conversations besides you and Mr. Bloomberg?</p>	<p>Page 130</p> <p>1 Bloomberg last?</p> <p>2 A Approximately four or five hours.</p> <p>3 Q Did you have an understanding of who he was</p> <p>4 investigating?</p> <p>5 A Yes.</p> <p>6 Q And who's that?</p> <p>7 A He was investigating the housing, the team I</p> <p>8 was on.</p> <p>9 Q Did you have an understanding of who the</p> <p>10 target of the investigation was?</p> <p>11 A As far as I knew, it was just a broad scope</p> <p>12 investigation.</p> <p>13 Q Was your second interview with Mr. Bloomberg</p> <p>14 also in person at the Chicago FBI office?</p> <p>15 A Yes.</p> <p>16 Q And how long after the first interview did the</p> <p>17 second interview take place?</p> <p>18 A I don't recall.</p> <p>19 Q Who was present for the second interview?</p> <p>20 A The same two FBI agents, Bloomberg and I don't</p> <p>21 remember if he had his DOJ assistant with him. I don't</p> <p>22 remember.</p> <p>23 Q Did you have attorneys present?</p> <p>24 A No.</p> <p>25 Q And what did Mr. Bloomberg speak with you</p>
<p>Page 131</p> <p>1 A Yes.</p> <p>2 Q Who?</p> <p>3 A Two FBI agents, another DOJ agent, and then</p> <p>4 two attorneys of mine.</p> <p>5 Q And which two attorneys of yours were present?</p> <p>6 A Craig Futterman and then Erica, I don't know</p> <p>7 her last name, but out of the same office, I think.</p> <p>8 Q Do you know the identities of the two FBI</p> <p>9 agents who were present?</p> <p>10 A I don't remember their names.</p> <p>11 Q What about the DOJ agent?</p> <p>12 A No clue.</p> <p>13 Q Okay, and what did your -- well, focusing on</p> <p>14 the first of the two interviews with Mr. Bloomberg, what</p> <p>15 did that interview consist of? What were you guys</p> <p>16 talking about?</p> <p>17 MR. DAFFADA: Object to form.</p> <p>18 A Talked about my time on the police department</p> <p>19 under Sergeant Watts.</p> <p>20 Q And was Mr. Bloomberg asking you questions?</p> <p>21 A Yes.</p> <p>22 Q And what was the nature of the questions? What</p> <p>23 was he asking you?</p> <p>24 A A lot of the same questions you asked.</p> <p>25 Q How long did your first interview with Mr.</p>	<p>Page 133</p> <p>1 about during the second interview?</p> <p>2 A I don't remember. It was just a few follow up</p> <p>3 questions that he had. But it was a short -- shorter</p> <p>4 interview, about 45 minutes.</p> <p>5 Q For either of those interviews, were you ever</p> <p>6 provided any documents summarizing the interview?</p> <p>7 A No.</p> <p>8 Q Did you take any notes during the interview?</p> <p>9 A No.</p> <p>10 Q What was the nature of the follow up that Mr.</p> <p>11 Bloomberg wanted to find out about in the second</p> <p>12 interview?</p> <p>13 MR. DAFFADA: Objection. Asked and answered.</p> <p>14 A It was just follow-up questions. I just, I</p> <p>15 don't remember the details.</p> <p>16 Q Have we talked about all the interviews that</p> <p>17 you've given to the FBI?</p> <p>18 MR. DAFFADA: Objection. Form.</p> <p>19 A To the best of my recollection.</p> <p>20 Q Prior to retiring from the Chicago Police</p> <p>21 Department, were you placed on administrative leave or</p> <p>22 desk duty?</p> <p>23 A I guess depends how you look at it. I was</p> <p>24 light duty, which was desk duty, but it was just because</p> <p>25 I hurt my back.</p>

<p style="text-align: right;">Page 134</p> <p>1 Q Okay. Were you ever --</p> <p>2 A I still had full police powers. I just want</p> <p>3 you to understand that, so...</p> <p>4 Q Right. Thank you. That's the part that I'm</p> <p>5 trying to get at. Were you ever placed on desk duty --</p> <p>6 or strike that, please. Did you ever have an</p> <p>7 understanding that you were on desk duty related to the</p> <p>8 fact that you were at one time part of the Watts</p> <p>9 tactical team?</p> <p>10 A No, never.</p> <p>11 Q And so the light duty that you were on at the</p> <p>12 end of your career at CPD was a result of your back</p> <p>13 injury, right?</p> <p>14 A Correct.</p> <p>15 Q Did anyone ever tell you that you were on desk</p> <p>16 duty -- or strike that, please. Were you ever told that</p> <p>17 the Cook County State's Attorney's office would no</p> <p>18 longer call you as a testifying witness?</p> <p>19 A No.</p> <p>20 Q Were you aware that other former members of</p> <p>21 the Watts tactical team had been placed on desk duty?</p> <p>22 A Yes.</p> <p>23 Q And did you have an understanding as to why</p> <p>24 they were placed on desk duty?</p> <p>25 A Yes.</p>	<p style="text-align: right;">Page 136</p> <p>1 Q Are you familiar with the nickname Big Shorty?</p> <p>2 A Yes.</p> <p>3 Q And what do you know about Big Shorty?</p> <p>4 A Just -- I just know of the name, that's it.</p> <p>5 Q Do you remember any residents of Ida B. Wells?</p> <p>6 A Nothing. No one who I can recall.</p> <p>7 Q Is there anyone that you know by nickname?</p> <p>8 A No.</p> <p>9 Q Do you know who [REDACTED] is?</p> <p>10 A No.</p> <p>11 Q Do you know someone with the nickname Shock?</p> <p>12 A No.</p> <p>13 Q Do you know someone with the nickname</p> <p>14 Fantasia?</p> <p>15 A No.</p> <p>16 Q Did you know someone with the nickname [REDACTED]</p> <p>17 or [REDACTED]</p> <p>18 A No.</p> <p>19 Q Are you familiar with the Second City Cop</p> <p>20 blog?</p> <p>21 A Yes.</p> <p>22 Q And during the time that you were employed by</p> <p>23 CPD, did you ever read that blog?</p> <p>24 A Yes.</p> <p>25 Q Did you ever comment on that blog?</p>
<p style="text-align: right;">Page 135</p> <p>1 Q What's your understanding as to why they were</p> <p>2 placed on desk duty?</p> <p>3 A Because their testimony was deemed not</p> <p>4 credible.</p> <p>5 Q Did you ever speak with any of the former</p> <p>6 members of the Watts tactical team about the fact that</p> <p>7 they were placed on desk duty?</p> <p>8 A Not that I recall.</p> <p>9 Q And did you ever speak with any of them about</p> <p>10 the fact that their testimony was deemed not credible?</p> <p>11 A No.</p> <p>12 Q Do you know who Roy Bennett is?</p> <p>13 A Is it the police officer or the citizen?</p> <p>14 Q My understanding is this person's not a police</p> <p>15 officer.</p> <p>16 A Oh, okay. Yeah. Then no, I don't know who</p> <p>17 that is.</p> <p>18 Q Okay. Do you ever know someone -- I'm sorry.</p> <p>19 Did you ever know someone by the name of Wilbert Moore?</p> <p>20 A I know of the name.</p> <p>21 Q Okay, and who was Wilbert Moore?</p> <p>22 A As far as I know, just someone who'd been</p> <p>23 arrested before.</p> <p>24 Q Did you know of him through Ida B. Wells?</p> <p>25 A I don't recall.</p>	<p style="text-align: right;">Page 137</p> <p>1 A Yes.</p> <p>2 Q And what was the nature of the comments that</p> <p>3 you made on that blog?</p> <p>4 A It was usually regarding incompetent people</p> <p>5 who got promoted.</p> <p>6 Q Okay. Did that happen more than once?</p> <p>7 A Are you kidding me? Yes.</p> <p>8 Q Were you able to comment anonymously on that</p> <p>9 blog?</p> <p>10 A Yes.</p> <p>11 Q Did you ever comment on Watts' arrest on the</p> <p>12 Second City Cop blog?</p> <p>13 A I don't remember.</p> <p>14 Q Do you know who Kenneth Mann (phonetic) is?</p> <p>15 A No.</p> <p>16 Q Do you know who Janessa Lewis (phonetic) is?</p> <p>17 A No.</p> <p>18 MR. DAFFADA: Tess, can we do five minutes? I</p> <p>19 have to go. I'm sorry.</p> <p>20 MS. KLEINHAUS: Sure. Let's take a break.</p> <p>21 MR. DAFFADA: Five minutes is all I need.</p> <p>22 COURT REPORTER: We're off record.</p> <p>23 (OFF THE RECORD)</p> <p>24 COURT REPORTER: We're back on record for the</p> <p>25 deposition of Michael Spaargaren being conducted by</p>

<p style="text-align: right;">Page 138</p> <p>1 videoconference. Today is March 7, 2022. The time  2 is  3 4:13 EST.  4 BY MS. KLEINHAUS:  5 Q Sir, I'm going to try again to share my screen  6 to show you an exhibit. Are you able to see that?  7 (LOEY PLAINTIFFS' EXHIBIT 2 MARKED FOR  8 IDENTIFICATION)  9 A Yes.  10 Q And I'll represent to you that this is from  11 the Second City Cop blog.  12 MS. KLEINHAUS: And Counsel, the -- let's see.  13 The Bates stamp is, I believe -- sorry. Bates stamp  14 is unreadable, but I'll circulate this to Counsel.  15 BY MS. KLEINHAUS:  16 Q Sir, can you just begin reading that from the  17 top, and when you need me to scroll down, just let me  18 know, okay?  19 A You're asking me?  20 Q Yes.  21 A Oh, okay. You can scroll. Okay, you can keep  22 scrolling. Okay.  23 Q Have you had a chance to review all of that?  24 A Yes.  25 MR. DAFFADA: Hey Tess, did you say you e-</p>	<p style="text-align: right;">Page 140</p> <p>1 Q Did you author this comment?  2 A No.  3 Q Do you know who authored this comment?  4 A No.  5 Q Do you have any suspicions as to who authored  6 this comment?  7 A No.  8 Q The last sentence says -- of this comment  9 says, "I'm really surprised that more of his team didn't  10 get caught up in this indictment." Do you see that  11 part?  12 A Yes.  13 Q Did you feel surprised that more of the team  14 didn't get caught up in the indictment?  15 A I don't know.  16 Q The next comment says, "Was no secret in  17 housing that Watts' team was dirty. F them." Did you  18 write that comment?  19 A No.  20 Q Do you know who wrote that comment?  21 A No.  22 Q Do you agree with the statement that it was no  23 secret in housing that the Watts team was dirty?  24 MR. BAZAREK: Object to the form of the  25 question. Foundation. Incomplete hypothetical.</p>
<p style="text-align: right;">Page 139</p> <p>1 mailed it?  2 MS. KLEINHAUS: I will e-mail it right now.  3 MR. DAFFADA: Thanks.  4 BY MS. KLEINHAUS:  5 Q Sir, focusing on this first portion, this  6 first comment that focuses on the karma bus rolled into  7 the 2nd District, do you see that part?  8 A Yes.  9 Q Did you author that comment?  10 A No.  11 Q Do you know who did author that comment?  12 A No.  13 Q Do you know who Ex-Commander GL refers to?  14 A No.  15 Q Do you know of any ex-commanders with those  16 initials?  17 A No.  18 Q Do you know who retired Lieutenant KM refers  19 to?  20 A No. Oh, K -- oh, I'm sorry. Hold on. KM. I  21 mean, I'm just guessing KM, Kallatt Mohammed and  22 Sergeant Ron Watts.  23 Q Okay. Looking at the next comment here, the  24 one that begins Watts and his team from housing?  25 A Uh-huh.</p>	<p style="text-align: right;">Page 141</p> <p>1 A I mean, I don't know.  2 Q You don't know if it was a secret or not?  3 MR. BAZAREK: Object to the form of the  4 question. Vague. Ambiguous. Foundation.  5 Q Go ahead, sir.  6 A Yeah. I mean, my answer's I don't know.  7 Q Do you know who is the blogger behind Second  8 City Cop?  9 A No.  10 Q Is it you?  11 A No.  12 Q Okay. Just had to try it, just in case. Have  13 you ever been interviewed by the Cook County State's  14 Attorney's office about your time on the Watts tactical  15 team?  16 A No.  17 Q Were you familiar with incident -- I'm sorry --  18 with instances where Sergeant Watts was tasked with  19 investigating complaints against members of his team?  20 MR. KOSOKO: Object to the form of the  21 question.  22 MR. DAFFADA: I don't think I heard it right.  23 Will you repeat it, please? I don't think either  24 one of us did.  25 THE WITNESS: No.</p>

<p style="text-align: right;">Page 142</p> <p>1 MS. KLEINHAUS: Maggie, can you play it back?</p> <p>2 COURT REPORTER: Yeah.</p> <p>3 (REPORTER PLAYS BACK REQUESTED TESTIMONY)</p> <p>4 A I don't -- I don't recall.</p> <p>5 BY MS. KLEINHAUS:</p> <p>6 Q Were you ever aware of any civilian complaints</p> <p>7 against you where Watts was the person investigating the</p> <p>8 complaint?</p> <p>9 A I don't remember.</p> <p>10 Q Have you ever had any sustained CRs against</p> <p>11 you?</p> <p>12 A Yes.</p> <p>13 Q How many times?</p> <p>14 A I don't remember.</p> <p>15 Q Were you ever disciplined in the course of</p> <p>16 your career with CPD?</p> <p>17 A Yes.</p> <p>18 Q How many times were you disciplined?</p> <p>19 A I don't remember.</p> <p>20 Q Did your discipline ever result in a</p> <p>21 suspension?</p> <p>22 A Yes.</p> <p>23 Q How many times did that happen?</p> <p>24 A I don't remember.</p> <p>25 Q What were you suspended for?</p>	<p style="text-align: right;">Page 144</p> <p>1 reported misconduct within CPD -- or let me ask it</p> <p>2 better. Other than the discussions we've had today</p> <p>3 about your conversations with the FBI, Sergeant Watts</p> <p>4 and Lieutenant Spratt, were there any other occasions</p> <p>5 where you tried to report or expose misconduct?</p> <p>6 A Not that I recall.</p> <p>7 Q If police officers on the Watts tactical team</p> <p>8 were receiving money from drug dealers in exchange for</p> <p>9 not arresting the drug dealers, do you agree that would</p> <p>10 constitute police misconduct?</p> <p>11 MR. MICHALIK: Object to the form of the</p> <p>12 question. Incomplete hypothetical.</p> <p>13 A Can you repeat the question, please?</p> <p>14 Q Sure. If police officers on the Watts</p> <p>15 tactical team were receiving money from drug dealers in</p> <p>16 exchange for not arresting the drug dealers, do you</p> <p>17 agree that would constitute police misconduct?</p> <p>18 MR. MICHALIK: Same objection.</p> <p>19 MR. DAFFADA: Same objection.</p> <p>20 A Yes.</p> <p>21 Q And if police officers on the Watts tactical</p> <p>22 team were demanding money of people who were not dealing</p> <p>23 drugs, in exchange for not arresting those people, do</p> <p>24 you agree that would be police misconduct?</p> <p>25 MR. DAFFADA: Objection. Calls for</p>
<p style="text-align: right;">Page 143</p> <p>1 A I don't remember. There was a couple</p> <p>2 different things.</p> <p>3 Q Do you remember any of the things?</p> <p>4 A No.</p> <p>5 Q Did you ever appeal any discipline that you</p> <p>6 received from CPD?</p> <p>7 A I don't remember.</p> <p>8 Q Are you familiar with the term code of</p> <p>9 silence?</p> <p>10 A Yes.</p> <p>11 Q What's your understanding of what code of</p> <p>12 silence means?</p> <p>13 A That if a police officer witnesses another</p> <p>14 police officer -- witness any wrongdoing that you don't</p> <p>15 say anything.</p> <p>16 Q In your experience, was there a code of</p> <p>17 silence at Chicago Police Department when you were</p> <p>18 there?</p> <p>19 A I don't know.</p> <p>20 Q And when you say you don't know, I mean, based</p> <p>21 on your experience, were you familiar with people</p> <p>22 failing to report misconduct?</p> <p>23 A I don't remember any particular instances.</p> <p>24 Q Other than the instances we've already talked</p> <p>25 about today, were there any other times that you</p>	<p style="text-align: right;">Page 145</p> <p>1 speculation.</p> <p>2 A Yes.</p> <p>3 MR. BAZAREK: Compound. Vague.</p> <p>4 Q And do you agree that if members of the Watts</p> <p>5 tactical team were planting drugs on people that that</p> <p>6 would constitute police misconduct?</p> <p>7 MR. DAFFADA: Objection. Calls for</p> <p>8 speculation. Vague.</p> <p>9 A Yes.</p> <p>10 Q And if members of the Watts tactical team were</p> <p>11 attributing drugs to people who didn't have drugs on</p> <p>12 them, do you agree that that would be police misconduct?</p> <p>13 MR. DAFFADA: Objection. Same objections.</p> <p>14 Speculation. Vague.</p> <p>15 A Yes.</p> <p>16 Q Do you know who Leonard Gipson is?</p> <p>17 A No.</p> <p>18 Q Do you know someone with the nickname Fuzz?</p> <p>19 A No.</p> <p>20 Q Do you know someone by the name Larry Lomax?</p> <p>21 A No.</p> <p>22 Q What about someone named Bobby Coleman?</p> <p>23 A No.</p> <p>24 Q You know someone named Ollie Grant?</p> <p>25 A No.</p>

