

EXHIBIT 87



Transcript of the Continued Deposition of
Daniel Echeverria

Case: In Re: Watts Coordinated Pretrial Proceedings

Taken On: March 5, 2025

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In Re: Watts Coordinated Pretrial Proceedings
Continued Deposition of Daniel Echeverria - Taken 3/5/2025

Page 1

THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE: WATTS COORDINATED
PRETRIAL PROCEEDINGS

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) No. 19 CV 01717
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The continued videotaped deposition of
DANIEL ECHEVERRIA, called by the Defendants for
examination, pursuant to notice and pursuant to the
Federal Rules of Civil Procedure for the United States
District Courts pertaining to the taking of depositions,
taken before Tina M. Hickey, Certified Shorthand Reporter
within and for the County of Cook and State of Illinois,
at 311 South Wacker Drive, Suite 5200, Chicago, Illinois,
on March 5th, 2025, at 11:22 a.m.

In Re: Watts Coordinated Pretrial Proceedings
Continued Deposition of Daniel Echeverria - Taken 3/5/2025

Page 2

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In Re: Watts Coordinated Pretrial Proceedings
Continued Deposition of Daniel Echeverria - Taken 3/5/2025

Page 3

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In Re: Watts Coordinated Pretrial Proceedings
Continued Deposition of Daniel Echeverria - Taken 3/5/2025

Page 4

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12

13 ALSO PRESENT: Michael Howard (videographer)

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In Re: Watts Coordinated Pretrial Proceedings
Continued Deposition of Daniel Echeverria - Taken 3/5/2025

Page 5

1	I N D E X	
2	WITNESS	PAGE
3	DANIEL ECHEVERRIA	
4	Examination by Mr. Zecchin.....	7
5	Examination by Mr. Noland.....	67
6	Examination by Mr. Gainer.....	122
7	Examination by Mr. Palles.....	174
8	Examination by Mr. Schalka.....	210
9	Examination by Ms. Kleinhaus.....	212
10	Further Examination by Mr. Noland.....	216
11	Further Examination by Mr. Zecchin....	217

13	E X H I B I T S	
14	ECHEVERRIA DEPOSITION EXHIBIT	PAGE
15	No. 50.....	60
16	No. 51.....	69
17	No. 52.....	74
18	No. 53.....	89

In Re: Watts Coordinated Pretrial Proceedings
Continued Deposition of Daniel Echeverria - Taken 3/5/2025

<p style="text-align: right;">Page 6</p> <p>1 THE VIDEOGRAPHER: For the record, my name is</p> <p>2 Michael Howard of Video Instanter. I'm the</p> <p>3 video-recording device operator for this deposition. Our</p> <p>4 businesses address is 134 North LaSalle Street,</p> <p>5 Suite 1400, Chicago, Illinois 60602. This deposition is</p> <p>6 being video recorded pursuant to the Federal Rules of</p> <p>7 Civil Procedure and --</p> <p>8 We are at 311 South Wacker Street, Suite 5200,</p> <p>9 Chicago, Illinois 60606 to take the video-recorded</p> <p>10 deposition of Daniel Echeverria in the matter of</p> <p>11 In re: Watts Coordinated Pretrial Proceedings,</p> <p>12 Case No. 19 CV 01717. Today's date is March 5th, 2025;</p> <p>13 and the time 11:22 a.m. This deposition is being video</p> <p>14 recorded at instance of the defendant and is being taken</p> <p>15 on behalf of the defendant.</p> <p>16 Will the attorneys present please introduce</p> <p>17 yourselves for the record.</p> <p>18 MS. KLEINHAUS: Theresa Kleinhaus on behalf of Loevy</p> <p>19 plaintiffs.</p> <p>20 MR. DEVINE: Thomas Devine, Government</p> <p>21 Accountability Project, counsel for Mr. Echeverria.</p> <p>22 MR. NOLAND: Daniel Noland for the City of Chicago</p> <p>23 and certain supervisory defendants.</p> <p>24 MR. ZECCHIN: Anthony Zecchin from Hale & Monico on</p>	<p style="text-align: right;">Page 8</p> <p>1 asking you questions, I'll be -- it will be pertaining to</p> <p>2 those specific officers unless I say otherwise. Okay?</p> <p>3 A. Yes, understood.</p> <p>4 Q. And you've been deposed two other times in</p> <p>5 this case, so I won't go over the rules again. But the</p> <p>6 one thing I will ask is, sometimes you'll kind of</p> <p>7 anticipate my questions. It will get conversational.</p> <p>8 Just let me finish my question, and, likewise, I'll let</p> <p>9 you finish your answer. And if for some reason I start</p> <p>10 asking you another question, just let me know, and I'll</p> <p>11 stop so you can finish. Okay?</p> <p>12 A. Absolutely.</p> <p>13 Q. Okay. The last time you were deposed, you</p> <p>14 talked about if you received -- or if you heard a rumor</p> <p>15 or received information about wrongdoing by an officer,</p> <p>16 that you would take steps to verify that information or</p> <p>17 that rumor. Am I recalling your testimony correctly?</p> <p>18 A. When was this? I'm sorry. How long ago --</p> <p>19 that was at our very last --</p> <p>20 Q. Yeah, the last time we were here.</p> <p>21 A. Yeah, it sounds familiar.</p> <p>22 Q. Okay. And how many times in your career did</p> <p>23 you learn information or hear a rumor that you took steps</p> <p>24 to verify?</p>
<p style="text-align: right;">Page 7</p> <p>1 behalf of certain individuals officers.</p> <p>2 MR. SCHALKA: Michael Schalka on behalf of</p> <p>3 defendants Spaargaren and Cadman.</p> <p>4 MR. PALLES: Eric Palles on behalf of Kallatt</p> <p>5 Mohammed.</p> <p>6 MR. GAINER: Brian Gainer for Ronald Watts.</p> <p>7 THE REPORTER: Could we just take two minutes?</p> <p>8 (A short break was had.)</p> <p>9 THE VIDEOGRAPHER: Could the reporter please</p> <p>10 introduce themselves and swear in the witness?</p> <p>11 THE REPORTER: My name is Tina Hickey with Royal</p> <p>12 Reporting.</p> <p>13 Sir, can you please raise your right hand?</p> <p>14 (Witness sworn.)</p> <p>15 WHEREUPON:</p> <p>16 DANIEL ECHEVERRIA,</p> <p>17 called as a witness herein, having been first duly sworn,</p> <p>18 was examined and testified as follows:</p> <p>19 EXAMINATION</p> <p>20 BY MR. ZECCHIN:</p> <p>21 Q. Mr. Echeverria, my name is Anthony Zecchin. I</p> <p>22 represent certain individual defendants in this case,</p> <p>23 specifically Jones, Summers, Bolton, Leano, Smith,</p> <p>24 Nichols, Gonzalez, Lewis, and Rodriguez. So when I'm</p>	<p style="text-align: right;">Page 9</p> <p>1 MS. KLEINHAUS: Objection to form.</p> <p>2 BY THE WITNESS:</p> <p>3 A. Pertaining to who?</p> <p>4 Q. To anybody, any officer.</p> <p>5 A. Anybody?</p> <p>6 Q. Anytime -- Strike that.</p> <p>7 Let me ask it this way: How many times were</p> <p>8 you provided with information from an individual where</p> <p>9 you heard a rumor that you acted on to verify what you</p> <p>10 had heard?</p> <p>11 A. No, I can't recall.</p> <p>12 Q. Okay. And what steps would you take,</p> <p>13 typically, in verifying the information that you heard or</p> <p>14 the rumor that you heard?</p> <p>15 A. As far as from an investigator's point of</p> <p>16 view, you would have to substantiate if it's truth or</p> <p>17 faux. You would look into it, if it becomes more of a</p> <p>18 pattern or if it's more than one person saying it,</p> <p>19 whether it's the person sharing the information or</p> <p>20 another investigator.</p> <p>21 Q. So what steps would you take to substantiate</p> <p>22 what you heard?</p> <p>23 A. Like I said, I would, like, try to</p> <p>24 substantiate it best I could depending what the rumor is.</p>

6 (Pages 6 to 9)

In Re: Watts Coordinated Pretrial Proceedings
Continued Deposition of Daniel Echeverria - Taken 3/5/2025

<p style="text-align: right;">Page 10</p> <p>1 I mean, I'm not gonna care if so-and-so is sleeping with 2 so-and-so. They have to be criminal in nature. 3 Q. Okay. Let's limit the question, then, to if 4 it's an allegation of criminal or unlawful conduct that 5 you hear from an individual. What steps would you take 6 to substantiate what you had heard from that person? 7 A. Try to -- 8 MS. KLEINHAUS: Objection to form, vague and 9 ambiguous. 10 Sorry. Go ahead. 11 BY THE WITNESS: 12 A. Try to ascertain details. 13 Q. Who would you -- or how would you go about 14 trying to ascertain those details? 15 A. I would ask the person who's saying it to be 16 specific: times, dates, the nature of it. 17 Anybody else would do the same thing. 18 Q. Okay. So other than interviewing that person, 19 asking those types of questions, are there any other 20 steps that you would take in order to verify or 21 corroborate what they had provided to you, 22 informationwise? 23 MS. KLEINHAUS: Objection to form. 24</p>	<p style="text-align: right;">Page 12</p> <p>1 or unlawful conduct about any of the officers that I 2 represent that I mentioned to you at the beginning? 3 A. Can you name them again? 4 Q. Sure, absolutely. 5 Jones, Summers, Bolton, Leano, Smith, Nichols, 6 Gonzalez, Lewis, or Rodriguez? 7 A. Not off the top of my head, I don't recall. 8 Q. Okay. And what did you tell the FBI about any 9 of those individuals that I have named? Anything? 10 A. They brought those names to our attention. 11 Q. What did the FBI tell you -- I'm only ask you 12 about those officers. 13 A. Yeah, yeah. 14 Q. What did the FBI tell you about those specific 15 officers that I just told you? 16 MS. KLEINHAUS: Objection to form. 17 You can answer. 18 BY THE WITNESS: 19 A. Their primary target was Ronald Watts and 20 Kallatt Mohammed. And they asked -- they presented 21 pictures, names; and they asked if we knew or If I knew 22 any of your defendants, and I recognized them all. How 23 many did you say? 24 Q. It is a total of nine that I listed.</p>
<p style="text-align: right;">Page 11</p> <p>1 BY THE WITNESS: 2 A. I think that would be it. 3 Q. Okay. And do you recall ever getting 4 information -- Well, strike that. 5 Other than [REDACTED] what he had told 6 you -- and we'll get into that a little bit later -- 7 other than that, did you receive any information or 8 any -- hear any rumors or get any information about any 9 of the officers that I spoke to you about earlier? 10 MS. KLEINHAUS: Objection to form. 11 BY THE WITNESS: 12 A. No, no. I can't -- I don't recall that. 13 Q. Okay. You testified also before -- Strike 14 that. 15 Did you listen to any of the overhear that the 16 FBI was able to get regarding their Brass Tax 17 investigation? 18 A. We were limited to some, yes. And then 19 some -- they were like -- the FBI is, like, really on a 20 need-to-know basis. And I guess because of the nature of 21 the investigation, they probably had to keep it that way. 22 Q. So just limit it to what you were able to hear 23 what you were provided by the FBI to hear. Did you ever 24 hear any phone conversations that were alleging improper</p>	<p style="text-align: right;">Page 13</p> <p>1 A. Let's just say I recognized about 90 percent 2 because some were unknown to me. So -- 3 Q. So when the -- go ahead. 4 A. Then I said, "Yeah, they work in conjunction 5 with Ronald Watts." 6 Q. So you identified pictures of them that the 7 FBI showed you? 8 A. Yes, yes. 9 Q. And then what did you -- you said they work in 10 conjunction with Ronald Watts? 11 A. Yes. 12 Q. What did you tell them about those officers? 13 A. I said, "I believe they work under direct 14 supervision of Ronald Watts. They work in the 15 2nd District tactical team. They're part of the housing 16 team." 17 Q. Did you say anything to them about your belief 18 that they were involved in any criminal activity? 19 A. No. I wasn't in that position to say that. 20 Q. And did the FBI tell you anything? I know you 21 said it's kind of a need to know from the FBI basis, but 22 did the FBI say anything to you other than they were 23 looking at Watts and Mohammed? 24 A. They said they have intel to implement all of</p>

7 (Pages 10 to 13)

In Re: Watts Coordinated Pretrial Proceedings
Continued Deposition of Daniel Echeverria - Taken 3/5/2025

Page 14

1 them.

2 **Q. Okay. Did they share that information?**

3 A. No.

4 **Q. Did they provide you with any more detail**

5 **other than "all of them"?**

6 A. A need-to-know basis.

7 **Q. So the answer is no?**

8 A. You know what? Let me go back.

9 **Q. Sure.**

10 A. They didn't share information. But when they

11 did do the rip scenarios where they did take the money

12 from the federal agents, they presented the pictures

13 again to everyone that was part of the operation, which

14 must have been about 20 or 30 agents. And they said to

15 be aware and conscious of their presence because they

16 will be -- pretty much believed they would be involved in

17 the scenario.

18 **Q. What is the rip scenario you're referring to?**

19 A. When Ronald Watts and Kallatt Mohammed stole

20 the FBI money.

21 **Q. Is there any other scenario that you would**

22 **lump into that rip scenario other than that single one?**

23 A. Those are those scenarios.

24 **Q. Okay.**

Page 15

1 A. Did they do other ones unknown to us? I

2 couldn't tell you. But I can only speak on what I was

3 conscious -- involved in.

4 **Q. So other than what you just testified to, did**

5 **they say anything else about, specifically, the clients**

6 **of mine that I mentioned to you?**

7 A. No.

8 **Q. And by the way, it is a lot of people, so if**

9 **you need me to read them back to you, just let me know.**

10 **I'd be happy to do so.**

11 A. I'll make a mental note. I'll ask you to

12 repeat it if I need it. Thank you.

13 MR. PALLES: Excuse me. Mr. Echeverria, can you

14 speak up just a tad?

15 THE WITNESS: Sure, sure. Sorry.

16 MR. PALLES: That's probably coming through clear.

17 I'm just having a little trouble.

18 THE WITNESS: Okay.

19 BY MR. ZECCHIN:

20 **Q. And, Officer, you testified last time -- do**

21 **you recall testifying about a meeting with -- it was**

22 **Tina Scahill, Tom Chester; and Special Agent [REDACTED] was**

23 **also involved in that meeting?**

24 A. And Barbara West.

Page 16

1 **Q. Do you remember that testimony?**

2 A. Yes.

3 **Q. When you -- you said that -- or you testified**

4 **that Scahill told you the information that was**

5 **substantiated. Did she provide you any more information**

6 **than just that?**

7 MS. KLEINHAUS: Objection to form.

8 BY THE WITNESS:

9 A. Such as?

10 **Q. Did she say anything else besides "We have**

11 **information that was substantiated"?**

12 A. She basically said that this Ronald Watts

13 investigation has been ongoing and that the nature of the

14 investigation and because of the investigation and the

15 allegations of the elements of crime, it would be

16 governed by the FBI at this point with the assistance of

17 CPD. It would be a joint investigation of your client

18 (indicating), of Ronald Watts.

19 **Q. Did she say anything other than what you just**

20 **said, anything that you can recall?**

21 A. She said we were to assist and observe.

22 **Q. Did she mention anything at that time,**

23 **specifically mentioning by name any of my clients and any**

24 **information or evidence to add about that?**

Page 17

1 A. No.

2 **Q. And what did your former partner, Officer**

3 **Spalding, ever tell you about any of my clients that you**

4 **can recall involved -- Strike that.**

5 **What did she tell you regarding criminal**

6 **activity that my clients were involved in?**

7 A. The only thing that she mentioned to me is

8 some of your clients were known to her. That was it.

9 **Q. Okay. Just known, meaning she knows who they**

10 **are?**

11 A. Yeah, because they worked in housing together.

12 **Q. But nothing beyond that?**

13 A. No, no.

14 **Q. Okay. Thank you.**

15 **Last time, you were asked some questions that**

16 **led to a discussion about handing off arrests or**

17 **providing -- or giving arrests to another team. Do you**

18 **remember that testimony?**

19 A. Sure.

20 **Q. Okay. Just so I -- because I wasn't here for**

21 **that, of course. But, essentially, was it that sometimes**

22 **a team would make an arrest, and, for whatever reason,**

23 **they might hand that arrest off to another team to**

24 **continue on the processing?**

In Re: Watts Coordinated Pretrial Proceedings
Continued Deposition of Daniel Echeverria - Taken 3/5/2025

<p style="text-align: right;">Page 18</p> <p>1 A. Yeah. I can explain.</p> <p>2 Q. Sure. Go ahead.</p> <p>3 A. Okay. So let's just say you're doing like</p> <p>4 what they would call a wolf pack mission. So you would</p> <p>5 focus on the 575 Browning building, but you also need</p> <p>6 another team to cover the 511 Browning building. So you</p> <p>7 would involve multiple teams, multiple officers, multiple</p> <p>8 cars. Let's just say the 575 Browning building had</p> <p>9 15 arrests while 511 only had two arrests. Well,</p> <p>10 15 arrests is overwhelming to process. So because they</p> <p>11 were assisting in the wolf pack mission, they would say,</p> <p>12 "Hey, you want to handle four for us and then whatever</p> <p>13 you got because we have 15." That's what I mean about</p> <p>14 handing off arrests.</p> <p>15 Q. And I wasn't sure from reading the</p> <p>16 transcripts, but did you ever work in Ida B. Wells as a</p> <p>17 police officer?</p> <p>18 A. Yes, I did.</p> <p>19 Q. How long did you work there?</p> <p>20 A. Well, when I was in the narcotics unit, we did</p> <p>21 some controlled buys in -- such as in the Ida B. Wells.</p> <p>22 Q. What years were you in narcotics?</p> <p>23 A. You know, you're asking me to remember</p> <p>24 something that's about well over a decade, maybe even</p>	<p style="text-align: right;">Page 20</p> <p>1 Q. Was it -- as part of organized crime, were you</p> <p>2 also doing missions and operations in other housing</p> <p>3 projects throughout the City of Chicago?</p> <p>4 A. Other projects, as far as other, like, what we</p> <p>5 call "hot spots," try to focus on, like, complaints that</p> <p>6 would come in. Let's say they had a shooting on 35th and</p> <p>7 King, so you would target that area and the surrounding</p> <p>8 areas.</p> <p>9 Q. And would the organized crime guys involve</p> <p>10 these wolf pack missions?</p> <p>11 A. No.</p> <p>12 Q. So the wolf pack, is that typically TAC teams</p> <p>13 that are doing those type of operations?</p> <p>14 A. TAC and gang, yeah.</p> <p>15 Q. So is it fair to say you did not participate</p> <p>16 in any wolf pack missions or operations on Ida B. Wells</p> <p>17 with the TAC team?</p> <p>18 A. No.</p> <p>19 Q. So is it fair what I said or not?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. And do you know how often -- if you</p> <p>22 know, how often wolf pack missions were conducted at</p> <p>23 Ida B. Wells?</p> <p>24 A. No, I can't answer that.</p>
<p style="text-align: right;">Page 19</p> <p>1 15 years. Sometime after 2006.</p> <p>2 Q. Okay. And were you a NAGIS, or were you just</p> <p>3 in the narcotics section?</p> <p>4 A. No. I was in organized crime, narcotics.</p> <p>5 Q. 189?</p> <p>6 A. Yes, Unit 189.</p> <p>7 Q. And were you -- how often would you say your</p> <p>8 police activity in 189 was assigned to work at the</p> <p>9 Ida B. Wells projects?</p> <p>10 A. Numerous times, but I can't put a number on it</p> <p>11 without -- I don't want to misinform you.</p> <p>12 Q. Sure. Would you say it was on a weekly basis</p> <p>13 you were at the Ida B. Wells?</p> <p>14 A. Let's just say the Ida B. Wells was like a</p> <p>15 sure thing. So if numbers were down, we'd say, "Go to</p> <p>16 the buildings." You can't miss.</p> <p>17 Q. Sure. Meaning, that there's a lot of drug</p> <p>18 activity, so if you need to make arrests, that's the</p> <p>19 place to go?</p> <p>20 A. Yes.</p> <p>21 Q. Was that consistent throughout your time in</p> <p>22 organized crime, that Ida B. Wells had a very strong drug</p> <p>23 market that was about -- up and running?</p> <p>24 A. Yes, among other housing areas, yeah.</p>	<p style="text-align: right;">Page 21</p> <p>1 Q. And when you're -- so is your understanding of</p> <p>2 the wolf pack just kind of anecdotal versus personal</p> <p>3 experience?</p> <p>4 MS. KLEINHAUS: Objection to form.</p> <p>5 BY THE WITNESS:</p> <p>6 A. No. I mean, I was in the gang tactical unit.</p> <p>7 We'd do wolf pack missions all the time, maybe every day,</p> <p>8 every other day. It would depend. So I can't speak for</p> <p>9 how often Ronald Watts decided to do a wolf pack mission</p> <p>10 or if he called it something else. But I'm using wolf</p> <p>11 pack as an example because we've done it. I've done it</p> <p>12 when I was in the tactical unit.</p> <p>13 Q. So do you have any knowledge of whether or not</p> <p>14 Ronald Watts's team ever did this arrest trade-off or</p> <p>15 handoff with any of their arrests?</p> <p>16 A. Firsthand, I couldn't tell you, no.</p> <p>17 Q. So your answer is -- I just want to make sure.</p> <p>18 So you're saying you don't have firsthand --</p> <p>19 A. Firsthand knowledge, no, because I never</p> <p>20 worked with them.</p> <p>21 Q. So when you were -- but have you personally</p> <p>22 done trade-offs as you've described it earlier?</p> <p>23 A. Yes.</p> <p>24 Q. How many times have you done that?</p>

In Re: Watts Coordinated Pretrial Proceedings
Continued Deposition of Daniel Echeverria - Taken 3/5/2025

