

GROUP EXHIBIT 94



CONTAINS CONFIDENTIAL INFORMATION

Transcript of Brian Bolton, Volume I

Date: May 18, 2020

Case: Watts Coordinated Cases

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

- - - - - x
WATTS COORDINATED CASES. : Master Docket
: Case No. 19-cv-01717
- - - - - x

CONTAINS CONFIDENTIAL INFORMATION
Deposition of BRIAN BOLTON, VOLUME I
Held Virtually
Monday, May 18th, 2020
10:09 a.m. CST

Job No.: 290251
Pages: 1 - 154
Reported by: Paula Quetsch, CSR, RPR

CONTAINS CONFIDENTIAL INFORMATION

Transcript of Brian Bolton, Volume I

Conducted on May 18, 2020

19

1	A	No.	10:26:19
2	Q	When I say "Watts 264 tactical team," you	10:26:21
3		understand the tactical team that I mean; correct?	10:26:39
4	A	The 264 tactical team, I understand.	10:26:41
5	Q	When did you start working for Sergeant	10:26:45
6		Watts as your sergeant?	10:26:53
7	A	I would say approximately -- I'd say 2002,	10:26:56
8		2003, somewhere around there.	10:27:09
9	Q	Okay. And when did you join the Chicago	10:27:12
10		Police Department?	10:27:16
11	A	The 8th of June, 1998.	10:27:16
12	Q	Did you attend the Chicago Police Academy?	10:27:20
13	A	I did.	10:27:27
14	Q	Okay. What were the dates that you went	10:27:27
15		to the academy?	10:27:29
16	A	The academy, 8 June '98, and I graduated	10:27:30
17		from the academy, I believe it was October of 1998.	10:27:39
18	Q	Where were you assigned after you --	10:27:43
19		excuse me. Where were you assigned after you left	10:27:47
20		the academy?	10:27:50
21	A	I was assigned to the 15th District.	10:27:51
22	Q	And what were your duties in the	10:27:56
23		15th District?	10:27:58
24	A	I was a patrolman.	10:27:59



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Transcript of Robert Gonzalez

Date: October 16, 2019

Case: Watts Coordinated Cases

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Transcript of Robert Gonzalez
Conducted on October 16, 2019

1 (1 to 4)

1	3
1 IN THE UNITED STATES DISTRICT COURT	1 APPEARANCES:
2 FOR THE NORTHERN DISTRICT OF ILLINOIS	2
3 EASTERN DIVISION	3
4	4 ON BEHALF OF CERTAIN PLAINTIFFS:
5	5 Theresa Kleinhaus, Esq.
6 IN RE:) Master Docket	6 Joshua Tepfer, Esq.
7 WATTS COORDINATED CASES) Case No.	7 Loevy & Loevy
8) 19-cv-01717	8 311 N. Aberdeen Street, 3rd Floor
9	9 Chicago, Illinois 60607
10	10 312-243-5900
11	11
12 VIDEOTAPED DEPOSITION OF ROBERT GONZALEZ	12
13 Chicago, Illinois	13 ON BEHALF OF CERTAIN PLAINTIFFS:
14 October 16, 2019	14 Joel A. Flaxman, Esq.
15 11:00 a.m. - 5:15 p.m.	15 Kenneth N. Flaxman, PC
16	16 200 South Michigan Avenue, Suite 201
17	17 Chicago, Illinois 60604
18	18 312-427-3200
19	19
20	20
21 Job No. 262548	21
22 Pages: 1-210	22
23 Reported by: Annette M. Montalvo, CSR, RDR, CRR	23
24	24
2	4
1 Videotaped deposition testimony of ROBERT	1 APPEARANCES: (Continued)
2 GONZALEZ, held at the office of:	2
3	3
4 Loevy & Loevy	4 ON BEHALF OF DEFENDANTS ALVIN JONES, ROBERT
5 311 North Aberdeen Street, 3rd Floor	5 GONZALEZ, MIGUEL CABRALES, DOUGLAS NICHOLS, JR.,
6 Chicago, Illinois 60607	6 MANUEL S. LEANO, BRIAN BOLTON, KENNETH YOUNG, JR.,
7	7 DAVID SOLTIS, ELSWORTH J. SMITH, JR., JOHN
8	8 RODRIGUEZ, GEROME SUMMERS, JR., CALVIN RIDGELL,
9	9 JR., LAMONICA LEWIS, REBECCA BOGARD, FRANKIE LANE,
10 Pursuant to agreement, before Annette M.	10 KATHERINE MOSES-HUGHES, and DARRYL EDWARDS:
11 Montalvo, a Certified Shorthand Reporter,	11 Anthony E. Zecchin, Esq.
12 Registered Diplomate Reporter, and Certified	12 Hale & Monico, LLC
13 Realtime Reporter for the State of Illinois.	13 53 West Jackson Boulevard, Suite 337
14	14 Chicago, Illinois 60604
15	15 312-870-6933
16	16
17	17
18	18 ON BEHALF OF DEFENDANT KALLATT MOHAMMED:
19	19 Gary Ravitz, Esq.
20	20 Ravitz & Palles, PC
21	21 203 North LaSalle Street, Suite 2100
22	22 Chicago, Illinois 60601
23	23 312-558-1689
24	24