<p style="text-align: right;">Page 146</p> <p>1 Q What about Mark Giles?</p> <p>2 A No.</p> <p>3 Q Okay. I'm going to show you what we'll mark</p> <p>4 as Exhibit 3. And my question is whether you recognize</p> <p>5 the person depicted in the photo? Okay. Can you see</p> <p>6 that photo, sir?</p> <p>7 (LOEY PLAINTIFFS' EXHIBIT 3 MARKED FOR</p> <p>8 IDENTIFICATION)</p> <p>9 A Yes.</p> <p>10 Q Do you recognize the person in that photo?</p> <p>11 A No.</p> <p>12 Q Can you see that photo?</p> <p>13 A Yes.</p> <p>14 Q This is Exhibit 4. Do you recognize the</p> <p>15 person depicted in Exhibit 4?</p> <p>16 (LOEY PLAINTIFFS' EXHIBIT 4 MARKED FOR</p> <p>17 IDENTIFICATION)</p> <p>18 A No.</p> <p>19 Q One more photo for you, which we'll mark as</p> <p>20 Exhibit 5. Do you recognize the person depicted in</p> <p>21 Exhibit 5?</p> <p>22 (LOEY PLAINTIFFS' EXHIBIT 5 MARKED FOR</p> <p>23 IDENTIFICATION)</p> <p>24 A No.</p> <p>25 Q I want to talk to you about an arrest that you</p>	<p style="text-align: right;">Page 148</p> <p>1 A No.</p> <p>2 Q Okay. I'm going to show you the vice case</p> <p>3 report from that arrest. Just give me a second to pull</p> <p>4 it up.</p> <p>5 Q Okay, sir. Are you able to see that page? I'm</p> <p>6 sorry, we'll mark this as Exhibit 6. Are you able to</p> <p>7 see the first page of Exhibit 6?</p> <p>8 (LOEY PLAINTIFFS' EXHIBIT 6 MARKED FOR</p> <p>9 IDENTIFICATION)</p> <p>10 A Yes.</p> <p>11 Q Okay. Same as before, if you can review it</p> <p>12 and let me know when I should scroll down. If you want</p> <p>13 me to make it bigger, just let me know.</p> <p>14 A You can scroll down. You can scroll.</p> <p>15 Q Give me one second. Let me turn it for you.</p> <p>16 A Okay. I've it.</p> <p>17 Q Okay. Did reviewing Exhibit 6 refresh your</p> <p>18 recollection about your participation in this arrest?</p> <p>19 A No.</p> <p>20 Q I'm going to just point you to the timestamp</p> <p>21 on the first page. It says -- in field five, it says</p> <p>22 date of occurrence and time. Do you see that part?</p> <p>23 A Yes.</p> <p>24 Q And next to it, in field six, it says date,</p> <p>25 RO, arrived, and time. Do you see that part?</p>
<p style="text-align: right;">Page 147</p> <p>1 participated in, in January 2003. Do you know whether</p> <p>2 you reviewed reports related to an arrest you were part</p> <p>3 of in January 2003 in preparation for your deposition</p> <p>4 today?</p> <p>5 A What -- what's the name?</p> <p>6 Q It would be -- you mean the name of the</p> <p>7 arrestees?</p> <p>8 A Yes.</p> <p>9 Q It would be Bobby Coleman, Leonard Gibson,</p> <p>10 Ollie Grant, Mark Giles. Did you review reports related</p> <p>11 to them?</p> <p>12 A I don't think so, right? Yeah? Yeah, we did.</p> <p>13 Q I'm sorry, you can't ask your attorney, but do</p> <p>14 you recall if you did?</p> <p>15 A We -- we reviewed some case reports and arrest</p> <p>16 reports, but I -- I didn't recognize any of them. No</p> <p>17 recollection.</p> <p>18 Q Okay. Do you have any recollection of being</p> <p>19 part of an arrest of Leonard Gibson?</p> <p>20 A No.</p> <p>21 Q Ollie Grant?</p> <p>22 A No.</p> <p>23 Q Mark Giles?</p> <p>24 A No.</p> <p>25 Q Bobby Coleman?</p>	<p style="text-align: right;">Page 149</p> <p>1 A Yes.</p> <p>2 Q And according to this, the ROs, meaning</p> <p>3 reporting officers arrived at 6:15 in the morning. Do</p> <p>4 you see that?</p> <p>5 A Yes.</p> <p>6 Q Do you have a recollection of being part of</p> <p>7 surveillance at Ida B. Wells for an early morning</p> <p>8 surveillance operation?</p> <p>9 A Not related to this.</p> <p>10 Q Okay. Do you have a recollection of doing it</p> <p>11 at any point while you were in public housing?</p> <p>12 MR. DAFFADA: Objection. Form.</p> <p>13 A What is the actual question?</p> <p>14 Q I'm sorry? Who was that?</p> <p>15 A That -- that was me. I'm -- I'm sorry, can</p> <p>16 you repeat the question?</p> <p>17 Q Oh, the question is, do you recall doing</p> <p>18 surveillance early in the morning at any point when you</p> <p>19 were assigned to Public Housing South?</p> <p>20 A Yes.</p> <p>21 Q So was that -- well, let's strike that please.</p> <p>22 This report was -- lists Officers Rigel (phonetic) and</p> <p>23 Summers, do you see that?</p> <p>24 A Yes.</p> <p>25 Q And were Rigel and Summers part of the Watts</p>

<p>1 tactical team when you were part of it?</p> <p>2 A Yes.</p> <p>3 Q Did you ever observe -- I'm sorry, strike</p> <p>4 that, please. Were you friends with Rigel or Summers</p> <p>5 outside of work?</p> <p>6 A No.</p> <p>7 Q When was the last time that you spoke with</p> <p>8 Officer Rigel?</p> <p>9 A I don't -- I don't remember.</p> <p>10 Q Would it have been before your retirement from</p> <p>11 CPD?</p> <p>12 A Yes.</p> <p>13 Q And when was the last time that you spoke with</p> <p>14 Officer Summers?</p> <p>15 A I don't recall.</p> <p>16 Q Did you ever have any suspicions that Officer</p> <p>17 Rigel or Officer Summers was failing to arrest people</p> <p>18 who had narcotics on them?</p> <p>19 A I -- I don't know.</p> <p>20 Q Did you ever have any suspicions that Rigel or</p> <p>21 Summers wasn't inventorying money that they seized.</p> <p>22 A I don't -- I don't know.</p> <p>23 Q Did you ever have any suspicions that Rigel or</p> <p>24 Summers was planting drugs on civilians?</p> <p>25 A I -- I don't recall having those suspicions.</p>	<p>Page 150</p> <p>1 A I don't remember.</p> <p>2 Q Okay. I'm going to show you what we'll mark</p> <p>3 as Exhibit 7. This is the affidavit of Bobby Coleman.</p> <p>4 Are you able to see that?</p> <p>5 (LOEY PLAINTIFFS' EXHIBIT 7 MARKED FOR</p> <p>6 IDENTIFICATION)</p> <p>7 A Yes.</p> <p>8 Q Let me know when I should scroll down.</p> <p>9 A Okay. Okay. Okay.</p> <p>10 Q You've had a chance to review the entirety of</p> <p>11 that exhibit?</p> <p>12 A Yes.</p> <p>13 Q Having reviewed that, do you have any basis on</p> <p>14 which to dispute Mr. Coleman's affidavit?</p> <p>15 A I -- I don't know.</p> <p>16 Q Do you have anything that you can say, from</p> <p>17 your own personal knowledge, that anything in this</p> <p>18 affidavit is inaccurate?</p> <p>19 MR. DAFFADA: Objection. Form.</p> <p>20 A I don't -- I don't know. I don't have an</p> <p>21 opinion either way.</p> <p>22 Q Okay, and you don't have any recollection of</p> <p>23 participating in his arrest?</p> <p>24 A No.</p> <p>25 Q Do you know who Lee Rainey is?</p>
<p>Page 151</p> <p>1 Q Okay. According to the narrative portion of</p> <p>2 this report, at some point -- if you look a few lines</p> <p>3 from the bottom, it says, "Offs," meaning offenders one</p> <p>4 and two, "Tried to flee the scene in their vehicles."</p> <p>5 Does that refresh your recollection at all about</p> <p>6 anything that happened in this arrest?</p> <p>7 A No.</p> <p>8 Q Do you know what your role in this arrest was?</p> <p>9 A No.</p> <p>10 Q Do you have any recollection of ever</p> <p>11 participating in surveillance at Ida B. Wells from the</p> <p>12 vantage point of a vacant apartment unit?</p> <p>13 A No.</p> <p>14 Q When you were assigned to the Watts tactical</p> <p>15 team, did you have any ability to gain access to vacant</p> <p>16 apartment units?</p> <p>17 A Sorry, repeat the question again, please.</p> <p>18 Q When you were a member of the Watts tactical</p> <p>19 team, did you have any ability to access vacant</p> <p>20 apartment units at Ida B. Wells?</p> <p>21 MR. DAFFADA: Objection. Form.</p> <p>22 A Not -- not that I remember.</p> <p>23 Q Did you review any affidavits of the</p> <p>24 plaintiffs and these lawsuits in preparation for your</p> <p>25 deposition today?</p>	<p>Page 153</p> <p>1 A No.</p> <p>2 Q Do you know -- I'm sorry, going back, before</p> <p>3 that last question, to the January 2003 arrests we were</p> <p>4 discussing, do you know of any -- anything that would</p> <p>5 refresh your recollection about those arrests?</p> <p>6 A No.</p> <p>7 Q Okay. I'm going to show you what we'll mark</p> <p>8 as the next exhibit. I'll represent to you this is a</p> <p>9 vice case report from another 2003 arrest. So this is</p> <p>10 Exhibit 8. Same deal. Let me know when I can scroll</p> <p>11 down, please.</p> <p>12 (LOEY PLAINTIFFS' EXHIBIT 8 MARKED FOR</p> <p>13 IDENTIFICATION)</p> <p>14 A You can scroll.</p> <p>15 Q Can you see that okay? I can make it a little</p> <p>16 bigger.</p> <p>17 A Yeah, that's fine. Yeah. I'm finished</p> <p>18 reading it.</p> <p>19 Q Did reviewing this vice case report refresh</p> <p>20 your recollection about your participation in the arrest</p> <p>21 of Lee Rainey in 2003?</p> <p>22 A No.</p> <p>23 Q Do you know what your role in his arrest was?</p> <p>24 A No.</p> <p>25 Q The vice case report also refers to an Officer</p>

<p style="text-align: right;">Page 154</p> <p>1 Edwards. Are you familiar with an Officer Darrell    2 Edwards?    3 A Yes.    4 Q And was he a member of the Watts tactical team    5 when you were a part of it?    6 A Yes.    7 Q Do you know if he left the team before you    8 left the team?    9 A I don't -- I don't recall.    10 Q Okay. Do you know anything about the    11 circumstances of his departure from the team?    12 A No.    13 Q Do you have any sustained CRs for excessive    14 force in your career?    15 A I don't recall.    16 Q Did Al Jones have a reputation for using    17 excessive force when you were on the Watts tactical    18 team?    19 A I -- I don't know.    20 MR. BAZAREK: Object to foundation. Form of    21 the question. Incomplete hypothetical.    22 Q Did you ever observe Al Jones use force    23 against arrestees?    24 MR. BAZAREK: Objection. Foundation. Form of    25 the question.</p>	<p style="text-align: right;">Page 156</p> <p>1 A I don't recall.    2 Q To the best of your knowledge, were you ever    3 accused of misconduct in executing a search warrant    4 along with Glenn Evans?    5 A I don't recall.    6 Q Are you familiar with the names Ravina Coker    7 (phonetic) or Vivian Coker (phonetic)?    8 A No.    9 MS. KLEINHAUS: Okay. Why don't we take a    10 short break? Counsel, I'm going to send you a few    11 additional exhibits. Let's take a five-minute    12 break.    13 COURT REPORTER: All right. The time is 4:49.    14 We're going off record.    15 (OFF THE RECORD)    16 COURT REPORTER: We're back on record for the    17 deposition of Michael Spaargaren being conducted by    18 videoconference. Today is March 7, 2022. The time    19 is    20 5:04 EST.    21 BY MS. KLEINHAUS:    22 Q Sir, you testified earlier that you noticed    23 that Officer Jones had a pattern of using force against    24 arrestees?    25 A Correct.</p>
<p style="text-align: right;">Page 155</p> <p>1 A Yes.    2 Q And tell me what you recall about those    3 incidents.    4 A I don't remember any specific arrestee or a    5 specific address. I just remember more of a pattern or    6 practice of him hitting arrestees out -- out in the    7 field.    8 Q Do you know whether there were ever any    9 civilian complaints against you, alleging that you    10 planted drugs on civilians?    11 A Not to my knowledge.    12 Q Were you aware of any civilian complaints that    13 Officer Gonzalez planted drugs on civilians?    14 A Not to my knowledge.    15 Q Were you aware of any civilian complaints that    16 Officer Jones planted drugs on civilians?    17 A No.    18 Q Are you familiar with a civilian complainant    19 by the name of Isaac Thorne?    20 A No.    21 Q Do you recall an incident in June 2000 where    22 you got hit in the face by an arrestee?    23 A Not -- not on that date. I don't know.    24 Q Were you a defendant in a lawsuit brought by    25 Jennifer Nicholson (phonetic)?</p>	<p style="text-align: right;">Page 157</p> <p>1 Q And in your view, as an experienced police    2 officer, do you believe it was a pattern of using    3 excessive force?    4 A Yes.    5 MR. BAZAREK: Object to the form of the    6 question.    7 Q Are you aware that at some point Al Jones was    8 promoted to Sergeant?    9 A Yes.    10 Q And do you have an opinion about whether Al    11 Jones should have been made a sergeant?    12 A I don't have an opinion either way.    13 Q Are you aware that at some point Douglas    14 Nichols was made a sergeant?    15 A I don't know who that is.    16 Q You never worked with Officer Nichols on the    17 Watts tactical team that you recall?    18 MR. DAFFADA: Objection. Form.    19 A I don't recall meeting him.    20 Q You testified earlier about Ronald Watts'    21 statement that you and Shannon Spalding were involved in    22 a romantic affair. Was that -- other than hearing that    23 today, have you ever heard about gossip or rumors about    24 that?    25 MR. DAFFADA: Objection. Form.</p>

<p style="text-align: right;">Page 158</p> <p>1 A I don't recall hearing it before.</p> <p>2 Q Okay. Do you have any understanding as to why</p> <p>3 Sergeant Watts would say that was an open secret?</p> <p>4 MR. DAFFADA: Objection. Form.</p> <p>5 A I don't -- I don't know.</p> <p>6 Q Okay. I want to turn your attention to our</p> <p>7 next exhibit, which we'll mark as Exhibit 9. Can you</p> <p>8 see that okay?</p> <p>9 (LOEY PLAINTIFFS' EXHIBIT 9 MARKED FOR</p> <p>10 IDENTIFICATION)</p> <p>11 A Yes.</p> <p>12 Q Same as before. Just let me know when I can</p> <p>13 scroll down, okay?</p> <p>14 A Yeah, go ahead. Okay, go ahead. Okay. Okay.</p> <p>15 Okay. Okay. Okay.</p> <p>16 Q Okay. Having reviewed Exhibit 9, do you have</p> <p>17 any recollection of the arrest of Mr. Thorne?</p> <p>18 A No.</p> <p>19 Q I'm going to show you what we'll mark as our</p> <p>20 next exhibit. Let me know when I can scroll down.</p> <p>21 (LOEY PLAINTIFFS' EXHIBIT 10 MARKED FOR</p> <p>22 IDENTIFICATION)</p> <p>23 A Okay. Okay. Okay.</p> <p>24 Q Have you finished reading Exhibit 10?</p> <p>25 A Yes.</p>	<p style="text-align: right;">Page 160</p> <p>1 MR. DAFFADA: I could put them up on the screen</p> <p>2 if you want.</p> <p>3 BY MR. FLAXMAN:</p> <p>4 Q I think it'll be easier if I put them up and</p> <p>5 share them. I just -- sorry, that I should have been</p> <p>6 ready for that, but I wasn't. So just give me one more</p> <p>7 minute and I will be ready. Okay. Is it okay if I</p> <p>8 start going now? I wanted to ask you about an arrest of</p> <p>9 someone named Rickey Henderson. Do you remember an</p> <p>10 arrest involving someone named Rickey Henderson?</p> <p>11 A No.</p> <p>12 Q Okay. Do you see on your screen an arrest</p> <p>13 report?</p> <p>14 A Yes.</p> <p>15 Q Okay, and do you see at the top, it's marked</p> <p>16 Plaintiff Henderson Exhibit 1, 03-07-22?</p> <p>17 (FLAXMAN PLAINTIFFS' EXHIBIT 1 MARKED FOR</p> <p>18 IDENTIFICATION)</p> <p>19 A Yes.</p> <p>20 Q Okay, and do you recognize this is an arrest</p> <p>21 report for someone named Rickey Henderson?</p> <p>22 A Yes.</p> <p>23 Q And a middle name of O'Brien (phonetic). Do</p> <p>24 you see that?</p> <p>25 A Yes.</p>
<p style="text-align: right;">Page 159</p> <p>1 Q Did it refresh your recollection at all about</p> <p>2 an encounter with Deandre Player (phonetic)?</p> <p>3 A No.</p> <p>4 MS. KLEINHAUS: Okay. I don't have any other</p> <p>5 questions for you right now. The other attorneys</p> <p>6 may have questions for you.</p> <p>7 EXAMINATION</p> <p>8 BY MR. FLAXMAN:</p> <p>9 Q Hi, this is Joel Flaxman. Can you hear me?</p> <p>10 A Yes.</p> <p>11 Q Okay, and can you see me on your screen?</p> <p>12 A Yes.</p> <p>13 Q Okay. I represent some of the plaintiffs in</p> <p>14 this case. I wanted to ask you a few questions. Did</p> <p>15 you want to take a break now? I mean, it would be a</p> <p>16 good time to take five, if --</p> <p>17 A No, sir. I'm fine.</p> <p>18 Q Okay. I had circulated some exhibits</p> <p>19 yesterday. I don't know if you have those or your</p> <p>20 lawyer had them printed out? If you don't have them on</p> <p>21 paper, I can put them on the screen.</p> <p>22 MR. DAFFADA: We couldn't print them. So let's</p> <p>23 use the screen.</p> <p>24 MR. FLAXMAN: Okay. Then give me a moment,</p> <p>25 okay?</p>	<p style="text-align: right;">Page 161</p> <p>1 Q Okay, and do you see under the name Rickey</p> <p>2 Henderson it has an alias or nickname of S-U-G-A?</p> <p>3 A Yes.</p> <p>4 Q Okay. Does that nickname refresh your</p> <p>5 recollection about this arrest?</p> <p>6 A No.</p> <p>7 Q Okay, and the date of the arrest on this is</p> <p>8 listed as August 27, 2003. Do you that?</p> <p>9 A Yes.</p> <p>10 Q Okay. What was your assignment on that date?</p> <p>11 A I don't remember.</p> <p>12 Q Okay. Were you part of Public Housing South</p> <p>13 in August 2003?</p> <p>14 A Yeah. Based on the arrest report. Yes.</p> <p>15 Q Okay, and were you on the tactical team led by</p> <p>16 Ronald Watts in August 2003?</p> <p>17 A Hey, can you -- can you make it bigger? I'm</p> <p>18 having a hard --</p> <p>19 Q Oh, sure. Did that get bigger on your screen?</p> <p>20 A Yeah, that's better.</p> <p>21 Q Okay, and based on your memory of your career</p> <p>22 as a Chicago police officer, were you on a tactical team</p> <p>23 led by Ronald Watts in August 2003?</p> <p>24 A Can -- can you go down a little bit further on</p> <p>25 the page, please?</p>