<p style="text-align: right;">Page 22</p> <p>1 A. I couldn't put a number on it.</p> <p>2 Q. Is it a lot?</p> <p>3 A. I'd lie to you if I tell you four. I'd lie to</p> <p>4 you if I told you 20. I couldn't tell you a number. I</p> <p>5 can't collaborate on that with a specific answer that</p> <p>6 you're looking for.</p> <p>7 Q. Do you remember any teams that you -- or who</p> <p>8 was on any of the teams that you gave your arrests away</p> <p>9 to?</p> <p>10 A. We were all part of the same tactical unit.</p> <p>11 Q. Do you remember any of the other officers that</p> <p>12 were on your team that were -- Strike that.</p> <p>13 A. You -- I'm talking about when it's like --</p> <p>14 you know, you have Ronald Watts has a team, so to speak.</p> <p>15 A. You -- I'm asking about other teams. So there's a</p> <p>16 sergeant who runs a TAC squad, right -- a TAC team,</p> <p>17 right?</p> <p>18 A. Um-hmm.</p> <p>19 Q. So was the squad that you were on run by a</p> <p>20 sergeant?</p> <p>21 A. Yes.</p> <p>22 Q. So when we're talking about handing off an</p> <p>23 arrest to another team, I'm referring to another team</p> <p>24 that was supervised by a sergeant.</p>	<p style="text-align: right;">Page 24</p> <p>1 BY THE WITNESS:</p> <p>2 A. Sure. I mean, you might have three or four</p> <p>3 tactical teams working a day. You know, one might be</p> <p>4 focusing on housing; one might be focusing -- you know,</p> <p>5 focused on burglaries and parking lots or focused on</p> <p>6 residential burglary, focused on the -- I mean, it</p> <p>7 depends.</p> <p>8 Q. So --</p> <p>9 A. Plus the radio assignments. It depends.</p> <p>10 Q. So it sounds like there's not a real typical</p> <p>11 way that these TAC teams are assigned to the projects?</p> <p>12 A. If you are -- Okay. I'll give you an example.</p> <p>13 Anything with a "4" in it tended to be a tactical unit.</p> <p>14 In this case, let's say 264, that was Ronald Watts's</p> <p>15 beat, his call site. So he was A housing team, so his</p> <p>16 primary focus should be housing.</p> <p>17 164, 1st District housing team, their primary</p> <p>18 focus was housing. So it would like the Hilliards, the</p> <p>19 Ickes, stuff like that, and now I think the other housing</p> <p>20 that's just south of that. Let's say if the</p> <p>21 16th District had the housing, it would be 1664. Those</p> <p>22 tended to be housing call sites.</p> <p>23 Q. So at the beginning of your shift, when you</p> <p>24 come in for roll call and the lieutenant or whoever is</p>
<p style="text-align: right;">Page 23</p> <p>1 A. Correct.</p> <p>2 Q. Okay. So do you remember the other teams that</p> <p>3 you had given arrests over to, who was on those teams?</p> <p>4 A. They're probably not even police now either.</p> <p>5 I couldn't tell you. You're asking me to recall</p> <p>6 something that's -- by name, I can't. It would</p> <p>7 definitely be another team that obviously works your same</p> <p>8 shift, your same unit, if they weren't busy and they were</p> <p>9 willing to assist you, let's say, yeah. That's the way</p> <p>10 it would work.</p> <p>11 Q. Do you remember any sergeants or any</p> <p>12 lieutenants that were supervising those other TAC teams</p> <p>13 when you were doing this, handing off arrests?</p> <p>14 A. I don't recall.</p> <p>15 Q. And, typically, is there one TAC other --</p> <p>16 Strike that.</p> <p>17 Other than like a wolf pack or a similar type</p> <p>18 of mission, is it typical that one TAC team would be</p> <p>19 assigned per shift to a location, typically?</p> <p>20 A. No.</p> <p>21 Q. So is it typical that there would be more than</p> <p>22 one team assigned to one location on the same shift?</p> <p>23 MS. KLEINHAUS: Objection to form.</p> <p>24</p>	<p style="text-align: right;">Page 25</p> <p>1 assigning out where people are going to be that day, in</p> <p>2 your experience, was like 264 would be going to this</p> <p>3 location for the day; 164 would be going to this location</p> <p>4 for the day? In other words, is it typical in your</p> <p>5 experience that one team would be sent to one location</p> <p>6 per shift?</p> <p>7 MS. KLEINHAUS: Objection to form, foundation.</p> <p>8 BY THE WITNESS:</p> <p>9 A. I mean, in my experience I would say, if I was</p> <p>10 on the 164 team, they would say focus on housing. If</p> <p>11 anything else comes up on the radio, of course, break off</p> <p>12 assist, but your focus would be housing. I mean, it</p> <p>13 doesn't mean you can't do other police work, but ...</p> <p>14 Q. Sure. What I'm asking you, though, is, if you</p> <p>15 are -- if you are -- your team, A Team, is assigned to a</p> <p>16 certain location, say Ida B. Wells, for the 3:00-to-11:00</p> <p>17 shift --</p> <p>18 A. Um-hmm.</p> <p>19 Q. -- would there typically be another TAC team</p> <p>20 that would also be assigned to the same shift, 3:00 to</p> <p>21 11:00, at the same location, Ida B. Wells, in your</p> <p>22 experience?</p> <p>23 MS. KLEINHAUS: Objection, foundation.</p> <p>24 You can answer.</p>

In Re: Watts Coordinated Pretrial Proceedings
Continued Deposition of Daniel Echeverria - Taken 3/5/2025

<p style="text-align: right;">Page 26</p> <p>1 BY THE WITNESS:</p> <p>2 A. Well, it depends on the supervisor and the</p> <p>3 element of crime. I mean, suppose Ida B. Wells was up</p> <p>4 for grabs. They weren't just gonna put three cars over</p> <p>5 there. You know, they'd say, "Hey, why don't you help</p> <p>6 them or" -- it would all depend. I'm not a</p> <p>7 superintendent. The superintendent runs their team the</p> <p>8 way they want to run their team.</p> <p>9 Q. Sure. But what I'm asking is actually much</p> <p>10 more simple than that.</p> <p>11 A. Okay.</p> <p>12 Q. It's essentially, on a typical assignment day,</p> <p>13 when you walk in and you are ready to go on the job,</p> <p>14 would there be more than one TAC team assigned per shift</p> <p>15 to a certain location? I know there's gonna be</p> <p>16 situations where there's increase in crime or whatever.</p> <p>17 But, typically, is it one TAC team, one location per the</p> <p>18 shift?</p> <p>19 MS. KLEINHAUS: Objection to form, foundation.</p> <p>20 BY THE WITNESS:</p> <p>21 A. Let's just say, for shits and giggles, no.</p> <p>22 There can be more than one team assigned.</p> <p>23 Q. How many times did you -- when you were in</p> <p>24 roll call, did the supervising officer assign more than</p>	<p style="text-align: right;">Page 28</p> <p>1 then in the narrative, they would say -- let's just say</p> <p>2 somebody handed me a narcotics arrest.</p> <p>3 I'm sorry. Your name?</p> <p>4 Q. Tony.</p> <p>5 A. Officer Tony. Our reporting officer,</p> <p>6 Echeverria, received information from Officer Tony of</p> <p>7 said individual, Tom Ballard, was engaged in a hand to</p> <p>8 hand observed by Officer Tony. RO was given this</p> <p>9 information in above-stated arrest for further processing</p> <p>10 based on this information. You would put it in the</p> <p>11 narrative. You're an assisting unit.</p> <p>12 Q. Would you ever check with your supervisors if</p> <p>13 that was okay to do?</p> <p>14 A. It's done. I mean, the supervisor says you're</p> <p>15 there to help them, right? Help them.</p> <p>16 Q. Did you ever have an instance where you did</p> <p>17 tell a supervisor, "Hey" --</p> <p>18 A. "Hey, we're going in with four." "Who's is</p> <p>19 it? Were they yours or" -- "Officer Tony gave us four."</p> <p>20 "Okay. Well, what are they? All right. Handle the</p> <p>21 paperwork. Get in there. Knock it out. Get back out."</p> <p>22 Q. Do you recall any of the specific supervisors</p> <p>23 that you had that type of conversation with?</p> <p>24 A. I couldn't tell you off the top of my head.</p>
<p style="text-align: right;">Page 27</p> <p>1 one TAC team to a location during the shift?</p> <p>2 A. I can't put a number on it. You're asking me</p> <p>3 to be specific. I can't recall how many times, but it</p> <p>4 does happen.</p> <p>5 Q. That's why I'm trying to find out how many</p> <p>6 times it does happen. Is it like a weekly thing that you</p> <p>7 have that happen, or do you recall?</p> <p>8 A. I don't recall.</p> <p>9 MS. KLEINHAUS: Objection, asked and answered.</p> <p>10 BY MR. ZECCHIN:</p> <p>11 Q. I'm sorry. I didn't hear over the objection.</p> <p>12 A. I don't recall.</p> <p>13 Q. Okay.</p> <p>14 A. I can't give you a straight answer like that.</p> <p>15 Q. So when you would give off an arrest to some</p> <p>16 other team, would that other team then fill out the</p> <p>17 paperwork regarding the arrests?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. And would it matter if that team didn't</p> <p>20 observe any of the criminal activity that was the basis</p> <p>21 for the arrest?</p> <p>22 MS. KLEINHAUS: Objection to form, foundation.</p> <p>23 BY THE WITNESS:</p> <p>24 A. Well, you'd inform them of what it is. And</p>	<p style="text-align: right;">Page 29</p> <p>1 I've had many supervisors.</p> <p>2 Q. And did you ever have a situation where you</p> <p>3 had to go testify in court for an arrest that you had</p> <p>4 given to another team?</p> <p>5 A. That I had to go testify for?</p> <p>6 Q. Yeah.</p> <p>7 A. No.</p> <p>8 Q. Okay. Did you ever get notified to come to</p> <p>9 court to testify on a case that -- where the paperwork</p> <p>10 was written up by another officer even if it wasn't your</p> <p>11 team?</p> <p>12 MS. KLEINHAUS: Objection to form.</p> <p>13 BY THE WITNESS:</p> <p>14 A. I've had incidents where I've had to testify</p> <p>15 on the grand jury, where I didn't do the paperwork, but</p> <p>16 I'm the arresting officer. I didn't -- Okay. I'll give</p> <p>17 you an example.</p> <p>18 How about this: When you're in narcotics, you</p> <p>19 worked as a unit. You worked as a team. You mobilize as</p> <p>20 a team. You have a surveillance officer, an enforcements</p> <p>21 officer, an eyeball officer, a buy officer, right? Then</p> <p>22 you have a processing officer, an enforcement officer.</p> <p>23 Let's just say Marcus is our buy officer</p> <p>24 today. Marcus did a controlled buy from a male black,</p>

In Re: Watts Coordinated Pretrial Proceedings
Continued Deposition of Daniel Echeverria - Taken 3/5/2025

<p style="text-align: right;">Page 30</p> <p>1 wearing a red hat, blah-blah-blah, goes into a physical</p> <p>2 description. He spit out two knotted baggies, suspect</p> <p>3 crack cocaine, in the exchange of 1505, which are</p> <p>4 prerecorded funds, City funds, police department funds,</p> <p>5 in exchange for suspect crack cocaine. Okay. All right.</p> <p>6 He gets the positive sign. He pulls off the spot, gets</p> <p>7 on the radio, communicates. Yeah, it's gonna be the cat</p> <p>8 with the red hat, blah-blah-blah-blah-blah. You roll up</p> <p>9 as an enforcement officer. You didn't observe the crime.</p> <p>10 You're two blocks away, right?</p> <p>11 Q. Right.</p> <p>12 A. But Officer Miles or Officer Marcus, or</p> <p>13 whatever, informed you of this. Surveillance officer</p> <p>14 collaborated what he saw. And that goes in your arrest.</p> <p>15 Then who testifies in that? The grand jury? The</p> <p>16 enforcement officer tended to testify in the majority of</p> <p>17 those cases. If it went to trial, now Officer Miles gets</p> <p>18 compromised because now he's no longer the undercover</p> <p>19 that bought. But now he get's to see face-to-face of the</p> <p>20 accused and the alleged and the whatever you want to call</p> <p>21 it.</p> <p>22 Q. Yeah, I guess --</p> <p>23 A. So does that answer it?</p> <p>24 Q. It doesn't, actually, but --</p>	<p style="text-align: right;">Page 32</p> <p>1 A. Then how were you in narcotics?</p> <p>2 Q. We can talk after the deposition.</p> <p>3 A. All right. Well, then, you know, it's</p> <p>4 because, you know, what you put in the report. I mean,</p> <p>5 you received information from Tony, and I'm processing.</p> <p>6 Now this guy wants to fight it because -- for whatever</p> <p>7 reason. He wants to buy time or he thinks he's innocent,</p> <p>8 right?</p> <p>9 So now you get called in to testify. You're</p> <p>10 gonna say, "Well, how did you get this arrest with</p> <p>11 Officer Tony?" Well, guess what? Officer Tony is also</p> <p>12 being -- getting a court notification, so you're all</p> <p>13 there. Then when you sit in a room like this in the</p> <p>14 State's Attorney's Office outside court, they're gonna</p> <p>15 say, "Well, what was your role?" "What was your role?"</p> <p>16 "What was your role?" "Oh, we don't need you." "We</p> <p>17 don't need you." "Oh, you did the transport? We don't</p> <p>18 need you. Why do we need you here for?"</p> <p>19 Q. That's the answer I was looking for.</p> <p>20 A. "We need you, and we need you, and we need the</p> <p>21 cuffer, right?"</p> <p>22 Q. So you said you can't remember how many times</p> <p>23 it happened, but it did happen in an instance?</p> <p>24 A. It does happen.</p>
<p style="text-align: right;">Page 31</p> <p>1 A. No? Oh, my God.</p> <p>2 Q. No, No, No. The reason being is because --</p> <p>3 A. Another scenario?</p> <p>4 Q. -- I was in narcotics, so I understand. I</p> <p>5 know exactly what you're talking about.</p> <p>6 What I was asking --</p> <p>7 A. You did what? I'm sorry.</p> <p>8 Q. I was in narcotics.</p> <p>9 A. Oh, then you know what the hell I'm talking</p> <p>10 about.</p> <p>11 Q. I didn't want to cut you off, though. You</p> <p>12 were giving a good explanation.</p> <p>13 What I was really asking about is, if there</p> <p>14 was a team that wasn't -- I understand your team --</p> <p>15 everybody on that team is, you know, all copacetic with</p> <p>16 what happened. They can testify. I'm saying, have you</p> <p>17 ever been called to testify on a case where you basically</p> <p>18 put cuffs on the guy and then dish it off to another</p> <p>19 team? That's what I'm talking about, not your --</p> <p>20 A. Yeah, yeah, of course.</p> <p>21 Q. Okay. How many times have you done that?</p> <p>22 A. Again, you're asking me for specifics.</p> <p>23 Were you in the police before?</p> <p>24 Q. No.</p>	<p style="text-align: right;">Page 33</p> <p>1 Q. Okay.</p> <p>2 A. Is that better?</p> <p>3 Q. That was much better.</p> <p>4 A. All right.</p> <p>5 MR. PALLES: I thought it was all pretty good.</p> <p>6 BY THE WITNESS:</p> <p>7 A. Listen, I'm gonna collaborate as much as I</p> <p>8 can. I'm gonna remember as much as I can. But we're</p> <p>9 going back quite some time.</p> <p>10 Q. Sure. And I'm not trying to quiz you or trick</p> <p>11 you or anything. If you don't remember, you don't</p> <p>12 remember. It's not a big deal.</p> <p>13 A. No.</p> <p>14 Q. So I'm gonna ask you about [REDACTED] in a</p> <p>15 little bit, but just to go back and ask you one thing, do</p> <p>16 you have any evidence or do you have any facts that the</p> <p>17 alleged false arrest [REDACTED] claims was made was a</p> <p>18 case that was passed off to another team?</p> <p>19 MS. KLEINHAUS: Objection, form, foundation.</p> <p>20 BY THE WITNESS:</p> <p>21 A. I don't recall.</p> <p>22 Q. You don't know or you don't recall?</p> <p>23 A. I couldn't recall. Knowing and recalling are</p> <p>24 two different things. I don't recall at the moment.</p>

12 (Pages 30 to 33)

In Re: Watts Coordinated Pretrial Proceedings
Continued Deposition of Daniel Echeverria - Taken 3/5/2025

Page 34

1 **Q. Okay. And do you know at the moment?**
 2 A. Don't recall.
 3 **Q. So would you agree with me the A&A sheets are**
 4 **the best way to document who is working at a certain time**
 5 **and on a certain date?**
 6 MS. KLEINHAUS: Objection, foundation.
 7 THE WITNESS: Answer it?
 8 BY MR. ZECCHIN:
 9 **Q. She's not your lawyer, but --**
 10 MR. DEVINE: You can answer, yeah.
 11 THE WITNESS: Answer?
 12 MR. DEVINE: Yeah.
 13 BY THE WITNESS:
 14 A. Yes and no.
 15 **Q. Okay. Well, how are they not the record of**
 16 **whoever is working that day?**
 17 A. You want my opinion?
 18 **Q. Sure.**
 19 A. I think my opinion is Ronald Watts falsified a
 20 lot of his A&As and then putting himself there and not
 21 there, so A&As could be falsified. So, I mean, maybe now
 22 it might be a little difficult because now I think
 23 they're computerized. But back then, it was hand A&As,
 24 and I think had to be faxed over or sent over or

Page 35

1 teletyped.
 2 **Q. What about the typed-out A&As? Do you believe**
 3 **those are subject to falsification as well?**
 4 A. Yes.
 5 **Q. Okay. And do you have any evidence that any**
 6 **of my clients falsified A&As if they said they were**
 7 **working or if they have them working?**
 8 A. Your clients are POs. They won't complete
 9 A&As. They would be done at a supervisory level.
 10 **Q. So they couldn't do that, right?**
 11 A. Your clients are POs. They're not
 12 supervisors. They would have to be done by a supervisory
 13 level.
 14 **Q. So if an A&A sheet said that none of the**
 15 **people on Watts' team were working during a day, would**
 16 **you disagree that that, in fact, is evidence that they**
 17 **were not working that day?**
 18 MS. KLEINHAUS: Objection to form, incomplete
 19 hypothetical.
 20 BY THE WITNESS:
 21 A. It's a possibility.
 22 **Q. Okay. Do you have any -- other than what you**
 23 **just testified to, do you have any other --**
 24 A. It's my opinion. I'm not telling you I know

Page 36

1 this because I've seen it. I'm giving you an opinion.
 2 **Q. Okay. And, obviously, you know, Mr. Watts and**
 3 **Mr. Mohammed have the lawyers. They'll ask you questions**
 4 **about that.**
 5 A. Sure.
 6 **Q. As far as my clients -- Strike that.**
 7 **But as far as any evidence or proof you have**
 8 **of A&As being doctored, do you have any of that?**
 9 MS. KLEINHAUS: Objection to form.
 10 BY THE WITNESS:
 11 A. No.
 12 **Q. Okay. Now I want to ask you some questions**
 13 **about [REDACTED] You obviously remember [REDACTED]**
 14 **[REDACTED] correct?**
 15 A. Sure.
 16 **Q. You testified at the last deposition -- you**
 17 **can change your testimony if you want, but --**
 18 A. I'm not changing anything.
 19 **Q. -- there's only one time that [REDACTED]**
 20 **came to you and said that he -- there was some wrongful**
 21 **conduct being done against him, correct?**
 22 A. Yes.
 23 **Q. And did he ever tell you any of my clients had**
 24 **done anything wrong to him when he told you about that?**

Page 37

1 MS. KLEINHAUS: Objection to form.
 2 BY THE WITNESS:
 3 A. He would definitely say Watts and Mohammed.
 4 He definitely would say his team. He would say the whole
 5 team is dirty. So would he name them? Because I don't
 6 think he knows their names. But he did name the two
 7 primary people I said.
 8 **Q. That was the single instance he came to you**
 9 **and talked about that?**
 10 A. He did also mention Al Jones. Are you
 11 representing Al Jones?
 12 **Q. I am representing Al Jones.**
 13 A. Okay. Well, then he did say your client.
 14 **Q. When did he tell you about Al Jones?**
 15 A. That he's Watts's bulldog.
 16 **Q. Anything else?**
 17 A. That what Watts says to do, Jones is the first
 18 one to do it behind Mohammed.
 19 **Q. And when did this conversation take place with**
 20 **[REDACTED]?**
 21 A. I couldn't tell you when. Definitely at one
 22 of the meetings with him. Maybe he even said it in front
 23 of the FBI agent because I know we took him to the FBI.
 24 The FBI had -- it's almost like when you interview

In Re: Watts Coordinated Pretrial Proceedings
Continued Deposition of Daniel Echeverria - Taken 3/5/2025

<p style="text-align: right;">Page 38</p> <p>1 somebody in a domestic. You want to separate them, 2 right? You want to separate the female from the male. 3 You don't know who's the aggressor, who's not. Maybe the 4 female or the male or the male, male, you know, nowadays, 5 they don't -- they hold back because of the presence of 6 the aggressor, right? 7 So with [REDACTED] he told us some stuff when we 8 were with ourselves. We had him repeat it to the FBI 9 agent. And then the FBI agent would separate us from 10 [REDACTED] so that they can have something that would be 11 just between them and [REDACTED] 12 Q. So what -- aside to what you just testified to 13 about Jones, what else do you recall [REDACTED] telling you 14 about Jones? 15 A. He's dirty. 16 Q. Anything else? 17 A. He said they're all dirty. 18 Q. Okay. Did you ask him what he means by that? 19 A. Yeah, he said they'll put cases on. They'll 20 steal. They'll put cases on you. They steal from other 21 dope lines in the building. He said they make people 22 disappear. 23 Q. Did you ask him who specifically did that type 24 of stuff?</p>	<p style="text-align: right;">Page 40</p> <p>1 Q. You just named four meetings. Was he at every 2 one of those meetings you discussed? 3 A. Yeah, he was. He became an informant. He was 4 signed up, so I'm sure he had numerous meetings with 5 them. 6 Q. And I'm not sure if you answered this, but did 7 he ever tell you specifically who did any of those things 8 you just listed off what he said, the wrongful conduct? 9 MS. KLEINHAUS: Objection, asked and answered. 10 MR. DEVINE: Asked and answered. 11 BY THE WITNESS: 12 A. I'll answer again. I'll answer again. 13 He said the whole team is dirty. They all do 14 it. All right? 15 Q. And you didn't -- go ahead. 16 A. They all do it. But he specifically said 17 Kallatt Mohammed and Al Jones -- 18 Q. Okay. 19 A. -- are the primary ones. 20 Q. Kallatt Mohammed and Al Jones? 21 A. Yeah, and Watts, Watts. 22 Q. Did you drill down on that any more to get any 23 more information out of him, details -- 24 A. I said, "Well, who's the whole team?" He</p>
<p style="text-align: right;">Page 39</p> <p>1 A. He said all of them. 2 Q. Did you, as a police officer, think it was -- 3 A. I said, "Well, who's all of them?" He said, 4 "The whole team." Then he would name names that were 5 familiar to him. 6 Q. Do you remember the names he named? 7 A. Kallatt Mohammed, Ronald Watts, Al Jones. 8 Q. Okay. 9 A. The other names, I don't remember him naming 10 them, but was he shown pictures like we were? I couldn't 11 tell you. Maybe he identified them. I don't know. 12 Q. Did you -- who was present for this 13 conversation with [REDACTED]? 14 A. Shannon Spalding, myself. Then there was 15 Shannon Spalding, myself, and the agent; Shannon 16 Spalding, myself, two agents; Shannon Spalding, myself, 17 maybe another three agents. 18 Q. So that's four total meetings if I'm -- 19 correct me ... 20 A. I mean, it was -- yeah. It could be four; it 21 can be three; it can be five. 22 Q. And was [REDACTED] at every one of those 23 meetings? 24 A. With them, yes.</p>	<p style="text-align: right;">Page 41</p> <p>1 goes, "I don't know their names." He started physically 2 describing them, but he's describing nobody that I would 3 know off the top of my head. 4 Q. Did you ask him any locations or times or 5 dates that any of these things occurred? 6 A. He would say it all happened at the buildings. 7 Q. Did you ask him, though? 8 A. Yeah, "Where's this going on?" He goes, "In 9 the buildings." 10 Q. Did he provide you with -- did you ask him any 11 more detailed information other than -- 12 A. Which buildings and -- all the Browning 13 buildings, the rock block, the Extensions, Ida B. I 14 said, "Okay. Well, we're gonna introduce you to some 15 people, and you can tell them also." 16 Q. How about, did you ask him when this occurred? 17 A. When? Of course. I'm sure I did, but I can't 18 remember what his -- what his answers at this time. 19 Q. Did you draft any reports about these things 20 he told you? 21 A. I don't recall I did. 22 Q. Is there any reason you wouldn't want to 23 memorize what he told you in writing? 24 A. I memorized as much as I can.</p>

In Re: Watts Coordinated Pretrial Proceedings
Continued Deposition of Daniel Echeverria - Taken 3/5/2025

Page 42

1 **Q.** Well, now I'm asking you if you remember now.
2 **You don't. But at the time, why wouldn't you have**
3 **written it down, what he told you?**
4 A. Because I was taking him to the FBI people.
5 **Q.** So you didn't feel you needed to write it down
6 **as well?**
7 A. No.
8 **Q.** Okay.
9 A. I wasn't a big note keeper either, so if I
10 tell you something, it's strictly from my recollection
11 of ...
12 **Q.** So you said that when you did ask [REDACTED]
13 **about what happened, you talked about there was a sweep**
14 **going on and that he got grabbed with a whole bunch of**
15 **other people. Do you remember that?**
16 A. I remember that.
17 **Q.** Okay. Did you ask him where that sweep took
18 **place?**
19 A. In the buildings.
20 **Q.** Okay. Anything more specific?
21 A. I don't recall any more specific than that.
22 **Q.** Okay. And do you remember the first time he
23 **told you that he was framed by Watts or his team?**
24 A. I don't remember exactly when.