Transcript of Robert Gonzalez
Conducted on October 16, 2019

8 (29 to 32)

29 1 you can focus on other things, yes. So I don't 2 know if that falls under proactive, but. 3 Q Did you ask to be assigned to public 4 housing in the 2nd District? 5 A No, I was transferred over from the public 6 housing unit over to the 2nd District. 7 Q And prior to your time working in the 8 public housing in the 2nd District, what was your 9 assignment? 10 A I was in the 22nd District. 11 Q And what was your role in the 22nd 12 District? 13 A Police officer there. Same. 14 Q Where -- what were your responsibilities? 15 Was it patrol or TAC team or something else? 16 A It was like a year and a half I was 17 assigned there after the academy time there where I 18 did part of my probationary period there. 19 Q And so during that time period, were you 20 assigned to patrol? 21 A Yes, I was under watch, different watches. 22 Q Did you request to leave the 22nd District? 23 A Yes, I put in a request to go to the public 24 housing unit.	31 1 did you ever make a request to leave the 2nd 2 District? 3 A I don't know if I ever put in any -- what 4 they call par forms. So I don't know if I did to 5 go to maybe a different area. I don't remember. 6 It is possible and I didn't make the cut for it. 7 But I don't recall doing that, no. 8 Q Okay. Putting aside whether or not you 9 made a request, did you ever want to leave the 2nd 10 District to go work somewhere else? 11 A No. I don't believe that I ever had the 12 feeling of wanting to get to leave, unless it would 13 be in an area where I thought I could -- thought 14 it'd be better for me. 15 Q Were there times when you thought there was 16 another area that would be better for you? 17 A Sure. I would have liked to have gone to 18 the airport unit or any other areas that would have 19 been just a little bit closer to home. 20 Q Other than wanting to be closer to home, 21 are there any other reasons that you wanted to 22 leave the 2nd District? 23 A No. Not that I can remember. 24 Q Did you ever request a change in your
30 1 Q And why did you want to go to the public 2 housing unit? 3 A At the time it was just I wanted to learn a 4 little bit more. 5 Q And -- 6 A I wanted to be in a busier area. 7 Q Sorry. Didn't mean to talk over you. 8 What was it that you were interested in 9 learning in the public housing unit? 10 A Anything I could about policing. 11 Q When you requested to go to the public 12 housing unit, did you know anyone who was assigned 13 to the public housing unit at that time? 14 A No, I don't believe that I did. I don't 15 recall if I did at that time. 16 Q During the time that you were assigned to 17 the 2nd District either in the public housing unit 18 or on the TAC team, did you ever request to leave 19 the 2nd District? 20 A I am not understanding the question. Can 21 you repeat it. I'm sorry. 22 Q Sure. 23 During the time period 1999 or 2000 until 24 2017 when you were placed on administrative duty,	32 1 duties within the 2nd District? So staying 2 assigned there, but doing something different. Did 3 you ever make a request like that? 4 A As far as? I don't understand. 5 Q Any request to change what your assignment 6 was? 7 A I don't recall making any requests. 8 Q Okay. 9 A To change my status. 10 Q Okay. You mentioned earlier that you were 11 assigned to the 22nd District after the academy. 12 So when did you complete the academy? 13 A I believe it was -- I want to say maybe 14 June of -- well, my academy entry point was 15 December 14 -- or 1998. But I don't know if that's 16 when I started the academy or that's when I started 17 my probationary period, I can't remember. But my 18 start date is officially December 14, 1998. 19 Q Your start date for starting with the 20 Chicago Police Department? 21 A Yes. As being employed, yes. 22 Q Okay. When you were in the academy, did 23 you receive any training about what different 24 tactical units did or what units in public housing