<p style="text-align: right;">Page 162</p> <p>1 Q Okay. Well, before I go down, I'm just trying 2 to understand if you remember what your assignments were 3 as a Chicago police officer. Do you remember where you 4 were assigned in August 2003?</p> <p>5 A Let me see.</p> <p>6 Q Sir, could you hear my question?</p> <p>7 A Yeah, I'm reading the narrative.</p> <p>8 Q Oh, okay. I'm not asking you about the 9 narrative now. I'm trying to ask you about your 10 assignment as a Chicago police officer.</p> <p>11 A You're asking where I was assigned at that 12 time?</p> <p>13 Q That's correct.</p> <p>14 A According to this, housing.</p> <p>15 Q Okay. Do you remember that in your own memory 16 or are you only going based on this record?</p> <p>17 A Well, no, I remember being in housing at that 18 time. I'm trying to remember the particular incident.</p> <p>19 Q Okay. Let me know when you're done looking at 20 this.</p> <p>21 A No, I'm done. Yeah, I'm finished.</p> <p>22 MR. DAFFADA: What about the bottom on it?</p> <p>23 THE WITNESS: No, I can't see the bottom.</p> <p>24 MR. DAFFADA: Can't see the bottom.</p> <p>25 MR. KOSOKO: I'm sorry. I can't hear. Is your</p>	<p style="text-align: right;">Page 164</p> <p>1 MR. DAFFADA: Objection. Form.</p> <p>2 A Yes.</p> <p>3 Q Okay, and when you listed another officer as 4 an assisting arrest officer, why did you do that?</p> <p>5 A Because they were either there as being on 6 site or maybe transporting. Various reasons you would 7 put them assisting arrest.</p> <p>8 Q Okay. Are you able to tell from this report, 9 what you did to assist this arrest?</p> <p>10 A No.</p> <p>11 Q Okay, and you've already said based on your 12 memory, you can't recall, correct?</p> <p>13 A No.</p> <p>14 Q At the bottom of the report, there is a box 15 that says first arresting. Do you see that?</p> <p>16 A Yes.</p> <p>17 Q And what officer is listed as first arresting?</p> <p>18 A L. Jones.</p> <p>19 Q Okay. Do you ever recall hearing the first 20 arresting officer referred to as box one?</p> <p>21 A Yes.</p> <p>22 Q Okay. Do you recognize Officer Jones 23 signature above his name?</p> <p>24 A No.</p> <p>25 Q Okay. Do you see there's a box for second</p>
<p style="text-align: right;">Page 163</p> <p>1 lawyer saying something? I just can't hear him.</p> <p>2 MR. DAFFADA: Yeah, I'm saying, can you scroll 3 down a little bit so he can see the bottom?</p> <p>4 MR. FLAXMAN: Okay. Sure.</p> <p>5 MR. DAFFADA: Thanks. Just so it's complete.</p> <p>6 BY MR. FLAXMAN:</p> <p>7 Q Let me know when you're done looking at the 8 exhibit.</p> <p>9 A Okay. I'm finished.</p> <p>10 Q Okay. Does looking at the -- and you read the 11 narrative section of this arrest report?</p> <p>12 A Yes.</p> <p>13 Q Okay. Did that help you recall this incident?</p> <p>14 A No.</p> <p>15 Q Okay. Do you see that your name is listed on 16 this report?</p> <p>17 A Yes.</p> <p>18 Q And what are you listed as?</p> <p>19 A Assisting arrest officer.</p> <p>20 Q Okay. What does that mean?</p> <p>21 A I don't remember what my assignment was at 22 that time. I don't know.</p> <p>23 Q Okay. Did you ever create arrest reports 24 where you listed other officers as assisting arrest 25 officers?</p>	<p style="text-align: right;">Page 165</p> <p>1 arresting officer?</p> <p>2 A Yes.</p> <p>3 Q And who's listed there.</p> <p>4 A It's split between Edwards and Mohammed.</p> <p>5 Q Okay. Based on your experience, do you know 6 why two officers would be listed in second arresting 7 officer box?</p> <p>8 A That would typically be they were riding three 9 deep that day.</p> <p>10 Q Meaning three officers were in a car together?</p> <p>11 A Correct.</p> <p>12 Q Okay, and did you ever hear the second 13 arresting officer referred to as box two?</p> <p>14 A Yes.</p> <p>15 Q I'm going to show you another exhibit. Do you 16 recognize this exhibit as a vice case report?</p> <p>17 A Yes.</p> <p>18 Q And is this for the arrest of Rickey Henderson 19 on August 3rd? I'm sorry. Is this for the arrest of 20 Rickey Henderson on August 27, 2003?</p> <p>21 A Yes.</p> <p>22 Q Okay. Do you see at the, on the right side, 23 going down the page, it says Plaintiff Henderson, 24 Exhibit 2, 3-7-22?</p> <p>25 (FLAXMAN PLAINTIFFS' EXHIBIT 2 MARKED FOR</p>

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1	IDENTIFICATION)	1	Typically the person who prepared the report.
2	A I'm sorry, I don't -- I don't see that.	2	Q Okay, and can you tell who prepared this
3	Q All right. I'm going to rotate this and	3	report?
4	scroll up. Do you see at the top of the page that it	4	A Jones.
5	says Plaintiff Henderson, Exhibit 2, 3-7-22.	5	Q And this report at the bottom has Jones as the
6	A Now I see it.	6	first reporting officer; is that right?
7	Q Okay. I'll rotate it back so you can read the	7	A Correct.
8	vice case report. Is it look the right way on your	8	Q And it has Edwards as the second reporting
9	screen now?	9	officer; is that right?
10	A Correct, yes.	10	A Yes.
11	MR. DAFFADA: Is there an exhibit number to	11	Q And then for supervisor approving it lists
12	this for the --	12	Ronald Watts; is that right?
13	MR. FLAXMAN: Sure. This is Exhibit 2. That's	13	A Correct.
14	what I just read at the top.	14	Q Okay. Did you have experience preparing
15	MR. DAFFADA: Okay. All right.	15	reports that were approved by Ronald Watts?
16	MR. FLAXMAN: It's Plaintiff Henderson, Exhibit	16	A Yes.
17	2.	17	Q And how did that process work?
18	BY MR. FLAXMAN:	18	A You would fill out your arrest report, you
19	Q Do you see your name on this vice case report?	19	would fill out your case report, and then the sergeant
20	A Yes.	20	would sign off on both reports before you would finish
21	Q And where is your name?	21	up with your arrest.
22	A Adjacent to Bolton.	22	Q Would the sergeant ever talk to you about the
23	Q Okay. What part of the report is that?	23	reports during that process?
24	A I don't understand your question. What do you	24	MR. DAFFADA: Objection. Form.
25	mean, what part of the report?	25	A Well, typically if the report is kicked back,
Page 167		Page 169	
1	Q Okay. Do you have experience preparing vice	1	but other than that, no.
2	case reports as a Chicago police officer?	2	Q And you said case report. Is this what we're
3	A Yes.	3	looking at, an example of a case report?
4	Q Okay, and what's your understanding of why	4	A Yes.
5	your name is listed, where it is on this report?	5	Q And what does it mean if a report is kicked
6	A Well, it looks like it was check as witness.	6	back?
7	Q I'm sorry. I think I just didn't hear the	7	A It's a term we use when there's a problem with
8	answer. Can you say what you said again?	8	the report.
9	A Yeah, it's checked as witness. Witness box.	9	Q Can you remember ever receiving reports as
10	Q Okay, and do you have any recollection of	10	having been kicked back by Sergeant Watts?
11	witnessing what's described in this report? And I could	11	A I don't recall.
12	go to the second page whenever you want me to.	12	Q Can you see an exhibit on your screen now?
13	A Yeah. If you can go down.	13	A Yes.
14	Q Okay. Can you see the whole first page? I	14	Q Okay, and do you see it's a man's photograph
15	just want to make sure before I go to the second.	15	and on top it says Plaintiff Henderson, Exhibit 3, 3-7-
16	A Yeah, I finished with the narrative.	16	22?
17	Q Okay. I'm going to go to page two of this	17	(FLAXMAN PLAINTIFFS' EXHIBIT 3 MARKED FOR
18	report. Is that on your screen now?	18	IDENTIFICATION)
19	A Yes. Okay.	19	A Yes.
20	Q And having reviewed the report, do you have	20	Q Okay. Does the man depicted in Exhibit 3,
21	any recollection of witnessing the events described in	21	look familiar to you?
22	the report?	22	A No.
23	A No.	23	Q So looking at this picture, doesn't refresh
24	Q Okay. Based on the report who would've	24	your recollection about arresting this man?
25	checked the box for witnessed?	25	A No.

<p style="text-align: right;">Page 170</p> <p>1 Q Okay. When you were listed as an assisting    2 officer on another officer's report, was it your    3 practice to review that report?</p> <p>4 A I don't recall.</p> <p>5 Q If your -- if your partner was the one    6 preparing the report, would you review the report before    7 it was finalized?</p> <p>8 A Typically if you were box two.</p> <p>9 Q Okay. One last -- and counsel asked you about    10 a romantic relationship with Shannon Spalding. Do you    11 remember that?</p> <p>12 A I remember the question. Yes.</p> <p>13 Q Okay, and I have to ask one more question was,    14 which is, did you ever have a sexual relationship with    15 Shannon Spalding?</p> <p>16 A No.</p> <p>17 MR. FLAXMAN: Okay. I apologize for having to    18 ask. Thank you for your time today. I don't have    19 any other questions.</p> <p>20 THE WITNESS: Okay.</p> <p>21 CROSS EXAMINATION</p> <p>22 BY MR. KOSOKO:</p> <p>23 Q I have questions on behalf of Sergeant Watts.    24 Mr. Spaargaren, when did you first start working on the    25 -- what was known as the Watts tactical team?</p>	<p style="text-align: right;">Page 172</p> <p>1 A Prior to leaving, prior to retiring.</p> <p>2 Q And what reason did you give for that leave?</p> <p>3 A I don't recall the reason.</p> <p>4 Q Was it the same reason you gave for your leave    5 off of the 4512 team?</p> <p>6 A I just answered your question. I said, I    7 don't recall.</p> <p>8 Q Is there anything that could refresh your    9 recollection?</p> <p>10 A To look at the PAR form.</p> <p>11 Q I'll share a screen. We can mark this as    12 Exhibit 1. You recognize that form, Mr. Spaargaren?</p> <p>13 (DEFENDANT WATTS EXHIBIT 1 MARKED FOR    14 IDENTIFICATION)</p> <p>15 MR. DAFFADA: Can you blow it up a little    16 bigger?</p> <p>17 Q Do you need it to be bigger?</p> <p>18 A Yes, I recognize it.</p> <p>19 Q Okay. Is this reason accurate that you gave    20 for your form you submitted for December 6, 2017?</p> <p>21 A Yeah. Personal leave.</p> <p>22 Q Family reasons?</p> <p>23 A Yes.</p> <p>24 Q And it's the same reason you gave for your    25 leave off the 4512 team, correct?</p>
<p style="text-align: right;">Page 171</p> <p>1 MR. DAFFADA: We can barely you. I'm going to    2 turn it up, give me a second. Let me see if I can    3 make it louder on our end. There you go. Go ahead.</p> <p>4 MR. BAZAREK: And Ms. Court Reporter, how much    5 time we have on the record right now?</p> <p>6 COURT REPORTER: Four hours and 52 minutes.</p> <p>7 MR. BAZAREK: Thank you.</p> <p>8 THE WITNESS: How much longer?</p> <p>9 BY MR. KOSOKO:</p> <p>10 Q What year did you start working with Sergeant    11 Watts?</p> <p>12 A I don't recall the year.</p> <p>13 Q Can you give me an approximate year?</p> <p>14 A I'd be guessing.</p> <p>15 Q All right. So let's -- when you asked for a    16 leave of absence, what was the time period you asked    17 for?</p> <p>18 A A year.</p> <p>19 Q A year. And what was the beginning date and    20 the end date?</p> <p>21 A Don't remember.</p> <p>22 Q Had you asked for a leave of absence at any    23 other time during your career with the department?</p> <p>24 A Yes.</p> <p>25 Q And when did you ask for that?</p>	<p style="text-align: right;">Page 173</p> <p>1 A I don't remember. I'd have to see that form.</p> <p>2 Q Would that PAR form help you refresh your    3 recollection?</p> <p>4 A Yes.</p> <p>5 MR. FLAXMAN: Ahmed, could you give us the    6 Bates before you go to the next exhibit?</p> <p>7 MR. KOSOKO: CBG033436.</p> <p>8 MR. FLAXMAN: Thanks.</p> <p>9 (DEFENDANT WATTS EXHIBIT 2 MARKED FOR    10 IDENTIFICATION)</p> <p>11 BY MR. KOSOKO:</p> <p>12 Q Do you recognize that form, Mr. Spaargaren?</p> <p>13 A Yes.</p> <p>14 Q Is this your PAR form for your request for    15 leave of absence?</p> <p>16 A Yes.</p> <p>17 Q For your one-year absence?</p> <p>18 A I'm sorry?</p> <p>19 Q For your one-year absence, correct?</p> <p>20 A Yes.</p> <p>21 Q And you listed family reasons; is that    22 correct?</p> <p>23 A Yes.</p> <p>24 Q Which one is the lie?</p> <p>25 MR. DAFFADA: Objection. Form.</p>

<p style="text-align: right;">Page 174</p> <p>1 Q You can answer.</p> <p>2 A Neither one's a lie.</p> <p>3 Q So you did request a leave in March -- May of</p> <p>4 '02 of 2004 for family reasons, correct?</p> <p>5 A That's the reason I have listed on there.</p> <p>6 Q You did -- that's the reason you took the</p> <p>7 leave, correct?</p> <p>8 A Well, there was multiple reasons why I took</p> <p>9 the leave. I don't have to list -- I don't have to list</p> <p>10 every reason on there. If I've got six reasons why I</p> <p>11 want to take off, I don't have to put six reasons on</p> <p>12 there.</p> <p>13 Q Okay. So the one of the reasons you took off</p> <p>14 was for family reasons, correct?</p> <p>15 A One of the reasons, yes.</p> <p>16 Q Okay. Who gave you your exit interview after</p> <p>17 you gave that leave of absence?</p> <p>18 A I don't recall.</p> <p>19 Q Would anything refresh your recollection, Mr.</p> <p>20 Spaargaren?</p> <p>21 MR. DAFFADA: I can't hear you. Can you come</p> <p>22 closer?</p> <p>23 MR. KOSOKO: I can speak up as loud as I can,</p> <p>24 Jim.</p> <p>25 BY MR. KOSOKO:</p>	<p style="text-align: right;">Page 174</p> <p>1 Q Isn't it part of procedure that you give an</p> <p>2 exit interview when you take a leave of absence?</p> <p>3 A I don't know.</p> <p>4 Q And you don't recall giving an exit interview</p> <p>5 before your leave of absence?</p> <p>6 A No.</p> <p>7 Q Okay, and as you sit here today, you can't</p> <p>8 tell us definitely that you did not give a housing</p> <p>9 inspector to a sergeant you state threatened your life?</p> <p>10 MS. KLEINHAUS: Objection to form.</p> <p>11 A Wait, what is your question?</p> <p>12 MR. DAFFADA: I can't -- we can't hear him.</p> <p>13 Q Did you perform a home inspection for Sergeant</p> <p>14 Watts ever?</p> <p>15 A I don't recall. I've done thousands of</p> <p>16 inspections.</p> <p>17 Q Okay. Do you remember doing any home</p> <p>18 inspections for Sergeant Watts?</p> <p>19 A No.</p> <p>20 MS. KLEINHAUS: Objection. Asked and answered.</p> <p>21 Q Do you still have the reports from your home</p> <p>22 inspection, Mr. Spaargaren?</p> <p>23 A I keep them for five years. So and anything</p> <p>24 past five years, I don't have.</p> <p>25 Q Okay, and you can't definitively state that</p>
<p style="text-align: right;">Page 175</p> <p>1 Q Would anything refresh your recollection about</p> <p>2 who gave you your exit interview, Mr. Spaargaren?</p> <p>3 A I don't know.</p> <p>4 Q Exhibit 3.</p> <p>5 (DEFENDANT WATTS EXHIBIT 3 MARKED FOR</p> <p>6 IDENTIFICATION)</p> <p>7 MR. FLAXMAN: Ahmed, did you give us the Bates</p> <p>8 for the second one?</p> <p>9 MR. KOSOKO: CBG033426.</p> <p>10 MR. FLAXMAN: Thanks.</p> <p>11 BY MR. KOSOKO:</p> <p>12 Q Isn't it true that Sergeant Watts you your</p> <p>13 exit interview, Mr. Spaargaren?</p> <p>14 A I don't recall.</p> <p>15 MR. DAFFADA: Just hold on, okay, because I</p> <p>16 can't hear you. We have to share one speaker. So</p> <p>17 I'm going to have to switch speakers. I think I</p> <p>18 can. Okay.</p> <p>19 BY MR. KOSOKO:</p> <p>20 Q You recall giving an exit interview, Mr.</p> <p>21 Spaargaren?</p> <p>22 A No.</p> <p>23 Q Isn't that part of procedure that you do give</p> <p>24 an exit interview?</p> <p>25 A I don't -- what was the question?</p>	<p style="text-align: right;">Page 177</p> <p>1 you didn't give Ronald Watts a home inspection after you</p> <p>2 left the 4512 tactical team?</p> <p>3 MS. KLEINHAUS: Objection to form. Asked and</p> <p>4 answered.</p> <p>5 A I've already answered the question.</p> <p>6 Q That's not my question. You can't state</p> <p>7 definitively that you did not?</p> <p>8 MS. KLEINHAUS: Objection to form and asked and</p> <p>9 answered.</p> <p>10 Q You can answer, Mr. Spaargaren.</p> <p>11 MR. DAFFADA: What was the question?</p> <p>12 A Yes.</p> <p>13 Q You cannot state definitively that you did not</p> <p>14 give Sergeant Watts a home inspection after you left the</p> <p>15 4512 team?</p> <p>16 MS. KLEINHAUS: Objection to form. Asked and</p> <p>17 answered.</p> <p>18 MR. DAFFADA: Answer his question.</p> <p>19 A I told you, I don't recall.</p> <p>20 BY MR. KOSOKO:</p> <p>21 Q That'd be something important to remember,</p> <p>22 right?</p> <p>23 MR. DAFFADA: Objection. Form. Answer the</p> <p>24 question.</p> <p>25 A I've done thousands of inspections. I don't</p>