Page 43

1 **Q.** And do you know if he told you -- do you know
2 **at all how close in time it was after the arrest took**
3 **place?**
4 A. I can't tell you specifics, no.
5 **Q.** As you sit here today, do you remember the
6 **year that he claims he was falsely arrested?**
7 A. I can't remember that at this time.
8 **Q.** And did he tell you anything -- other than
9 **what you've just told me right now, did he tell you**
10 **anything more specific with regard to that arrest he**
11 **claims was false?**
12 A. Just that he didn't -- he didn't have
13 narcotics on him that day.
14 **Q.** And did you do anything to verify what he was
15 **telling you was true?**
16 A. I may have, but I don't recall exactly.
17 **Q.** What would you have done to verify what he was
18 **telling you was true?**
19 A. I may have looked up an arrest history or
20 something.
21 **Q.** Would you have pulled his rap sheet?
22 A. No, because the rap sheet is once you get
23 adjudicated, so ...
24 **Q.** I'm talking about the CPD criminal history.

Page 44

1 A. One thing is a rap sheet, and the other one is
2 an arrest history.
3 **Q.** How about a criminal history? Are you
4 **familiar with what that document is?**
5 A. Of course. The rap sheet is -- lists your
6 convictions, nolle pros, et cetera, et cetera, et cetera.
7 **Q.** But it includes arrests as well?
8 A. Yes.
9 **Q.** So did you pull a LEADS report for him to see
10 **if it was on there?**
11 A. There's no need to pull a LEADS report. A
12 LEADS report is for a name check to see if you have a
13 warrant, see if you have a driver's license. Anything
14 that's the Secretary of State would be a LEADS or, like I
15 said, like a warrant.
16 **Q.** Is your testimony that the LEADS does not
17 **contain criminal convictions on it?**
18 A. No, it doesn't. You have to -- basically
19 LEADS does not.
20 **Q.** How about the advanced LEADS?
21 A. Advanced LEADS, you'd have to do a -- like
22 what they call a Triple I. That might have something in
23 it.
24 **Q.** Did you pull the Triple I for --

Page 45

1 A. No.
2 **Q.** -- [REDACTED]
3 A. No, I did not.
4 **Q.** And so last time I -- Strike that.
5 **So if you looked at his criminal history and**
6 **there was no report that matched up, what would you have**
7 **done to try and take another step to verify what he was**
8 **saying?**
9 A. Tell him to be sure about the dates when this
10 happened, when it didn't happen, where it happened.
11 Maybe I can look it up by location. It's not coming up
12 under his name. "Did you use a different name?" But it
13 would still come up because he has an IR number. An IR
14 number is like a fingerprint number.
15 **Q.** Did you ask Mr. [REDACTED] any of those questions
16 **to try to narrow down when this arrest took place?**
17 A. I'm sure I did. I'm sure I said, "Where did
18 this happen?" I think what prompted it is he had been
19 missing for a little bit. And then he had said that --
20 and then when we finally came across him, he said he's
21 been looking for us, that he was incarcerated wrongfully.
22 And I said, "Well, what are you talking about?" Then he
23 went into not having certain things on him that was
24 recovered by some of your clients or some of the clients

In Re: Watts Coordinated Pretrial Proceedings
Continued Deposition of Daniel Echeverria - Taken 3/5/2025

Page 46

1 here.

2 **Q. Did you pull any IDOC, Illinois Department of**

3 **Corrections --**

4 A. No, I did not.

5 **Q. -- information?**

6 A. No, I did not.

7 **Q. Are you able to look up case numbers as a**

8 **police officer?**

9 A. Yeah, you go through the court. There's a hot

10 desk or court, court -- you can run court.

11 **Q. Do you recall if you called the hot desk to**

12 **look up a case involving [REDACTED]**

13 A. No, I didn't do that.

14 **Q. You'd never do that?**

15 A. I didn't do that.

16 **Q. And then with regard to the steps you took**

17 **like -- like you said, you would have asked him some**

18 **questions. Do you recall specifically if you did find an**

19 **arrest report regarding [REDACTED]**

20 A. I don't recall.

21 **Q. Okay. If you found an arrest report that was**

22 **allegedly done by Watts or his team, would you expect**

23 **them to be listed as the arresting officers on that?**

24 MS. KLEINHAUS: Objection, foundation.

Page 47

1 BY THE WITNESS:

2 A. Yes and no.

3 **Q. Okay.**

4 A. They could be passing it back to the --

5 passing down of the arrest.

6 **Q. Sure. That's why if you had an arrest report**

7 **after you talked to Mr. [REDACTED] and you found that arrest**

8 **report and it had names that were nobody on Watts's team,**

9 **would that suggest to you that maybe this wasn't an**

10 **arrest by Watts's team?**

11 MS. KLEINHAUS: Objection, form, foundation, calls

12 for speculation.

13 BY THE WITNESS:

14 A. Yes and no.

15 **Q. Okay. I think I asked you earlier, but do you**

16 **have any reason to believe if you had an arrest report**

17 **that had names other than the people on Watts's team,**

18 **that they were involved in his arrests other than you**

19 **said your opinion?**

20 A. How about I answer it this way: Knowing what

21 I know now, I would say yes. Knowing what I didn't know

22 then, I would say I wouldn't -- I would not have thought

23 it was something erroneous. But knowing what I know now

24 and being involved in whistleblowing and being involved

Page 48

1 with the FBI, I would -- I would speculate, and I would,

2 like, question a lot.

3 **Q. Do you have any reason to believe any of my**

4 **clients were involved in this subsequent arrest that --**

5 A. I've never worked with your clients, so I

6 really -- I know them, who they are, in passing. I know

7 them because we worked in the same building, probably

8 like from here to the -- their office was from here to

9 the elevator. They would visit the office and pay

10 attention to our board, which, knowing what I know now,

11 they were paying attention to the board to find out what

12 we're doing.

13 **Q. You don't know that --**

14 A. Knowing what I know now. But then, I

15 didn't -- it didn't come to me.

16 **Q. Okay. Well, my original question was, do you**

17 **have any reason to believe that they were involved in an**

18 **arrest if their names aren't on the paperwork? My**

19 **clients only, sir.**

20 MS. KLEINHAUS: Asked and answered.

21 BY THE WITNESS:

22 A. I think I answered it already.

23 **Q. I know, but you gotta answer it. That's not a**

24 **reason to not answer the question, sir.**

Page 49

1 A. I'm not refusing to answer.

2 **Q. No, no. But I'm saying, you said, "I think I**

3 **answered it already." You can answer it the exact same**

4 **way if you'd like.**

5 A. How did I answer it just --

6 **Q. Do you want to ask her to read the question**

7 **back?**

8 THE WITNESS: Sure. Read --

9 BY MR. ZECCHIN:

10 **Q. No, no, no.**

11 THE WITNESS: Read my answer back.

12 THE REPORTER: Which --

13 THE WITNESS: The answer to Tom. Tom, was it?

14 BY MR. ZECCHIN:

15 **Q. No, not even close.**

16 A. What was your name?

17 **Q. Tony.**

18 A. There you go, Tony. Let me write that -- see

19 what I mean. I don't remember.

20 **Q. Memories can fail.**

21 A. Hey, at my age, shit.

22 **Q. What I'm just asking is, do you have any**

23 **reason to believe that my guys were involved in the**

24 **arrest if their names aren't on the paperwork? That's**

In Re: Watts Coordinated Pretrial Proceedings
Continued Deposition of Daniel Echeverria - Taken 3/5/2025

Page 50

1 all.
2 MS. KLEINHAUS: Objection, asked and answered.
3 BY MR. ZECCHIN:
4 Q. Other than your opinion, any evidence, any
5 proof, anything like that?
6 A. I don't have any proof. How about that?
7 Q. And when you first signed up [REDACTED] as
8 an informant, did you pull his criminal background?
9 A. I think the FBI did that.
10 Q. So he was signed up -- was he your informant
11 before he was an FBI informant?
12 A. He was our confidential, concerned
13 citizen/informant. But as far as signed up with the
14 department itself, no. So let's call him a concerned
15 citizen.
16 Q. So when you enlisted him as a concerned
17 citizen, did you pull his criminal background?
18 A. For us?
19 Q. Yes.
20 A. Yes.
21 Q. Okay. And do you remember how many arrests he
22 had had in the past?
23 A. I don't remember off the top of my head but
24 numerous.

Page 51

1 Q. Would it have been a concern to you to put
2 your trust in someone that had a lot of arrests?
3 A. No, because, like I said, when somebody --
4 let's say Tony gives me information, says things are
5 going on at the 311 building. Okay. I say, "Well, now I
6 have Tony as a concerned citizen, but I have Eric as
7 another concerned citizen." "Eric, hey, what do you know
8 about the 300 block on Wacker?" "Oh, I don't know
9 nothing about the 400 block, but, yeah, maybe the 300
10 block. You might pay attention to the 311 building."
11 Eric doesn't know Tony, but they're giving me
12 the same information. That's how you would try to
13 substantiate truth from faux.
14 Q. Did you do that with [REDACTED]
15 A. Of course.
16 Q. And who was the person that was able to
17 substantiate what [REDACTED] was telling you?
18 A. She's deceased now.
19 Q. What's her name?
20 A. Linda Hamilton was another one.
21 Q. Is that the one who corroborated what [REDACTED]
22 [REDACTED] was telling you?
23 A. Yeah, among others. But that's one. That's
24 one.

Page 52

1 Q. Who else do you recall?
2 A. [REDACTED]. Another one was [REDACTED]
3 Q. Are they related, if you know?
4 A. Those two are brothers.
5 Q. Okay.
6 A. But they collaborated with what [REDACTED] would
7 say, and they didn't know they were both talking to us.
8 Q. How many times did [REDACTED] provide you
9 with information?
10 A. Prior to what?
11 Q. Ever, throughout the course of you working
12 with [REDACTED]
13 MS. KLEINHAUS: Objection to form.
14 MR. DEVINE: You can answer.
15 BY THE WITNESS:
16 A. [REDACTED] we would use prior to the Watts
17 incident many times, so he was credible to us. So once
18 he did mention one of your clients, I was like, wow.
19 Okay. Well, maybe we should pay attention to that.
20 Q. Did he ever give you information that turned
21 out not to be correct or not to be truthful?
22 A. He was spot-on.
23 Q. And how many times would you estimate that he
24 gave you information that was -- led to an arrest?

Page 53

1 A. A hundred percent.
2 Q. How many times is that?
3 A. I'd say many arrests through [REDACTED] but I
4 can't put a number on it, but it's been good. Every time
5 he said something, it was good.
6 Q. Was [REDACTED] -- did he use drugs?
7 A. Yes, he did.
8 Q. Did you ever see him under the influence of
9 drugs?
10 A. No. He also was a big drinker.
11 Q. Did you ever have any reasons, based on his
12 drug and alcohol use, to question his reliability?
13 A. If it was false, I'd say yeah, but there was
14 no reason to question him. He was spot-on every time.
15 Q. So your testimony is that [REDACTED] gave
16 you a hundred percent accurate information?
17 A. Prior to this -- yeah, yeah, that's why we
18 used him.
19 Q. Okay. When you say "prior to this," I don't
20 know --
21 A. Prior to this Watts thing and then with Watts
22 too.
23 Q. Okay. So you didn't use him after that, of
24 course?

In Re: Watts Coordinated Pretrial Proceedings
Continued Deposition of Daniel Echeverria - Taken 3/5/2025

Page 54

1 A. No.

2 **Q. And are you aware that the United States**

3 **government used that alleged arrest at the sentencing for**

4 **Mr. Watts?**

5 MS. KLEINHAUS: Objection to form.

6 BY THE WITNESS:

7 A. I have no knowledge of that. I wasn't

8 present.

9 **Q. Did you ever learn that, or is this the first**

10 **time hearing it?**

11 A. I didn't even -- nobody even told me Watts

12 came out of jail. They were supposed to notify me of

13 that.

14 **Q. I'm sorry. I didn't understand what you said.**

15 A. Nobody even informed me when Watts was

16 released from custody, and I was supposed to be informed

17 about that.

18 **Q. Okay. What I was asking you, though, is, did**

19 **you ever hear that [REDACTED] alleged false arrest**

20 **was used during --**

21 A. I answered that already, Tony. I said, no, I

22 wasn't informed of that.

23 **Q. Okay. If I misheard you, then --**

24 A. No, no problem. I'll repeat it.

Page 55

1 **Q. No, that's okay.**

2 **Do you remember being present for a recorded**

3 **interview on June 10th of 2008? It was yourself,**

4 **Officer Spalding, and you were discussing -- he was**

5 **discussing a false arrest -- an alleged false arrest of a**

6 **person named Trey?**

7 A. I don't recall that.

8 **Q. If there was a --**

9 A. If you have something to refresh my memory, if

10 you can share it, I'd look at it, and maybe that will

11 collaborate what you're trying to get.

12 **Q. Sure.**

13 MR. PALLES: If I may, it was in a car, you, [REDACTED]

14 and Shannon in a car.

15 THE WITNESS: We've had many encounters with him

16 like that.

17 BY MR. ZECCHIN:

18 **Q. So then I guess the question for right now is,**

19 **you don't remember [REDACTED] saying a person named Trey was**

20 **falsely arrested by Watts and his team, do you?**

21 A. I don't recall at this time.

22 **Q. Okay. And after -- is there any time that you**

23 **ever prepared a report after having an interview with**

24 **[REDACTED] [REDACTED]**

Page 56

1 MS. KLEINHAUS: Objection to form.

2 BY THE WITNESS:

3 A. I don't recall.

4 **Q. Do you know if your partner, Shannon Spalding,**

5 **prepared reports after these interviews of [REDACTED]**

6 A. I can't speak on her behalf. You'd have to

7 ask her.

8 **Q. Sure. Do you remember ever seeing her taking**

9 **notes while you were talking to [REDACTED]**

10 A. She always took notes. She was a big -- like

11 I said earlier, I wasn't a big note guy. I just

12 remembered a lot, and I was good with that. At least I

13 try to remember a lot. But Shannon was more detailed

14 than I was.

15 **Q. And if that June 10th, 2008 interview happened**

16 **after [REDACTED] said he was falsely arrested, would**

17 **you expect him to tell you about that?**

18 MS. KLEINHAUS: Objection to form.

19 BY THE WITNESS:

20 A. Of course he would say something to us.

21 **Q. Okay. And if there was a recording of your**

22 **conversation, you would expect it would be on that**

23 **recording, wouldn't you?**

24 A. I don't think we were recording anything from

Page 57

1 him. That would be recorded by the FBI.

2 **Q. Do you recall ever having a conversation where**

3 **there was recording being done by the FBI of the**

4 **conversation between you, Officer Spalding, and [REDACTED]**

5 **[REDACTED]**

6 A. I don't recall.

7 **Q. Okay. And do you remember being present for a**

8 **March 24th, 2009 interview with the FBI with Special**

9 **Agent [REDACTED] Special Agent [REDACTED] yourself, and**

10 **Officer Spalding with Mr. [REDACTED] present?**

11 A. Like I said, he met with many agents.

12 [REDACTED] does ring a bell. [REDACTED] definitely rings a

13 bell. Shannon rings a bell. [REDACTED] rings a bell. As

14 far as to put a date on it, I couldn't tell you

15 March 9th, March 12th. But if you have documentation of

16 it and you can share and I can review it, then I can

17 collaborate on anything you might be questioning on.

18 **Q. Sure. Do you remember ever meeting with those**

19 **four individuals in the same room -- or five individuals?**

20 **Sorry.**

21 A. We've met with them outside; we've met with

22 them inside; we've met with them at the 2011 building. I

23 couldn't put a -- tell you. We've met in cars. We met

24 at -- we've met at Soldier Field. I mean, I can't recall

In Re: Watts Coordinated Pretrial Proceedings
Continued Deposition of Daniel Echeverria - Taken 3/5/2025

Page 58

1 March 9th. I can't even tell -- I don't remember what --
2 many meetings. I couldn't tell you.
3 **Q. Do you recall ever being with [REDACTED]**
4 **and Shannon Spalding and the FBI where he talked about**
5 **that time that Trey was falsely arrested?**
6 A. Like I said, I don't -- you mentioned Trey,
7 and I don't recall that name.
8 **Q. So you have no recollection of anything**
9 **involving Trey, correct?**
10 A. I don't --
11 MR. DEVINE: Asked and answered.
12 BY THE WITNESS:
13 A. I don't recall at this time, Tony.
14 **Q. Okay. Thank you.**
15 THE VIDEOGRAPHER: Excuse me. Somebody joined the
16 Zoom call.
17 THE WITNESS: I don't know who that is.
18 (Enter Mr. Flaxman.)
19 (Discussion off the record.)
20 BY MR. ZECCHIN:
21 **Q. Do you recall any other time that [REDACTED] told**
22 **you that he was falsely arrested?**
23 A. No, I don't recall.
24 **Q. Do you know if he ever -- do you know if he**

Page 59

1 **ever told the FBI any other time he was falsely arrested?**
2 A. I can't tell you what he spoke to them. I
3 mean, we weren't -- like I said, some things we were
4 privileged to, some things we weren't. A lot of times we
5 were on a need-to-know basis.
6 **Q. And were you ever present when Mr. [REDACTED]**
7 **told the FBI that he was falsely arrested by Ronald Watts**
8 **or his team?**
9 A. I don't recall.
10 **Q. So is there anything else you did to verify**
11 **[REDACTED] claim of false arrest -- Well, strike**
12 **that.**
13 Did you provide an arrest report to the
14 U.S. Attorney's Office -- I'm sorry -- to the FBI
15 regarding that alleged false arrest?
16 A. I don't recall.
17 **Q. Okay. If you did, would you have verified --**
18 **would you have taken any steps to verify that was, in**
19 **fact, accurate before you sent it -- handed it over to**
20 **the FBI?**
21 A. I would have handed it over, and I -- they'd
22 ask my opinion, I'm sure. And then they would --
23 anything we told the FBI people, they're the type of
24 people that they want to do their own verification as

Page 60

1 well. They're not just taking your word for it.
2 **Q. Sure. I'm not sure what exhibit we're on from**
3 **last time, but I'm going to mark this -- just, it's gonna**
4 **be an exhibit. We'll add the number later. I'm gonna**
5 **show you this exhibit.**
6 A. Sure, sure, pass it down.
7 **Q. It's going to be a group exhibit with two**
8 **documents that are part of it.**
9 MR. NOLAND: Maybe we should just call it March 5th.
10 MR. GAINER: Make it 50.
11 MR. NOLAND: There you go.
12 BY MR. ZECCHIN:
13 **Q. I'm going to show you Exhibit 50, which is an**
14 **arrest report and a vice case report.**
15 MR. ZECCHIN: Tess, do you mind handing this down to
16 him?
17 BY MR. ZECCHIN:
18 **Q. Mr. Echeverria, if you could take a look at it**
19 **and let me know when you've reviewed it, I'm going to**
20 **have some questions on it.**
21 A. All right. You refer to this --
22 **Q. Sure. You can look at it if you want.**
23 A. Yes.
24 **Q. Do you recognize the photo on the first page**

Page 61

1 **of the arrest report?**
2 A. Yeah, it's [REDACTED].
3 **Q. Okay. And at the bottom is DO-JOINT 005282,**
4 **correct?**
5 A. 5282, yeah.
6 **Q. And this is an arrest that occurred on**
7 **June 21st, 2008, at approximately 3:15 in the afternoon,**
8 **correct?**
9 A. June 21, 2008, yes.
10 **Q. And it was at the 575 East Browning address;**
11 **is that correct?**
12 A. Yeah, it's a busy building.
13 **Q. And if you look on the second page, Page 2 of**
14 **5, it says, This is a 2nd District housing TAC arrest by**
15 **Beat 266D and C.**
16 **Is that correct?**
17 A. Yes -- wait, one more time.
18 **Q. It's --**
19 A. Page 2?
20 **Q. Yes, Page 2.**
21 A. Where do you see that?
22 **Q. In the incident narrative, Event No. 13839.**
23 A. Yes, yes, C and D -- D and C, yes.
24 **Q. And you said earlier you believe that Ron**

In Re: Watts Coordinated Pretrial Proceedings
Continued Deposition of Daniel Echeverria - Taken 3/5/2025

Page 62

1 **Watts's team was 264D, correct?**
2 A. Most likely, yeah.
3 **Q. So 266D and C would be a different team; is**
4 **that correct?**
5 A. Correct.
6 **Q. And then if you turn to the next page, Page 3**
7 **of 5, there's a first arresting officer listed as**
8 **Lee, Jr. Do you see that?**
9 A. Yes.
10 **Q. And a second arresting officer as**
11 **Officer Savickas?**
12 A. I worked with his dad, yeah.
13 **Q. And there's an approval of probable cause**
14 **by --**
15 A. Forlenza.
16 **Q. -- Forlenza. Do you know that person as well?**
17 A. No.
18 **Q. Did you work with this -- the younger**
19 **Savickas?**
20 A. The dad.
21 **Q. You didn't work with the younger one?**
22 A. No.
23 **Q. Okay.**
24 A. I know who he is.

Page 63

1 **Q. And if you could turn to Page 5, sir.**
2 A. Yes.
3 **Q. There's a -- assit- -- in the processing**
4 **personnel section, it says assisting arresting officer,**
5 **and there's a D. Smith listed there. Do you see that?**
6 A. D.T. Smith, yeah.
7 **Q. And his beat is 266A, as in Adam?**
8 A. Yeah.
9 **Q. And then there's also a second one. It's**
10 **M.E. Biedrzycki. You see that?**
11 A. Biedrzycki, yeah.
12 **Q. And that's 266 David, right?**
13 A. Yeah.
14 **Q. Do you see any of my clients listed on this**
15 **arrest report?**
16 A. I saw the arrest report is generated by
17 Rodriguez.
18 **Q. Okay. That's Marian Rodriguez, correct?**
19 A. That's what it says.
20 **Q. So if my client is John Rodriguez, would you**
21 **say that's not the same person?**
22 A. No, because they have a PC code that's
23 uniquely assigned to every officer.
24 **Q. So you don't know -- do you know Marian**

Page 64

1 **Rodriguez?**
2 A. No.
3 **Q. Do you see any of my clients' or Watts' or**
4 **Mohammed's name listed on this report?**
5 A. No, I do not.
6 **Q. And if you could take a look at the vice case**
7 **reports which is also part of the group exhibit in front**
8 **of your counsel.**
9 A. Okay.
10 **Q. And same questions, this is -- on this report**
11 **it doesn't list any of my clients or Watts or Mohammed**
12 **anywhere on this report; is that correct?**
13 A. I don't see their names.
14 **Q. And the same officers that I just referenced**
15 **being in the arrest report -- an Officer Lee,**
16 **Officer Savickas, and Officer Biedrzycki -- are all**
17 **listed on this vice case report regarding this June 21st,**
18 **2008, arrest of [REDACTED], correct?**
19 A. I see that, yes.
20 **Q. And looking at that arrest report again, do**
21 **you recognize this as the report that you would have**
22 **provided to the -- to Special Agent [REDACTED]**
23 MS. KLEINHAUS: Objection, foundation, calls for
24 speculation.

Page 65

1 BY THE WITNESS:
2 A. I don't recall providing this. I didn't print
3 this. It's not printed by me.
4 **Q. Do you recognize it looking at it?**
5 A. No.
6 **Q. Do you recognize the vice case report, by any**
7 **chance, as something you would have provided to**
8 **Special Agent [REDACTED]**
9 A. No.
10 MS. KLEINHAUS: Objection to form, foundation.
11 BY THE WITNESS:
12 A. They would be able to print it off themselves
13 if they needed it.
14 **Q. But with regard to your earlier testimony that**
15 **you believe you had handed Officer -- Special Agent [REDACTED]**
16 **the arrest report as a stack?**
17 A. Could have been.
18 **Q. Sure, but you don't recognize this as the**
19 **reports you provided --**
20 A. I don't recall this. I can't recall.
21 MR. ZECCHIN: Okay. I don't believe I have any
22 other questions at this time, so I'm going to turn it
23 over to the other attorneys.
24 THE WITNESS: You sure? I'm ready.