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Transcript of Alvin Jones

Date: February 26, 2020

Case: Watts Coordinated Cases

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Transcript of Alvin Jones
Conducted on February 26, 2020

1 (1 to 4)

1	3
1 IN THE UNITED STATES DISTRICT COURT FOR THE	1 A P P E A R A N C E S
2 NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION	2 ON BEHALF OF CERTAIN PLAINTIFFS:
3	3 SCOTT R. RAUSCHER, ESQUIRE
4 -----x	4 LOEVY & LOEVY
5 : Master Docket Case No.	5 311 North Aberdeen Street
6 : 19-cv-01717	6 Third Floor
7 In re: WATTS COORDINATED :	7 Chicago, Illinois 60607
8 PRETRIAL PROCEEDINGS : Judge Andrea R. Wood	8 (312) 243-5900
9 :	9
10 : Magistrate Judge	10 ON BEHALF OF CERTAIN PLAINTIFFS:
11 : Sheila M. Finnegan	11 JOEL A. FLAXMAN, ESQUIRE
12 -----x	12 KENNETH N. FLAXMAN P.C.
13	13 200 South Michigan Avenue
14 VOLUME 1	14 Suite 201
15 Videotaped Deposition of SERGEANT ALVIN JONES	15 Chicago Illinois 60604
16 CHICAGO, ILLINOIS	16 (312) 427-3200
17 Wednesday, February 26, 2020	17
18 10:12 a.m.	18 ON BEHALF OF DEFENDANTS, CADMAN and SPAARGAREN
19	19 MICHAEL SCHALKA, ESQUIRE
20	20 LEINENWEBER BARONI & DAFFADA LLC
21	21 120 North LaSalle Street
22 Job: 291160	22 Suite 2000
23 Pages: 1 - 325	23 Chicago, Illinois 60602
24 Transcribed by: Jerome E. Harris, CLDT-204	24 (866) 786-3705
2	4
1 Videotaped Deposition of SERGEANT ALVIN JONES,	1 A P P E A R A N C E S C O N T I N U E D
2 held at the offices of:	2 ON BEHALF OF DEFENDANT, KALLATT MOHAMMED
3 LOEVY & LOEVY	3 GARY RAVITZ, ESQUIRE
4 311 N. Aberdeen Street	4 DALEY MOHAN GROBLE
5 3rd Floor	5 55 West Monroe
6 Chicago, IL 60607	6 Suite 1600
7 (312) 243-5900	7 Chicago, Illinois 60603
8	8 (312) 422-9999
9	9
10	10 ON BEHALF OF THE DEFENDANT, RONALD WATTS:
11	11 AHMED A. KOSOKO, ESQUIRE
12	12 JOHNSON & BELL
13	13 33 West Monroe Street
14	14 Suite 2700
15 Pursuant to notice, before Ryan Grzelak, Notary	15 Chicago, Illinois 60603
16 Public in and for the State of Illinois.	16 (312) 984-0214
17	17
18	18 ON BEHALF OF CITY OF CHICAGO and SUPERVISORY OFFICIALS
19	19 PAUL A. MICHALIK, ESQUIRE
20	20 REITER BURNS LLP
21	21 311 Wacker Drive
22	22 Suite 5200
23	23 Chicago Illinois 60606
24	24 (312) 878-1294