<p style="text-align: right;">Page 178</p> <p>1 remember every inspection I've done for every client, 2 police or non-police. I don't remember.</p> <p>3 Q How many people have threatened your life that 4 you've done a home inspection for?</p> <p>5 MS. KLEINHAUS: Objection. Argumentative.</p> <p>6 A Don't have an answer for you, Counselor.</p> <p>7 Q Got it.</p> <p>8 A Is there a pending question?</p> <p>9 Q You'll get it when I give it to you.</p> <p>10 A I'm waiting to answer.</p> <p>11 Q Mr. Spaargaren, I'll give you the opportunity 12 to review your PAR form, to see if it refreshes your 13 recollection of your effective and end dates of your 14 leave of absence.</p> <p>15 MR. DAFFADA: And here we go.</p> <p>16 THE WITNESS: Well, that's what I'm saying, I 17 didn't know if there was a pending question.</p> <p>18 MR. DAFFADA: We really can't hear you and it's 19 not our fault.</p> <p>20 BY MR. KOSOKO:</p> <p>21 Q Did you go for leave of absence on May 14, 22 2004?</p> <p>23 A What is the question?</p> <p>24 Q Did you take a leave of absence effective May 25 14, 2004?</p>	<p style="text-align: right;">Page 180</p> <p>1 but we can't hear you. It's not something -- let's 2 try again. All right. Try it.</p> <p>3 BY MR. KOSOKO:</p> <p>4 Q After you left for leave of absence, you never 5 returned to work with that tactical team, correct?</p> <p>6 A No.</p> <p>7 Q No, you did not ever work with that tactical 8 team again, correct?</p> <p>9 A No.</p> <p>10 Q Okay. So you didn't observe them make any 11 arrest or recover any narcotics or money, correct?</p> <p>12 MS. KLEINHAUS: Objection to form.</p> <p>13 A What date are you referring to?</p> <p>14 Q After you left the tactical team. After May 15 14, 2004.</p> <p>16 A No.</p> <p>17 Q Okay. So it's safe to say the allegations in 18 your affidavit regarding Sergeant Watts' alleged 19 behavior would've been before May 14, 2004, correct?</p> <p>20 A Yes.</p> <p>21 Q And you don't remember when you started with 22 the tactical team at all?</p> <p>23 A I don't remember the date.</p> <p>24 Q Approximately, how many years did you work 25 under Sergeant Watts?</p>
<p style="text-align: right;">Page 179</p> <p>1 A According to the form, yes.</p> <p>2 Q Okay, and was that -- that was the last time 3 you worked on the 4512 tactical team, correct?</p> <p>4 A I don't remember the last time I worked on the 5 team.</p> <p>6 Q Okay. When you returned to CPD, did you work 7 on a 4512 tactical team?</p> <p>8 A No.</p> <p>9 Q So you didn't observe any policing at the 4512 10 tactical team then after you left your leave of absence, 11 correct?</p> <p>12 A No.</p> <p>13 Q Okay. When you left for leave of absence, was 14 it still called the -- were you still in Public Housing 15 South?</p> <p>16 A What is your question?</p> <p>17 MR. DAFFADA: We can't hear you.</p> <p>18 Q When you took leave -- you can't hear. Can 19 everyone else hear me?</p> <p>20 MR. FLAXMAN: I can hear you fine.</p> <p>21 MS. DOI: We can hear you fine.</p> <p>22 MR. KOSOKO: Can the court reporter hear me?</p> <p>23 COURT REPORTER: Yes.</p> <p>24 MR. DAFFADA: Well, we can't. Let me try to 25 fix it then because for some reason, we heard Tess</p>	<p style="text-align: right;">Page 181</p> <p>1 A I don't remember how long it was altogether.</p> <p>2 Q Okay. In May -- on May 14, 2004, were you 3 still a part of the Public Housing South tactical team?</p> <p>4 A I don't remember.</p> <p>5 Q You don't remember if -- you don't remember at 6 all?</p> <p>7 MR. DAFFADA: Objection. Form. Argumentative.</p> <p>8 Q Did you ever --</p> <p>9 A I --</p> <p>10 Q Go ahead, Mr. Spaargaren.</p> <p>11 A I said I answered your question.</p> <p>12 Q Did you -- were you ever are part of the 264 13 tactical team?</p> <p>14 A No.</p> <p>15 Q So during your time period with Sergeant 16 Watts, it consisted solely of being a member of Public 17 Housing South, correct?</p> <p>18 A Correct.</p> <p>19 Q Also, isn't your nickname Mickey?</p> <p>20 A Yes.</p> <p>21 Q So when you testified earlier, you didn't have 22 a nickname that was incorrect?</p> <p>23 A What's that?</p> <p>24 Q When you testified earlier that you did not 25 have a nickname, that was incorrect?</p>

<p style="text-align: right;">Page 182</p> <p>1 MS. KLEINHAUS: Objection. Argumentative.</p> <p>2 A I don't recall that question.</p> <p>3 Q You recognize this affidavit from earlier, Mr.</p> <p>4 Spaargaren?</p> <p>5 A Yes.</p> <p>6 Q Would you like me to give you an opportunity</p> <p>7 to read it again?</p> <p>8 A No.</p> <p>9 Q Okay. Is paragraph 1, correct?</p> <p>10 A Yes.</p> <p>11 Q Okay. Paragraph 2 is incorrect?</p> <p>12 A Is that a question?</p> <p>13 Q Yeah. Is paragraph 2 incorrect?</p> <p>14 A I don't recall the date that it broke up, no.</p> <p>15 Q Okay. You were never a member of the 264</p> <p>16 tactical team in the 2nd District, correct?</p> <p>17 A The 264 team I was not a part of.</p> <p>18 Q You were only a member of the 4512 tactical</p> <p>19 team, correct?</p> <p>20 A I don't remember all the teams I was on.</p> <p>21 Q Well, for Sergeant Watts, you were only a</p> <p>22 member of the 4512 technic team, correct?</p> <p>23 A They -- they changed the names to the team, so</p> <p>24 I don't know. There might be reports with different</p> <p>25 numbers on them. I don't know what to tell you.</p>	<p style="text-align: right;">Page 184</p> <p>1 forget what it's called, the form that you fill out when</p> <p>2 you drop something into the safe.</p> <p>3 Q Do other teams fill the same logbook?</p> <p>4 A I didn't hear the question.</p> <p>5 Q Do other teams fill out the same logbook?</p> <p>6 MR. FLAXMAN: Objection. Foundation.</p> <p>7 A Yes.</p> <p>8 Q So it's your testimony that that alleged day,</p> <p>9 no other team recovered anything also?</p> <p>10 MR. DAFFADA: Objection. Form.</p> <p>11 A I never said that.</p> <p>12 Q Okay. So did you see other entries in the</p> <p>13 logbook for that date?</p> <p>14 MR. DAFFADA: Objection. Form.</p> <p>15 A I don't recall now.</p> <p>16 Q Okay. Can you give us an approximate date of</p> <p>17 when this incident occurred?</p> <p>18 MR. DAFFADA: Objection. Form.</p> <p>19 A I don't remember now.</p> <p>20 Q Okay. Let's go back to when you recover --</p> <p>21 did you ever recover narcotics on the scene?</p> <p>22 A Yes.</p> <p>23 Q Okay. What do you do once you recover</p> <p>24 narcotics from the scene, the very next moment?</p> <p>25 MS. KLEINHAUS: Objection to form.</p>
<p style="text-align: right;">Page 183</p> <p>1 Q All right. When did the Public Housing South</p> <p>2 tactical team break up?</p> <p>3 A I don't recall.</p> <p>4 Q All right. Let's try to see if you remember</p> <p>5 anything from your career. What are the inventory</p> <p>6 procedures after you recover narcotics and or money?</p> <p>7 MS. KLEINHAUS: Objection. Argumentative.</p> <p>8 A I don't remember the procedures anymore, I'm</p> <p>9 no longer on the job.</p> <p>10 Q Isn't it true, that a sergeant only verifies</p> <p>11 what the police officer inventories?</p> <p>12 MR. FLAXMAN: Objection. Foundation.</p> <p>13 MS. KLEINHAUS: Join.</p> <p>14 A Can you repeat the question?</p> <p>15 Q Isn't it true that a sergeant only verifies</p> <p>16 what the recovering officer actually inventories?</p> <p>17 MR. FLAXMAN: Objection. Foundation.</p> <p>18 MR. DAFFADA: Objection. Form.</p> <p>19 A I don't remember now.</p> <p>20 Q Okay. What do you remember about the</p> <p>21 inventory procedures at all, anything?</p> <p>22 A Inventory procedures for what narcotics?</p> <p>23 Q Let's start with narcotics, yeah.</p> <p>24 A I remember that you have to fill out the</p> <p>25 inventory sheet or the logbook, the bag, and then the, I</p>	<p style="text-align: right;">Page 185</p> <p>1 A Depends on the situation.</p> <p>2 Q Okay. Depending on what?</p> <p>3 A Is there an arrest? Is there somebody with</p> <p>4 you?</p> <p>5 Q Okay. Let's say you're making an arrest. What</p> <p>6 do you do with the narcotics at that point for an</p> <p>7 arrestee?</p> <p>8 MR. DAFFADA: Objection. Form.</p> <p>9 A Are you asking me if I arrest somebody, what I</p> <p>10 do with the narcotic that's on scene? Is that what</p> <p>11 you're asking me?</p> <p>12 Q Yeah.</p> <p>13 A Secure it somewhere.</p> <p>14 Q Okay, and then what do you do with it after</p> <p>15 you secure it somewhere?</p> <p>16 MR. DAFFADA: Objection. Form.</p> <p>17 A Typically head back to the station and do the</p> <p>18 processing.</p> <p>19 Q Okay. Once you get back to the station, what</p> <p>20 do you do with the same bag of narcotics?</p> <p>21 MR. DAFFADA: Objection. Form.</p> <p>22 A Start the inventory.</p> <p>23 Q Okay, and what is the inventory process at</p> <p>24 that point?</p> <p>25 MR. DAFFADA: Objection. Form.</p>

<p style="text-align: right;">Page 186</p> <p>1 A Do a count of the narcotics that you've 2 recovered.</p> <p>3 Q Okay, and then what do you do next?</p> <p>4 MR. DAFFADA: Objection. Form.</p> <p>5 A Typically fill out the inventory sheet, the 6 logbook, and then the bag.</p> <p>7 Q Okay. What do you do after that section is 8 complete?</p> <p>9 MR. DAFFADA: Objection. Form.</p> <p>10 A Have the, whoever the desk officer is or the 11 desk sergeant review and sign off on it.</p> <p>12 Q Okay. During your time on the 4512 tactical 13 team, did you ever work any complex narcotics cases?</p> <p>14 MS. KLEINHAUS: Objection to form.</p> <p>15 MR. DAFFADA: And foundation.</p> <p>16 A I don't understand the question when you say 17 complex. Define it for me.</p> <p>18 Q Okay. Did you ever secure a confidential 19 overhear?</p> <p>20 A A what?</p> <p>21 Q Did you ever overhear someone's phones? Did 22 you ever get a bug?</p> <p>23 THE WITNESS: I don't know what he's talking 24 about.</p> <p>25 MR. DAFFADA: I don't either.</p>	<p style="text-align: right;">Page 188</p> <p>1 involved getting the identity and arresting a wholesale 2 supplier?</p> <p>3 MR. DAFFADA: Objection. Form.</p> <p>4 A I don't know what you mean by a wholesaler -- 5 supplier.</p> <p>6 Q You were with the Chicago Police Department 7 for 20 years, you don't know what a wholesale narcotic 8 supplier is?</p> <p>9 MR. DAFFADA: Objection. Form.</p> <p>10 A No.</p> <p>11 Q Okay. Let's talk about when you recover money 12 during a narcotics arrest. What do you do after you 13 recover that money, on scene?</p> <p>14 MR. DAFFADA: Objection. Form -- no.</p> <p>15 Foundation.</p> <p>16 A Your question is what do I do with the 17 narcotics?</p> <p>18 Q The money.</p> <p>19 A With the -- go back to the station and 20 inventory it.</p> <p>21 Q Okay. Where do you put it once you recover it 22 off the person on scene?</p> <p>23 A Typically you secure it on your person.</p> <p>24 Q Okay, and then what do you do with it next?</p> <p>25 MR. DAFFADA: Objection. Form.</p>
<p style="text-align: right;">Page 187</p> <p>1 A I don't understand your question.</p> <p>2 BY MR. KOSOKO:</p> <p>3 Q Did you ever fill out an affidavit to listen 4 to someone's phone recordings?</p> <p>5 A No.</p> <p>6 Q Okay. Your time on the tactical team was just 7 going to the projects and suppressing drug activity, 8 correct?</p> <p>9 A No, I did -- I did other things.</p> <p>10 Q Okay. Like what?</p> <p>11 A Looking for guns, looking for people who had 12 warrants, doing regular police work in regards to high 13 visibility, responding to calls, not just narcotics.</p> <p>14 Q Okay. In regards to narcotics, did you ever 15 try to get a supplier?</p> <p>16 MR. DAFFADA: Objection. Form.</p> <p>17 A A supplier? I don't understand the question.</p> <p>18 Q Okay. When you patrolled at the Wells, you 19 generally saw narcotics activity, correct?</p> <p>20 A Yes.</p> <p>21 Q Okay. Did you ever try to get someone who 22 supplied the narcotics to those people?</p> <p>23 A I don't recall.</p> <p>24 Q Okay. Did you ever work a case that involved 25 -- I mean, during your time on the 4512 team, it</p>	<p style="text-align: right;">Page 189</p> <p>1 A Head back to the station and process the 2 inventory.</p> <p>3 Q Okay. When you say process the inventory, is 4 it the same process as inventorying the narcotics?</p> <p>5 A It's similar.</p> <p>6 Q What's different?</p> <p>7 A The money goes into a money bag, not a 8 narcotics bag.</p> <p>9 Q Okay, and then after that's completed and 10 you've done inventory reports, you have a sergeant 11 verify, correct?</p> <p>12 MR. DAFFADA: Objection. Form.</p> <p>13 A I believe so.</p> <p>14 Q Okay. Have you ever in your time, as a 15 tactical officer, traded up to get someone higher than 16 the arrestee?</p> <p>17 A Not that I recall.</p> <p>18 Q Also, you know, after you took your leave of 19 absence, was your sole source of income your home 20 inspection business?</p> <p>21 A Yes.</p> <p>22 Q Did you, at times, go to Michigan to do home 23 inspections?</p> <p>24 A I didn't hear the question.</p> <p>25 Q Did you, at times, go to Michigan to do home</p>

<p>1    inspections?</p> <p>2    A    Yes.</p> <p>3    Q    Do you remember any other department members</p> <p>4    you've done home inspections for?</p> <p>5    A    There have been several.</p> <p>6    Q    Give me one other name.</p> <p>7    A    Officer Spalding.</p> <p>8    Q    Anyone else?</p> <p>9    A    We have a lot of -- we got a lot of people</p> <p>10   that get us off of the internet. I have no idea. I</p> <p>11   mean, hundreds.</p> <p>12   Q    Okay. I'm asking you. Did you do any other</p> <p>13   home inspections for members of your team? The 4512</p> <p>14   team.</p> <p>15   A    It's possible, yes.</p> <p>16   Q    It's possible. Do -- what do you remember?</p> <p>17   A    I've been doing this for 21 years. I have no</p> <p>18   specific recollection.</p> <p>19   Q    Did you -- while you on the 45 sub, 12</p> <p>20   tactical team, did anybody confront you about talking to</p> <p>21   the FBI about your prior incident?</p> <p>22   MS. KLEINHAUS: Objection to form.</p> <p>23   A    What's the question?</p> <p>24   MR. DAFFADA: I didn't even hear anything.</p> <p>25   A    We didn't hear the question.</p>	<p>Page 190</p> <p>1    during your time on the 4512 team?</p> <p>2    A    I don't remember.</p> <p>3    Q    One moment, Mr. Spaargaren. Let me see if I</p> <p>4    can get this right. You joined the department in</p> <p>5    October 23, 1995, correct?</p> <p>6    A    Yep. You were asking the date I joined?</p> <p>7    Q    Yes, sir.</p> <p>8    A    Yes.</p> <p>9    Q    Do you actually remember joining on that day?</p> <p>10   A    No.</p> <p>11   Q    Okay. How long until you went to District 7?</p> <p>12   A    Approximately six months.</p> <p>13   Q    Okay, and then how long did you spend in the</p> <p>14   7th District?</p> <p>15   A    About two years.</p> <p>16   Q    And then after 7, how long did you spend in</p> <p>17   12?</p> <p>18   A    Approximately a year.</p> <p>19   Q    It's after the 12th that you went to Public</p> <p>20   Housing South; is that correct?</p> <p>21   A    Yes.</p> <p>22   Q    You remember what year this was?</p> <p>23   A    No.</p> <p>24   Q    How long after you were on the Public Housing</p> <p>25   South team did the team break up?</p>
<p>Page 191</p> <p>1    Q    You spoke with Ken Samuels about some alleged</p> <p>2    corruption you saw on a prior team, correct?</p> <p>3    A    Correct.</p> <p>4    Q    Did Sergeant Watts ever mention that to you?</p> <p>5    A    I don't recall.</p> <p>6    Q    Did any members of the team ever mention that</p> <p>7    to you?</p> <p>8    A    I don't recall.</p> <p>9    Q    Did anyone ever treat you as if you were a rat</p> <p>10   because of that?</p> <p>11   MS. KLEINHAUS: Objection to form.</p> <p>12   A    I don't remember.</p> <p>13   Q    Okay. Did you ever go to Ken Samuels to tell</p> <p>14   him about your allegations against Sergeant Watts?</p> <p>15   MR. DAFFADA: Objection to form.</p> <p>16   A    No.</p> <p>17   Q    How many arrests did you observe Sergeant</p> <p>18   Watts personally make, while you were on the 4512 team?</p> <p>19   A    I don't remember.</p> <p>20   Q    How many times did you observe Sergeant Watts</p> <p>21   actually make a recovery of narcotics during your time</p> <p>22   on the 4512 team?</p> <p>23   A    I don't remember.</p> <p>24   Q    How many times did you ever recover -- did you</p> <p>25   observe Sergeant Watts recover money from an arrestee</p>	<p>Page 193</p> <p>1    A    I don't remember.</p> <p>2    Q    The team didn't break up while you were on it,</p> <p>3    though, correct?</p> <p>4    MS. KLEINHAUS: Objection to form.</p> <p>5    A    You -- I'm sorry. You're talking about</p> <p>6    Sergeant Watts' team?</p> <p>7    Q    I'm talking about Public Housing South. The</p> <p>8    unit.</p> <p>9    A    The unit, no. The unit was still intact when</p> <p>10   I left.</p> <p>11   Q    When you left for your leave of absence,</p> <p>12   correct?</p> <p>13   A    Yes.</p> <p>14   Q    So again, I'm going to show you your</p> <p>15   affidavit. That statement that it broke up in 2000</p> <p>16   would be incorrect.</p> <p>17   MS. KLEINHAUS: Objection. Argumentative.</p> <p>18   Foundation.</p> <p>19   MR. DAFFADA: What's your question?</p> <p>20   MR. KOSOKO: Is that you asking, Jim? Would he</p> <p>21   like to amend '02 to change it to '04 or does he</p> <p>22   want to keep the 2000?</p> <p>23   MR. DAFFADA: He can hear you, but we don't</p> <p>24   hear you that well. You're talking too fast, and it</p> <p>25   makes it even harder to hear you.</p>