In Re: Watts Coordinated Pretrial Proceedings
Continued Deposition of Daniel Echeverria - Taken 3/5/2025

<p style="text-align: right;">Page 66</p> <p>1 MR. ZECCHIN: This time, I said. It might change</p> <p>2 afterwards.</p> <p>3 MR. NOLAND: Would you like to take a break,</p> <p>4 Officer Echeverria, or are you ready to go?</p> <p>5 THE WITNESS: No, no. Let's keep going.</p> <p>6 MR. NOLAND: All right. I just have a few</p> <p>7 follow-ups on this.</p> <p>8 THE WITNESS: Who do you represent?</p> <p>9 MR. NOLAND: Yeah, we met a couple times. I'm Dan</p> <p>10 Noland, N-O-L-A-N-D. I represent the City of Chicago --</p> <p>11 THE WITNESS: Okay.</p> <p>12 MR. NOLAND: -- and some supervisory defendants who</p> <p>13 have been sued.</p> <p>14 THE WITNESS: Okay. Who are they?</p> <p>15 MR. NOLAND: Kirby, Deb Kirby, IAD.</p> <p>16 THE WITNESS: Yeah, right.</p> <p>17 MR. NOLAND: Phil Cline and --</p> <p>18 THE WITNESS: The young Phil Cline?</p> <p>19 MR. NOLAND: No. They sued Superintendent Cline.</p> <p>20 THE WITNESS: Oh, wow, okay.</p> <p>21 MR. NOLAND: But they've dismissed him in most of</p> <p>22 the cases. And then some other supervisory defendants</p> <p>23 too.</p> <p>24 THE WITNESS: Sure.</p>	<p style="text-align: right;">Page 68</p> <p>1 that any other officers other than these officers -- Lee,</p> <p>2 Savickas, and Biedrzycki -- had anything to do with this</p> <p>3 arrest of Mr. [REDACTED] on this particular date, June 21st</p> <p>4 of 2008?</p> <p>5 A. Correct.</p> <p>6 Q. Okay. I'm gonna take a step back and just go</p> <p>7 through -- I'm gonna try to run through a timeline so I</p> <p>8 can keep it straight in my head and maybe --</p> <p>9 A. Jog my memory too.</p> <p>10 Q. -- and maybe help to jog your memory. So --</p> <p>11 and I know you've already talked about the incident</p> <p>12 where -- with respect to Sergeant -- some type of an</p> <p>13 arrestee was providing information relative -- making</p> <p>14 allegations against Watts. You went to Sergeant Watts,</p> <p>15 Ron Watts, and he said to make it a negative, so I don't</p> <p>16 need to ask you about that again. But I think you said</p> <p>17 that shortly thereafter, within a month or two, is when</p> <p>18 you went to the FBI. Is that --</p> <p>19 A. I couldn't tell you the time frame, but</p> <p>20 definitely after that incident.</p> <p>21 Q. Okay. And I've got a report dated</p> <p>22 September 10th of 2007. I'll show it to you if you want</p> <p>23 to see it. It's an FBI report.</p> <p>24 A. Sure.</p>
<p style="text-align: right;">Page 67</p> <p>1 EXAMINATION</p> <p>2 BY MR. NOLAND:</p> <p>3 Q. I may bounce around a little bit --</p> <p>4 A. No problem.</p> <p>5 Q. -- so I apologize.</p> <p>6 Just sticking with this Exhibit 50 --</p> <p>7 A. Yeah.</p> <p>8 Q. -- from looking at Exhibit 50, there's no</p> <p>9 indication on -- anywhere on Exhibit 50 that anybody on</p> <p>10 the Watts team had anything to do with this June 21st,</p> <p>11 2008 arrest of Mr. [REDACTED] correct?</p> <p>12 A. Looking at it on paper, no.</p> <p>13 Q. Okay. And you don't have any proof that the</p> <p>14 Watts team had any role whatsoever in this arrest,</p> <p>15 correct?</p> <p>16 A. Correct.</p> <p>17 Q. And you didn't -- you never looked into</p> <p>18 whether -- Strike that.</p> <p>19 Did you ever talk to Officer Lee or</p> <p>20 Officer Savickas or Officer Biedrzycki?</p> <p>21 A. I wasn't trying to talk to them.</p> <p>22 Q. You never talked to them?</p> <p>23 A. I wasn't trying to either.</p> <p>24 Q. Okay. So you have no indication whatsoever</p>	<p style="text-align: right;">Page 69</p> <p>1 Q. And, basically, I'm trying to see if it jogs</p> <p>2 your memory. I believe they're talking about you and</p> <p>3 Officer Spalding. If you could -- we'll call this one</p> <p>4 51. And I think the thing to focus on is the -- in the</p> <p>5 details section, the second full paragraph, if you could</p> <p>6 read that silently to yourself, where the author of this,</p> <p>7 the FBI author, is talking about a couple of CPOs.</p> <p>8 Reading that, it looks like that's you and Shannon.</p> <p>9 (Witness reviewing document.)</p> <p>10 BY THE WITNESS:</p> <p>11 A. All right.</p> <p>12 Q. So would you agree with me that it appears</p> <p>13 that they're talking about you and Shannon Spalding?</p> <p>14 A. It's a safe assumption.</p> <p>15 Q. You've never -- have you ever seen this report</p> <p>16 before?</p> <p>17 A. Never.</p> <p>18 Q. So this is dated September 10th, 2007. Does</p> <p>19 that refresh your recollection of the general time frame</p> <p>20 of when you first went to the FBI?</p> <p>21 A. I can look at it twofold. I can look at it</p> <p>22 the day -- this was the day it was either prepared, and</p> <p>23 it could have been sooner and they just prepared it on</p> <p>24 that day. It could be backdated, but --</p>

21 (Pages 66 to 69)

In Re: Watts Coordinated Pretrial Proceedings
Continued Deposition of Daniel Echeverria - Taken 3/5/2025

Page 70

1 **Q.** It does say in the details section that the
2 meeting was on -- there was a meeting on September 5th.
3 A. You see what I mean? Yeah, okay. It would
4 make no difference.
5 **Q.** I'm just asking. If it doesn't refresh your
6 recollection, that's fine. I'm just asking you whether
7 it does.
8 A. I mean, if -- I mean, it had to have been.
9 **Q.** No reason to disagree?
10 A. Correct.
11 **Q.** Okay. So can you put -- from looking at this
12 report, does that -- can you put an estimate on when this
13 --
14 A. Watts --
15 **Q.** -- arrestee with Sergeant Watts and how long
16 before that that that had occurred?
17 A. It had to have been some time.
18 **Q.** I think you said a month or two at the last
19 deposition, but --
20 A. Could be. Maybe longer.
21 **Q.** Here's my question: So I know that you
22 went -- you had presumed that Watts was gonna make it a
23 confidential?
24 A. Yes.

Page 71

1 **Q.** And then you hadn't heard anything, correct?
2 A. Correct.
3 **Q.** And so then -- here's my question: Why didn't
4 you call confidential yourself?
5 A. I did my part already. I reported it to the
6 supervisor.
7 **Q.** Yeah.
8 A. That's all general order has to do.
9 **Q.** Yeah, no, I -- not a criticism. I'm just --
10 why did you decide to go to the FBI in saying, "You know
11 what? I'm gonna contact the IAD confidential section
12 myself to make sure that this has been done"?
13 A. In a way, I did do that. I contacted Tina
14 Seahill.
15 **Q.** And that was later on?
16 A. Yeah.
17 **Q.** Right, but --
18 A. So eventually, I did.
19 **Q.** I'm just -- you decided to go to the FBI
20 rather than call confidential. I'm just asking why you
21 chose the FBI instead of going right to confidential?
22 A. Maybe somebody neutral.
23 **Q.** Somebody neutral?
24 A. Yeah, somebody that didn't have a dog in the

Page 72

1 fight.
2 **Q.** Okay. When you did that, when you went to the
3 FBI -- and I'm gonna focus your attention on that second
4 paragraph again. I'm just gonna read that sentence.
5 A. Sure, sure.
6 **Q.** "IAD was informed of this matter and was in
7 the process of assessing the appropriate method of
8 transferring the CPOs without indicating their
9 cooperation with IAD or the FBI."
10 Were you aware, when you first went to the
11 FBI, that IAD was trying to protect you?
12 A. I don't think that's true.
13 **Q.** Well, that's what it says here.
14 A. It's a typo.
15 **Q.** You don't have any proof that that's a typo,
16 right?
17 A. If you do the timeline, I don't -- I disagree
18 with that statement.
19 **Q.** But you have no -- do you -- how can you
20 disagree with that -- I mean -- Strike that.
21 What basis do you have to disagree with the
22 statement that was written by the FBI on September 10th,
23 2007, that the FBI was informed of the matter and was in
24 the process of assessing the appropriate method of

Page 73

1 transferring you and Shannon without indicating your
2 cooperation --
3 A. How would they transfer me and Shannon if I
4 didn't inform them of anything yet?
5 **Q.** Because the FBI was already working with IAD.
6 A. This is true because when I did speak to
7 Seahill, she said this has been ongoing.
8 **Q.** So now you know. At the time, you didn't
9 know.
10 A. I don't think they had any intention of
11 transferring us there until we made it over there.
12 **Q.** So --
13 A. It's all --
14 **Q.** -- that's your speculation?
15 A. That's my opinion --
16 **Q.** Okay.
17 A. -- going through what I've been through on
18 this job.
19 **Q.** Sometime later you meet with Seahill?
20 A. Yes.
21 **Q.** Okay. And do you recall how long after --
22 A. I can't give you a specific time frame.
23 **Q.** -- you first went to the FBI?
24 A. I can't give you a time frame. I'd be

In Re: Watts Coordinated Pretrial Proceedings
Continued Deposition of Daniel Echeverria - Taken 3/5/2025

<p style="text-align: right;">Page 74</p> <p>1 misinforming you or -- I'm trying to be as honest as I 2 can. 3 Q. I appreciate that, Civilian Echeverria. 4 A. Thank you. 5 Q. And you've talked a bunch about that meeting 6 and -- I'm gonna show you another exhibit. 7 A. Sure. 8 Q. We'll mark this 52. 9 MR. NOLAND: Can you pass that down? 10 So I'm showing Officer Echeverria an 11 excerpt -- and this has to be confidential because this 12 is a -- this is a transcribed recording. 13 (PURSUANT TO AGREEMENT, PAGES 75 14 THROUGH 121 WERE BOUND UNDER 15 SEPARATE COVER.) 16 17 18 19 20 21 22 23 24</p>	<p style="text-align: right;">Page 123</p> <p>1 too. 2 Q. I have a couple of other questions but only a 3 couple. 4 A. Sure. Go ahead. 5 Q. My understanding of what you're saying or what 6 you've testified to over the last sessions is that you're 7 not aware of any documents that indicate that [REDACTED] was 8 falsely arrested by Watts or his team; is that accurate? 9 A. Best of my knowledge. 10 Q. Okay. And I think you said earlier today that 11 you weren't aware that the government, when sentencing 12 Watts, used that undocumented false arrest as an 13 aggravating factor. You're not aware of that? 14 A. It's the first I'm hearing it. 15 Q. Okay. You were earlier asked about FBI Agent 16 [REDACTED] and [REDACTED] -- you said that it rang a bell, 17 but you thought maybe you knew him? 18 A. I think I know who he is now. 19 Q. Okay. Do you have any recollection of having 20 discussions with him or interviews with him during the 21 course of your work on this case? 22 A. I'm sure we've met. 23 Q. All right. Did you ever -- 24 A. Because -- I'm sorry. We've had to have met</p>
<p style="text-align: right;">Page 122</p> <p>1 MR. NOLAND: Okay. That's all I have for now. 2 Thanks a lot. END END 3 THE WITNESS: No problem. END END START PAGE 122 4 MR. GAINER: You want to go? 5 MR. PALLES: Go ahead. 6 MR. NOLAND: I know you don't want a break, but do 7 you want something to drink? 8 THE WITNESS: No, I'm good. Let's get this going. 9 MR. PALLES: I may have to take a comfort break in a 10 little while. 11 THE WITNESS: All right. You let me know. 12 MR. PALLES: I'm an older guy so -- 13 MR. GAINER: So we're good to keep going. I don't 14 have as many questions as these folks did, I don't think. 15 THE WITNESS: You're Mr. Gainer, right? 16 MR. GAINER: I am. 17 THE WITNESS: Yeah, you're the tough guy. 18 MR. GAINER: Well, we'll see. 19 THE WITNESS: You were rough on me last time. 20 EXAMINATION 21 BY MR. GAINER: 22 Q. So this false arrest issue with [REDACTED] has 23 been beaten to death. 24 A. I know. You beat me to death with that before</p>	<p style="text-align: right;">Page 124</p> <p>1 because I know who he is now. He was the taller FBI 2 agent. The other [REDACTED] guy was the shorter, younger 3 guy. That's the best I can describe the guy. 4 Q. Okay. Did you -- 5 A. And -- 6 Q. I'm sorry. I didn't mean -- 7 A. When [REDACTED] and [REDACTED] no longer were a part 8 of -- I think that part of the investigation, [REDACTED] 9 and [REDACTED] may have took it over. 10 Q. Fair enough. 11 A. With Bohmer. 12 Q. Okay. Do you recall ever having a discussion 13 with [REDACTED] -- specifically with [REDACTED] -- 14 A. Okay. 15 Q. -- about Watts falsely arresting people? 16 A. I think at that point it was common knowledge. 17 If he asked me, I'd repeat it to him, yeah. 18 Q. Right. My question is a little different than 19 what you think was common knowledge. 20 Do you remember specifically ever talking to 21 him about it? 22 A. Sure. I'm sure -- I'm sure I have. 23 Q. Okay. Did you -- or do you recall ever 24 providing evidence to the FBI that Watts was falsely</p>

23 (Pages 74 to 124)

In Re: Watts Coordinated Pretrial Proceedings
Continued Deposition of Daniel Echeverria - Taken 3/5/2025

Page 125

1 **arresting people?**
2 A. Yeah, I did.
3 **Q. Okay. Do you know that FBI Agent Henderson**
4 **swore in an affidavit that there was no evidence that**
5 **Watts was falsely arresting people?**
6 A. That's on him.
7 **Q. Did you know that?**
8 A. I did not.
9 **Q. Okay. Did you ever have any discussion with**
10 **FBI Agent Henderson about an affidavit in which he swore**
11 **under oath that there was no evidence that Watts was**
12 **falsely arresting people?**
13 A. I never heard -- first time hearing it.
14 **Q. First you're hearing about it today?**
15 A. Yeah.
16 **Q. Now, you testified earlier in this deposition**
17 **that you have an opinion that Watts was falsifying A&A**
18 **sheets?**
19 A. Yes.
20 **Q. Tell me one day, any day, where you know --**
21 A. Yeah, I saw it.
22 **Q. Hold on. Hold on.**
23 A. Okay.
24 **Q. Tell me one day that you know that there are**

Page 126

1 **falsified A&A sheets by Ronald Watts?**
2 A. Okay. Let me do this: I don't know if this
3 might answer your question.
4 **Q. Let's see.**
5 A. Scenario -- I don't know if it was Scenario 1,
6 2, or 3. I know they did a couple of them with the FBI.
7 It was Ronald Watts's day off, and Ronald Watts came to
8 the district in full uniform, assigned -- signed out a
9 car or took keys to a car and did one of the scenarios
10 with the FBI. So wouldn't that be a false A&A?
11 **Q. Well, no, I don't think so.**
12 A. You're not on the A&As to work, but here you
13 are in full uniform operating a car, doing the rip and on
14 a recording.
15 **Q. Let me ask you about that, first thing.**
16 A. I mean, if it don't answer it, I don't know.
17 **Q. He can't answer it.**
18 A. No, I'm telling you. If you can't answer it,
19 I don't know.
20 **Q. So my question was a little bit different than**
21 **that.**
22 A. Okay.
23 **Q. But I want to talk about that first.**
24 A. Let's talk about that.

Page 127

1 **Q. So your recollection is that on one of the**
2 **scenarios where Watts was recorded by the FBI, he was in**
3 **uniform, in a marked police car when he was supposed to**
4 **be off duty?**
5 A. Yes.
6 **Q. Okay. What day was that?**
7 A. I couldn't tell you a day, but it was one of
8 the scenarios that were put in play by the FBI.
9 **Q. And which scenario would that be?**
10 A. May have been Scenario 1.
11 **Q. And what was Scenario 1?**
12 A. Scenario 1 was where we gave him information
13 via [REDACTED] that he was gonna be transporting money or
14 dope from Point A to Point B and meeting with [REDACTED]
15 [REDACTED] to turn it over at the hotel on 26th and State.
16 **Q. Okay. Do you remember when that was?**
17 A. I couldn't -- you can find out through the
18 FBI. I'm sure they have documents.
19 **Q. Yeah, I know I can, but do you remember?**
20 A. I don't remember. I told you I couldn't tell
21 you, top of my head, June 20, 2024. I can't tell you
22 that.
23 **Q. Do you remember what year it was?**
24 A. No, I can't you that you either.

Page 128

1 **Q. And what was your role in that scenario?**
2 A. To monitor.
3 **Q. Tell me what you mean by that, "monitor"?**
4 A. Monitor [REDACTED] but not to be in the
5 immediate area because Watts knew who we were.
6 **Q. Do you know what the result of that scenario**
7 **was?**
8 A. It was positive.
9 **Q. What does that mean?**
10 A. So, supposedly, that day what had transpired
11 was Watts ran an interception on [REDACTED] at the hotel,
12 just like the plan went in effect. And then that was a
13 recording. In fact, I think they used a mug, a recording
14 mug, that was attached to the backpack. And Watts had
15 done the rip, was on audio, may have been on video as
16 well, was observed by the FBI agents as well, but not by
17 us, at the hotel when everything transpired.
18 And Watts went as far as telling [REDACTED] that
19 he was gonna prepare a false bond report to show that he
20 was arrested but released on an I-bond. And I want to
21 say Watts even may have put a number on [REDACTED] hand
22 with a marker, like a tracking number, the way arrestees
23 are processed.
24 **Q. And where did you get all this information**

In Re: Watts Coordinated Pretrial Proceedings
Continued Deposition of Daniel Echeverria - Taken 3/5/2025

<p style="text-align: right;">Page 129</p> <p>1 from?</p> <p>2 A. From the FBI.</p> <p>3 Q. From who?</p> <p>4 A. The agent. At that point, it may have been</p> <p>5 Agent [REDACTED]</p> <p>6 Q. Did you listen to any recordings of this</p> <p>7 scenario?</p> <p>8 A. I don't recall.</p> <p>9 Q. Did you watch any video of it?</p> <p>10 A. Definitely not.</p> <p>11 Q. So the information about the mug and the</p> <p>12 number and the positive is all from somebody telling you</p> <p>13 about it?</p> <p>14 A. As well as [REDACTED]</p> <p>15 Q. It's all from somebody telling you about it?</p> <p>16 A. Yes, sir.</p> <p>17 Q. Okay. And what happened? Why wasn't Watts</p> <p>18 charged with that crime?</p> <p>19 MS. KLEINHAUS: Objection, foundation, calls for</p> <p>20 speculation, calls for a legal conclusion.</p> <p>21 BY MR. GAINER:</p> <p>22 Q. Well, I mean, you were instrumental in this</p> <p>23 investigation, right?</p> <p>24 A. I believe so.</p>	<p style="text-align: right;">Page 131</p> <p>1 A. (Indicating).</p> <p>2 Q. Okay. So we were talking about this</p> <p>3 Scenario 1 that you described between FBI and Watts and</p> <p>4 either [REDACTED] or [REDACTED] Do you remember that testimony</p> <p>5 you just gave?</p> <p>6 A. Yeah, yeah.</p> <p>7 Q. So you -- and I think I asked you this</p> <p>8 already, but just to be clear, you didn't see any video</p> <p>9 of that scenario?</p> <p>10 A. Correct.</p> <p>11 Q. You didn't hear any audio of it?</p> <p>12 A. No.</p> <p>13 Q. You learned about it from others?</p> <p>14 A. Correct.</p> <p>15 Q. And you don't -- do you know why Watts was in</p> <p>16 charge with that scenario if it was positive?</p> <p>17 A. It was a corruption one. Maybe they wanted to</p> <p>18 get two or three more in to him.</p> <p>19 Q. Right, but my question is, I'm not</p> <p>20 suggesting -- I'm not asking you why he wasn't</p> <p>21 immediately arrested. Okay?</p> <p>22 A. Okay.</p> <p>23 Q. I'm asking you why he wasn't charged.</p> <p>24 MS. KLEINHAUS: Objection, calls for --</p>
<p style="text-align: right;">Page 130</p> <p>1 Q. Yeah, and you were involved from the beginning</p> <p>2 until the end?</p> <p>3 THE WITNESS: I'm sorry. Let me -- I don't mean to</p> <p>4 do you like this, but I need to re-up my parking before I</p> <p>5 get a ticket.</p> <p>6 MR. GAINER: That's no problem. Go for it. You</p> <p>7 want to take a break?</p> <p>8 THE WITNESS: One minute. You want to take a break</p> <p>9 and I'll do this?</p> <p>10 MR. PALLES: Five minutes.</p> <p>11 THE WITNESS: Are you okay with that?</p> <p>12 MR. GAINER: I'm totally fine with that.</p> <p>13 THE WITNESS: Let's do that while I do this here.</p> <p>14 MR. GAINER: We're taking a break.</p> <p>15 MR. PALLES: Thanks. I appreciate that.</p> <p>16 MR. NOLAND: Anybody need the bathroom code?</p> <p>17 THE VIDEOGRAPHER: The time is 1:32 p.m.</p> <p>18 THE WITNESS: 5205 pound.</p> <p>19 THE VIDEOGRAPHER: We're off the record.</p> <p>20 (A short break was had.)</p> <p>21 THE VIDEOGRAPHER: The time is 1:42 p.m., and we're</p> <p>22 back on the record.</p> <p>23 BY MR. GAINER:</p> <p>24 Q. All right. You ready to keep going?</p>	<p style="text-align: right;">Page 132</p> <p>1 MR. DEVINE: Objection.</p> <p>2 MS. KLEINHAUS: -- a legal conclusion.</p> <p>3 MR. DEVINE: And speculation.</p> <p>4 BY THE WITNESS:</p> <p>5 A. I'll answer.</p> <p>6 Q. Yeah, go ahead. You can.</p> <p>7 A. I don't know why he wasn't charged. I think</p> <p>8 he should have.</p> <p>9 Q. Okay. But you don't know why he wasn't?</p> <p>10 A. It wasn't my investigation.</p> <p>11 Q. Okay. Well, it was your investigation. You</p> <p>12 were involved.</p> <p>13 A. I don't charge people. They charge people.</p> <p>14 Q. You were involved in the investigation, right?</p> <p>15 A. Yes.</p> <p>16 Q. Right. And you worked on it from the</p> <p>17 beginning to the end?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. Now I want to go back to -- because</p> <p>20 this all -- this started because of my question about</p> <p>21 A&A sheets, right?</p> <p>22 A. Right.</p> <p>23 Q. So you know what A&A sheets are?</p> <p>24 A. Yeah, I know very well what --</p>

In Re: Watts Coordinated Pretrial Proceedings
Continued Deposition of Daniel Echeverria - Taken 3/5/2025

Page 133

1 **Q.** Attendance and assignment sheets?
2 A. Yeah.
3 **Q.** It's the thing that says whether you're at
4 work or not?
5 A. Correct, yeah.
6 **Q.** And those are filled out generally by Watts'
7 secretaries, right?
8 A. Supervisors.
9 **Q.** So Watts' secretaries don't do them?
10 A. I've never done one. I've never seen a Watts
11 secretary do it. I've seen supervisors do it.
12 **Q.** Regardless --
13 A. That's what I've seen.
14 **Q.** They're filled out to say who's at work and
15 who isn't?
16 A. That's what the purpose is.
17 **Q.** Right. And you said earlier that you think
18 Watts -- it's your opinion, knowing what you know now,
19 that Watts was falsifying A&A sheets?
20 A. He could very well have done that.
21 **Q.** Well, he could very well have not done it too,
22 right?
23 A. Sure. I'll give you that one.
24 **Q.** Right. And you can't tell me a specific

Page 134

1 A&A sheet that he falsified, can you?
2 A. I never worked with the guy. I couldn't tell
3 you.
4 **Q.** Okay. And so what you told us earlier about
5 falsifying A&A sheets, that was your opinion, right?
6 A. Yes.
7 **Q.** And you don't have any proof to support that,
8 do you?
9 A. No, I don't.
10 **Q.** Okay. Thank you.
11 Now I want to talk for a little bit about -- I
12 think you might have talked about this a little earlier
13 today. I know you talked about it back in previous
14 sessions, about the -- I'm gonna call it like the arrest
15 trade-off scenario, right?
16 A. Yeah, sure.
17 **Q.** You know what I'm talking about?
18 A. Yeah, yeah.
19 **Q.** When you testified that a TAC team would make
20 an arrest and sometimes give it to another TAC team?
21 A. If it was multiples, yeah.
22 **Q.** I think you said the purpose for that was just
23 to help -- so the other team could help out?
24 A. Yeah.