Transcript of Alvin Jones
Conducted on February 26, 2020

15 (57 to 60)

57 1 A An accurate list? Yes, it's accurate. 2 Q So you started in 1996; is that right? 3 A Yes. 4 Q And you were -- you started in training? 5 A Yes. 6 Q And then, you moved immediately after that to 7 District 2? 8 A Yes. 9 Q Can you tell me anything else you -- we talked 10 some about you had some memory of a report writing 11 training? 12 A Yes. 13 Q Is that right? 14 A Yes. 15 Q Would that be during the '96, '97 time period 16 listed here? 17 A Yes. 18 Q What else do you remember getting trained on 19 during that time period? 20 A I got trained on firearms, I got trained on 21 traffic stops, I got trained on how to wear uniforms, 22 how to search. 23 Q What do you remember about training on how to 24 search?	59 1 A Yes, I was. 2 Q What was your job with the Cook County 3 Sheriff's Office? 4 A I was Cook County Sheriff correctional officer. 5 Q How long were you a Cook County Sheriff's 6 correctional officer? 7 A From approximately '94 to '96. 8 Q What did you do as a correctional officer for 9 Cook County? 10 A Guarded inmates. 11 Q Where did you guard inmates? 12 A On cell blocks. 13 Q Where? 14 Where? What was the location? 15 A 26th and California. 16 Q What did you do to guard inmates in cell blocks 17 at 26th and California? 18 A There's an interlock area where you sit and 19 observe inmates all day. 20 Q Did you like that job? 21 A It was okay. 22 Q Did you ever get accused of using excessive 23 force in that job? 24 A I don't remember.
58 1 A Vaguely. You always try to make sure there's 2 nothing in a waistband. If nothing harms you, that's 3 the first thing. Make sure their hands are clear in 4 their waistband where a weapon might could be stored. 5 Q Did you receive training on where searches 6 should be conducted if you're arresting people? 7 A I don't recall that. 8 Q Any other topics that you remember receiving 9 training on? 10 A I don't remember all the topics from the 11 academy. 12 Q Do you remember any other topics from the 13 academy that you received training on? 14 A No, not at this time. 15 Q All right. And what was your first assignment 16 after the academy? 17 A The 2nd District. 18 Q Did you ask to go to the second 2nd District? 19 A No. 20 Q Did you want to be in the 2nd District? 21 A I didn't know where I wanted to be. I was just 22 assigned there. 23 Q Before you came to the police station, were you 24 working for the Cook County Sheriff's Office?	60 1 Q Did you ever get disciplined or reprimanded in 2 any way at that job? 3 A I don't remember. 4 Q You don't remember one way or the other? 5 A I don't remember one way or the other. 6 Q Did you ever use excessive force in that job? 7 A No. 8 Q Did you ever do anything that would have 9 warranted discipline? 10 A Not that I can remember. 11 Q What were your main responsibilities when you 12 worked as a correctional officer? 13 A To observe inmates during the course of the 14 tour to make sure that they were safe inside that -- 15 that tier. 16 Q How did you accomplish your job of making sure 17 inmates were safe inside the tier? 18 A By sitting there and observing them for the 19 tour of duty. 20 Q How did you sit and observe them? 21 A After you get there, you do a count, and they 22 -- and a count clear, the doors are open, they are 23 allowed time to come out. Those that want to come out 24 come out. Those that don't, don't. After that, the



Transcript of Manuel Leano

Date: September 26, 2019

Case: Watts Coordinated Cases

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Transcript of Manuel Leano
Conducted on September 26, 2019

1 (1 to 4)

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

Transcript of Manuel Leano
Conducted on September 26, 2019

6 (21 to 24)

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

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Transcript of Kallatt Mohammed, Cont.