<p style="text-align: right;">Page 194</p> <p>1 BY MR. KOSOKO:</p> <p>2 Q Okay. Mr. Spaargaren, would you like to amend 3 your affidavit as you did earlier to note that the team 4 broke up in '04, sometime after '04?</p> <p>5 MS. KLEINHAUS: Objection. Argumentative.</p> <p>6 Foundation.</p> <p>7 A Again, I don't remember the date at this time.</p> <p>8 Q Let's talk about the date that you confronted 9 Sergeant Watts. What else do you remember about that 10 day?</p> <p>11 MS. KLEINHAUS: Objection to form.</p> <p>12 A Which day?</p> <p>13 Q The day you allegedly confronted Sergeant 14 Watts.</p> <p>15 A Okay. What is your question about that day?</p> <p>16 Q What else do you remember?</p> <p>17 MS. KLEINHAUS: Objection to form.</p> <p>18 A I don't have an answer for you. I don't know.</p> <p>19 Q Okay. When you arrived for work that day, 20 which blocks were you working?</p> <p>21 A Working -- I -- again, I don't remember the 22 date or the time.</p> <p>23 Q Who conducted the roll call that day?</p> <p>24 A I don't remember.</p> <p>25 Q Did you confront Sergeant Watts before or</p>	<p style="text-align: right;">Page 196</p> <p>1 MR. DAFFADA: Objection to form.</p> <p>2 MS. KLEINHAUS: Objection to form.</p> <p>3 THE WITNESS: I didn't hear the question.</p> <p>4 MR. DAFFADA: Can you repeat the question?</p> <p>5 BY MR. KOSOKO:</p> <p>6 Q What were the circumstances upon which you met 7 Shannon Spalding at the academy?</p> <p>8 MR. DAFFADA: Objection. Form.</p> <p>9 MS. KLEINHAUS: Hey, Ahmed, could you take down 10 your --</p> <p>11 MR. DAFFADA: Misstates his testimony.</p> <p>12 A I didn't meet her in the academy.</p> <p>13 BY MR. KOSOKO:</p> <p>14 Q Okay. When did you meet her?</p> <p>15 A Before I became the police.</p> <p>16 Q What were the circumstances of you meeting 17 her?</p> <p>18 MR. DAFFADA: Objection. Asked and answered.</p> <p>19 Go ahead.</p> <p>20 A She wanted to get a scanner programmed, the 21 police scanner.</p> <p>22 Q Often did you socialize with her?</p> <p>23 MR. DAFFADA: Objection. Asked and answered.</p> <p>24 A Every so often, we went out.</p> <p>25 Q Okay. Let's start -- when did you -- when was</p>
<p style="text-align: right;">Page 195</p> <p>1 after roll call?</p> <p>2 A I don't remember the time.</p> <p>3 Q Who was your partner that day?</p> <p>4 A I don't remember.</p> <p>5 Q Had your wife filed for divorce prior or after 6 to that day?</p> <p>7 A I don't remember.</p> <p>8 Q Your wife filed for divorce in 2003, correct?</p> <p>9 A What was your question?</p> <p>10 Q Your wife initially filed for divorce in 2003, 11 correct?</p> <p>12 A I would have to check the court records. I 13 don't remember.</p> <p>14 Q Okay. When she filed the '03 complaint, what 15 did she allege?</p> <p>16 MR. DAFFADA: Objection to form.</p> <p>17 A I don't remember.</p> <p>18 Q Was it in part due to your relationship with 19 Shannon Spalding?</p> <p>20 A No.</p> <p>21 Q Did your wife, Jacqueline, ever have a 22 physical confrontation with Shannon Spalding?</p> <p>23 A Not to my knowledge.</p> <p>24 Q What were the circumstances upon which you met 25 Shannon Spalding in the academy?</p>	<p style="text-align: right;">Page 197</p> <p>1 -- what year did you first meet Shannon Spalding?</p> <p>2 A I believe it was '95.</p> <p>3 Q Okay, and it was in relation to this police 4 scanner thing; is that correct?</p> <p>5 A Yes.</p> <p>6 Q Okay. When did you first go out with her 7 socially?</p> <p>8 A I don't remember.</p> <p>9 Q What was her employment at the time?</p> <p>10 MR. DAFFADA: Sorry, we didn't hear that. Can 11 you repeat it?</p> <p>12 Q What was Shannon Spalding's employment at the 13 time when you first met her?</p> <p>14 A Her appointment?</p> <p>15 MR. DAFFADA: Employment.</p> <p>16 Q Yes, sir.</p> <p>17 A Oh, employment. Her job?</p> <p>18 Q Yes, sir.</p> <p>19 A Oh, I don't remember where she worked.</p> <p>20 Q Okay. How many times did you socialize with 21 Shannon Spalding without others being present?</p> <p>22 A I don't remember.</p> <p>23 Q Did your wife know that you were socializing 24 with Shannon Spalding without others being present?</p> <p>25 MS. KLEINHAUS: Objection to form.</p>

<p style="text-align: right;">Page 198</p> <p>1 MR. DAFFADA: Objection. Form. Can you tell 2 us when -- which wife? 3 BY MR. KOSOKO: 4 Q After you got married, anytime you went out 5 with her. 6 MR. DAFFADA: Which marriage? 7 Q Your marriage to Jackie Spaargaren. 8 A What is your question again, please? 9 Q Okay. Whenever you socialized with Shannon 10 Spalding, was your wife aware? 11 A I don't remember. 12 Q How long were you supervised by Sergeant 13 Watts? 14 A I don't remember the exact timeframe. 15 MR. DAFFADA: Thanks. 16 Q It's your testimony that Matthew Cadman stated 17 that he didn't want to go to jail, and that's why he 18 left the team? 19 MR. DAFFADA: Objection. Not a statement. 20 Q Is it your testimony that Matthew Cadman made 21 that statement to you? 22 A Yes. 23 Q So if he testified that he did not make that 24 statement to you, which one of you are you lying? 25 MR. DAFFADA: Objection.</p>	<p style="text-align: right;">Page 200</p> <p>1 A The only one is Officer Dan Dahill. 2 Q What's the spelling of that name? 3 A D-A-H-I-L-L. 4 Q What's the first name? 5 A Dan. Daniel. 6 Q When's the last time you spoke to Officer 7 Dahill? 8 A Probably about a year ago, maybe two years 9 ago. 10 Q So the last person from the department you've 11 spoken to was Shannon Spalding? 12 A So what is the question? 13 Q The last person that's had any connection with 14 the department you've spoken to is Shannon Spalding? 15 MR. DAFFADA: Objection. Form. Any connection 16 to the department? 17 A I'm trying to remember. I don't know. 18 Probably Shannon. 19 Q Did your wife file another divorce petition in 20 2005? 21 A What was the question? 22 Q Did your wife file another divorce petition in 23 2005? 24 A I don't remember if she filed, or I filed. 25 Q Well, if you filed, what did you allege in</p>
<p style="text-align: right;">Page 199</p> <p>1 MS. KLEINHAUS: Objection to form. 2 Argumentative. 3 MR. DAFFADA: Hypothetical. 4 BY MR. KOSOKO: 5 Q Are you aware that Matthew Cadman denied ever 6 making that statement to you? 7 A No. 8 Q How many times were you with Shannon Spalding 9 without anyone else being present? 10 MS. KLEINHAUS: Objection. Asked and answered. 11 A You already asked me that question. 12 Q All right. You still got to answer it. You 13 got a judge -- it's actually not them that -- it's the 14 determined to -- 15 A I don't remember. 16 Q -- judge. Well, answer the question. 17 A I don't remember. 18 Q Have you ever had any contact with Shannon 19 Spalding with the intention of sexual gratification? 20 A No. 21 MR. DAFFADA: Objection. 22 Q Who else from the department do you maintain 23 contact with -- it -- to this day? 24 A Just in the police department in general? 25 Q Correct. The department, yes.</p>	<p style="text-align: right;">Page 201</p> <p>1 your petition? 2 A I don't remember. 3 Q Were both of you pro se for those proceedings? 4 A Yes. 5 Q Did you come to amicable divorce dissolution? 6 A Yes. 7 Q When was the last time you had communications 8 with your ex-wife, Jacqueline? 9 A I don't remember. 10 Q Was it before your communications with Shannon 11 Spalding? 12 A Before which communication? 13 Q Your holiday tidings with Shannon Spalding. 14 A I haven't talked to Jacqueline in probably 15 five or six years or more. 16 Q Isn't it true, Mr. Spaargaren, that felony 17 drug cases are the one exception to the felony review 18 rule? 19 MS. KLEINHAUS: Objection. Calls for a legal 20 conclusion. Foundation. 21 MR. DAFFADA: Did you hear the question? 22 THE WITNESS: Yeah. 23 MR. DAFFADA: Why they need it. 24 A Yeah. To the best of my knowledge, yes. 25 BY MR. KOSOKO:</p>

<p style="text-align: right;">Page 202</p> <p>1 Q Okay. So officers can file their own felony 2 complaints, correct?</p> <p>3 A Correct.</p> <p>4 Q They do not need to contact felony review, 5 correct?</p> <p>6 A Correct.</p> <p>7 Q The reports are for their own memory, correct?</p> <p>8 MR. DAFFADA: Objection to form. Yeah.</p> <p>9 A No. The reports are part of the arrest 10 process. They're not just for memory.</p> <p>11 Q Mr. Spaargaren, when has any one of your 12 arrest reports ever been a substitute for your live 13 testimony?</p> <p>14 A I don't remember.</p> <p>15 Q Has that ever happened in your career?</p> <p>16 A I don't remember.</p> <p>17 Q Have you ever charged any civilians based upon 18 the evidence the alleged evidence you have against 19 Sergeant Watts?</p> <p>20 MR. DAFFADA: Objection to form.</p> <p>21 MS. KLEINHAUS: Objection to form.</p> <p>22 A I don't understand the question.</p> <p>23 Q Would you, in your role as a police officer, 24 proceed with any criminal charges based upon the 25 evidence you have against Sergeant Watts?</p>	<p style="text-align: right;">Page 204</p> <p>1 Q Were you at the Ickes?</p> <p>2 A I don't remember.</p> <p>3 Q Were you at the Wells?</p> <p>4 MR. DAFFADA: Objection. Form.</p> <p>5 A You keep asking the same question. The 6 answer's the same. I don't remember. I told you.</p> <p>7 Q Yeah. I want you to keep -- I want -- we're 8 going to try to crack your memory, Mr. Spaargaren.</p> <p>9 Because you remember certain things and not other 10 things.</p> <p>11 A Of course. It was over 20 years ago. I'm not 12 the police anymore. I don't live in the city. So of 13 course, I don't remember a lot of this stuff.</p> <p>14 Q Name one arrest you remember from your entire 15 career.</p> <p>16 A I'm not going to go there.</p> <p>17 Q Name one arrest remember during your time on 18 the 4512 team.</p> <p>19 A I don't remember any specific arrest from the 20 4512 team.</p> <p>21 Q Weren't you usually just the enforcement 22 officer, Mr. Mr. Spaargaren?</p> <p>23 A It depended.</p> <p>24 Q Okay. Give me a percentage of the times you 25 were actually a surveillance officer or enforcement</p>
<p style="text-align: right;">Page 203</p> <p>1 MS. KLEINHAUS: Objection to form.</p> <p>2 Q Alleged evidence.</p> <p>3 THE WITNESS: I still don't understand the 4 question.</p> <p>5 MR. DAFFADA: I don't either.</p> <p>6 A I still don't understand your question.</p> <p>7 BY MR. KOSOKO:</p> <p>8 Q Got it. You testified earlier that there were 9 times that the team would seize narcotics and no one 10 would be arrested. Do you remember that?</p> <p>11 A Yes.</p> <p>12 Q I just want to clarify. Are you saying that 13 you actually witnessed them recover narcotics from a 14 person, on a person, and not arrest that person?</p> <p>15 A Yes.</p> <p>16 Q Okay. When did this happen?</p> <p>17 A I don't have a date.</p> <p>18 Q Who did this happen to?</p> <p>19 A I don't know.</p> <p>20 Q Where were you when this happened?</p> <p>21 A I don't remember.</p> <p>22 Q Were you in the lobby of a building?</p> <p>23 A I just answered your question.</p> <p>24 Q Were you in the lobby of a building?</p> <p>25 A I don't remember. I just told you.</p>	<p style="text-align: right;">Page 205</p> <p>1 officer, or someone who actually arrested someone after 2 observing a crime.</p> <p>3 MR. DAFFADA: Object to form.</p> <p>4 MS. DOI: Object to the form. Incomplete 5 hypothetical. Foundation.</p> <p>6 A I don't know. I don't keep track of the 7 stats. Never did that.</p> <p>8 BY MR. KOSOKO:</p> <p>9 Q Mr. Spaargaren, I'm going to direct you to 10 paragraph 5 of your affidavit, give you an opportunity 11 to read it. What do you consider a large contraband 12 seizure?</p> <p>13 A Typically when it's something that's more than 14 just personal consumption. Usually -- I mean, large is 15 a relative term. So for me, this was meaning like -- 16 when it was like 20 bags or more.</p> <p>17 Q Okay. What do you consider a large seizure 18 containing money?</p> <p>19 A I don't know. I'm referring to the -- I'm 20 referring to the whole thing here.</p> <p>21 Q So how much money -- estimate how much money 22 you think you meant when you swore to that paragraph 5?</p> <p>23 A I don't remember now.</p> <p>24 Q As you sit here today, you're still sure that 25 it would've been impossible to count it within a</p>

<p>1 specified period of time.</p> <p>2 A What is your question?</p> <p>3 Q You said you don't remember the size of the</p> <p>4 narcotics, correct?</p> <p>5 A Correct.</p> <p>6 Q It could be as little as just 20 bags though,</p> <p>7 correct?</p> <p>8 A Correct.</p> <p>9 Q You don't know the amount of money, correct,</p> <p>10 that you meant in this paragraph?</p> <p>11 A No.</p> <p>12 Q Okay. It could be \$500.</p> <p>13 A I don't know. You're speculating now.</p> <p>14 Q Tell me what you meant by paragraph 5, Mr.</p> <p>15 Spaargaren. What's a large amount of money?</p> <p>16 MS. DOI: Objection. Asked and answered.</p> <p>17 A I don't remember.</p> <p>18 Q So as you sit here today, you also can't</p> <p>19 remember if you had to report to duty the very next day.</p> <p>20 A I'm sorry. I didn't hear you. We didn't hear</p> <p>21 you.</p> <p>22 Q As you sit here today, you can't remember if</p> <p>23 paragraph 6 is correct? Because you actually had to</p> <p>24 report the next day.</p> <p>25 MR. DAFFADA: Objection. Argumentative. So</p>	<p>Page 206</p> <p>1 to change it to time? The next time?</p> <p>2 Q It's your affidavit, man. If you -- change it</p> <p>3 if you feel the need to. You've changed other things on</p> <p>4 it.</p> <p>5 A Yeah. I'm saying the next day, the next day</p> <p>6 that I went and saw it. I don't remember the dates.</p> <p>7 Q Okay. Where do you go to recover the</p> <p>8 inventory log?</p> <p>9 MS. DOI: Objection to form.</p> <p>10 A What is the question?</p> <p>11 Q Where did you go to recover the inventory log?</p> <p>12 MS. DOI: Objection to form. Foundation.</p> <p>13 A To recover or check it?</p> <p>14 Q You had to go get it, right?</p> <p>15 A I don't understand your question.</p> <p>16 Q Did you have to go get the inventory log?</p> <p>17 A The inventory log was in the station.</p> <p>18 Q Okay. Where in the station?</p> <p>19 A I don't have to go get it. It's sitting out.</p> <p>20 Q Okay. Where in the station is it?</p> <p>21 A By the safe. By the desk.</p> <p>22 Q Okay. Is it near anyone's desk?</p> <p>23 A It's -- it was near the desk of the -- I don't</p> <p>24 know you want to call it. When you walk into the</p> <p>25 station, there's a desk. It was by the desk.</p>
<p>1 what's your question?</p> <p>2 THE WITNESS: Yeah. I still don't understand</p> <p>3 his question.</p> <p>4 BY MR. KOSOKO:</p> <p>5 Q You can't remember if it's the next day that</p> <p>6 you checked the logs?</p> <p>7 A I don't remember the day. I'm referring to</p> <p>8 the next day. It should say at --</p> <p>9 MR. DAFFADA: Can you remember?</p> <p>10 MR. KOSOKO: Can you let him finish without</p> <p>11 interrupting him? If you're going to coach him, at</p> <p>12 least take a break.</p> <p>13 MR. DAFFADA: Okay.</p> <p>14 A So ask me the question again.</p> <p>15 BY MR. KOSOKO:</p> <p>16 Q You can't remember if it was actually the next</p> <p>17 day, correct?</p> <p>18 A No. This is referring to the next day that I</p> <p>19 checked it. Doesn't necessarily mean that it was the</p> <p>20 following day. The next day I checked it. It could</p> <p>21 have been three days or four days later. The next day I</p> <p>22 checked it. The next time.</p> <p>23 Q So you're saying paragraph 6, the phrase "The</p> <p>24 next day" could mean the next several days?</p> <p>25 A The next day, the next time. Do you want me</p>	<p>Page 207</p> <p>1 Q Okay. By -- near the desk sergeant?</p> <p>2 A I don't remember now.</p> <p>3 Q Okay. Do you have to sign it out?</p> <p>4 A No.</p> <p>5 Q Okay. So what date did you turn to in the</p> <p>6 logbook?</p> <p>7 A I don't remember now.</p> <p>8 Q Was it the day before or several days before?</p> <p>9 A I just said I don't remember. I just said</p> <p>10 that.</p> <p>11 Q Got it. As you sit here today, is there any</p> <p>12 way we can confirm anything in your affidavit?</p> <p>13 MS. DOI: Objection to form. Argumentative.</p> <p>14 Asked and answered.</p> <p>15 A What is the question?</p> <p>16 Q Where can we go to check this logbook to see</p> <p>17 if what you're saying is accurate?</p> <p>18 A You're asking where you can go check the</p> <p>19 logbook now?</p> <p>20 Q Yes, sir.</p> <p>21 A I'm not the police anymore. I'm -- I've been</p> <p>22 gone for five years. I have no idea where the logbook</p> <p>23 is at. No clue.</p> <p>24 Q Did you know it in 2005? 2015, I'm sorry.</p> <p>25 MR. DAFFADA: I'm sorry. What's the question?</p>

<p style="text-align: right;">Page 210</p> <p>1 Q Did you know where the law book was located in 2 2015?</p> <p>3 MR. DAFFADA: Objection. Argumentative.</p> <p>4 A No.</p> <p>5 Q So you gave your buddy, Shannon Spalding, this 6 affidavit without knowing to help her get the actual 7 concrete evidence?</p> <p>8 MR. DAFFADA: Objection. Argumentative.</p> <p>9 MS. DOI: Objection to form.</p> <p>10 A I don't know.</p> <p>11 Q Who came to who? Did she come to you to ask 12 for this affidavit?</p> <p>13 A I don't remember now.</p> <p>14 Q Got it. Did anyone -- after you returned to 15 the department, did anyone ever threaten you?</p> <p>16 A Not that I recall.</p> <p>17 Q Did you ever see anyone that you worked with 18 on the 4512 team again during your time before your 19 retirement?</p> <p>20 A I don't -- I don't remember.</p> <p>21 Q Did you ever work with anybody again in any 22 capacity after you returned to the department?</p> <p>23 MR. DAFFADA: Objection. Form.</p> <p>24 A I'm thinking. I think I worked with Officer 25 Calvin Rigel when he was at 311 for a while.</p>	<p style="text-align: right;">Page 212</p> <p>1 Q I'm going to direct you to paragraph 23 of 2 your affidavit, Mr. Spaargaren, give you an opportunity 3 to read it.</p> <p>4 A Okay.</p> <p>5 Q How frequently did you call Shannon Spalding?</p> <p>6 A I don't remember.</p> <p>7 Q Did you call her on a cell phone?</p> <p>8 A Yes.</p> <p>9 Q Okay. What phone number did you use when you 10 called her?</p> <p>11 A You mean my phone or her phone?</p> <p>12 Q Okay. What phone number did you have at the 13 time, sir?</p> <p>14 A I don't remember. It was saved to my contact 15 list.</p> <p>16 Q What phone number was your phone number, Mr. 17 Spaargaren?</p> <p>18 A I don't remember what phone I had.</p> <p>19 Q Okay. What cellular service did you use at 20 the time?</p> <p>21 A I don't remember.</p> <p>22 Q Okay. What year did you have this 23 conversation with Shannon Spalding?</p> <p>24 MR. DAFFADA: Objection. Form. Which 25 conversation are you referring to?</p>
<p style="text-align: right;">Page 211</p> <p>1 Q Did you -- were you fearful of Calvin Rigel 2 during that time period?</p> <p>3 A What do you mean, fearful?</p> <p>4 Q You know what the word <b>fearful</b> means, Mr. 5 Spaargaren?</p> <p>6 A Well, I'm asking you to define in this 7 context. What do you mean by <b>fearful</b>? I was --</p> <p>8 Q Do you know what the word <b>fearful</b> means in the 9 English diction, Mr. Spaargaren?</p> <p>10 A What?</p> <p>11 Q Do you know what the word <b>fearful</b> means in the 12 English diction, Mr. Spaargaren?</p> <p>13 MR. DAFFADA: Objection.</p> <p>14 A No. Please define it for me.</p> <p>15 Q Oh, you don't? Oh, CPD.</p> <p>16 MR. DAFFADA: What'd he say? I can't hear him.</p> <p>17 Q Were you scared that Calvin Rigel was going to 18 harm you during your time with working with him again?</p> <p>19 A No.</p> <p>20 Q Did you report to anyone that he was part of 21 that tactical team and you couldn't work with him?</p> <p>22 A No.</p> <p>23 Q So it's safe to say that you didn't observe or 24 suspect Officer Rigel of any corruption, correct?</p> <p>25 A I don't recall.</p>	<p style="text-align: right;">Page 213</p> <p>1 Q Yeah, I'll share it again. I'm going to 2 direct your attention again, Mr. Spaargaren, to your 3 affidavit. Paragraph 23.</p> <p>4 A I don't remember the year.</p> <p>5 Q Mr. Spaargaren, would you say that the Ida B. 6 Wells was an open-air drug market during your time 7 there?</p> <p>8 MS. DOI: Objection to form. Foundation.</p> <p>9 A Well, there was heavy narcotics there if 10 that's what you're asking.</p> <p>11 Q Was there a heavy presence of guns out there 12 also during your time on 4512?</p> <p>13 A Yes.</p> <p>14 Q I'm going to direct your attention to 15 paragraph 8 of your affidavit. Was this incident you're 16 referring to, was this after an arrest?</p> <p>17 MS. DOI: Objection to form.</p> <p>18 A I don't believe so.</p> <p>19 Q Okay. So why did you mention that, "One day I 20 confronted Sergeant Watts about there being no arrest"?</p> <p>21 A Wait, I don't understand your question.</p> <p>22 Q I just asked you to read paragraph 8. You can 23 read it again if you need time, okay? You just 24 testified you didn't realize it was after an arrest. Why 25 did you put that in the affidavit?</p>