Page 135

1 **Q.** In a scenario like that, where there -- in
2 your experience when there was an arrest trade-off, the
3 person who would be in Box 1 on that arrest report would
4 not be the person who arrested the individual being
5 arrested, correct?
6 A. It would be the person processing.
7 **Q.** Right, but do you know what Box 1 is?
8 A. Yeah.
9 **Q.** Right. Of course you do. You worked forever,
10 and you filled out arrest reports, right?
11 A. Yeah.
12 **Q.** So in an arrest trade-off scenario like you
13 described --
14 A. Yeah.
15 **Q.** -- the person in Box 1 who would be the
16 attesting officer, that would not be the person who --
17 A. Who passed it off.
18 **Q.** Let me just finish the question.
19 That would be a person different from the
20 person who arrested the person being arrested, right?
21 MS. KLEINHAUS: Objection to form.
22 BY THE WITNESS:
23 A. Okay. Let me clarify that because you're kind
24 of confusing here.

Page 136

1 I'm gonna pass something off to you,
2 Mr. Gainer, right? You're gonna handle the pinch.
3 You're gonna be Box 1.
4 **Q.** Exactly.
5 A. Exactly.
6 **Q.** But I wasn't the one who arrested the
7 person --
8 A. Correct.
9 **Q.** -- in that scenario?
10 A. Right.
11 **Q.** Right. So your testimony is that is something
12 that would happen when you were involved in an arrest
13 pass-off scenario like you just described?
14 A. Yes.
15 **Q.** And the person in Box 2 in that scenario,
16 Eric, my partner, wouldn't be the person who arrested the
17 person on the arrest report either, right?
18 A. Right.
19 **Q.** Okay.
20 A. Or it could be.
21 **Q.** It could be, but it wasn't always in your
22 experience, right?
23 A. Right. You could even do that in moving
24 violation tickets. If you look at the ticket, it says,

In Re: Watts Coordinated Pretrial Proceedings
Continued Deposition of Daniel Echeverria - Taken 3/5/2025

<p style="text-align: right;">Page 137</p> <p>1 "To wit." So let's say, "Mr. Gainer, you don't have any 2 tickets. Shame on you. But, hey, let me call somebody 3 on the radio." "Hey, can somebody come and write a mover 4 for me?" "Oh, sure. I'm gonna have 106 come and do the 5 mover." "To wit is gonna be Mr. Gainer, but you're gonna 6 be the signing officer and the issuing ticket officer." 7 Q. I guess that's my point, which is, sometimes 8 in your experience -- 9 A. Right. 10 Q. -- the officers in Box 1 and Box 2 on arrest 11 reports weren't the officers who actually arrested the 12 person being arrested? 13 A. Correct, yeah. And I think I explained that 14 earlier too. 15 Q. You did, right. 16 A. Okay. 17 Q. And that's something that you experienced 18 throughout your career as a police officer? 19 A. Yeah. 20 Q. And are you familiar with the -- like, let's 21 say a vice case report, the section where a sergeant has 22 to approve a vice case report? 23 A. All supervisors need to approve a case report, 24 whether it's vice or general.</p>	<p style="text-align: right;">Page 139</p> <p>1 A. Every case report I've done, the 2 superintendent has been present. Every arrest that have 3 been done, because we worked as a team in narcotics, a 4 supervisor was there. 5 Q. How about when you were on the watch? 6 A. On the watch? I don't necessarily -- not 7 present, but they'll call you and say, "What do you got?" 8 Before you write the paper, "What do you got?" 9 Q. Okay. 10 A. So whether they were physically present, no, 11 but they were aware of what's going on. 12 Q. Well, you know that -- did you ever work on a 13 TAC team? 14 A. Yes, I did. 15 Q. Okay. And what district? 16 A. 1st District. 17 Q. All right. In 1, when you would complete a 18 vice case report -- 19 A. Uh-huh. 20 Q. -- would you then put your vice case report in 21 a basket so that it could be approved by a supervisor? 22 A. No. 23 Q. Okay. How did it work in 1 when you -- 24 A. We'd hand it off to the supervisor.</p>
<p style="text-align: right;">Page 138</p> <p>1 Q. Right. I'm only talking about a vice case 2 report. 3 A. Okay. 4 Q. Okay? 5 And I'm talking about the box on the vice case 6 report that a supervisor has to sign to approve it? 7 A. Okay. 8 Q. You're familiar with that? 9 A. Yeah. 10 Q. And you've drafted vice case reports before? 11 A. Sure. 12 Q. And you've submitted them? 13 A. Yeah. 14 Q. And they've been approved by supervisors? 15 A. Yes. 16 Q. And would you agree with me that the 17 supervisor who approves the vice case report is 18 frequently not a superintendent who was present when the 19 incident happened? 20 A. No. 21 Q. You would not agree with me? 22 A. I don't think it's frequently. 23 Q. Okay. How often do you think in your 24 experience?</p>	<p style="text-align: right;">Page 140</p> <p>1 Q. To what supervisor? 2 A. Your immediate supervisor. 3 Q. So the TAC team sergeant? 4 A. Yeah. If they weren't present, they'd come 5 in, and they'd want to look at your paper. "Whatchu 6 doin'? What do you got?" And then you complete it. You 7 complete it, hand it to him or her, and they'll do it on 8 the spot; or they'll say, "You know what? I'm gonna go 9 get lunch now. Leave it in the box, and then I'll sign 10 it later." 11 Q. Right. And the person who signed it wasn't 12 always present when the incident that's reported in the 13 report occurred? 14 A. Not always. Right, yeah. 15 Q. Okay. Now, in the trade-off, in the arrest 16 trade-off scenario that we've been talking about, in a 17 scenario like that, the person signing the criminal 18 complaint in a case like that wasn't always the person 19 who arrested -- 20 A. It would be the same situation. 21 Q. Same situation as the arrest report? 22 A. Right. 23 Q. Thank you. 24 Did you look at anything to get ready for</p>

In Re: Watts Coordinated Pretrial Proceedings
Continued Deposition of Daniel Echeverria - Taken 3/5/2025

Page 141

1 today's deposition?

2 A. No, I did not, sir.

3 Q. All right. You didn't read your previous

4 transcript?

5 A. No need.

6 Q. All right. Earlier, you were talking about

7 the rip scenario?

8 A. Yeah.

9 Q. And my understanding of what you were saying

10 is you were talking about the scenario where Watts and

11 Mohammed -- for which Watts and Mohammed got arrested,

12 right?

13 A. Yeah.

14 Q. But then I also thought I heard you say rip

15 scenarios?

16 A. Yeah, there's three of them.

17 Q. Okay. So any of the -- we just talked about

18 Scenario 1, right?

19 A. In fact, let me correct myself. That's

20 Scenario 2.

21 Q. Okay. So we just talked about Scenario 2?

22 A. Um-hmm.

23 Q. Yes?

24 A. Because Scenario 1, for the record, Watts was

Page 142

1 present, but he did a dry run. He didn't do anything.

2 He was there to watch and see if anybody was watching

3 [REDACTED]

4 Q. And how do you know that?

5 A. Because he was spotted and we were there.

6 Q. You were there --

7 A. Okay. When they did the scenario, like I

8 said, they did the scenario. They did three. And then

9 the scenario was not just, "Hey, you know, Tom, come with

10 us. We need somebody to watch." "Mr. Gainer, cover the

11 south end." "Mr. Noland, cover the east end."

12 No. It was the whole platoon in the FBI

13 building there. So you're talking about 20, 30 agents,

14 plus, they sent an airplane. How true it is, I don't

15 know.

16 Q. Did you see the airplane?

17 A. My eyes aren't that good.

18 Q. Were you in the airplane?

19 A. No.

20 Q. So I want --

21 A. So he was observed because they had a

22 surveillance team there. He was observed. "Hey, we

23 believe this is Ronald Watts." They took pictures of

24 him, a video, whatever. The license plate on his black

Page 143

1 Cadillac was boy, X-ray, Tom, 3, 2, 4. You know, it's

2 him. All right. "We have -- let's start rolling. We

3 have [REDACTED] dropping -- picking up the bag from

4 Agent Thomas, Thomas handing him the bag." They're

5 taking pictures of that nonsense.

6 Then they see [REDACTED] "go

7 southbound on State the way we told him to do it, the way

8 he was instructed to do it. Okay. He's heading to the

9 corner. He's making the corner. Oh, here comes Watts.

10 He's driving by, but he's not engaging," right? And then

11 later on, they was supposed to meet Watts because we

12 fed -- he was -- [REDACTED] was fed the scenario to feed --

13 to pass down to Ronald Watts.

14 So then after the scenario was complete, you

15 know, they were supposed to meet at Walgreens in

16 Chinatown, on Princeton and 22nd. Well, Watts did

17 everything and met him and said, "Hey" -- and this is

18 supposedly on audio, which I didn't hear, and I didn't

19 see no video. He said, "Hey, nobody's watching you.

20 You're good. Let me know when the lick is on again."

21 Q. Okay.

22 A. So then fast-forward to scenario No. 2,

23 where --

24 Q. You've described that one already.

Page 144

1 A. Okay, unless you want me to do it again?

2 Q. No, I don't.

3 A. Okay, just in case.

4 Q. I want to ask you --

5 MR. NOLAND: Scenario 2 is the one that was not

6 charged?

7 THE WITNESS: Yes, yes.

8 MR. GAINER: That's my understanding.

9 MR. NOLAND: Just based on your prior

10 conversation -- prior questioning.

11 BY THE WITNESS:

12 A. In fact, in Scenario 2, let's just say --

13 don't quote me or hold this --

14 Q. Well, I mean, we are quoting you.

15 A. Quote me, but also attach this to the quote:

16 I'm using this dollar amount as an example, 10,000. And

17 supposedly Watts took, you know, 8 of those 10,000 and

18 gave 2,000 to [REDACTED] for Scenario 2, which was recovered

19 by the agents. So they strip-search [REDACTED] make sure

20 he don't have anything on him, any money. Then when he

21 comes back, well, guess what? AK is gone, but these

22 1505 -- Federal 1505, he has two of that.

23 Q. So I want to ask you some very specific

24 questions about each scenario.

In Re: Watts Coordinated Pretrial Proceedings
Continued Deposition of Daniel Echeverria - Taken 3/5/2025

Page 145	<p>1 A. Sure. Okay. Okay. Sure.</p> <p>2 Q. Scenario 1, which is --</p> <p>3 A. The dry run?</p> <p>4 Q. Yeah. Did you see any video of Watts doing</p> <p>5 anything in that scenario?</p> <p>6 A. I told you I didn't.</p> <p>7 Q. Okay. Did you listen to any recordings of</p> <p>8 Watts doing anything in that scenario?</p> <p>9 A. I believe I did not.</p> <p>10 Q. Did you actually see Watts do anything in that</p> <p>11 scenario?</p> <p>12 A. No.</p> <p>13 MR. DEVINE: Objection, asked and answered</p> <p>14 repeatedly.</p> <p>15 MR. GAINER: No, it wasn't, but thank you.</p> <p>16 BY MR. GAINER:</p> <p>17 Q. Scenario 2 we've already -- well, we</p> <p>18 originally called it Scenario 1.</p> <p>19 A. Right, and I corrected it.</p> <p>20 Q. Now it's Scenario 2.</p> <p>21 A. Yes.</p> <p>22 Q. And you've already told me that you did not</p> <p>23 see any video of Watts engaged in any misconduct, right?</p> <p>24 A. Right.</p>	Page 147	<p>1 A. No.</p> <p>2 Q. Okay. And did you see, yourself, Watts</p> <p>3 engaged in any misconduct in that scenario?</p> <p>4 A. No.</p> <p>5 Q. Let's move on from the scenarios.</p> <p>6 Would you agree with me, based on your</p> <p>7 experience working in 189 and then later in Brass Tax,</p> <p>8 that Ida B. Wells' drug sales were going on 24/7?</p> <p>9 A. Yes.</p> <p>10 Q. Did you ever do any work to try to estimate</p> <p>11 how much money was being made by the drug dealers in the</p> <p>12 Ida B. Wells on like a particular day or week?</p> <p>13 A. Yeah, I mean, you get curious. Like, what the</p> <p>14 heck so good about the Browning buildings --</p> <p>15 Q. Right, sure.</p> <p>16 A. -- you know.</p> <p>17 Q. So did you ever come up with a number?</p> <p>18 A. I'd say they were making about a hundred</p> <p>19 thousand a day --</p> <p>20 Q. Okay.</p> <p>21 A. -- if I had to guesstimate.</p> <p>22 Q. Based on your experience working --</p> <p>23 A. Based on the foot traffic I'd see, you know,</p> <p>24 Subject 1 goes in, comes out within 30 seconds, walking</p>
Page 146	<p>1 Q. And you did not hear any audio of Watts</p> <p>2 engaged in any misconduct, right?</p> <p>3 A. Correct.</p> <p>4 Q. And you did not see, yourself, him engaged in</p> <p>5 any misconduct?</p> <p>6 A. We couldn't be that close to him.</p> <p>7 Q. So now, Scenario 3, my understanding, is the</p> <p>8 one where -- for which he was charged?</p> <p>9 A. Yes, that was with Kallatt.</p> <p>10 Q. Right.</p> <p>11 Specifically, did you see any video of Watts</p> <p>12 engaged in any misconduct during that scenario?</p> <p>13 A. No.</p> <p>14 Q. Did you listen to any audio --</p> <p>15 A. Yes.</p> <p>16 Q. -- of Watts?</p> <p>17 Okay. What audio did you listen to?</p> <p>18 A. It wasn't Watts's audio. It was -- it may</p> <p>19 have been Watts and Mohammed communicating, but the audio</p> <p>20 that I remember specifically was Kallatt talking to</p> <p>21 [REDACTED]</p> <p>22 Q. Okay. So my question was, did you hear any</p> <p>23 audio of Watts engaged in any misconduct in that</p> <p>24 scenario?</p>	Page 148	<p>1 at a faster pace, a little fist clinched, you know.</p> <p>2 Subject No. 2, maybe less than 30 seconds, you know, come</p> <p>3 in through the front door, come out the back door. I</p> <p>4 mean, it was very organized. They were like little army</p> <p>5 ants.</p> <p>6 Q. Right. And are you -- like, when you say --</p> <p>7 A. And you figure \$10 a bag.</p> <p>8 Q. For two bags and a jab?</p> <p>9 A. Maybe even more, depends. You know, South</p> <p>10 Side don't use jabs; they use bundles. West Side's a</p> <p>11 jab.</p> <p>12 Q. I'm a West Side guy.</p> <p>13 A. There you go. What do you know about West</p> <p>14 Side?</p> <p>15 Q. I worked in 11.</p> <p>16 A. Then you know. Shit.</p> <p>17 Q. So let me ask you, when you say a hundred</p> <p>18 thousand dollars a day, are you talking about one</p> <p>19 building, or are you talking about a group of buildings?</p> <p>20 A. I'm talking about the Obama line.</p> <p>21 Q. Okay. So just that line?</p> <p>22 A. That's what I would guess.</p> <p>23 Q. The Fears line?</p> <p>24 A. Yes.</p>

In Re: Watts Coordinated Pretrial Proceedings
Continued Deposition of Daniel Echeverria - Taken 3/5/2025

<p style="text-align: right;">Page 149</p> <p>1 Q. The Kamane Fears line?</p> <p>2 A. Kamane Fears.</p> <p>3 Q. Now, you testified previously that when you</p> <p>4 were in narcotics, you were -- you were often the</p> <p>5 debriefing officer?</p> <p>6 A. Yes.</p> <p>7 Q. And your role was, after someone got taken</p> <p>8 down after a controlled buy, you would talk to that</p> <p>9 person to see if they had information --</p> <p>10 A. Right.</p> <p>11 Q. -- right?</p> <p>12 And that's what the debriefing officer does?</p> <p>13 A. Right.</p> <p>14 Q. And you would ask those arrestees if they</p> <p>15 could provide any information to help themselves out?</p> <p>16 A. Not help themselves out because that then</p> <p>17 you'll be proffering. I'm not in a position to proffer.</p> <p>18 You would ask them if they have any knowledge about</p> <p>19 narcotics sales; obviously, because they're held up on a</p> <p>20 narcotics case. "Do you have something on a search</p> <p>21 warrant? How about weapons? How about shootings?"</p> <p>22 Especially, we would target, supposedly, shootings was</p> <p>23 our focus.</p> <p>24 Q. Yeah, so you're saying that during the time</p>	<p style="text-align: right;">Page 151</p> <p>1 A. Yes, yes.</p> <p>2 Q. People who had been arrested for selling</p> <p>3 drugs?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. Did you ever, during debriefing, tell</p> <p>6 anybody, "Look, if you give me information and it's</p> <p>7 positive, we can charge you with possession instead of</p> <p>8 delivery"?</p> <p>9 A. No.</p> <p>10 Q. Never?</p> <p>11 A. No, never.</p> <p>12 Q. So you never -- you never offered to do</p> <p>13 anything for anyone when you were getting information?</p> <p>14 A. Never.</p> <p>15 Q. Okay. Were there people -- when you were the</p> <p>16 debriefing officer and you were getting information from</p> <p>17 people, were there ever people that gave you information</p> <p>18 that turned out to be false?</p> <p>19 A. I don't think I took it that far.</p> <p>20 Q. What do you mean by that?</p> <p>21 A. They give information, and I just said -- I</p> <p>22 would say, "Hmm, sounds good" or I don't think they're a</p> <p>23 credible person, and I just didn't take it the step</p> <p>24 further.</p>
<p style="text-align: right;">Page 150</p> <p>1 that you -- it sounded like you did that for a while?</p> <p>2 A. I don't know how long.</p> <p>3 Q. Well, during the time that you were the</p> <p>4 debriefing officer, is it your testimony that you were</p> <p>5 asking these people to provide you with information in</p> <p>6 exchange for nothing?</p> <p>7 MS. KLEINHAUS: Objection to form.</p> <p>8 BY THE WITNESS:</p> <p>9 A. "Do you have any information?" "Is it gonna</p> <p>10 help me any?" I'd say, "I'm not in a position to help</p> <p>11 you."</p> <p>12 Q. But --</p> <p>13 A. But if you have something, give it up.</p> <p>14 Q. "And maybe I can figure out a way to talk to</p> <p>15 the State's Attorney"?</p> <p>16 A. I've never said that to anybody.</p> <p>17 Q. Did you ever hear anybody do that?</p> <p>18 A. No.</p> <p>19 Q. Okay. "Maybe I can figure out a way to have</p> <p>20 the arresting officer not show up in court," ever hear</p> <p>21 anything like that?</p> <p>22 A. Are you crazy? I haven't.</p> <p>23 Q. So sometimes you got information from people</p> <p>24 who were just giving you information to help the police?</p>	<p style="text-align: right;">Page 152</p> <p>1 Q. What would you do if you received information</p> <p>2 when you were debriefing someone and you got information</p> <p>3 you thought -- from a person who was credible?</p> <p>4 A. You'd channel it down to the supervisor.</p> <p>5 Q. Okay. Would you write a report about that?</p> <p>6 A. Yeah, and you'd put in -- you'd tell the</p> <p>7 supervisor -- say, "Are we gonna do anything with it?"</p> <p>8 They'd say, "Make it positive, and we'll look into it or</p> <p>9 we'll further evaluate it."</p> <p>10 Q. Did you ever do that? Did you ever further</p> <p>11 evaluate any of the information you received?</p> <p>12 A. Sometimes we did, and then sometimes we said,</p> <p>13 "You know what? That's probably expired by now."</p> <p>14 Q. Anything that sticks out to you as information</p> <p>15 you received from somebody you debriefed that turned into</p> <p>16 something else?</p> <p>17 A. Yeah, this case.</p> <p>18 Q. Anything else?</p> <p>19 A. I mean, that's the big goose egg there, I</p> <p>20 mean -- no.</p> <p>21 Q. Okay. People would sometimes lie to you,</p> <p>22 right?</p> <p>23 A. Of course. There's people that lie to the</p> <p>24 police all the time.</p>

In Re: Watts Coordinated Pretrial Proceedings
Continued Deposition of Daniel Echeverria - Taken 3/5/2025

Page 153

1 **Q.** No. I'm talking about to you. People would
2 sometimes lie to you when you asked them for information?
3 A. I couldn't tell you if they're lying.
4 **Q.** Well, people would say anything to get out of
5 a bind, right?
6 A. Sure.
7 MS. KLEINHAUS: Objection to form, foundation.
8 BY MR. GAINER:
9 **Q.** Well, those are your exact words from your
10 first deposition.
11 A. I think my exact words were "They lie to
12 live."
13 **Q.** Yes, you did say that too.
14 A. See, I don't need to look at it. I know what
15 I said.
16 **Q.** Right. But that's true, right? That's your
17 experience?
18 A. Sure.
19 **Q.** People who got arrested for selling narcotics
20 would say anything to get out of the bind that they were
21 in?
22 A. Sure.
23 **Q.** Okay. Would you agree with me that the Watts
24 team that you're familiar with was actively patrolling

Page 154

1 the Wells homes?
2 MS. KLEINHAUS: Objection, calls for speculation.
3 BY THE WITNESS:
4 A. They were housing --
5 **Q.** I think maybe you're right about that, but
6 we've been talking about the Watts team for three
7 different sessions now. So would you agree with me that
8 they were actively patrolling the Wells homes?
9 A. They're a housing team.
10 **Q.** Right, I know that. But there are -- I think
11 we can agree that there's some teams that just don't work
12 very hard, right?
13 A. I've been a hard worker.
14 **Q.** I'm not suggesting you haven't been. I'm just
15 saying sometimes you run into a team, and they don't seem
16 like they're doing a lot of work, right, in your
17 experience?
18 A. Yeah, we got dog asses on this job.
19 **Q.** This team -- yeah, we do. I wasn't gonna say
20 it that way, but you're right.
21 This team, this specific team, the Watts team,
22 they made a lot of arrests?
23 A. Yes.
24 **Q.** And they actively patrolled the Ida B. Wells

Page 155

1 homes?
2 A. Yeah.
3 MS. KLEINHAUS: Objection, foundation.
4 BY MR. GAINER:
5 **Q.** And the work that they did in the Ida B. Wells
6 homes that you're familiar with because of your work in
7 those [REDACTED] and your involvement in investigation -- the
8 work that they did disrupted the drug sales in the
9 Ida B. Wells homes, wouldn't you say?
10 MS. KLEINHAUS: Objection, foundation.
11 BY THE WITNESS:
12 A. I'd say they facilitated it.
13 **Q.** Okay. And I appreciate that. You've said
14 that before. You think that they were facilitating drug
15 deals?
16 A. I'm gonna be real clear. I think they
17 facilitated it to their convenience, when it was
18 convenient for them; however, I can't say that all their
19 work was bad. You can't say every pinch they did was a
20 bogus pinch. You can't. It's impossible. I can't. But
21 they were very much involved in the narcotics trade.
22 **Q.** And the work --
23 A. And we wouldn't be here if they didn't.
24 **Q.** And the work that they did by arresting people

Page 156

1 disrupted the drug sales in those buildings, right?
2 MR. DEVINE: Objection, calls for speculation.
3 BY THE WITNESS:
4 A. Okay. Let me agree with you to disagree with
5 you. Agree with you in the fact that, let's say 575 was
6 paying Watts but 511 wasn't. So he would patrol 511
7 based on what 575 would tell him. "Hey, you know, the
8 run-to spot up there is" -- in fact, that was big tension
9 among the buildings -- "The run-to spot there is 302."
10 So Watts did interrupt narcotics sales in 511 but not
11 575.
12 **Q.** Yeah, that's all --
13 A. Or vice versa.
14 **Q.** That's all I'm looking for. I'm not trying to
15 go move you off your position.
16 A. I don't know. Does that answer it?
17 **Q.** It does.
18 A. So it's a "yes" or "no" type answer.
19 **Q.** I'm not trying to move you off your position
20 about Watts. All I'm saying is that team making arrests
21 in certain places in Ida B. Wells homes disrupted the
22 drug sales --
23 A. Yeah.
24 **Q.** Right?