Date: November 21, 2019
Case: Watts Coordinated Cases

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

- - - - - x

In Re: WATTS COORDINATED : Master Docket
CASES. : Case No. 19-cv-01717

- - - - - x

Videotaped Deposition of
KALLATT MOHAMMED, II, Volume II
Chicago, Illinois
Thursday, November 21, 2019
10:06 a.m.

Job No.: 266048

Pages: 191 - 385

Reported by: Melanie L. Humphrey-Sonntag,
CSR, RDR, CRR, CRC, FAPR

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

369

1	A	It's been -- it's been some time.	14:02:07
2	Q	Do you remember when -- when you got	14:02:09
3		formal training about police report writing other	14:02:12
4		than at the academy?	14:02:14
5	A	I don't remember.	14:02:15
6	Q	And do you remember where you got that	14:02:17
7		formal training outside of the academy?	14:02:20
8	A	I don't remember.	14:02:22
9	Q	Do you remember any of your training --	14:02:23
10		well, did you get trained on how to write police	14:02:26
11		reports while you were at the academy?	14:02:29
12	A	Yes.	14:02:31
13	Q	Can you tell me what you remember about	14:02:31
14		the training on how to write police reports that	14:02:33
15		you received while you were at the academy?	14:02:37
16	A	Well, it's -- that's been over seven,	14:02:39
17		eight years. I don't remember.	14:02:41
18	Q	It's probably been a lot longer than seven	14:02:44
19		or eight years; right?	14:02:47
20	A	Probably. Yeah, I don't -- I don't	14:02:48
21		remember.	14:02:50
22	Q	When were you at the academy?	14:02:50
23	A	In -- '96. 1996.	14:02:52
24	Q	Do you remember anything about your	14:02:56

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

370

1	training from the academy?	14:03:03
2	A No.	14:03:04
3	Can't remember, no.	14:03:07
4	MR. RAUSCHER: I'm going to mark	14:03:13
5	Exhibit 40.	14:03:14
6	(Mohammed Deposition Exhibit 40 marked for	14:03:21
7	identification and attached to the transcript.)	14:03:24
8	Q This is a report documenting the arrest of	14:03:24
9	Anthony McDaniels on November 21st, 2008?	14:04:02
10	A That's what it says, yes.	14:04:07
11	Q And you were involved in that arrest?	14:04:08
12	A Take the Fifth.	14:04:10
13	Q Have you had a chance to review the	14:04:12
14	narrative portion of here, the "Incident	14:04:19
15	Narrative"?	14:04:21
16	You had a chance to review that?	14:04:43
17	A Yes.	14:04:44
18	Q Which part of the narrative in this, if	14:04:45
19	any, is true?	14:04:47
20	MR. BAZAREK: Object to the form of the	14:04:48
21	question, foundation.	14:04:51
22	MR. MICHALIK: Join.	14:04:54
23	MR. SCHALKA: Join.	14:04:54
24	MR. KOSOKO: Join.	14:04:54



Transcript of Douglas Nichols

Date: December 19, 2019

Case: Watts Coordinated Cases

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1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF ILLINOIS
3 EASTERN DIVISION
4

5 - - - - - x
6 WATTS COORDINATED CASES. : Master Docket
7 : Case No. 19-cv-01717
8 - - - - - x

9
10
11
12 Videotaped Deposition of
13 DOUGLAS NICHOLS, VOLUME I
14 Chicago, Illinois
15 Thursday, December 19, 2019
16 10:12 a.m.