<p style="text-align: right;">Page 214</p> <p>1 MR. DAFFADA: Object to form.</p> <p>2 A Oh, yeah. Your question -- you're asking me</p> <p>3 if I asked them this question, like right after an</p> <p>4 arrest. I misunderstood your question. Your question</p> <p>5 wasn't clear to me.</p> <p>6 Q Okay. That incident that led to the recovery</p> <p>7 of the large contraband and the large narcotics. Was it</p> <p>8 after an arrest?</p> <p>9 A No.</p> <p>10 Q Okay. So why did you confront Sergeant Watts</p> <p>11 about there being no arrest?</p> <p>12 MS. DOI: Objection to form.</p> <p>13 A Because there was no arrest afterwards.</p> <p>14 Q Okay. When -- who recovered this large</p> <p>15 contraband in the narcotics?</p> <p>16 A I don't remember now.</p> <p>17 Q You don't remember any member of your team</p> <p>18 being an actual person that recovered it?</p> <p>19 A No, I don't remember.</p> <p>20 Q You don't remember where it was recovered?</p> <p>21 A I don't remember the address. No.</p> <p>22 Q You don't remember if you guys were executing</p> <p>23 a search warrant?</p> <p>24 A No.</p> <p>25 Q You don't remember if it was just a stash you</p>	<p style="text-align: right;">Page 216</p> <p>1 A No, I remember the sun being up.</p> <p>2 Q Okay. When you say early, what do you mean by</p> <p>3 you got there early?</p> <p>4 A Well, because typically we worked an eight-</p> <p>5 hour day, and it was less than an eight-hour day. We</p> <p>6 were released early, ahead of time.</p> <p>7 Q Okay. You said you remember getting there</p> <p>8 early. What do you mean by you remember arriving early?</p> <p>9 MS. DOI: Objection. Mischaracterizes his</p> <p>10 prior testimony.</p> <p>11 A Early, like around like -- like 4:00 in the</p> <p>12 morning.</p> <p>13 Q 4:00 in the morning. So at 4:00 in the</p> <p>14 morning, you recover a large amount of money and</p> <p>15 contraband?</p> <p>16 MR. DAFFADA: Objection. Form.</p> <p>17 A No, 4:00 in the morning is when we started,</p> <p>18 and that's when we set up. The time --</p> <p>19 Q Okay.</p> <p>20 A -- was later.</p> <p>21 Q Okay. When did -- where did you set up?</p> <p>22 A I don't remember the property now. I don't</p> <p>23 remember the address.</p> <p>24 Q Okay. Around what time did you make the</p> <p>25 recovery?</p>
<p style="text-align: right;">Page 215</p> <p>1 found at the Ida B. Wells, one of the buildings?</p> <p>2 A I don't remember.</p> <p>3 Q You don't remember any circumstances about</p> <p>4 this recovery; is that correct?</p> <p>5 MS. DOI: Objection to form. Mischaracterizes</p> <p>6 his prior testimony.</p> <p>7 A No, I don't remember the particulars. No.</p> <p>8 Q Okay. Let's not talk about the particulars.</p> <p>9 Let's just talk about generally. What do you remember</p> <p>10 generally about the incident that led to that recovery?</p> <p>11 MS. DOI: Objection. Form. Asked and</p> <p>12 answered.</p> <p>13 A I remember it was a situation where we got</p> <p>14 there early in the morning, and narcotics and money was</p> <p>15 recovered, and we were -- the team was released early,</p> <p>16 and it was -- I don't know, I don't even remember the</p> <p>17 time now, but I remember it wasn't -- it wasn't a full</p> <p>18 day, and we were released early.</p> <p>19 Q Okay, how early, Mr. Spaargaren?</p> <p>20 A I -- I don't remember. It wasn't a full eight</p> <p>21 hours though.</p> <p>22 Q Okay. When you say early, are you talking</p> <p>23 about before sunrise?</p> <p>24 MS. DOI: Objection to form. Mischaracterizes his</p> <p>25 prior testimony.</p>	<p style="text-align: right;">Page 217</p> <p>1 A I don't remember the time now.</p> <p>2 Q Okay. Did you observe a lot of narcotics</p> <p>3 transactions in between the time you arrived on scene</p> <p>4 and after the -- and until the time the recovery was</p> <p>5 made?</p> <p>6 A I don't recall.</p> <p>7 Q You didn't make the recovery, correct?</p> <p>8 A No.</p> <p>9 Q Mr. Cadman didn't make the recovery, correct?</p> <p>10 A I don't recall.</p> <p>11 Q Do you recall if it was one of the black</p> <p>12 officers that made the recovery?</p> <p>13 A I don't recall who it was, no.</p> <p>14 Q Do you remember the composition of the team on</p> <p>15 that day?</p> <p>16 A No.</p> <p>17 Q So it's possible Sergeant Watts wasn't even</p> <p>18 there then, correct?</p> <p>19 A I remember him being there.</p> <p>20 Q Of course you do. That helps your friend,</p> <p>21 Shannon Spalding, correct?</p> <p>22 MS. DOI: Objection. Argumentative.</p> <p>23 Q Isn't that true, Mr. Spaargaren, that</p> <p>24 including Sergeant Watts in this affidavit helps your</p> <p>25 friend's lawsuit?</p>

<p style="text-align: right;">Page 218</p> <p>1 MS. DOI: Objection. Calls for a legal 2 conclusion.</p> <p>3 Q It didn't? But you can't remember any other 4 members of the team being there, correct?</p> <p>5 A I don't remember who was there.</p> <p>6 Q Just Watts and Mohammed?</p> <p>7 A That's all who I remember, yeah.</p> <p>8 Q That's what you remember in 2015?</p> <p>9 A That's what I remember, yeah.</p> <p>10 Q About an incident that occurred prior to 2005?</p> <p>11 A Correct.</p> <p>12 MR. KOSOKO: What a coinkydink. No further 13 questions at this time.</p> <p>14 MS. DOI: Can we please take five minutes? I 15 just have to do something very quickly.</p> <p>16 MR. BAZAREK: Yeah, I'm going to go next. Is 17 that okay?</p> <p>18 MS. DOI: That's fine. I have very few 19 questions.</p> <p>20 MR. BAZAREK: Yeah.</p> <p>21 MS. DOI: Which I think Mr. Spaargaren will be 22 happy.</p> <p>23 MR. BAZAREK: Yeah, let's go off the record 24 right now. Let's get the time captured we go off 25 record.</p>	<p style="text-align: right;">Page 220</p> <p>1 (phonetic) is?</p> <p>2 A No.</p> <p>3 Q Do you know who Manuel Leano (phonetic) is?</p> <p>4 A No.</p> <p>5 Q Do you know who Douglas Nichols is?</p> <p>6 A No.</p> <p>7 Q Do you know Elsworth Smith?</p> <p>8 A No.</p> <p>9 Q So fair to say that you never worked with any 10 of those officers, correct?</p> <p>11 A No.</p> <p>12 Q That's a -- is that correct?</p> <p>13 A I'm sorry, yes, it's correct, no I didn't work 14 with them.</p> <p>15 Q Okay, and when you worked in Unit 715, that 16 was Public Housing South, correct?</p> <p>17 A Yes.</p> <p>18 Q And you've already named a number of officers 19 you worked with, and I'll just give you their names 20 again. You worked with Kenneth Young and Darrell 21 Edwards, and Jerome Summers, and Brian Bolton, and 22 Robert Gonzalez, and Alvin Jones, and Calvin Rigel. You 23 worked with those officers in Unit 715, correct?</p> <p>24 A Correct.</p> <p>25 Q And you worked with them on a team that was</p>
<p style="text-align: right;">Page 219</p> <p>1 COURT REPORTER: The time is 6:21. We're going 2 off.</p> <p>3 (OFF THE RECORD)</p> <p>4 COURT REPORTER: We're back on record for the 5 deposition of Michael Spaargaren, being conducted by 6 videoconference. Today is March 7, 2022. The time 7 is 8 6:45 EST.</p> <p>9 EXAMINATION</p> <p>10 BY MR. BAZAREK:</p> <p>11 Q Hello, Mr. Spaargaren, my name's William 12 Bazarek, and I represent a number of police officers in 13 these lawsuits, the Watts coordinated pre-trial 14 proceedings. By the way, have you have framed anyone 15 yourself, sir?</p> <p>16 A I'm sorry, what was the last question?</p> <p>17 Q Have you ever framed anyone yourself, sir?</p> <p>18 A Oh, no.</p> <p>19 Q Okay. Someone asked you -- it is correct that 20 you were never assigned to the 2nd District of the 21 Chicago Police Department?</p> <p>22 A No.</p> <p>23 Q That's a correct statement?</p> <p>24 A Yes.</p> <p>25 Q Okay. Do you know who Lamonica Lewis</p>	<p style="text-align: right;">Page 221</p> <p>1 supervised by Ronald Watts, correct?</p> <p>2 A Correct.</p> <p>3 Q Did you ever work with an officer named John 4 Rodriguez on Sergeant Watts' team?</p> <p>5 A The name doesn't ring a bell.</p> <p>6 Q Did you ever work with a Catherine (phonetic) 7 Moses Hughes on Sergeant Watts' team?</p> <p>8 A I'm sorry, what was the name?</p> <p>9 Q Catherine Moses Hughes, H-U-G-H-E-S.</p> <p>10 A I don't recognize the name.</p> <p>11 Q Okay. Were there any females on the team that 12 you were on that was supervised by Ronald Watts?</p> <p>13 A I don't recall.</p> <p>14 Q Okay. At any time did you ever observe 15 Officer Kenneth Young frame anyone or falsely arrest anyone?</p> <p>17 A No.</p> <p>18 Q At any time, did you observe Kenneth Young 19 steal money from anyone?</p> <p>20 A No.</p> <p>21 Q At any time, did you ever observe Kenneth 22 Young plant narcotics on an individual?</p> <p>23 A No.</p> <p>24 Q Did you ever observe Darrell Edwards falsely 25 arrest anyone?</p>

<p>1 A No.</p> <p>2 Q Did you ever observe Darrell Edwards plant 3 narcotics on an individual?</p> <p>4 A No.</p> <p>5 Q Did you ever observe Darrell Edwards frame 6 anyone?</p> <p>7 A No.</p> <p>8 Q Same questions for -- or strike that. Jerome 9 Summers, did you ever see Jerome Summers falsely arrest 10 anyone?</p> <p>11 A No.</p> <p>12 Q Did you ever see Jerome Summers frame anyone?</p> <p>13 A No.</p> <p>14 Q Did you ever see Jerome Summers plant illegal 15 narcotics on an individual?</p> <p>16 A No.</p> <p>17 Q Did you ever observe Brian Bolton falsely 18 arrest anyone?</p> <p>19 A No.</p> <p>20 Q Did you ever observe Brian Bolton plant 21 illegal narcotics on an individual?</p> <p>22 A No.</p> <p>23 Q Did you ever observe Brian Bolton frame 24 anyone?</p> <p>25 A No.</p>	<p>Page 222</p> <p>1 A No.</p> <p>2 Q At any time, did you ever observe any of the 3 officers, who you worked with on the team, steal money 4 from someone?</p> <p>5 MS. DOI: Objection to form.</p> <p>6 A No.</p> <p>7 Q Now I want to talk about suspicions that you 8 had. Do you recall earlier in the deposition you were 9 talking about suspicions?</p> <p>10 A Correct.</p> <p>11 Q Okay, and I just want to make sure I 12 understand your testimony and correct me if I'm wrong. 13 And you've looked at Exhibit 1, your affidavit, 14 throughout this deposition, and in paragraph number 5, 15 I'll just read it again, according to the affidavit, it 16 says, "One day after large contraband seizure containing 17 money and drugs, Sergeant Watts informed the team 18 members that we were free to go home, while he and 19 Mohammed completed the inventories of the contraband 20 seized that day," right? You're aware of what your 21 affidavit says, correct?</p> <p>22 A Yes.</p> <p>23 Q And as I understand it, it was after that 24 seizure is when you first became suspicious; is that 25 correct?</p>
<p>Page 223</p> <p>1 Q Did you ever observe Robert Gonzalez frame 2 anyone?</p> <p>3 A No.</p> <p>4 Q Did you ever observe Robert Gonzalez falsely 5 arrest anyone?</p> <p>6 A No.</p> <p>7 Q Did you ever observe Robert Gonzalez plant 8 drugs on anyone?</p> <p>9 A No.</p> <p>10 Q Did you ever observe Alvin Jones falsely 11 arrest anyone?</p> <p>12 A No.</p> <p>13 Q Did you ever observe Alvin Jones plant 14 narcotics on anyone?</p> <p>15 A No.</p> <p>16 Q Did you ever observe Alvin Jones frame anyone?</p> <p>17 A No.</p> <p>18 Q Did you ever observe Calvin Rigel falsely 19 arrest anyone?</p> <p>20 A No.</p> <p>21 Q Did you ever observe Calvin Rigel plant 22 narcotics on anyone?</p> <p>23 A No.</p> <p>24 Q Did you ever observe Calvin Rigel frame 25 anyone?</p>	<p>Page 225</p> <p>1 A Yes.</p> <p>2 Q You called it an aha moment, right?</p> <p>3 A Yes.</p> <p>4 Q Okay, and the reason I wanted to direct you to 5 that paragraph, Mr. Spaargaren, because earlier in the 6 deposition, you talked about -- you talked about, and 7 I'll use the phrasing, you said something about -- and I 8 believe it was in the context of suspicions, and you 9 said, "A couple of months after being on the team." Do 10 you recall giving testimony like that?</p> <p>11 A Yes.</p> <p>12 Q Okay, so were you misstating or not 13 remembering correctly? What was it?</p> <p>14 A Yeah. Yeah, I wasn't remembering correctly. 15 Basically -- and I thought I clarified it earlier but 16 let me clear the air on it now. So basically, after my 17 comment here in the deposition number five, it was going 18 back after I realized that, because I mean, I worked for 19 Watts for, I don't know, a year, year and a half, 20 whatever the timeframe was. What I should have said 21 was, going back, I realized about three months in, was 22 when I first realized that that was happening. So at 23 the time, it wasn't a suspicion per se, it was later on 24 after this incident happened, it's kind of like when the 25 light bulb when off and I'm like -- and I remember</p>

<p style="text-align: right;">Page 226</p> <p>1 saying to myself, I'm like, "I'll be damned," I said,    2 "Now I know why he was, you know, letting us go home    3 early." And, you know, I was thinking in my mind that    4 he was doing us a favor by, "Hey, we're going to cut you    5 guys loose. We're going to stay after. We're going to    6 do the inventory." I didn't question it, "See you    7 later, goodbye." And what I -- what I should have said    8 is, that timeframe started about three months in. So I    9 mean, I'm remembering it after the fact. So about three    10 months in was when I realized that that had happened.</p> <p>11 Q Okay. Did you ever go back and check the    12 logbooks from three months after you joined the team?</p> <p>13 A No, because the logbooks are only so -- they    14 only have so many entries and then they get filed    15 afterwards.</p> <p>16 Q Let me ask you this, and specifically again to    17 paragraph 5, that what you describe is a large    18 contraband seizure, containing money and drugs. Do you    19 know what type of drugs was recovered?</p> <p>20 A I don't remember now.</p> <p>21 Q Could it have been cannabis?</p> <p>22 A It could have been. I don't remember, I'd be    23 guessing at this point.</p> <p>24 Q Okay, so -- all right, and then as you sit    25 here today at this deposition, you have no recollection</p>	<p style="text-align: right;">Page 228</p> <p>1 speculation.</p> <p>2 Q Go ahead.</p> <p>3 A I don't recall.</p> <p>4 Q I want to ask you, you had mentioned Alvin    5 Jones in using force against individuals; is that    6 correct?</p> <p>7 A Yes.</p> <p>8 Q Okay, and you would agree that a police    9 officer can use force to affect an arrest, right?</p> <p>10 A Yes.</p> <p>11 Q A police officer can lawfully defend himself,    12 right?</p> <p>13 A Correct.</p> <p>14 Q Can you tell me, in terms of the uses of force    15 that you described used by Alvin Jones, can you tell me    16 anything that the subject was doing before Alvin Jones    17 used force?</p> <p>18 MS. KLEINHAUS: Objection. Incomplete    19 hypothetical.</p> <p>20 A It -- situations where we were like searching    21 for the narcotics and we couldn't find it, and that's    22 when Al Jones would hit the people to try to find it, to    23 try to get them to tell him where it was at, to try to    24 tell us.</p> <p>25 Q Can you tell me what the individual was doing</p>
<p style="text-align: right;">Page 227</p> <p>1 of any of your -- strike that. Was Kenneth Young there    2 for that contraband seizure that's described in    3 paragraph 5?</p> <p>4 MS. KLEINHAUS: Objection. Calls for    5 speculation.</p> <p>6 A Well, I don't remember if he was there or not.</p> <p>7 Q Was Darrell Edwards there?</p> <p>8 MS. KLEINHAUS: Calls for speculation.</p> <p>9 A I don't recall.</p> <p>10 Q Was Jerome Summers there?</p> <p>11 MS. KLEINHAUS: Objection. Calls for    12 speculation.</p> <p>13 A I don't recall.</p> <p>14 Q Was Brian Bolton there?</p> <p>15 MS. KLEINHAUS: Same objection.</p> <p>16 A I don't recall.</p> <p>17 Q Was Robert Gonzalez there?</p> <p>18 MS. KLEINHAUS: Objection. Speculation.</p> <p>19 A I don't recall.</p> <p>20 Q Was Alvin Jones there?</p> <p>21 MS. KLEINHAUS: Objection. Calls for    22 speculation.</p> <p>23 A I don't recall.</p> <p>24 Q Was Calvin Rigel there?</p> <p>25 MS. KLEINHAUS: Objection. Calls for</p>	<p style="text-align: right;">Page 229</p> <p>1 during the moments before they were struck by Officer    2 Jones?</p> <p>3 MS. KLEINHAUS: Objection. Asked and answered.</p> <p>4 A I don't remember now.</p> <p>5 Q Okay. So as you sit here today at this    6 deposition, you have no recollection of what the    7 subjects were doing before Officer Jones used force    8 against them, correct?</p> <p>9 MS. KLEINHAUS: Objection. Mischaracterizes    10 his testimony.</p> <p>11 A I don't remember now.</p> <p>12 Q Right, you don't know what those individuals    13 were doing before Officer Jones used force, correct?</p> <p>14 MS. KLEINHAUS: Objection. Asked and answered.</p> <p>15 A I don't remember now.</p> <p>16 Q Right. Would anything help you remember?</p> <p>17 A I don't know.</p> <p>18 Q Can you tell me one thing that any of these    19 individuals were doing before Officer Jones used force    20 against them?</p> <p>21 MS. KLEINHAUS: Objection to form.</p> <p>22 MR. DAFFADA: Objection. Asked and answered.</p> <p>23 You can answer.</p> <p>24 A I don't remember now.</p> <p>25 BY MR. BAZAREK:</p>