In Re: Watts Coordinated Pretrial Proceedings
Continued Deposition of Daniel Echeverria - Taken 3/5/2025

Page 157

1 **And --**

2 A. Not everybody paid him.

3 **Q. -- because the drug sales were being**

4 **disrupted, there was an incentive for people to lie on**

5 **members of the Watts team to get them out of there,**

6 **right?**

7 MS. KLEINHAUS: Objection, calls for speculation.

8 BY THE WITNESS:

9 A. I can't say what they did to him or not.

10 **Q. I'm just asking if there was incentive to do**

11 **it. I'm not saying they did it.**

12 **Was there incentive for them to lie on the**

13 **Watts team to get them out of the buildings?**

14 A. No.

15 MS. KLEINHAUS: Objection, calls for speculation.

16 BY THE WITNESS:

17 A. I would say no, my opinion, based on my

18 experience, and I'll tell you why. I'm surprised nobody

19 did anything to Watts. I think they were fuckin' scared

20 of the man.

21 **Q. Okay. Who told you that, that he was scared**

22 **of him?**

23 A. Everybody says.

24 **Q. Who specifically?**

Page 158

1 A. Okay. Let's just say [REDACTED] for one.

2 Let's just say Kamane Fears.

3 **Q. Anybody else? So Kamane Fears told you that?**

4 A. No. I mean Monk, Monk.

5 **Q. You're talking about Jerome Fears?**

6 A. There you go.

7 **Q. So Jerome Fears told you that?**

8 A. Yeah.

9 **Q. And [REDACTED] told you that?**

10 A. Yeah.

11 **Q. Okay. Anybody else?**

12 A. [REDACTED]

13 **Q. Anybody else?**

14 A. And I'll go a step further. In today's

15 climate with the police, there's a lot of disrespect for

16 the police. I think police hands are tied a lot. And

17 I'm just surprised none of them young boys ever did

18 anything to Watts, knowing what he was doing to them.

19 **Q. Did you ever hear anyone talk about planning**

20 **on doing something to Watts?**

21 A. No. I would run interception, I believe.

22 **Q. What?**

23 A. I would run interception on it.

24 **Q. Did you ever write a report that indicated**

Page 159

1 **that you thought something bad was gonna happen to Watts?**

2 A. No.

3 **Q. Did you ever tell the FBI that?**

4 A. No. I'm surprised -- I've told them. I'm

5 surprised nobody has done anything to him.

6 **Q. Right, and I understand what you're saying.**

7 **My point is, did you ever share that with the FBI?**

8 A. Yeah, I've said that -- what I said now --

9 **Q. Yes.**

10 A. -- I've said to the FBI people.

11 **Q. Okay.**

12 A. I'm surprised that nobody has ever done

13 nothing to him.

14 **Q. Who in the FBI did you say that to?**

15 A. [REDACTED] [REDACTED] [REDACTED]

16 **Q. All right. Did you ever meet --**

17 A. Chester, Bohmer, you know.

18 **Q. Did you ever meet Ron Watts?**

19 A. I know who he is. Yes, I've met him.

20 **Q. I mean have you met him?**

21 A. In passing.

22 **Q. You ever have a conversation with him?**

23 A. Yeah.

24 **Q. When was that?**

Page 160

1 A. When he'd come in the office and look at the

2 board.

3 **Q. You talked about that last time.**

4 A. He'd say, "Y'all got nothing up there. Where

5 y'all gonna be at today?" And knowing what I know now,

6 it was because he wanted to make sure we weren't

7 interrupting what he had going on or we weren't gonna be

8 at the buildings, because he's been specific. "Y'all

9 gonna hit them buildings today? Where y'all gonna be?

10 Aw, you ain't got nobody. Y'all got bums. You ain't got

11 no players."

12 **Q. So this is stuff he said to you?**

13 A. Yeah, in general to me and people present in

14 the office.

15 **Q. Your belief is that he was actually checking**

16 **up on you guys to see where you'd be?**

17 A. Knowing what I know now, yes.

18 **Q. What does that mean, knowing what you know**

19 **now?**

20 A. Knowing where I'm at now, knowing he's

21 convicted, knowing that he got charged, knowing who [REDACTED]

22 [REDACTED] is, what [REDACTED] been through, knowing the

23 rips. So, yes, I believe that. That's where I refer to.

24 **Q. So you're not aware of any report that**

In Re: Watts Coordinated Pretrial Proceedings
Continued Deposition of Daniel Echeverria - Taken 3/5/2025

Page 161

1 indicates that that's what he was doing, are you?
 2 A. Other than the Brass Tax?
 3 Q. No. I'm saying, specifically, you're not
 4 aware of any report that indicates that Watts would go
 5 into your office and check on your board --
 6 A. No.
 7 Q. -- to try to help himself?
 8 A. No.
 9 Q. Okay. Now, were you ever present when Watts
 10 arrested someone?
 11 A. No.
 12 Q. Did you ever see him arrest someone?
 13 A. Him physically?
 14 Q. Yes.
 15 A. No.
 16 Q. I'm talking now -- all my questions right now
 17 are about Ronald Watts. Okay?
 18 A. No, not physically.
 19 Q. Did you ever see him put narcotics on anybody?
 20 A. No. I'd report it right away.
 21 Q. And you never reported it?
 22 A. Because I've never seen it.
 23 Q. Exactly.
 24 A. Exactly.

Page 162

1 Q. That's my point, right.
 2 You talked earlier about taxation, the street
 3 tax, right?
 4 A. Yes.
 5 Q. Did you ever -- were you ever present when he
 6 explained to anyone that they were being taxed?
 7 A. No.
 8 Q. Did you ever hear him do that?
 9 A. No.
 10 Q. Okay. All that information about taxation
 11 that you talked about before is what people told you
 12 about Watts, right?
 13 A. Yes.
 14 Q. Okay. You also talked earlier about false --
 15 I mean earlier, like two depositions ago.
 16 A. Okay.
 17 Q. -- about false imprisonment, Watts was engaged
 18 in false imprisonment?
 19 A. Yes.
 20 Q. You remember saying that?
 21 A. Yes.
 22 Q. Is that the same as putting a case on
 23 somebody, or is that something different?
 24 A. Putting a case on somebody.

Page 163

1 Q. All right. Did you -- were you ever present
 2 when you -- when Watts falsely arrested or falsely
 3 imprisoned someone?
 4 A. I think I answered that. No.
 5 Q. Okay. All the information you have on that
 6 was told to you by someone else?
 7 A. Part of the brass tax, yes.
 8 Q. Okay. And you also talked earlier about
 9 extortion?
 10 A. Yeah.
 11 Q. You remember saying that Watts was engaged in
 12 extortion, right?
 13 A. Yeah.
 14 Q. Did you ever see him engage in extortion?
 15 A. No.
 16 Q. And when I say that, I don't just mean in
 17 person; I mean on video or overhear it on audio?
 18 A. No, just like -- no, no, no, no.
 19 Q. Okay. Everything you have about Watts
 20 extorting people is something told to you by someone
 21 else?
 22 A. Through the investigation.
 23 Q. Right. So there were two murders that have
 24 been talked about during the course of these

Page 164

1 investigations.
 2 A. Yes.
 3 Q. Let's talk about Big Shorty --
 4 A. Yes.
 5 Q. -- first. Okay?
 6 A. Um-hmm.
 7 Q. Who was convicted for the murder of Big
 8 Shorty?
 9 MS. KLEINHAUS: Objection, foundation.
 10 BY THE WITNESS:
 11 A. I don't know. I don't know.
 12 Q. Did you know someone was convicted for that?
 13 A. Not off the top of my head.
 14 Q. Okay. Do you know who the Hobos are?
 15 A. Yeah, it's a faction of the 5th Ward.
 16 Q. Yeah. Did you -- were you aware of any
 17 connection between the Hobos and Big Shorty?
 18 A. Not off the top of my head.
 19 Q. Who told you about the connection -- the
 20 supposed connection between Big Shorty and Watts?
 21 A. [REDACTED]
 22 Q. The FBI agent?
 23 A. Yes.
 24 Q. Did you ever see Big Shorty and Watts

In Re: Watts Coordinated Pretrial Proceedings
Continued Deposition of Daniel Echeverria - Taken 3/5/2025

<p style="text-align: right;">Page 165</p> <p>1 together?</p> <p>2 A. No.</p> <p>3 Q. Are you aware of any evidence of them being</p> <p>4 together?</p> <p>5 A. No.</p> <p>6 Q. Are you aware of any evidence indicating that</p> <p>7 Big Shorty was paying Watts?</p> <p>8 A. You know what? Let me retract that. I</p> <p>9 believe the FBI agent did share some information -- I</p> <p>10 don't recall if it was documentation or not -- where</p> <p>11 there was dealings with Watts and Big Shorty.</p> <p>12 Q. Can you --</p> <p>13 A. And they asked us to elaborate on it, and we</p> <p>14 couldn't because I didn't know any firsthand knowledge of</p> <p>15 it.</p> <p>16 Q. Can you be any more specific about what that</p> <p>17 evidence was that the FBI agent shared with you?</p> <p>18 A. I want to say there was a big, like, powwow or</p> <p>19 clashing with the DEA and the FBI as to who's gonna</p> <p>20 govern the Watts case because, I guess, initially,</p> <p>21 Big Shorty may have reported Watts or gave up some Watts</p> <p>22 information due to a homicide that Big Shorty was alleged</p> <p>23 in. And he -- that's how Watts first came on the radar.</p> <p>24 So it was like tension between who's gonna</p>	<p style="text-align: right;">Page 167</p> <p>1 Q. Okay. And you were asked to try to help</p> <p>2 confirm it, and you were unable to do so?</p> <p>3 A. And then they said, "What do you know about</p> <p>4 that?" I was like, "This is the first I'm hearing it."</p> <p>5 Q. You knew nothing about it?</p> <p>6 A. Right.</p> <p>7 Q. And Shannon didn't know anything about it</p> <p>8 either?</p> <p>9 A. I don't recall.</p> <p>10 Q. I thought you said "we" informed--</p> <p>11 A. "We" meaning -- yeah, let me correct it. I</p> <p>12 didn't know nothing about it.</p> <p>13 Q. Okay. Fair enough.</p> <p>14 A. I shouldn't speak on behalf of Shannon.</p> <p>15 Q. Fair enough.</p> <p>16 So are you aware of any evidence that</p> <p>17 indicates that Watts was involved in that murder?</p> <p>18 A. Other than what I just explained to you?</p> <p>19 Q. Yes.</p> <p>20 A. No.</p> <p>21 Q. Okay. You said somebody named Mary Thompson</p> <p>22 told you that there was tension between Watts and Kamane</p> <p>23 Fears before Fears was killed?</p> <p>24 A. That was his fiancée or mother of his child.</p>
<p style="text-align: right;">Page 166</p> <p>1 take it, what we knew about -- us, meaning me, meaning</p> <p>2 DEA, knew about it before you guys knew about it. And I</p> <p>3 think it went stale until we came forward with it, and</p> <p>4 then -- well, then it was like, "Well, now we got fresh</p> <p>5 eyes and fresh info on it. So, FBI, we're gonna govern</p> <p>6 it now."</p> <p>7 Q. Right.</p> <p>8 A. And I think that's where it was when we met</p> <p>9 with Tina Scahill.</p> <p>10 Q. Okay. But you testified just a moment ago</p> <p>11 that you think maybe the FBI agent shared some evidence</p> <p>12 with you guys --</p> <p>13 A. I want to say they did.</p> <p>14 Q. -- about Watts and Big Shorty?</p> <p>15 A. Yeah, they asked a lot about Watts and</p> <p>16 Big Shorty.</p> <p>17 Q. Right, but -- okay. But you said shared some</p> <p>18 evidence with you?</p> <p>19 A. Yes.</p> <p>20 Q. My question is what evidence was shared?</p> <p>21 A. It may -- I want to say it may have been a</p> <p>22 document. I don't recall if it was something they let us</p> <p>23 read or something they read off to us where Big Shorty</p> <p>24 was interviewed by DEA and some other CPD officials.</p>	<p style="text-align: right;">Page 168</p> <p>1 Q. And you're aware -- or she told you -- she</p> <p>2 described to you that she heard the shooting where Fears</p> <p>3 was killed, right?</p> <p>4 A. Yes.</p> <p>5 Q. And she never told you she saw Watts out</p> <p>6 there, right?</p> <p>7 A. Correct.</p> <p>8 Q. And you don't have any other evidence that</p> <p>9 Watts was involved in that murder, do you?</p> <p>10 A. Other than what they speculated at the FBI</p> <p>11 building.</p> <p>12 Q. Who speculated?</p> <p>13 A. The agents.</p> <p>14 Q. Okay. But --</p> <p>15 A. It was like common knowledge up there. They</p> <p>16 like freely speak about it.</p> <p>17 Q. Okay. And I'm asking a question different</p> <p>18 than what people were speculating about.</p> <p>19 A. Okay.</p> <p>20 Q. I'm asking about evidence.</p> <p>21 A. No, I...</p> <p>22 Q. You're not aware of any?</p> <p>23 A. No.</p> <p>24 Q. Okay. Thank you.</p>

In Re: Watts Coordinated Pretrial Proceedings
Continued Deposition of Daniel Echeverria - Taken 3/5/2025

<p style="text-align: right;">Page 169</p> <p>1 You, at your previous deposition, testified 2 about being in the detective division when some 3 detectives were talking about Watts and Big Shorty. Do 4 you remember that testimony? 5 A. Yes. 6 Q. Okay. Who were the detectives? 7 A. I want to say Detective Flagg was one. The 8 other one, I can't remember the name. I think he's 9 deceased as well now. 10 Q. Okay. Do you know Flagg's first name? 11 A. No. 12 Q. You're not talking about Corey Flagg? 13 A. No. He was not a detective. That's a 14 criminal. We all know that. 15 Q. Well, now we do. Knowing what I know now -- 16 A. Now you know. 17 Q. So, anyway, you can't -- 18 A. Touche. 19 Q. You can't give me that guy's first name? 20 A. No. I can describe him to you. 21 Q. Go for it. 22 A. Male black, light skin, green eyes, bald head, 23 about 6, 3. 24 Q. Okay. When you heard that conversation</p>	<p style="text-align: right;">Page 171</p> <p>1 stuff. They're a special breed up there. 2 Q. Do you know someone name Dion Moore? 3 A. Sounds familiar. I can't -- 4 Q. In 2008 -- I wasn't a detective either, but in 5 2008 my investigation reveals that he sued you for false 6 arrest. Does that ring a bell? 7 A. Dion Moore? No, it doesn't ring a bell. 8 Q. Okay. His complaint in that case indicates 9 that you put a case on him? 10 A. Oh, okay. 11 Q. Does that ring a bell? 12 A. No, it doesn't. 13 Q. Okay. Was he being honest about that? 14 A. I don't know who he is. 15 Q. So he might be? 16 A. I don't recall who he is. 17 Q. So there's a chance he could -- if you 18 remember him, that might be true? 19 A. Bullshit. 20 Q. That's my point. 21 A. I call bullshit. 22 Q. That's my point. 23 A. Okay. 24 Q. So Dion Moore alleged in a federal complaint</p>
<p style="text-align: right;">Page 170</p> <p>1 between these detectives talking about Watts and 2 Big Shorty, did you report that to anybody? 3 A. Juan Rivera. 4 Q. And how did you do that? 5 A. I don't know if I told him verbally, or I 6 don't know if I may have typed something up. 7 Q. So you're not sure if you typed up a report? 8 A. I know verbally, for sure. But I couldn't 9 tell you if I ... 10 Q. All right. When you overheard that 11 conversation, did you tell anyone other than Juan Rivera? 12 A. Shannon. 13 Q. Anybody else? 14 A. The agents. 15 Q. So you shared that with the FBI? 16 A. Yeah. 17 Q. Okay. And did you do that in a report or -- 18 A. Verbally. 19 Q. With whom? 20 A. The agents. 21 Q. But which ones? I know there were a lot. 22 A. [REDACTED] and [REDACTED] 23 Q. Have you ever seen a 302 about that? 24 A. No. Like I said, they would share limited</p>	<p style="text-align: right;">Page 172</p> <p>1 that you put a case on him, a drug case on him. 2 A. Okay. 3 Q. And your belief, based on what -- or my 4 understanding of what you believe is that's a lie, 5 correct? 6 A. Correct. 7 Q. Is that right? 8 A. Yeah. 9 Q. Because people will lie to get out of a jam, 10 right? 11 A. Absolutely. Lie to live. 12 Q. But also lie to make money, right? 13 A. Correct. 14 Q. Because that's probably what's happening with 15 Dion Moore, right? 16 MS. KLEINHAUS: Objection, calls for speculation. 17 BY THE WITNESS: 18 A. I don't know what Dion Moore did. 19 Q. Do you know what happened with that case? 20 A. No, I don't. 21 Q. How about Isaac Gaden (phonetic)? Does that 22 name ring a bell? 23 A. No, it doesn't. 24 Q. He filed a suit against you in 2008 for</p>

35 (Pages 169 to 172)

In Re: Watts Coordinated Pretrial Proceedings
Continued Deposition of Daniel Echeverria - Taken 3/5/2025

Page 173

1 excessive force and false arrest. It says you put a
2 delivery case on him. Does that ring a bell?
3 A. No, it doesn't.
4 Q. Do you know what happened with that case?
5 A. It's the first time hearing it or remembering
6 it.
7 Q. I mean, given -- Dan asked you before, you
8 were thorough, good police officer?
9 A. Yeah, absolutely.
10 Q. You said already that the truth is important
11 to you?
12 A. Absolutely.
13 Q. You know, in 2008 did you put a case on
14 someone, a delivery case on Isaac Gaden?
15 A. What do you think?
16 Q. I think no. What do you think?
17 A. I agree with you.
18 Q. Okay. But the idea is Isaac Gaden filed a
19 federal complaint indicating -- you know, in federal
20 court indicating that that's what you did to him, right?
21 A. (Inaudible.)
22 Q. And that's a lie, right?
23 A. Absolutely.
24 Q. Isaac Gaden was looking for money behind that

Page 174

1 lawsuit?
2 A. Did he get it?
3 Q. I don't know. Do you know?
4 A. I don't know.
5 Q. Okay. Isaac Gaden was looking for money
6 behind that lawsuit and sued you and lied about you in
7 order to try to get paid, right?
8 A. Okay.
9 MS. KLEINHAUS: Objection, calls for speculation,
10 argumentative.
11 BY MR. GAINER:
12 Q. Is that right?
13 A. Yeah, because I don't --
14 Q. Because you didn't do it?
15 A. Absolutely. It's inaccurate.
16 MR. GAINER: All right. That's all the questions I
17 have.
18 THE WITNESS: A distortion of the truth.
19 MR. GAINER: I agree. Thank you. I'm finished.
20 THE WITNESS: Next.
21 EXAMINATION
22 BY MR. PALLES:
23 Q. All right. If I delay a lot between
24 questions, it's because I'm trying to cut through a lot

Page 175

1 of notes. You've covered a lot of ground today, as you
2 know.
3 In one of the depositions, you were asked, I
4 think by Ms. Kleinhaus, whether or not your work on
5 Brass Tax consisted of managing and getting information
6 from a confidential informant. You said absolutely, yes.
7 In terms of the CIs that you engaged with in Operation
8 Brass Tax, was that limited to [REDACTED] and [REDACTED]
9 [REDACTED]
10 A. Yes, maybe even [REDACTED]. I believe he
11 may have spoken to the FBI, but I don't know if they ever
12 signed him up or not.
13 Q. Did the FBI sign up [REDACTED]?
14 A. Yes, because he was part of Scenario 2.
15 Q. Right.
16 You were also asked about -- well, the
17 question was, all the narcotics leads and work you did
18 while you were reporting to the FBI, you were working
19 with Sergeant Padar, you felt was related to the Watts
20 investigation, and you agreed with that. Do you recall
21 that?
22 A. One more time.
23 Q. Yeah, you were doing narcotics work and --
24 while you were reporting to the FBI and working with

Page 176

1 Sergeant Padar?
2 A. Uh-huh.
3 Q. Yeah, and you said that was related to the
4 Watts investigation?
5 A. I don't recall.
6 Q. Okay. Was it, in fact, related to the Watts
7 investigation?
8 A. Padar was different. That was -- he was 189
9 as well. But the thing is, I think at that time frame,
10 that's when it was the clashing of titans up there in the
11 FBI building, myself and [REDACTED]
12 Q. Okay.
13 A. So then they said -- Rivera said, "You know
14 what? Keep yourself busy. Why don't you go try
15 something with Padar, one of their teams. And at the
16 same time, keep developing Watts stuff."
17 Q. Okay.
18 A. And I think at that point we did use [REDACTED]
19 to make a buy, and we flipped that to a search warrant,
20 Padar did.
21 Q. Okay. Unrelated to the Watts cases?
22 A. I think that's where I want to go with that.
23 Q. Okay. Now, Mr. Zecchin asked you about some
24 of the overhears --

In Re: Watts Coordinated Pretrial Proceedings
Continued Deposition of Daniel Echeverria - Taken 3/5/2025

Page 177

1 A. Yes.

2 Q. -- some of the recordings you listened to.

3 And you mentioned hearing Mohammed speaking with [REDACTED]

4 A. Yes.

5 Q. Okay. And that was a recording that was made

6 during Scenario No. 3?

7 A. 3, yes.

8 Q. Other than that, do you recall hearing any FBI

9 recordings of Mohammed?

10 A. Maybe conversations between Mohammed and

11 Watts.

12 Q. Okay. And those would be what, telephone

13 conversations?

14 A. Yes.

15 Q. Okay. So the result of Title III wiretaps?

16 A. I think so. I think it was when the

17 information was channeled to Watts. I think Watts

18 channeled it to Mohammed, and I think that's the

19 conversations I was referring to.

20 Q. Okay.

21 MR. GAINER: I didn't hear your -- Watts what?

22 THE WITNESS: Watts channeled it to Mohammed, so the

23 FBI channeled the scenario to [REDACTED]

24 MR. GAINER: Got you.

Page 178

1 THE WITNESS: We took [REDACTED] to the meet spot.

2 [REDACTED] channeled it to Watts, and then Watts channeled

3 it to Mohammed, which led Mohammed to the third rip,

4 Scenario 3.

5

6 BY MR. PALLES:

7 Q. Shannon spoke, I believe, about -- well,

8 perhaps you did as well -- about recordings they had that

9 were already recorded and transcribed. Do you recall

10 what the subject of those conversations were?

11 A. What are you referring to? There's many

12 recordings that we -- that were already just transcribed.

13 I'll give you an example of one, which it was a

14 recording. It may have been Mohammed, where he was

15 saying something to maybe Watts, and he kept calling

16 "lieu," "I told the lieu. I told the lieu. I told the

17 lieu," and in parentheses -- or "I told lieu," and in

18 parentheses will be a last name unknown. So the FBI

19 thought "lieu" meant --

20 Q. Somebody named Lou?

21 A. -- somebody name Lou, when they were referring

22 to the lieutenant. So there were that --

23 Q. Got you.

24 A. -- corrections that we would make.

Page 179

1 Q. Okay. Let me ask you --

2 A. Okay.

3 Q. -- were there numerous FBI transcripts of

4 these conversations?

5 A. Yeah, there was quite a few.

6 Q. Okay. Okay. And let me ask you this: Do you

7 recall any -- listening to any recordings of Mohammed

8 which took place before your involvement in Brass Tax and

9 involved certain controlled payments made to him?

10 A. Not off the top of my head, don't recall.

11 Q. Okay. By the way, do you know -- those

12 transcripts, the FBI transcripts, do you know where the

13 FBI kept them?

14 A. Like, I'll give an example. Like, we would

15 show up at 8:00. We'd go to the wire room. They'll give

16 us a stack of stuff, and it was referenced to a CD. We

17 played the CD that corresponded to the package that they

18 would hand. And they'd say, "Hey, if you find anything

19 that needs correcting" -- and they would like highlight

20 some stuff that they needed clarification on -- "you

21 know, just write it down and reference the page to it,

22 but don't write on the document."