17
18
19
20
21
22 Job No.: 273007
23 Pages: 1 - 194
24 Reported by: Joanne E. Ely, CSR, RPR

Transcript of Douglas Nichols
Conducted on December 19, 2019

20

1	MR. BAZAREK: Object to the form of the	10:23:42
2	question, speculation.	10:23:43
3	BY MS. KLEINHAUS:	10:23:43
4	Q Go ahead.	10:23:48
5	A I have no idea.	10:23:49
6	Q Do you consider being placed on	10:23:50
7	administrative duty a punishment?	10:24:07
8	MR. NOLAND: Object to the form of the	10:24:13
9	question, foundation.	10:24:15
10	MR. BAZAREK: Join.	10:24:16
11	A Absolutely, 100 percent I feel it's a	10:24:17
12	punishment.	10:24:19
13	Q And have you ever asked anyone at the	10:24:21
14	Chicago Police Department what you're being	10:24:23
15	punished for?	10:24:27
16	A No.	10:24:29
17	Q Prior to being placed on administrative	10:24:29
18	duty at the 2nd District, what were you doing?	10:24:39
19	A When I first got hired by the Chicago	10:24:42
20	Police Department, I went to the academy. After	10:24:47
21	the academy, I went to the 15th District. I did	10:24:50
22	my probation there; and then right before my	10:24:53
23	probation, I got sent to the 2nd District.	10:24:57
24	When I got to the 2nd District, I was	10:24:59

Transcript of Douglas Nichols
Conducted on December 19, 2019

21

1 working midnights; and after I was working

10:25:02

2 midnights as a beat patrol officer, I went to the

10:25:06

3 tactical division, tactical, slash, housing in

10:25:11

4 November of 2004.

10:25:14

5 Q And you've been assigned to the 2nd
6 District ever since?

10:25:19

10:25:24

7 A Yes.

10:25:24

8 Q What was the approximate time frame that
9 you were in the academy?

10:25:25

10:25:38

10 A If I had to guess 24 February of '03, and
11 I'm not sure when I graduated. I think it was
12 August of '03, if I'm not mistaken. I could be
13 wrong on that.

10:25:41

10:25:54

10:25:57

10:26:02

14 Q How long were you assigned to the 15th
15 District?

10:26:02

10:26:07

16 A I'm guessing again, I'm not 100 percent
17 sure, but I did my probation there. So probably
18 around six months, if I had to guess. I'm
19 guessing.

10:26:07

10:26:15

10:26:19

10:26:23

20 Q When you left the 15th District to go to
21 the 2nd District, was that the result of a bidding
22 process?

10:26:24

10:26:36

10:26:39

23 A To the best of my knowledge, when I got
24 sent to the 2nd District -- you get assigned to a

10:26:39

10:26:44



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Transcript of Elsworth Smith, Jr.

Date: February 17, 2020

Case: Watts Coordinated Cases

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1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF ILLINOIS
3 EASTERN DIVISION
4

5 - - - - - x
6 WATTS COORDINATED CASES. : Master Docket
7 : Case No. 19-cv-01717
8 - - - - - x
9
10
11

12 Videotaped Deposition of
13 ELSWORTH SMITH, JR., Volume I
14 Chicago, Illinois
15 Monday, February 17, 2020
16 10:09 a.m.
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20
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22 Job No.: 281824
23 Pages: 1 - 314
24 Reported by: Joanne E. Ely, CSR, RPR