<p>1       Q    Okay, and how many uses of force did you 2 observe? 3       A    Approximately five, maybe six times. 4       Q    Okay, and the force Mr. Spaargaren where you 5 observed, did it occur at Ida B. Wells, or some other 6 location? Do you know? 7       A    Typically in the Ida B. Wells. 8       Q    Okay. Anywhere else? 9       A    Not that I recall. 10      Q    Okay. Tell me, going back to paragraph 5 -- 11 strike that. Going to paragraph 6 of Exhibit 1, where 12 you talked about checking the inventory log, you recall 13 that in your affidavit, correct? 14      A    Yes. 15      Q    What -- when police officers recover narcotics 16 or contraband, you can document that recovery on a vice 17 case report, right? 18      A    Honestly, I don't recall anymore. 22      Q    Okay. So you check the inventory log, but 23 paragraph 6 of your affidavit, it doesn't say that you 24 reviewed any vice case reports, correct? 25            MS. KLEINHAUS: Objection. Document speaks for</p>	<p>Page 230</p> <p>1       the inventory log, was that like a big ledger type book? 2       Was that what that was? 3       A    Yes. 4       Q    Like hard copy, hard cover? 5       A    I remember it being -- I don't know, I mean, 6 for reference, about the size of a Manila folder, it was 7 about this big. 8       Q    Okay. 9       A    In the book. It was a big book and it had 10 multiple copies in it, and I mean, I remember it was 11 like NCR type paper, and it was multiple copies, and you 12 had to press really hard. And so that was the books 13 that we had at the time. 14      Q    Okay, then maybe -- I just want to make sure I 15 understand your answer. Is the -- when you say the 16 inventory log, is that the same as reviewing inventory 17 slips, or is it something different? 18      A    The -- I'm trying to remember. You had -- you 19 had an inventory book, which accompanied the inventory 20 log. So when you filled out the log -- or when you 21 filled out the book, it went into the log, if that makes 22 sense. 23      Q    Okay, but if you're actually doing an 24 inventory, like writing in, "This is what I'm 25 inventorying, this is the amount of money or narcotics,"</p>
<p>1            itself. 2       A    Correct. 3       Q    And by the way, was eTrack in place during 4 2004? 5       A    No. 6       Q    How would you enter -- were there computers to 7 assist with documenting inventories back in 2004? 8       A    Let me -- sorry, let me retract that 9 statement. I don't remember when eTrack went in, but I 10 remember at the time, that it was still -- because 11 Housing was behind. Housing, you know, was -- we had 12 old radios, we had old cars, and so I don't know if 13 eTrack was in effect at the time, but I remember for us, 14 in our satellite station, we were still using the old 15 paper books. 16      Q    Okay, and that would be another way for you to 17 look, you could look at the paper books to see a copy of 18 an inventory, correct? 19      A    Correct. 20      Q    But in paragraph 6, you didn't look at any 21 copies of inventories, correct? 22            MS. KLEINHAUS: Objection to form. 23      Q    Yeah, I don't -- I'll ask another question. 24      A    Yeah. 25      Q    You looked at -- when you say you looked at</p>	<p>Page 231</p> <p>Page 233</p> <p>1       whatever it is -- 2       A    Uh-huh. 3       Q    -- are you writing to the inventory log, and 4 that -- the form goes to court, or is it something 5 different? That's why -- I don't understand your 6 answer. 7       A    Well, I don't know how else to explain it any 8 more clearly. You have to fill out the book, the 9 inventory book, and then when you're done with the 10 inventory book, you document it on the inventory log. 11 You know, you -- it's like -- it was -- I just remember 12 it being on a clipboard, and it would show you what it 13 was. And I remember -- I remember I had checked both, 14 the book and the log, and there was nothing there. 15      Q    Okay. What about inventory slips? Is that 16 something different? 17      A    Inventory slips. I mean, nomenclature wise, I 18 don't know. I mean, I don't know if it's just a 19 different name for the same thing. 20      Q    Okay. By the way, who typed out this 21 affidavit? 22      A    The attorney, I think his name was -- I don't 23 know if it's on here. I'm trying to remember. 24      Q    Was it Christopher Smith? 25      A    Yeah, yeah. It was Chris Smith, yeah, yep.</p>

<p>Page 234</p> <p>1 Q Okay, so the individual who typed out the 2 affidavit, and that you signed, right, he also -- he 3 notarized the affidavit?</p> <p>4 A Let me see.</p> <p>5 Q Look at that last page, page --</p> <p>6 A Yeah, that's -- yeah, that's his name, 7 Christopher Smith.</p> <p>8 Q Was Shannon Spalding present when you signed 9 this affidavit?</p> <p>10 A Yes.</p> <p>11 Q You were in -- were you at Christopher Smith's 12 office?</p> <p>13 A Yes.</p> <p>14 Q Did you and Shannon Spalding arrive at her 15 lawyer's office together that day?</p> <p>16 A I don't remember.</p> <p>17 Q Okay. Has Shannon Spalding ever told you that 18 she actually observed any member of Sergeant Watts' team 19 framing someone?</p> <p>20 MS. KLEINHAUS: Objection to form.</p> <p>21 A I don't remember her telling me that.</p> <p>22 Q Has Shannon Spalding ever told you that she 23 actually observed any member of Sergeant Watts' team 24 planting narcotics on anyone?</p> <p>25 A I don't remember her telling me that.</p>	<p>Page 236</p> <p>1 Q Did Ms. Spalding say that anyone from the FBI 2 or the DOJ retaliated against her?</p> <p>3 A I don't remember her telling me that.</p> <p>4 Q Okay. Did -- you deny wrongdoing in these 5 lawsuits that are being brought against you, is that 6 true?</p> <p>7 A Yes.</p> <p>8 Q And in fact, the plaintiffs that are suing you 9 have filed false complaints in federal court, right?</p> <p>10 MS. KLEINHAUS: Objection to form.</p> <p>11 A I don't know.</p> <p>12 Q Well, you're accused of being part of a team 13 that was framing innocent individuals, right?</p> <p>14 A I don't know when these -- of any specific 15 allegations against me.</p> <p>16 Q Okay. I want to ask -- going back to the -- 17 just strike that. I know on your -- you mentioned 18 earlier in the deposition, you talked about your PAR 19 form, and I'll just -- I'll say to you, it's City 20 BG033461 is the number, and it's dated at the top, March 21 26, 2004. And then ultimately, as I understand it, you 22 went on leave in May of 2004. Does that sound right?</p> <p>23 A I don't recall the exact dates.</p> <p>24 Q Okay. Would you agree that there was a delay 25 from the time you submit the PAR form until your leave</p>
<p>Page 235</p> <p>1 Q Has Shannon Spalding ever told you that she 2 observed any member of Sergeant Watts' team stealing 3 money from any individual?</p> <p>4 A I don't recall being told that.</p> <p>5 Q Has Shannon Spalding ever talked to you about 6 the FBI agents that were investigating Sergeant Watts' 7 team?</p> <p>8 MS. KLEINHAUS: Objection to form.</p> <p>9 A I don't remember having that conversation with 10 her.</p> <p>11 Q Did she tell you that they engaged in 12 misconduct, the FBI agents, or FBI agent who 13 investigated Sergeant Watts' team?</p> <p>14 A She stated something to that effect, yes.</p> <p>15 Q Yeah, and when did Ms. Spalding tell you that?</p> <p>16 A I don't remember when.</p> <p>17 Q Do you recall any detail about the misconduct 18 of the FBI agents that Ms. Spalding alerted you to?</p> <p>19 A No, I -- I don't remember the particulars, but 20 I remember her saying that they had like a corrupt agent 21 that they were working with, and that was it.</p> <p>22 Q Yeah. Did she go into more detail about that 23 corrupt FBI agent and what misconduct he was engaging 24 in?</p> <p>25 A I don't -- I don't remember.</p>	<p>Page 237</p> <p>1 actually starts?</p> <p>2 A I'd have to look at the form, but if those are 3 the dates that are on there, then that would be correct.</p> <p>4 Q Yeah. Okay, and then let me ask you, on the 5 day you filled out the PAR form --</p> <p>6 A Uh-huh.</p> <p>7 Q -- and let's presume that it was on March 26, 8 2004.</p> <p>9 A Okay.</p> <p>10 Q How much time had transpired before you had 11 this confrontation with Ron Watts?</p> <p>12 A I don't remember.</p> <p>13 MS. KLEINHAUS: Asked and answered.</p> <p>14 Q Was it the next day? Was it the same day?</p> <p>15 A I don't remember how long it was.</p> <p>16 Q Okay. Would you agree that it occurred 17 sometime during the month of March of 2004?</p> <p>18 A Again, I don't want to speculate, I don't 19 remember.</p> <p>20 Q Well if you're requesting a leave on March 26, 21 2004, can you ballpark when this confrontation would 22 have been that you had with Ron Watts?</p> <p>23 MS. KLEINHAUS: Objection. Calls for 24 speculation. Asked and answered.</p> <p>25 A Again, I don't want to guess. I don't</p>

<p style="text-align: right;">Page 238</p> <p>1 remember the date.</p> <p>2 Q Can you -- so you don't know -- do you think</p> <p>3 it was in '04, or you think it was even earlier?</p> <p>4 A It wasn't that long. I remember it not --</p> <p>5 sorry. I remember it not being that long.</p> <p>6 Q Okay. Meaning it wasn't that long before you</p> <p>7 put in the -- strike that. Meaning it wasn't that long</p> <p>8 after the confrontation that you had with Mr. Watts</p> <p>9 before you did the PAR form on March 26, 2004?</p> <p>10 A Correct.</p> <p>11 Q Okay. You think it was -- it could have been</p> <p>12 a week or less?</p> <p>13 A Again, you keep asking me, but I mean, I don't</p> <p>14 remember, I just -- I know it wasn't that long of a</p> <p>15 timeframe.</p> <p>16 Q Okay.</p> <p>17 A Now was it a week, two weeks?</p> <p>18 Q When you were on Ron Watts' TAC team, did you</p> <p>19 ever steal money from anyone?</p> <p>20 A No.</p> <p>21 Q Did you observe any of your fellow teammates</p> <p>22 on Ron Watts' team steal money from anyone?</p> <p>23 A No.</p> <p>24 Q Did you or members of Sergeant Watts' team</p> <p>25 ever arrest anyone because they refused to provide you</p>	<p style="text-align: right;">Page 240</p> <p>1 Q To Craig Futterman?</p> <p>2 A Yes.</p> <p>3 Q Tell me about your conversations with Josh</p> <p>4 Tepfer.</p> <p>5 MR. DAFFADA: Objection. I don't know if this</p> <p>6 calls for privileged information. I think you need</p> <p>7 to lay a foundation.</p> <p>8 BY MR. BAZAREK:</p> <p>9 Q Have you ever spoke with an attorney named</p> <p>10 Josh Tepfer?</p> <p>11 A Yes.</p> <p>12 Q And do you recall what year it was when you</p> <p>13 first spoke with Josh Tepfer?</p> <p>14 A No.</p> <p>15 Q Had you been named a defendant in any of these</p> <p>16 lawsuits at the time -- strike that. Had you been named</p> <p>17 a defendant in any of these lawsuits in the Watts'</p> <p>18 coordinated proceedings, at the time you first spoke</p> <p>19 with Josh Tepfer?</p> <p>20 A Not to my knowledge.</p> <p>21 Q Okay. Is Josh Tepfer -- was he ever your</p> <p>22 attorney?</p> <p>23 A No.</p> <p>24 Q Did someone put you in contact with Josh</p> <p>25 Tepfer?</p>
<p style="text-align: right;">Page 239</p> <p>1 with information?</p> <p>2 MS. KLEINHAUS: Objection to form. Compound.</p> <p>3 A Can you ask the question again, sir?</p> <p>4 MR. BAZAREK: Can you read it, please?</p> <p>5 COURT REPORTER: Yes. Were you asking me? I'm</p> <p>6 sorry.</p> <p>7 (REPORTER PLAYS BACK REQUESTED TESTIMONY)</p> <p>8 MS. KLEINHAUS: Objection to form. Compound.</p> <p>9 A Yeah, I don't recall that happening.</p> <p>10 BY MR. BAZAREK:</p> <p>11 Q Did you ever extort money from drug dealers</p> <p>12 when you were on Sergeant Watts' team?</p> <p>13 A No.</p> <p>14 Q Did you ever observe any of your fellow team</p> <p>15 members on Sergeant Watts' team extort money from drug</p> <p>16 dealers?</p> <p>17 MS. KLEINHAUS: Objection to form.</p> <p>18 A No.</p> <p>19 Q Tell me, how did you get Craig Futterman as</p> <p>20 your attorney to go meet with the FBI?</p> <p>21 A From Josh Tepfer.</p> <p>22 Q Oh, Josh Tepfer from the Exoneration Project?</p> <p>23 A Yes.</p> <p>24 Q He was the referring attorney?</p> <p>25 A Yes.</p>	<p style="text-align: right;">Page 241</p> <p>1 A From what I remember, he reached out to me.</p> <p>2 Q Did you ask him, "Hey, how'd you get my name</p> <p>3 and number?"</p> <p>4 A I don't recall. I found him on the internet,</p> <p>5 so...</p> <p>6 Q Okay. So then -- all right, so Tepfer just</p> <p>7 called you out of the blue, he's not your attorney,</p> <p>8 correct?</p> <p>9 A Yes.</p> <p>10 Q He -- you agree he was not your attorney,</p> <p>11 right?</p> <p>12 A Correct.</p> <p>13 Q Okay, and then what did he say to you, and</p> <p>14 what'd you say to him?</p> <p>15 A Something to the effect he wanted to know if I</p> <p>16 could help out with information regarding my time on the</p> <p>17 Watts team.</p> <p>18 Q So he was looking for assistance from you?</p> <p>19 A Yes.</p> <p>20 MS. KLEINHAUS: Objection to form.</p> <p>21 Q Did he tell you that, "Hey, in a couple years,</p> <p>22 I'm going to be part of a plaintiff's team and I'm going</p> <p>23 to be suing you"? Did he tell you that?</p> <p>24 A No.</p> <p>25 Q Did he say that if you say the right thing,</p>

<p>1 you know, you won't get sued?</p> <p>2 A No.</p> <p>3 MR. FLAXMAN: Objection. Foundation.</p> <p>4 Q Tell me what else was said in this phone call</p> <p>5 with Mr. Tepfer.</p> <p>6 A He asked me if I would basically answer some</p> <p>7 of his questions regarding my time when I was with</p> <p>8 Watts, but I told him, I said, "I'm not going to answer</p> <p>9 any of your questions until I'm done and I'm off the</p> <p>10 job." I'm not going to, you know, open up the can of</p> <p>11 worms in other words, and put myself at risk. I said,</p> <p>12 "If I'm subpoenaed, it's a different story." I said,</p> <p>13 "But I'm not going to do that." I said, "Everybody</p> <p>14 knows where I live." And, you know, I basically told</p> <p>15 him, "Once I retire in a short time, call me then."</p> <p>16 Q Did he speak with you about any particular</p> <p>17 cases?</p> <p>18 A I honestly don't remember now. The call was</p> <p>19 short.</p> <p>20 Q Okay, and then -- all right, and best you</p> <p>21 recall, do you know what year that was?</p> <p>22 A Oh, no. I was still on the job though.</p> <p>23 Q Okay, and then when was the next time you</p> <p>24 spoke with Mr. Tepfer after that?</p> <p>25 A I had been watching the news and I heard about</p>	<p>Page 242</p> <p>1 MR. BAZAREK: Can we go off the record for just</p> <p>2 a moment? And I want to see what our time is.</p> <p>3 COURT REPORTER: Time is 7:19. We're off</p> <p>4 record.</p> <p>5 (OFF THE RECORD)</p> <p>6 COURT REPORTER: We're back on record for the</p> <p>7 deposition of Michael Spaargaren being conducted by</p> <p>8 videoconference. Today is March 7, 2022. The time</p> <p>9 is</p> <p>10 7:27 EST.</p> <p>11 BY MR. BAZAREK:</p> <p>12 Q Mr. Spaargaren, I know you had two meetings</p> <p>13 with Mr. Bloomberg, that's from the DOJ; is that right?</p> <p>14 A Yes.</p> <p>15 Q And was Futterman present with you for both or</p> <p>16 just once?</p> <p>17 A Just for the first one.</p> <p>18 Q And did you attend the second meeting with</p> <p>19 Bloomberg without counsel?</p> <p>20 A Yes.</p> <p>21 Q Did Mr. Bloomberg ever ask you about any</p> <p>22 specific plaintiffs in the Watts coordinated pre-trial</p> <p>23 proceedings?</p> <p>24 A I don't recall.</p> <p>25 Q I want to just talk -- can you just give me a</p>
<p>Page 243</p> <p>1 the -- about the lawsuits. And I remember, I had sent</p> <p>2 him an e-mail because now I was retired, and I sent him</p> <p>3 an e-mail and I said, "Hey, if you want, call me." And</p> <p>4 when I -- when we spoke -- spoke to him for a minute or</p> <p>5 two and he told me, he goes, "I can't talk to you</p> <p>6 anymore." And I asked him, I said, "Well, what do you</p> <p>7 mean? "And he says, he goes, "Well," he goes, "now," I</p> <p>8 don't remember the exact words, but words to the effect</p> <p>9 that, "Now there's a lawsuit," blah, blah, blah. "But</p> <p>10 I'm going to refer you to somebody." You know? And</p> <p>11 then basically, you know, for lack of a better term, the</p> <p>12 tone that I had with him my first time versus second</p> <p>13 time was different. And then I was referred to him by -</p> <p>14 - I'm sorry. He referred me to Erica and Craig</p> <p>15 Futterman. That's how I got into contact with him.</p> <p>16 Q Okay and did -- were you -- okay. And did you</p> <p>17 reach out to him again or send him the e-mail because</p> <p>18 the FBI had contacted you?</p> <p>19 A I don't remember now.</p> <p>20 Q Okay. Did Mr. Tepfer tell you in that second</p> <p>21 phone conversation, that he was going to be the attorney</p> <p>22 and he was going to be -- you were going to be named in</p> <p>23 future of lawsuits?</p> <p>24 MR. FLAXMAN: Objection. Foundation.</p> <p>25 A No.</p>	<p>Page 245</p> <p>1 little more detail on how you would do your job as a</p> <p>2 member of Sergeant Watts' team, in terms of engaging in</p> <p>3 narcotics investigations, how you would go about doing</p> <p>4 that?</p> <p>5 MS. KLEINHAUS: Object to form.</p> <p>6 MR. DAFFADA: Form. Go ahead.</p> <p>7 A We had, you know, team direct admissions that</p> <p>8 we would do, and then we would go out by ourselves.</p> <p>9 Q Okay. In team direct admissions, part of the</p> <p>10 mission is to catch individuals that are engaging in</p> <p>11 illegal narcotics activity, right?</p> <p>12 A Correct.</p> <p>13 Q And you would agree that narcotics trafficking</p> <p>14 occurred on a daily basis at Ida B. Wells, right?</p> <p>15 MS. KLEINHAUS: Objection. Foundation.</p> <p>16 Q You can answer.</p> <p>17 A I said yes.</p> <p>18 Q Okay. I didn't hear that. Thank you.</p> <p>19 A That's okay. Yeah.</p> <p>20 Q And your job and the job of your team members</p> <p>21 was to apprehend these criminal offenders that were</p> <p>22 engaging in narcotics activity at Ida B. Wells, correct?</p> <p>23 MS. KLEINHAUS: Objection to form.</p> <p>24 A Yes.</p> <p>25 Q And are you proud of the time when you worked</p>