23 Q. Okay. When we were talking about some of the

24 claims that [REDACTED] made -- he talked about the

Page 180

1 Watts team putting cases on people. You mentioned he

2 talked about them disappearing people. Now, let me ask

3 you that. By "disappearing," you understood committing

4 violence, getting rid of --

5 A. Yes --

6 Q. -- individuals --

7 A. -- that's exactly what I meant.

8 Q. Okay. And in those circumstances, was -- do

9 you know whether or not [REDACTED] had in mind particularly

10 Kamane Fears and Big Shorty?

11 A. Maybe Kamane.

12 Q. Okay. Do you know whether he had any other

13 people that he was referring to?

14 A. No, no. I know Agent [REDACTED] said that to us

15 when -- I don't know if we had already shared that info,

16 or [REDACTED] may have shared that info. She was surprised.

17 She's like -- I'm gonna quote here. I'm fuckin'

18 surprised your department still has this guy on the

19 street knowing that he's potentially responsible for two

20 or three homicides, unquote.

21 That came straight from her mouth to us. I

22 think I've said that before too.

23 Q. Okay. You talked about stealing earlier in

24 the connection with [REDACTED] [REDACTED] didn't say that

In Re: Watts Coordinated Pretrial Proceedings
Continued Deposition of Daniel Echeverria - Taken 3/5/2025

Page 181

1 **Watts or any of his team stole money from him, did he?**
 2 A. Scenario 1 -- Scenario 2.
 3 **Q. Okay. But that was a -- that wasn't his**
 4 **money, was it?**
 5 A. No.
 6 **Q. Okay. So the claim about the stealing, then,**
 7 **from the team, was that simply based on these controlled**
 8 **scenarios?**
 9 A. No, based on [REDACTED] information and based on
 10 [REDACTED]
 11 **Q. Okay.**
 12 A. And [REDACTED].
 13 **Q. Okay. So [REDACTED] didn't say they stole money**
 14 **from him, did they?**
 15 A. No. [REDACTED] don't have money like that.
 16 **Q. That's what I thought.**
 17 A. [REDACTED] be lucky he got 20 bucks in his
 18 pocket.
 19 **Q. Did he identify any of the victims of the**
 20 **thefts?**
 21 A. Not off the top of my head, no.
 22 **Q. Okay. But you think that [REDACTED]**
 23 **may have --**
 24 A. They can identify themselves and others.

Page 182

1 **Q. Who are the others?**
 2 A. Whoever else he may have been identifying.
 3 **Q. Okay. But you don't remember today?**
 4 A. No, no.
 5 **Q. Of course not?**
 6 A. Yeah.
 7 **Q. Oh, and then there was another thing -- and**
 8 **this came up during your earliest deposition -- that you**
 9 **believe that Watts and his team were running a drug line**
 10 **out of the buildings?**
 11 A. Yes.
 12 **Q. Okay. And what's that based on?**
 13 A. Intel from the FBI, intel from [REDACTED] the
 14 [REDACTED] brothers.
 15 **Q. Okay. Are you aware of any other sources --**
 16 **let's leave -- the FBI, obviously, had some sort of**
 17 **source. Are you familiar with who those sources might**
 18 **have been?**
 19 A. I think they called them T-Dog or K-Dog. I
 20 think he's in one of these -- one of your Noland reports,
 21 one of your specimens.
 22 **Q. Yeah, okay. T-Dog.**
 23 A. T-Dog or K-Dog or -- he was, I think, active
 24 in the Ida B. Wells building, the trade. And I think

Page 183

1 they flipped him to work with them.
 2 **Q. You know, do you have -- you saw those**
 3 **exhibits there?**
 4 A. Which one?
 5 **Q. The group one that's a compilation of your**
 6 **memos.**
 7 A. This one?
 8 **Q. Yeah, Group 3.**
 9 MS. KLEINHAUS: No. It looks like this. It's like
 10 a big packet.
 11 THE WITNESS: Here we go.
 12 BY MR. PALLES:
 13 **Q. Yeah, okay. Okay, Page 388 on the bottom.**
 14 **Now, I just want to make sure, if you see -- I'm**
 15 **concerned about the reference to Mohammed that supposedly**
 16 **Watts told [REDACTED] that Mohammed is his partner and it's**
 17 **safe to work with him. Okay? Reviewing the document, it**
 18 **appears, am I correct, that that information came from**
 19 **[REDACTED] himself?**
 20 A. Can I read it?
 21 **Q. Yeah, please. Go ahead.**
 22 (Witness reviewing document.)
 23 BY MR. PALLES
 24 **Q. Oh, you know what? This is not the one I**

Page 184

1 **wanted to look at, but that's fine. 388 is good.**
 2 A. Okay. What about it?
 3 **Q. All right. Is this based entirely on**
 4 **discussions with --**
 5 A. [REDACTED]
 6 **Q. -- [REDACTED]**
 7 **You did not hear and you don't have any**
 8 **recordings of [REDACTED] --**
 9 A. No. It says here that he called me by pay
 10 phone or something like that.
 11 **Q. Okay. Just trying to confirm.**
 12 **So in terms of the recordings that we have of**
 13 **Mohammed's interactions with [REDACTED] it's only the one**
 14 **on the day of Scenario 3?**
 15 A. The only one I was privileged to.
 16 **Q. Yeah.**
 17 A. That I can say a hundred percent.
 18 **Q. Okay. By the way, do you know Clarissa Glenn?**
 19 A. I want to say she -- I don't know her
 20 personally, but I know who she is.
 21 **Q. Did you interact with her during the course of**
 22 **Operation Brass Tax?**
 23 A. No, I can't say I have.
 24 **Q. Okay. All right. Let's talk a little bit**

In Re: Watts Coordinated Pretrial Proceedings
Continued Deposition of Daniel Echeverria - Taken 3/5/2025

<p style="text-align: right;">Page 185</p> <p>1 about Monk Fears.</p> <p>2 A. Of who?</p> <p>3 Q. Monk, Jerome.</p> <p>4 A. Monk, okay.</p> <p>5 Q. Now, at the last time -- or at one of the last</p> <p>6 times, you referred to him as a higher mid-level drug</p> <p>7 dealer. Do you remember that?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. What about his brother, Kamane?</p> <p>10 A. He ran it.</p> <p>11 Q. What?</p> <p>12 A. He owned it.</p> <p>13 Q. Okay. So Kamane was more than a higher</p> <p>14 mid-level drug dealer?</p> <p>15 A. He's the proprietor.</p> <p>16 Q. Okay. All right.</p> <p>17 A. And then Monk was probably the VP.</p> <p>18 Q. Okay. Did Monk, as far as you're aware,</p> <p>19 succeed to the Obama line after Kamane's death?</p> <p>20 A. No.</p> <p>21 Q. Do you know who did?</p> <p>22 A. No. I don't think anybody did.</p> <p>23 Q. All right. Now --</p> <p>24 A. My opinion.</p>	<p style="text-align: right;">Page 187</p> <p>1 BY THE WITNESS:</p> <p>2 A. I can't confirm that either.</p> <p>3 Q. I think the article would bear it out. But,</p> <p>4 nonetheless, let me go through some statements that were</p> <p>5 in that as a jumping off point. And if Shannon said</p> <p>6 something that you don't buy into, you know, please let</p> <p>7 me know. Okay?</p> <p>8 A. So you want me to agree or disagree on what</p> <p>9 you're gonna read?</p> <p>10 Q. Yeah. Well -- Yeah --</p> <p>11 A. Okay. All right.</p> <p>12 Q. -- or at least refer to, yeah.</p> <p>13 Okay. So at one point it says here that,</p> <p>14 While Spalding and Echeverria were -- Echeverria. Excuse</p> <p>15 me. That's why I asked -- didn't have definitive proof</p> <p>16 that Watts and members of his team had committed crimes,</p> <p>17 they were convinced there was sufficient evidence to</p> <p>18 warrant an investigation.</p> <p>19 What was that?</p> <p>20 MS. KLEINHAUS: Objection, incomplete</p> <p>21 hypothetical --</p> <p>22 BY THE WITNESS:</p> <p>23 A. I don't know about that.</p> <p>24 MS. KLEINHAUS: -- out of context.</p>
<p style="text-align: right;">Page 186</p> <p>1 Q. Okay. Now, let me just tell you what I'm</p> <p>2 gonna do next. I'm gonna go through a series of</p> <p>3 statements that were made in an article -- in articles in</p> <p>4 the intercept by Jamie Kalven. Are you familiar with</p> <p>5 those?</p> <p>6 A. I think I've heard about the paper.</p> <p>7 Q. Okay. Now, I have at least portions of the</p> <p>8 articles if you want to refer to them, but --</p> <p>9 A. Sure.</p> <p>10 Q. -- in order to save some time, I'm gonna start</p> <p>11 off and ask you, do you know Jamie Kalven, the</p> <p>12 journalist?</p> <p>13 A. Only by picture.</p> <p>14 Q. Okay. So you have never spoken with him?</p> <p>15 A. No.</p> <p>16 Q. Okay. And do you know whether or not you</p> <p>17 provided any information for his Intercept articles?</p> <p>18 A. I don't know who he is.</p> <p>19 Q. Beg your pardon?</p> <p>20 A. No, no.</p> <p>21 Q. I'm gonna assume then that the information</p> <p>22 that he got was largely from Shannon Spalding.</p> <p>23 MS. KLEINHAUS: Objection, calls for speculation,</p> <p>24 foundation.</p>	<p style="text-align: right;">Page 188</p> <p>1 BY MR. PALLES:</p> <p>2 Q. As I recall, there was apparently a time --</p> <p>3 correct me if I'm wrong, but I got the impression from</p> <p>4 your first deposition that you had heard a lot of stories</p> <p>5 about Watts that you tended to discount but that -- at</p> <p>6 one point you heard something that really rang a bell</p> <p>7 with you, and you started to give more credence to --</p> <p>8 A. Yes, I remember saying that.</p> <p>9 Q. All right. And it seems to me that at the</p> <p>10 time, we were talking about this particular -- I'm gonna</p> <p>11 call them an informant -- interviewee, whatever, and you</p> <p>12 didn't remember specifically who it was. Am I correct?</p> <p>13 A. In reference to what?</p> <p>14 Q. The time the first individual who gave you</p> <p>15 information where things clicked and you said, you know,</p> <p>16 there must be something to this?</p> <p>17 A. I don't can't recall who that might be but</p> <p>18 definitely somebody in a pickle.</p> <p>19 Q. Right, right. And that's what you indicated</p> <p>20 last time too. I'm just wondering whether or not, at any</p> <p>21 time since you had time to reflect about this, you have</p> <p>22 any -- you know, you have any recollection who it was --</p> <p>23 A. No.</p> <p>24 Q. -- that first turned you on to this Watts --</p>

39 (Pages 185 to 188)

In Re: Watts Coordinated Pretrial Proceedings
Continued Deposition of Daniel Echeverria - Taken 3/5/2025

<p style="text-align: right;">Page 189</p> <p>1 A. Definitely gotta be a player that got caught 2 up in some way, shape, or form.</p> <p>3 Q. Okay. All right. Now, Shannon relates this 4 story about a drug dealer at the Harold Ickes Homes who, 5 for the longest time, had never been caught by Shannon 6 but that they had built up a relationship. And he said, 7 "You're never gonna get me." And then Shannon says, "But 8 he helped us get everybody else."</p> <p>9 Do you know who she might be referring to?</p> <p>10 A. We spoke to a lot of guys down there. I can't 11 specifically name one person.</p> <p>12 Q. All right. All right. Among the people who 13 may have been helpful, were the -- let me ask you this: 14 Were the [REDACTED] brothers dealing out of the Ickes?</p> <p>15 A. Yes, they were.</p> <p>16 Q. What about Bernard Brown? Do you remember 17 him?</p> <p>18 A. I know who he is.</p> <p>19 Q. Was he dealing out of the Ickes?</p> <p>20 A. No. He's South Side.</p> <p>21 Q. All right. That's what I thought. Now, he 22 provided information --</p> <p>23 A. Yes.</p> <p>24 Q. -- about Watts?</p>	<p style="text-align: right;">Page 191</p> <p>1 A. He may have mentioned -- it's so long ago, but 2 I want to say he ventured in that direction.</p> <p>3 Q. Okay. All right. So it wasn't your 4 impression that his information was basically thirdhand?</p> <p>5 A. No. It was him --</p> <p>6 Q. Okay. All right.</p> <p>7 A. -- is how I remember it.</p> <p>8 Q. All right. Let's talk about -- back to the 9 Ickes dealer. Okay? And this is Jamie Kalven's writing 10 and, again, I think mostly from Shannon. And here's 11 what -- here's what the article says: Watts came to the 12 Ickes dealer to get paid off, Spalding recounted. There 13 were drugs and guns on the table between them. You got 14 what's on the table, the --</p> <p>15 I'm sorry. This must have got screwed up a 16 little bit.</p> <p>17 But he thought Watts -- Watts put some stuff 18 on the table, and he thought Watts meant that he wanted 19 more drugs and guns, when what he really wanted was more 20 money. If he had understood, according to Spalding, he 21 would have gone along. She quoted him as saying, If that 22 motherfucker told me I needed to give him another 5,000, 23 I would have given it to him.</p> <p>24 A. I know who it is.</p>
<p style="text-align: right;">Page 190</p> <p>1 A. Yes, he did.</p> <p>2 Q. But --</p> <p>3 A. Bernard Brown might be more 5th Ward, 4 5th Ward, or he might be more -- I don't know, per se, 5 because he's more like on 43rd or 47th. That's closer to 6 5th Ward.</p> <p>7 Q. But you participated in an interview?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. And as I recall, it was not the FBI, 10 but it might be an ATF or DEA?</p> <p>11 A. It may have been DEA and --</p> <p>12 Q. And an ATF?</p> <p>13 A. No, and FBI.</p> <p>14 Q. And FBI, okay.</p> <p>15 In any event, did it become apparent to you 16 that Bernard Brown had no direct interactions with Watts 17 or his team?</p> <p>18 A. No.</p> <p>19 Q. Okay. Did he -- how did he describe his 20 direct interaction with Watts and his team, if you 21 recall?</p> <p>22 A. I want to say he made the same type statement 23 about taxing.</p> <p>24 Q. Did he say that he was paying Watts?</p>	<p style="text-align: right;">Page 192</p> <p>1 MS. KLEINHAUS: Objection to form. 2 BY MR. PALLES:</p> <p>3 Q. Huh?</p> <p>4 A. I know who it is.</p> <p>5 Q. That's what I'm asking. Who?</p> <p>6 A. It's [REDACTED]</p> <p>7 Q. Okay.</p> <p>8 A. Because [REDACTED] -- I remember [REDACTED] 9 [REDACTED] saying he got caught up and he didn't understand 10 what Watts is doing. And it wasn't that Watts came to 11 the Ickes. It was that [REDACTED] went to Ida B. and 12 got caught in Ida B. in, like, unchartered [sic] 13 territory.</p> <p>14 Q. Right.</p> <p>15 A. And then he got caught up in the web, Watts's 16 web. And then he got brought into the station. And I 17 guess, if I remember what [REDACTED] said is, he put like -- 18 I don't know if it was guns or -- I think it might have 19 been dope and said, "You gotta put more -- you gotta give 20 me more than what's on the table."</p> <p>21 Q. Right.</p> <p>22 A. Meaning what he had -- is gonna put on him.</p> <p>23 Q. That's where I screwed up, yeah.</p> <p>24 A. And then [REDACTED] said he didn't know that's</p>

In Re: Watts Coordinated Pretrial Proceedings
Continued Deposition of Daniel Echeverria - Taken 3/5/2025

<p style="text-align: right;">Page 193</p> <p>1 what he was speaking or referring to, that had he known, 2 he would have made it happen for him. I don't know about 3 dollar amount. I don't know where you got that from, but 4 I don't remember him saying dollar amount, but he said, 5 "Put something more than what I got on the table, and 6 then we can talk" -- 7 Q. Okay. 8 A. -- is what I remember the conversation being 9 with [REDACTED] So I don't know if that's kind of on 10 par but not on par. 11 Q. All right. Now, when Kalven describes the -- 12 what we've been calling Scenario 2, he says that [REDACTED] 13 talked his way out of jail; Watts gave [REDACTED] \$770 and 14 released him. And then he says, The two officers -- and 15 he's referring to Watts and Mohammed -- then drove to 16 Mohammed's house where they presumably divided up the 17 spoils. 18 Now, my question is, do you recall Mohammed 19 being present at Scenario 2? 20 MS. KLEINHAUS: Objection to form. 21 BY THE WITNESS: 22 A. I think I talked about the scenario, and I 23 think I just mentioned -- I think I just mentioned Watts. 24 Q. Yeah.</p>	<p style="text-align: right;">Page 195</p> <p>1 Q. Okay. 2 A. And I'll give you an example. They had a very 3 similar case to this in Schaumburg that involved some 4 detectives doing about 80 percent of the cookie cutter of 5 what Watts is doing. And then guys got 20 and 25 years, 6 and then I don't know why Watts got a slap on the 7 wrist -- 8 Q. Ah? 9 A. -- and a pat on the back. 10 Q. Well, I'm not talking about that. I'm talking 11 about -- 12 A. So I'm -- to answer your question, maybe 13 the -- those law enforcement people handled it better, 14 were smarter about it, or they had better cooperation, 15 better CIs. I don't know. I can't speak about what they 16 did. But here, I -- there's some stuff that I think, 17 being a street officer, would have done a lot different 18 than what they did being a public corruption squad that 19 mainly work out of an office setting. 20 Q. Okay. All right. 21 A. Maybe that's why we were instrumental with 22 setting up scenarios for them because they were -- the 23 scenarios they wanted to do with, I was like, You can't 24 do that because Watts is the kind of guy that plays</p>
<p style="text-align: right;">Page 194</p> <p>1 A. I don't know. That's the day I told you 2 where -- or I told Mr. Gainer that he put on his uniform 3 and then went to the station and picked out a car and did 4 what he did on his day off. 5 Q. Is that the dry run? 6 A. No, that's -- 7 Q. That's the actual -- 8 A. Scenario 2. 9 Q. Right. 10 A. The dry run is Scenario 1. That's why I said 11 the A&As, tell me about A&As. It's a toss of the coin. 12 Q. Well, in the article, at the result of 13 Scenario No. 2, apparently, Shannon is asking whether the 14 FBI was really inept or was there something else going 15 on. 16 Let me ask you today, what's your opinion? 17 A. What do you mean? 18 MS. KLEINHAUS: Objection to form. 19 BY MR. PALLES: 20 Q. In your opinion -- well, let's put it this 21 way: Would you agree that Scenario No. 2 was botched? 22 A. I don't think anything was botched. 23 Q. Okay. 24 A. I think they could be smarter about it.</p>	<p style="text-align: right;">Page 196</p> <p>1 chess, not checkers. Your scenario is a game of 2 checkers. 3 Q. So now, Scenario 2 did not result in obtaining 4 evidence against Watts or Mohammed, correct? 5 A. I think it did if they got the recording. 6 Q. Ah, okay. 7 A. Right? 8 Q. Okay. 9 A. Because they did get a recording from him, and 10 they -- I think even -- if I remember -- if my 11 recollection of it is what it is, I want to say Watts 12 even put a number on Mohammed -- on [REDACTED] hand to 13 reflect that he was -- see, this is the thing. Let me 14 elaborate a little bit. 15 So he did the dry run. That's Scenario No. 2. 16 He took stuff on Scenario No. 2. He took money. 17 Q. Right. 18 A. Okay? He took money. So Chewbacca, being the 19 street person that he is, [REDACTED] he said, "Man, you 20 can't just take shit from me. What am I gonna tell these 21 people that it belonged to? You gotta put a number on my 22 hand, at least say that I was arrested, or what are we 23 gonna do? I can't just go back with stuff missing." 24 So Watts and [REDACTED] came up -- devised this</p>

41 (Pages 193 to 196)

In Re: Watts Coordinated Pretrial Proceedings
Continued Deposition of Daniel Echeverria - Taken 3/5/2025

<p style="text-align: right;">Page 197</p> <p>1 plan. "Well, I'll tell you what. I'm gonna take you to</p> <p>2 the station. I'm gonna give you a bond sheet. And you</p> <p>3 show them that, that you got locked up, and the police</p> <p>4 took it all. And I'm gonna put this number on your</p> <p>5 hand," like, because you use the last four numbers.</p> <p>6 THE WITNESS: Mr. Gainer, am I right?</p> <p>7 MR. GAINER: Yeah.</p> <p>8 THE WITNESS: Last four numbers on the hand,</p> <p>9 CB number?</p> <p>10 BY THE WITNESS:</p> <p>11 A. There you go. So he put that on [REDACTED] hand</p> <p>12 and gave him that, so like that, [REDACTED] had a</p> <p>13 believable --</p> <p>14 Q. So he had to have --</p> <p>15 A. -- that, "No, [REDACTED] you stole the money</p> <p>16 from us."</p> <p>17 Q. Okay. All right.</p> <p>18 A. Does that answer that?</p> <p>19 Q. It does. Thank you.</p> <p>20 A. Beautiful.</p> <p>21 Q. I appreciate it.</p> <p>22 A. Thank you.</p> <p>23 Q. I learned a lot.</p> <p>24 Let's talk -- I want to talk a little bit</p>	<p style="text-align: right;">Page 199</p> <p>1 A. The homicide.</p> <p>2 Q. I'm sorry?</p> <p>3 A. Of the homicide.</p> <p>4 Q. Of the homicide, correct.</p> <p>5 Okay. Did you ever actually work on the</p> <p>6 homicide?</p> <p>7 A. We gave a light touch, but that's it.</p> <p>8 Q. Okay. All right. Do you know who the</p> <p>9 investigating detectives were on the homicide?</p> <p>10 A. Obviously, someone from 2nd District.</p> <p>11 Q. Do you -- do you recall having any</p> <p>12 interactions with any of those detectives?</p> <p>13 A. I had -- we had interaction with -- at that</p> <p>14 time with a Sergeant Svilar.</p> <p>15 Q. Okay.</p> <p>16 A. And then he had asked Thompson about how come</p> <p>17 she didn't share that certain info with him or his</p> <p>18 detectives. And her answer was, "Well, they didn't come</p> <p>19 back to reinterview me or ask me anything about it."</p> <p>20 Q. Okay.</p> <p>21 A. So that kind of pissed that guy off.</p> <p>22 Q. How do you spell Svilar?</p> <p>23 A. S-V- -- hold on. Sam, Victor, Ida, Lincoln,</p> <p>24 Adam, Robert.</p>
<p style="text-align: right;">Page 198</p> <p>1 about the Fears brothers. First of all, the -- we</p> <p>2 talked -- you were asked a little bit before about Mary</p> <p>3 Thompson?</p> <p>4 A. Yes.</p> <p>5 Q. She was Kamane's girlfriend?</p> <p>6 A. Yeah.</p> <p>7 Q. Okay.</p> <p>8 A. Kamane.</p> <p>9 Q. And was she involved in the drug trade, as far</p> <p>10 as you know?</p> <p>11 A. No. She was a nursing student that was</p> <p>12 pregnant at the time.</p> <p>13 Q. Okay. Now --</p> <p>14 A. I don't think she's ever been locked up.</p> <p>15 Q. Okay. Let me ask you this: Do you know</p> <p>16 whether she had a brother named Lapon?</p> <p>17 A. I know she had a brother, but I don't know the</p> <p>18 name.</p> <p>19 Q. How about a sister named Shavon?</p> <p>20 A. Couldn't tell you. I know her dad was some</p> <p>21 CFD lieutenant or captain or something.</p> <p>22 Q. All right. Now, when you and Shannon first</p> <p>23 approached or it was on the basis of the fact --</p> <p>24 pretext that you were --</p>	<p style="text-align: right;">Page 200</p> <p>1 Q. Okay.</p> <p>2 A. I think he actually became like a gold star</p> <p>3 guy or brass star guy. He may even be retired by now.</p> <p>4 Q. Okay. The --</p> <p>5 A. He actually went to cold case, I think, or ran</p> <p>6 it.</p> <p>7 Q. Okay. In the article, there's a lengthy piece</p> <p>8 concerning Jerome Fears, Monk --</p> <p>9 A. Okay.</p> <p>10 Q. -- and a chase with his girlfriend that went</p> <p>11 up and down the Dan Ryan and Lake Shore Drive?</p> <p>12 A. And they crashed.</p> <p>13 Q. Right.</p> <p>14 A. I know -- I know the incident.</p> <p>15 Q. Okay. So you know the story. Okay.</p> <p>16 So now, according to the article -- well,</p> <p>17 first of all, who's Monk's girlfriend? Do you remember</p> <p>18 her name?</p> <p>19 A. If you keep going, it will come to me.</p> <p>20 Q. Okay. We'll keep going up -- up to four hours</p> <p>21 and --</p> <p>22 A. No, no, no. You got -- I'll tell you right</p> <p>23 now how much you got. You got 50 minutes and 10 seconds.</p> <p>24 Q. All right. Well, I'm not gonna take that</p>

In Re: Watts Coordinated Pretrial Proceedings
Continued Deposition of Daniel Echeverria - Taken 3/5/2025

<p style="text-align: right;">Page 201</p> <p>1 long.</p> <p>2 Okay. So, now, according to the article,</p> <p>3 Monk -- she and the baby were in the car with Monk, who</p> <p>4 was in the process of re-upping, distributing, and</p> <p>5 collecting money, so there was lots of dope and cash in</p> <p>6 the car. Watts and his team came after them. Watts and</p> <p>7 his partner, Mohammed --</p> <p>8 A. Jamika.</p> <p>9 Q. Shamika Branson.</p> <p>10 A. There you go.</p> <p>11 Q. Okay. Good.</p> <p>12 A. I didn't take a single note on it.</p> <p>13 Q. Thank you. I appreciate it.</p> <p>14 There was lots of dope and cash in the car.</p> <p>15 Watts and his team came after him. Watts and his</p> <p>16 partner, Mohammed, were in an unmarked car with City</p> <p>17 plates, and Brian Bolton and Bobby Gonzalez were in a CPD</p> <p>18 Tahoe. A wild chase -- car chase ensued on the Dan Ryan</p> <p>19 Expressway, Lake Shore Drive, and ultimately into the</p> <p>20 Hyde Park neighborhood. Well -- and then Monk lost</p> <p>21 control and crashed in a park and fled on foot.</p> <p>22 Now, let me ask you this: First of all, the</p> <p>23 information that Monk was distributing -- that Monk was</p> <p>24 distributing packages and collecting money and had lots</p>	<p style="text-align: right;">Page 203</p> <p>1 Q. All right.</p> <p>2 A. And then I think that's -- it went stagnant</p> <p>3 there for a little bit because of that. But I couldn't</p> <p>4 tell you where they crashed. They crashed somewhere on</p> <p>5 like on 63rd or --</p> <p>6 Q. But you understood that Monk was driving at</p> <p>7 high speeds?</p> <p>8 A. Sure. He didn't want to get caught.</p> <p>9 Q. Right, okay. So he was driving, and he wanted</p> <p>10 to elude him because he had drugs?</p> <p>11 A. Sure.</p> <p>12 Q. Cash?</p> <p>13 A. Or maybe he wanted to elude him because he</p> <p>14 didn't want to pay him. I don't know. I wasn't there.</p> <p>15 Q. All right. So he drove away with an infant in</p> <p>16 the car?</p> <p>17 A. Yeah.</p> <p>18 Q. Now, let me ask you this: Then the --</p> <p>19 Gonzalez and Bolton, they're in a Chevy Tahoe. How does</p> <p>20 that come about? These are TAC team members. Do they</p> <p>21 usually drive a Chevy Tahoe?</p> <p>22 MS. KLEINHAUS: Objection, foundation.</p> <p>23 MR. ZECCHIN: Join.</p> <p>24</p>
<p style="text-align: right;">Page 202</p> <p>1 of dope and cash in the car, do you recall where you</p> <p>2 heard that from?</p> <p>3 MS. KLEINHAUS: Objection to form and foundation.</p> <p>4 BY THE WITNESS:</p> <p>5 A. Monk himself.</p> <p>6 Q. Monk himself?</p> <p>7 A. And Shamika.</p> <p>8 Q. Okay. Good. And do you recall specifically</p> <p>9 where they told you the chase went?</p> <p>10 MS. KLEINHAUS: Objection to form and foundation.</p> <p>11 BY THE WITNESS:</p> <p>12 A. I don't recall, off the top of my head, the</p> <p>13 exact route of the chase, but --</p> <p>14 Q. Yes.</p> <p>15 A. -- before you even started, I told you they</p> <p>16 crashed. I remember --</p> <p>17 Q. Do you recall where?</p> <p>18 A. Before we even started, I told you they had</p> <p>19 crashed.</p> <p>20 Q. Right.</p> <p>21 A. I remember it ending with a crash. I think</p> <p>22 that's when also the investigation went somewhat -- came</p> <p>23 to a halt because I think Monk may have struck Watts with</p> <p>24 the car, and Watts went IOD for a while.</p>	<p style="text-align: right;">Page 204</p> <p>1 BY THE WITNESS:</p> <p>2 A. Yeah, of course.</p> <p>3 Q. Yeah?</p> <p>4 A. Yeah.</p> <p>5 Q. Not an unmarked car?</p> <p>6 A. The Tahoe is unmarked.</p> <p>7 Q. Oh, the Tahoe is unmarked?</p> <p>8 A. Yeah, they have a lot of -- the department</p> <p>9 steered away from the Tahoes because the City bought only</p> <p>10 rear-wheel drive. Then they came out with -- the Ford to</p> <p>11 take the place of the Tahoes.</p> <p>12 Q. Supposedly, Gonzalez and Bolton had an</p> <p>13 arrestee in the Tahoe?</p> <p>14 A. I'm sorry?</p> <p>15 MS. KLEINHAUS: Objection, foundation.</p> <p>16 BY MR. PALLES:</p> <p>17 Q. Supposedly, Gonzalez and Bolton had an</p> <p>18 arrestee in the Tahoe?</p> <p>19 A. I don't remember, off the top of my head, who</p> <p>20 had it. But I want to say they said -- when I say</p> <p>21 "they," I don't know if it was Monk or it was Shamika</p> <p>22 that said, "They even had somebody in the car."</p> <p>23 Q. And I understand that, ultimately, that</p> <p>24 individual supposedly was dropped off near U.S. Cellular</p>

In Re: Watts Coordinated Pretrial Proceedings
Continued Deposition of Daniel Echeverria - Taken 3/5/2025

Page 205

1 **Field?**
2 MR. ZECCHIN: Okay, Foundation.
3 MS. KLEINHAUS: Objection to foundation, join.
4 BY THE WITNESS:
5 A. Everything I told you is what I know. That's
6 it.
7 **Q. Okay. All right. Now, after that incident,**
8 **supposedly --**
9 A. Okay.
10 **Q. -- all right, several weeks later, Monk's**
11 **girlfriend lets Spalding and Echeverria know that he had**
12 **been locked up, that Monk had been locked up. Do you**
13 **recall Monk being locked up?**
14 A. I think, eventually, he did get caught.
15 **Q. Do you recall --**
16 A. I don't know if he got caught and charged with
17 what they found in the car or he got caught because he
18 hit Watts with the car.
19 **Q. All right. But, actually, I believe he got**
20 **caught on a separate drug charge. Were you aware of**
21 **that?**
22 MS. KLEINHAUS: Objection, foundation.
23 BY THE WITNESS:
24 A. Off the top of my head, I -- I know he got

Page 206

1 caught, but ...
2 **Q. All right. All right.**
3 **Now, it says that you and Shannon arranged to**
4 **talk to Monk at that time via his girlfriend's cell**
5 **phone. Do you recall that?**
6 A. Don't remember, can't recall.
7 **Q. Okay. Do you recall ever asking to be put on**
8 **Monk's phone lists either at Cook County Department of**
9 **Corrections or at the Illinois Department of Corrections?**
10 A. I've never requested it. I know that guys
11 call me a couple times from ... I remember receiving some
12 calls. I'm like, what the fuck is this?
13 **Q. All right.**
14 A. But I don't think I talked to him much.
15 **Q. When Monk called Spalding and Echeverria --**
16 MR. DEVINE: Echeverria.
17 BY MR. PALLES:
18 **Q. -- Echeverria --**
19 A. Ech, Ech, Ech.
20 **Q. -- spelled out the offer that the feds were**
21 **prepared to make in exchange for his cooperation.**
22 **What was that?**
23 MS. KLEINHAUS: Objection, form, foundation.
24

Page 207

1 BY THE WITNESS:
2 A. I don't recall.
3 **Q. Okay. Do you recall making an offer to --**
4 A. I'm not in a position to make offers.
5 **Q. All right. Do you --**
6 A. Above my pay grade.
7 **Q. Do you remember conveying an offer made by the**
8 **feds?**
9 A. I don't recall.
10 **Q. It says that Monk had agreed to proffer and**
11 **wear a wire in his dealing with Watts, true?**
12 A. I don't recall.
13 **Q. Do you recall making arrangements to visit**
14 **Monk at IDOC?**
15 A. No. I don't recall.
16 **Q. Okay. According to Shannon, you were going**
17 **down to Southern Illinois to get one of the biggest drug**
18 **dealers, and you got the plug pulled on you. Do you**
19 **recall that?**
20 MS. KLEINHAUS: Objection to form, foundation.
21 BY THE WITNESS:
22 A. I think when Monk was caught up, I don't think
23 he was at a State level. I think when Monk was caught
24 up, I think he was still at the County level. That's the

Page 208

1 incident I talked about with Bohmer all of a sudden
2 putting the stop on it because he didn't want Monk to get
3 on the stand and say anything else.
4 **Q. All right.**
5 MR. NOLAND: Objection, move to strike, lacks
6 foundation.
7 BY MR. PALLES:
8 **Q. All right. I'm gonna try to -- based on**
9 **Monk's custody history, I just want to take a shot to see**
10 **whether or not you recall making arrangements to travel**
11 **to any of these IDOC sites to see Monk.**
12 **Stateville?**
13 A. No.
14 **Q. Shawnee?**
15 A. No.
16 **Q. Big Muddy?**
17 A. Never heard of that. That's a new one.
18 **Q. Vandalia?**
19 A. No.
20 **Q. You said Shannon did -- well, it seems like**
21 **Shannon did most of the paperwork --**
22 A. She was a good --
23 **Q. -- am I correct?**
24 A. She was big on note-taking.

In Re: Watts Coordinated Pretrial Proceedings
Continued Deposition of Daniel Echeverria - Taken 3/5/2025

<p style="text-align: right;">Page 209</p> <p>1 Q. What about in terms of preparing reports? Did 2 you share those responsibilities equally? 3 A. I guess (indicating). 4 Q. Did she ever prepare reports for -- 5 A. I'm referring to this specimen, to this -- 6 Q. Yeah, yeah. 7 A. So I guess, yeah. 8 Q. Okay. Did she ever prepare reports for you? 9 A. I would do my own; she would do her own. 10 Q. Okay. Did you ever prepare reports for her? 11 MR. DEVINE: He just said -- 12 BY THE WITNESS: 13 A. I would do my own; she would do her own. 14 Q. I'm sorry. I heard -- the last part went 15 away. You're right. 16 Okay. Do you know an individual named -- or 17 did you know an individual named Allen Jackson? 18 A. Yes. 19 Q. Okay. And how did you know Allen Jackson? 20 A. He was part of the narcotics trade at the 21 Ickes and Ida B. Wells. 22 Q. Did he run or operate out of any particular 23 buildings at Ida B. Wells? 24 A. The Browning buildings.</p>	<p style="text-align: right;">Page 211</p> <p>1 involvement -- earlier, you talked about -- with 2 Mr. Zecchin, you were talking about any specific evidence 3 of his clients involved in a misconduct. Do you remember 4 anything about Cadman or Spaargaren being involved in the 5 rips or anything from any of the -- 6 A. No, sir. No, sir. 7 MR. SCHALKA: That's all I have. 8 THE WITNESS: That was quick. 9 MS. KLEINHAUS: The person -- remind me of the 10 Scahill person's name. 11 Mr. Wycoff? 12 MR. SCHALKA: Drew, I think, yeah. 13 THE REPORTER: Mr. Wycoff, are you there? 14 MR. WYCOFF: Yup, I'm here. 15 MS. KLEINHAUS: Do you have any questions for this 16 witness? 17 MR. WYCOFF: No questions for me, no. 18 MS. KLEINHAUS: I think, then, I have a -- Oh, 19 sorry. Mr. Flaxman, do you have questions of this 20 witness? 21 MR. FLAXMAN: No questions for me. 22 Thank you for your time. 23 MS. KLEINHAUS: I have a handful of follow-ups. It 24 will be less than five minutes, so thank you for all the</p>
<p style="text-align: right;">Page 210</p> <p>1 Q. Any particular number, if you recall? 2 A. Not off the top of my head. 3 Q. Okay. Did you have information that Kamane 4 and Allen Jackson were running out of -- running drugs 5 out of the same building? 6 A. Not off the top of my head. I don't think 7 they were running at the same time. I mean -- 8 Q. Okay. 9 A. I mean, one is a different time frame than the 10 other, I believe. 11 Q. All right. Let met go back to Bernard Brown a 12 moment. 13 A. Sure. 14 Q. Did he -- what specifically, if anything, did 15 he tell you about Kallatt Mohammed? 16 A. Where you find Watts, you find Mohammed. 17 MR. PALLES: Okay. Those are all the questions I 18 have. Thanks. 19 THE WITNESS: Okay. 20 EXAMINATION 21 BY MR. SCHALKA: 22 Q. My name is Michael Schalka. I represent 23 Michael Spaargaren and Matthew Cadman. 24 Do you recall -- you talked about the</p>	<p style="text-align: right;">Page 212</p> <p>1 time you spent today. 2 EXAMINATION 3 BY MS. KLEINHAUS 4 Q. During the course of Operation Brass Tax, you 5 had many communications with [REDACTED], correct? 6 A. Yes. 7 Q. And you were shown today a transcript of a 8 conversation that referred to Trey as well as an FBI 302 9 related to Mr. [REDACTED]. Those two documents aren't a 10 comprehensive record of everything you talked to [REDACTED] 11 about, right? 12 A. Absolutely not. 13 Q. Okay. And in other conversations, Mr. [REDACTED] 14 may have discussed other false arrests with you; is that 15 right? 16 MR. NOLAND: Objection, form, foundation. 17 MR. ZECCHIN: Join. 18 BY THE WITNESS: 19 A. Correct. 20 Q. And, in fact, is it possible that some of 21 those conversations were on the surplus device that 22 [REDACTED] lost? 23 MR. GAINER: Objection, foundation. 24</p>

45 (Pages 209 to 212)

In Re: Watts Coordinated Pretrial Proceedings
Continued Deposition of Daniel Echeverria - Taken 3/5/2025

<p style="text-align: right;">Page 213</p> <p>1 BY THE WITNESS:</p> <p>2 A. Anything's possible.</p> <p>3 Q. And was it your understanding that the FBI was</p> <p>4 supposed to be completing 302 reports about the</p> <p>5 information that you provided to them?</p> <p>6 A. That's their investigation. It should be</p> <p>7 their reports.</p> <p>8 Q. Okay. I want to turn your attention to the</p> <p>9 interrogatory responses from Mr. Fears. It looks -- it's</p> <p>10 the one that looks like this (indicating).</p> <p>11 A. What page?</p> <p>12 Q. Page 4, please.</p> <p>13 A. All right.</p> <p>14 Q. So I think, if I understood your testimony</p> <p>15 correctly, Mr. Fears told you that he believed,</p> <p>16 basically, that Watts had a motive to kill his brother;</p> <p>17 is that fair to say?</p> <p>18 MR. GAINER: Objection, form.</p> <p>19 BY THE WITNESS:</p> <p>20 A. Yes.</p> <p>21 Q. In other words, he knew that Watts and Kamane</p> <p>22 had had a falling out, right?</p> <p>23 MR. GAINER: Objection, form and foundation.</p> <p>24</p>	<p style="text-align: right;">Page 215</p> <p>1 A. Yes.</p> <p>2 Q. And in your practice, if you were doing one of</p> <p>3 those hand-off arrests and the person who actually saw</p> <p>4 the criminal conduct wasn't in Box 1 or Box 2, you would</p> <p>5 include their name in the narrative, right?</p> <p>6 MR. GAINER: Objection, that mischaracterizes his</p> <p>7 testimony, and it calls for speculation.</p> <p>8 BY THE WITNESS:</p> <p>9 A. Yes. I think I elaborated on that. I said RO</p> <p>10 received information from RO Gains that said subject was</p> <p>11 observed dropping the clear plastic bag containing</p> <p>12 blah-blah-blah-blah, and I would go with what he related</p> <p>13 to me and then put that in there. And if...</p> <p>14 Q. And so it would not be appropriate for there</p> <p>15 to be an occasion where someone's name appears in Box 1</p> <p>16 or Box 2 and there's no indication anywhere that there</p> <p>17 was a hand-off or some other officer actually viewed the</p> <p>18 misconduct, right?</p> <p>19 MR. GAINER: Objection to form.</p> <p>20 BY THE WITNESS:</p> <p>21 A. Right.</p> <p>22 Q. Okay. And now that you are retired from CPD,</p> <p>23 do you have plans to move out of state?</p> <p>24 A. As quick as possible.</p>
<p style="text-align: right;">Page 214</p> <p>1 BY THE WITNESS:</p> <p>2 A. Correct.</p> <p>3 Q. He didn't have any specific information about</p> <p>4 who was the triggerman in the murder, right?</p> <p>5 MR. GAINER: Same objection.</p> <p>6 BY THE WITNESS:</p> <p>7 A. No.</p> <p>8 Q. He just had some suspicions that Watts was</p> <p>9 involved; is that fair to say?</p> <p>10 MR. GAINER: Same objection.</p> <p>11 BY THE WITNESS:</p> <p>12 A. Yes.</p> <p>13 Q. So when his interrogatory responses say "I</p> <p>14 didn't have information about who killed him," meaning</p> <p>15 his brothers, that's accurate? He had suspicions that</p> <p>16 Watts was involved but no information about who actually</p> <p>17 killed his brother, right?</p> <p>18 MR. GAINER: Same objection.</p> <p>19 BY THE WITNESS:</p> <p>20 A. Correct.</p> <p>21 Q. You were asked some questions by Mr. Gainer</p> <p>22 about officers putting their name in -- I'm sorry. You</p> <p>23 can put that to the side -- in Box 1 or Box 2. Do you</p> <p>24 recall those questions?</p>	<p style="text-align: right;">Page 216</p> <p>1 Q. Okay. And where are you looking to move to?</p> <p>2 A. That's classified.</p> <p>3 Q. You don't have to give us your address, but</p> <p>4 what state are you looking to move to?</p> <p>5 A. I'm thinking of living abroad.</p> <p>6 Q. Just leave the United States altogether?</p> <p>7 A. Yes.</p> <p>8 Q. Are you considering moving to Puerto Rico?</p> <p>9 A. I'm not Puerto Rican. I'm considering Mexico.</p> <p>10 MS. KLEINHAUS: Okay. All right. I get it. All</p> <p>11 right. I don't have any further questions. Thank you.</p> <p>12 THE WITNESS: Get a job with the cartel there.</p> <p>13 MR. GAINER: Do you have any questions?</p> <p>14 MR. DEVINE: I just got a couple.</p> <p>15 MR. GAINER: I don't -- what is -- why are you -</p> <p>16 MR. DEVINE: If you're gonna object to it, that's</p> <p>17 all right.</p> <p>18 MR. GAINER: I do object to it. Thanks.</p> <p>19 MR. NOLAND: I have just a couple follow-ups real</p> <p>20 quick.</p> <p>21 FURTHER EXAMINATION</p> <p>22 BY MR. NOLAND:</p> <p>23 Q. So the -- I think you said earlier that all</p> <p>24 the information that Monk gave you, you gave to the feds?</p>

In Re: Watts Coordinated Pretrial Proceedings
Continued Deposition of Daniel Echeverria - Taken 3/5/2025

<p style="text-align: right;">Page 217</p> <p>1 A. Everything that was gave to me by Monk or 2 anybody else, I channeled it to that agency. 3 Q. They knew what you knew? 4 A. Yes. 5 Q. And they were the lead agency in Operation 6 Brass Tax? 7 A. Correct. 8 Q. So if the feds thought that Monk would be 9 useful to utilize as an informant and Monk was agreeable 10 to it, the feds could move forward with -- 11 A. With Monk. 12 Q. -- with doing that, right? 13 A. Yes. 14 Q. Regardless of what Bohmer said, right? 15 A. Correct. 16 MR. NOLAND: All right. Nothing else. 17 MR. GAINER: I don't have anything. 18 MR. ZECCHIN: I do have a couple quick questions. 19 I'll make them quick. 20 FURTHER EXAMINATION 21 BY MR. ZECCHIN: 22 Q. Sir, you talked earlier about the hand-off 23 arrest, the pass-off arrest? 24 A. Yeah, yeah.</p>	<p style="text-align: right;">Page 219</p> <p>1 Q. Okay. And you just -- for Ms. Kleinhaus, you 2 said that if you handed off an arrest to someone else, 3 you'd expect them to say something like "Learned 4 information from RO Echeverria"? 5 A. That's how I would do it. 6 Q. Sure. Would you expect that to be the case 7 here if it was a hand-off? 8 A. That's how I would to it. 9 MR. ZECCHIN: Okay. I have no other questions. 10 MR. NOLAND: Okay. 11 MR. GAINER: Thank you. Third time's a charm. 12 THE VIDEOGRAPHER: Okay. This the end of the 13 deposition. This is the end of today's testimony. The 14 time is 3:11 -- (inaudible.) 15 (Discussion off the record.) 16 THE REPORTER: Do you want to reserve or waive 17 signature? 18 MR. DEVINE: Oh, no, I'll waive it. 19 THE VIDEOGRAPHER: This is the actual end of the 20 deposition. This is end of today's testimony. The time 21 is 3:12 p.m., and the reporting time is 3 hours, 22 40 minutes, and 23 seconds. 23 (Witness excused.) 24 (Deposition concluded at 3:12 p.m.)</p>
<p style="text-align: right;">Page 218</p> <p>1 Q. That was like a wolf pack or large number of 2 arrestees? 3 A. Yes. 4 Q. Of if you wanted to help another officer get 5 some arrests, right? 6 A. Anybody that would -- if I recruit you, I 7 would tell you this is what we're doing. Do you want to 8 do it? And if I have an X amount, like 10, 12 arrests, 9 I'm not gonna sit 8 hours and do 12 arrests when I can 10 cut it in half and maybe hand you 3 or something. 11 Q. So if this arrest report that I showed you, 12 Exhibit 50, is just an arrest of a single individual, 13 Mr. [REDACTED] that's not consistent with your experience 14 in a hand-off type of situation, is it? 15 A. Maybe that's 1 of 12. I don't know. 16 Q. No, but if it says total arrested, one, that 17 is not consistent with the situation where you would pass 18 it off, correct? 19 A. Correct. 20 Q. And is it possible this is the arrest report 21 that you handed over to the feds? 22 MS. KLEINHAUS: Objection, calls for speculation. 23 BY THE WITNESS: 24 A. I don't recall.</p>	

47 (Pages 217 to 219)

In Re: Watts Coordinated Pretrial Proceedings
Continued Deposition of Daniel Echeverria - Taken 3/5/2025

Page 220

1 UNITED STATES OF AMERICA)
NORTHERN DISTRICT OF ILLINOIS)
2 EASTERN DIVISION) SS.
STATE OF ILLINOIS)
3 COUNTY OF COOK)

4

5 I, Tina M. Hickey, Certified Shorthand
6 Reporter, do hereby certify that DANIEL ECHEVERRIA was
7 first duly sworn by me to testify the whole truth and
8 that the above deposition was reported stenographically
9 by me and reduced to typewriting under my personal
10 direction.

11 I further certify that the said deposition was
12 taken at the time and place specified and that the taking
13 of said deposition commenced on March 5th, 2025, at
14 11:22 a.m.

15 The signature of the witness, DANIEL
16 ECHEVERRIA, was waived by agreement of counsel.

17 I further certify that I am not a relative or
18 employee or attorney or counsel of any of the parties,
19 nor a relative or employee of such attorney or counsel or
20 financially interested directly or indirectly in this
21 action.

22

23

24

In Re: Watts Coordinated Pretrial Proceedings
Continued Deposition of Daniel Echeverria - Taken 3/5/2025

Page 221

1 Witness my official signature as a Certified
2 Shorthand Reporter in the State of Illinois, on
3 March 25th, 2024.

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