<p style="text-align: right;">Page 246</p> <p>1 on that team, and the work that you did?</p> <p>2 A I don't know, kind of indifferent.</p> <p>3 Q Okay. Just give me a moment. Did Mr.</p> <p>4 Bloomberg ask you about any of the drug dealers at Ida</p> <p>5 B. Wells or did he have any questions about that?</p> <p>6 A I don't recall.</p> <p>7 Q Okay. I know earlier in this deposition, you</p> <p>8 testified that the officers on the team, their testimony</p> <p>9 was deemed not credible. Do you recall that testimony?</p> <p>10 A Yes.</p> <p>11 Q Who were you refer to as to who's deeming</p> <p>12 officer's testimony not credible?</p> <p>13 A The state's attorney -- Cook County State's</p> <p>14 Attorney's office.</p> <p>15 Q Oh, you're talking about Kim Fox?</p> <p>16 A Yes.</p> <p>17 Q Okay. Anyone else other than Kim Fox of the</p> <p>18 State's Attorney's office?</p> <p>19 A No.</p> <p>20 MS. KLEINHAUS: Objection to form.</p> <p>21 MR. BAZAREK: I have no further questions at</p> <p>22 this time.</p> <p>23 EXAMINATION</p> <p>24 BY MS DOI:</p> <p>25 Q All right. Good evening, Mr. Spaargaren. My</p>	<p style="text-align: right;">Page 248</p> <p>1 affidavits, and you've already given testimony that you</p> <p>2 left that day because Watts released your team early; is</p> <p>3 that correct?</p> <p>4 A Yes.</p> <p>5 Q Okay. So is it fair to say you did not</p> <p>6 personally observe anything that happened in the station</p> <p>7 between Watts and Mohammed or individually after you</p> <p>8 left?</p> <p>9 MS. KLEINHAUS: Objection to form.</p> <p>10 A No.</p> <p>11 Q Okay. I want to talk about after you had the</p> <p>12 confrontation with, with Watts and I believe with</p> <p>13 Lieutenant Spratt, and you were asked to question by Ms.</p> <p>14 Kleinhaus as to whether you discussed those</p> <p>15 confrontations with anyone on Watts' team. Do you</p> <p>16 remember those questions?</p> <p>17 A Yes.</p> <p>18 Q Okay, and I believe you said you didn't talk</p> <p>19 to anyone on the team except for Officer Mohammed. Did</p> <p>20 I hear that correctly?</p> <p>21 A Yes.</p> <p>22 Q Why did you approach Officer Mohammed in lieu</p> <p>23 of anyone else on the team?</p> <p>24 A I didn't approach him. He approached me.</p> <p>25 Q Okay. Was he the only Watts team member that</p>
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<p style="text-align: right;">Page 247</p> <p>1 name is Kathryn Doi. I represent Defendant Mohammed in</p> <p>2 these cases. I just have a few follow up questions for</p> <p>3 you, and then hopefully we'll be wrapping up here. So</p> <p>4 going back to the alleged incident that you've described</p> <p>5 in paragraph 5 of your affidavit, which I won't go over</p> <p>6 again, because we've already talked about it. Is there</p> <p>7 any other time that you personally witness Defendant</p> <p>8 Mohammed do something that you would consider improper?</p> <p>9 A Nothing else that I can recall.</p> <p>10 Q Have you ever seen Defendant Mohammed -- or</p> <p>11 I'm sorry, Officer Mohammed, at the time, plant</p> <p>12 narcotics?</p> <p>13 A No.</p> <p>14 Q Have you ever seen Officer Mohammed falsely</p> <p>15 arrest anyone?</p> <p>16 A No.</p> <p>17 Q Have you ever seen Officer Mohammed steal</p> <p>18 money from anyone?</p> <p>19 A No.</p> <p>20 Q Have you ever personally observed Officer</p> <p>21 Mohammed frame anyone?</p> <p>22 A No.</p> <p>23 Q Okay. Sorry. I'm trying to pin you to my</p> <p>24 screen here because I can't see you. Okay. So the</p> <p>25 incident that was discussed in paragraph 5 of your</p>	<p style="text-align: right;">Page 249</p> <p>1 approached you after those conversations with Watts and</p> <p>2 Spratt?</p> <p>3 A Yes.</p> <p>4 Q Okay, and where did he approach you?</p> <p>5 A I don't remember where we were at.</p> <p>6 Q Were you in the station, possibly? I'm just</p> <p>7 trying to narrow down whether you were in the station or</p> <p>8 outside of the station somewhere.</p> <p>9 A Yeah, I don't remember if I was -- I mean, it</p> <p>10 was in the vicinity. I don't remember if I was inside</p> <p>11 or outside. I don't remember at this time.</p> <p>12 Q Do you remember approximately how many days</p> <p>13 later that you had this conversation with Officer</p> <p>14 Mohammed about the Watts and Spratt confrontations?</p> <p>15 MS. KLEINHAUS: Objection to form.</p> <p>16 A I don't remember.</p> <p>17 Q Could it have been multiple days, a week?</p> <p>18 A I don't remember.</p> <p>19 Q Okay, and what specifically did Officer</p> <p>20 Mohammed say when he first approached you? I just want</p> <p>21 to get a little more information. If your memories are</p> <p>22 refreshed by talking about again here all day, do you</p> <p>23 remember any more specifics about that conversation?</p> <p>24 A Mohammed basically said to me -- I remember</p> <p>25 him saying that, "Damn Mick, I hate to see you go." He</p>
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<p style="text-align: right;">Page 250</p> <p>1 says, "But you can't" -- words to the effect that, "You    2 can't challenge the boss or accuse the boss," or    3 something to that effect. But I remember, you know, he    4 -- it was like a genuine conversation. He says, you    5 know, he goes, "I really liked working with you," blah,    6 blah, blah. And I said, "Yeah, likewise." I mean, I    7 got along with the guy. It was just -- it was a brief    8 conversation, but that's what transpired.</p> <p>9       Q    Okay. Did Officer Mohammed ask you lie in    10 that conversation?</p> <p>11            MR. DAFFADA: He asked what? I'm sorry I    12 didn't hear.</p> <p>13       Q    To lie. To lie in that conversation.</p> <p>14       A    To lie. I don't understand.</p> <p>15       Q    Are you having trouble hearing me? Okay. I'm    16 sorry.</p> <p>17       A    I hear you. I don't understand the question.    18 Ask me to lie for what?</p> <p>19       Q    I don't know. Did he ask you to do anything    20 improper in that conversation?</p> <p>21       A    No. No. I mean, like I said, the    22 conversation was him saying he going to be sad to see me    23 go.</p> <p>24       Q    Okay. So it was a friendly conversation.    25 Would you describe it like that?</p>	<p style="text-align: right;">Page 252</p> <p>1            MS. KLEINHAUS: Objection to form.</p> <p>2       Q    Let me just ask this question. When did you    3 first hear that phrase, pattern and practice?</p> <p>4       A    I don't remember.</p> <p>5       Q    Was it after your time on the Watts team?</p> <p>6       A    I don't remember.</p> <p>7       Q    Okay. Let me look at my notes very quickly,    8 but I believe I'm almost done. Does anyone have follow-    9 up questions? Anyone?</p> <p>10            MR. KOSOKO: What's the run time?</p> <p>11            MR. MICHALIK: I may have one or two.</p> <p>12            MS. DOI: Okay. Maggie, what is the running    13 time please?</p> <p>14            COURT REPORTER: Six hours, 41 minutes.</p> <p>15            MS. DOI: Okay. I have no more questions.    16 Thank you. Paul, did you have a question?</p> <p>17            MR. MICHALIK: I do. Give me one second. I'm    18 looking for something. Actually, I don't. Thank    19 you. No questions.</p> <p>20            RE-EXAMINATION</p> <p>21       BY MR. BAZAREK:</p> <p>22       Q    Yeah. I've got a couple follow-up. Mr.    23 Spaargaren, I know you have Exhibit 1, the affidavit, in    24 front of you.</p> <p>25       A    Yes.</p>
<p style="text-align: right;">Page 251</p> <p>1       A    Yeah, very much so.</p> <p>2       Q    Okay. Did you like Officer Mohammed when you    3 worked with him?</p> <p>4       A    Yeah, I mean, I thought he was a great guy. I    5 mean, he's very friendly and you know, it's -- I got    6 along with him very well.</p> <p>7       Q    Did it surprise you when Officer Mohammed was    8 arrested?</p> <p>9       A    Not so much surprised me. I kind of    10 disappointed.</p> <p>11       Q    Okay. Officer Mohammed, would you agree with    12 me, never at any point threatened you?</p> <p>13       A    No. Never.</p> <p>14       Q    Is that right? And it doesn't sound like you    15 ever felt threatened by him, correct?</p> <p>16       A    No.</p> <p>17       Q    I noticed a phrase that you were using    18 throughout the deposition, the phrase, pattern and    19 practice. Is that a phrase that you would typically use    20 in normal conversation?</p> <p>21            MS. KLEINHAUS: Objection to form.</p> <p>22            MR. DAFFADA: Objection. Form.</p> <p>23       A    In regards to what?</p> <p>24       Q    I don't know. You used it several times in    25 the deposition. I'm just asking.</p>	<p style="text-align: right;">Page 253</p> <p>1       Q    In paragraph 24, you refer to a sergeant who    2 worked with Sergeant Watts in the 2nd District, correct?</p> <p>3       Paragraph 24.</p> <p>4       A    Yes.</p> <p>5       Q    Who was that sergeant?</p> <p>6       A    I don't know who it was. I don't remember. I    7 never knew his name. He was in plain clothes.</p> <p>8       Q    Was he -- could you describe him?</p> <p>9       A    Male white. That's all I remember. It was    10 just a -- it was a brief encounter.</p> <p>11       Q    And do you know his age?</p> <p>12       A    I don't remember.</p> <p>13       Q    Okay. Do you -- his first name, anything?</p> <p>14       A    No, I never knew his name.</p> <p>15       Q    Was he -- you said he was plain clothes, was    16 he a tac sergeant or was he a patrol sergeant? What --    17 or tac is patrol. What was he?</p> <p>18       A    I don't remember.</p> <p>19       Q    In paragraph 24, you say this unnamed sergeant    20 said, "Because if these officers could put a pipe bomb    21 under her car, they would," right? That's in quotes.</p> <p>22       A    Yes.</p> <p>23       Q    Who are these officers referring to?</p> <p>24       A    I have no idea.</p> <p>25       Q    Did this unknown, unnamed sergeant tell you</p>

<p>1 who the officers were?</p> <p>2 A No, that was -- all he said was that.</p> <p>3 Q Okay, and where did this conversation take</p> <p>4 place?</p> <p>5 A In the 2nd District.</p> <p>6 Q Okay. Tell -- going back to this affidavit,</p> <p>7 was the affidavit already typed out before you arrived</p> <p>8 at Christopher Smith's law office?</p> <p>9 A No.</p> <p>10 Q So, he typed it out in front of you on the</p> <p>11 same day you met him with Shannon Spalding?</p> <p>12 A Yes.</p> <p>13 Q And how long was that meeting on that day when</p> <p>14 the affidavit was prepared and you signed it?</p> <p>15 A I don't remember, but it wasn't that long,</p> <p>16 maybe two hours.</p> <p>17 Q Was Mr. Smith was he taking notes when you</p> <p>18 were talking to him and giving him the information for</p> <p>19 the affidavit?</p> <p>20 A I don't remember now.</p> <p>21 Q Well, let me ask you this. Did Christopher</p> <p>22 Smith ever show you any notes that he took of what you</p> <p>23 purportedly said to him?</p> <p>24 A I don't remember.</p> <p>25 MR. BAZAREK: That's all I have.</p>	<p>Page 254</p> <p>1 MR. DAFFADA: Sorry. Hold on a second.</p> <p>2 A I can't -- I can't read it because of the --</p> <p>3 MR. DAFFADA: The video.</p> <p>4 A -- the video.</p> <p>5 COURT REPORTER: You should be able to minimize</p> <p>6 the tab on the side. If that's what you're talking</p> <p>7 about.</p> <p>8 MR. DAFFADA: Yeah. Here it is. I don't have</p> <p>9 a good mouse here.</p> <p>10 BY MR. KOSOKO:</p> <p>11 Q Mr. Spaargaren were you on the --</p> <p>12 MR. DAFFADA: Okay, go ahead.</p> <p>13 Q Were you on the 4512 tactical team on November</p> <p>14 2, 2002?</p> <p>15 A I don't remember.</p> <p>16 Q Were you a member of the team on that date?</p> <p>17 A I don't remember.</p> <p>18 Q Okay. Do you see that this alleges an</p> <p>19 incident from November 2, 2002?</p> <p>20 A Yes.</p> <p>21 Q Okay. I'm going to show you an arrest report.</p> <p>22 MS. KLEINHAUS: Ahmed, can you give the Bates</p> <p>23 range for this?</p> <p>24 MR. KOSOKO: Sure. I'll give it to you. It's</p> <p>25 Baker Glenn starts at 030351.</p>
<p>1 RE-CROSS EXAMINATION</p> <p>2 BY MR. KOSOKO:</p> <p>3 Q Mr. Spaargaren, I'm going to show you an</p> <p>4 affidavit that I want you to review, okay?</p> <p>5 A We can't hear you.</p> <p>6 MR. DAFFADA: I'm sorry. We can't hear you.</p> <p>7 Q I'm going to show you an affidavit, okay, Mr.</p> <p>8 Spaargaren?</p> <p>9 A The same one.</p> <p>10 Q No. No, sir. A different one.</p> <p>11 A Okay.</p> <p>12 MR. DAFFADA: Could I just ask what this</p> <p>13 questioning is? I don't know why everyone gets a</p> <p>14 second turn here.</p> <p>15 MR. KOSOKO: You can cite to rule 26. If it</p> <p>16 tells me not to do it, I'll stop. Otherwise, I'm</p> <p>17 going to proceed.</p> <p>18 MS. KLEINHAUS: How much time do we have left?</p> <p>19 COURT REPORTER: 14 minutes.</p> <p>20 BY MR. KOSOKO:</p> <p>21 Q Mr. Spaargaren, this is the affidavit of a</p> <p>22 plaintiff in this matter named Anthony Mays. I'm going</p> <p>23 to ask you to read paragraphs one and two.</p> <p>24 A I can't -- I can't read it because the things</p> <p>25 are in the way.</p>	<p>Page 255</p> <p>1 MS. KLEINHAUS: Thank you.</p> <p>2 BY MR. KOSOKO:</p> <p>3 Q You're familiar with arrest reports, Mr.</p> <p>4 Spaargaren; is that correct?</p> <p>5 A Yes.</p> <p>6 Q Can you point to the date of this arrest?</p> <p>7 A I didn't hear your question. Sorry.</p> <p>8 Q Can you see the date of arrest on this</p> <p>9 document?</p> <p>10 A Date of arrest. Yeah, it's November 2, 2002.</p> <p>11 Q Okay, and who's the box one officer?</p> <p>12 A Officer Cadman.</p> <p>13 Q And who's the box two officer?</p> <p>14 A Officer Bolton.</p> <p>15 Q And who are the assisting listed on the</p> <p>16 report?</p> <p>17 A Officer Edwards, Officer Mohammed, Officer</p> <p>18 Summers, Officer Young, myself, and then Officer Rigel.</p> <p>19 Q And those are some of the members on the 4512</p> <p>20 tactical team; is that correct?</p> <p>21 A Yes.</p> <p>22 Q When Mr. Mays alleges that he was framed by</p> <p>23 Watts and members of his corrupt crew, that was being</p> <p>24 incorrect statement, correct?</p> <p>25 MR. FLAXMAN: Objection. Foundation.</p>

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1 A I don't know.  
2 Q Well, did you take -- did you help frame  
3 Anthony Mays on November 2, 2002?  
4 A No.  
5 Q Did you know Matthew Cadman to frame Anthony  
6 Mays in 2002?  
7 MR. FLAXMAN: Objection. Foundation.  
8 A I have -- I have no knowledge of Cadman  
9 framing anybody.  
10 MR. KOSOKO: Okay. No further questions.  
11 COURT REPORTER: Are there any other questions?  
12 All right. Do all parties agree to go off record?  
13 MR. KOSOKO: Yeah.  
14 MS. DOI: Yes, sorry.  
15 COURT REPORTER: It's all right, I was just  
16 waiting for --  
17 MS. DOI: We're all nodding.  
18 COURT REPORTER: All right. This concludes the  
19 deposition of Michael Spaargaren. The time is 7:48.  
20 We are off record.  
21 (DEPOSITION CONCLUDES AT 7:48 p.m.)  
22  
23  
24  
25

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1 CERTIFICATE OF REPORTER  
2  
3 I do hereby certify that the witness in the foregoing  
4 transcript was taken on the date, and at the time and  
5 place set out on the Title page hereof by me after first  
6 being duly sworn to testify the truth, the whole truth,  
7 and nothing but the truth; and that the said matter was  
8 recorded digitally by me and then reduced to typewritten  
9 form under my direction, and constitutes a true record  
10 of the transcript as taken, all to the best of my skills  
11 and ability. I certify that I am not a relative or  
12 employee of either counsel, and that I am in no way  
13 interested financially, directly or indirectly, in this  
14 action.  
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17  
18  
19  
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21

22 MARGARET THORNTON,  
23 COURT REPORTER / NOTARY  
24 COMMISSION EXPIRES ON: 09/30/2025  
25 SUBMITTED ON: 05/09/2022