Transcript of Elsworth Smith, Jr.
Conducted on February 17, 2020

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1	what I've observed or what I've heard on -- I'm	12:36:56
2	sorry -- what I've heard through the media.	12:36:59
3	Q Do you think the code of silence allowed	12:37:01
4	Ronald Watts and Kallatt Mohammed to go unchecked?	12:37:05
5	MR. STEFANICH: Objection --	12:37:08
6	MR. MICHALIK: Objection.	12:37:09
7	MR. STEFANICH: -- form and foundation.	12:37:10
8	You can answer.	12:37:11
9	A I have no idea.	12:37:12
10	Q Before you became a patrol officer, did	12:37:28
11	you receive any training on how to write police	12:37:32
12	reports?	12:37:34
13	A Yes, I did.	12:37:34
14	Q Tell me about the training that you	12:37:34
15	received on how to be -- how to write police	12:37:36
16	reports?	12:37:38
17	A Any training that I've had about writing	12:37:38
18	reports would have been while I was in the police	12:37:43
19	academy, which was 20 years ago. And as I sit	12:37:46
20	here today, I don't remember the specific training	12:37:49
21	that I received from any classes in the police	12:37:53
22	academy.	12:37:57
23	Q Did you take any written tests on your	12:37:57
24	training while you were at the academy?	12:38:04

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

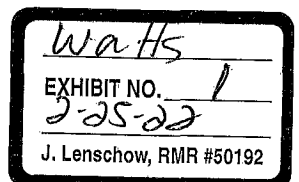
In re WATTS CONSOLIDATED

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)
) Master Docket No 19 CV 1717
) Judge Andrea R Wood
) Magistrate Judge Sheila M Finnegan
)

**DEFENDANT RONALD WATTS' ANSWERS TO PLAINTIFF SHAUN JAMES FIRST
SET OF INTERROGATORIES TO INDIVIDUAL DEFENDANT RONALD WATTS**

Defendant, Ronald Watts, by and through his attorneys, Johnson & Bell, Ltd , and for his
Answers to Plaintiff's First Set of Interrogatories to Defendant Watts, herein states as follows

- 1 Defendant objects to these interrogatories to the extent that they seek information that is not reasonably calculated to lead to the discovery of admissible evidence
- 2 Defendant objects to these interrogatories as improper and unduly burdensome to the extent that they purport to impose upon Defendant any obligations or requirements broader than those set forth in the Federal Rules of Civil Procedure or rules otherwise applicable to this matter
- 3 Defendant objects to these interrogatories to the extent they call for information that is a matter of public record or otherwise routinely available to all parties
- 4 Defendant objects to these requests to the extent they are duplicative or designed to harass or to reintroduce evidence ordered stricken from the record
- 5 Defendant reserve the right to modify, amend, or supplement any answers or objections contained herein in light of information developed or learned at a later date through Defendants' continuing investigation and/or discovery
- 6 Defendant does not concede that any of their responses to these interrogatories are or will be admissible evidence at a trial of this action Defendant does not waive any objection, on any ground, whether or not asserted herein, to the use of any such response at trial



2 Under oath, please identify every Communication that you have had about any of the allegations, events, or circumstances described in each Plaintiffs' Complaint with any Person, including but not limited to each Plaintiff and any of the other Individual Defendants, any other employee or agent of the City of Chicago, any other prosecutor or law enforcement authority, or any witness to the events described in Plaintiffs' Complaints. For each such Communication, please (a) state with particularity the substance of the Communication, (b) identify everyone involved in the Communication, (c) provide the date of the Communication, and (d) state whether or not the Communication was memorialized in a police report or other Document. If you answer this Interrogatory by referring to Documents, please state under oath that the sum total of Communications responsive to this Interrogatory are contained in the Documents that you reference.

ANSWER: Defendant objects to this interrogatory on the basis that it is vague, not limited to in time or scope, unduly burdensome, and overly broad. Defendant further objects to this interrogatory on the basis that it seeks information protected by the attorney client and attorney work product privileges.

3 Please identify with specificity all of your assignments and/or details during your employment with the Chicago Police Department, specifically identifying the time in which you were a member of team that patrolled/responded to/ investigated/surveilled/or had any responsibilities related in any way to the Ida B Wells public housing development. For each, please include the time period(s) during which you were assigned and/or detailed, specific responsibilities for each assignment and/or detail, list your direct supervisors up the chain of command for each

assignment and/or detail, and list all subordinates under your command for each assignment and/or detail

ANSWER: Defendant objects to this interrogatory as being overly broad, unduly burdensome, and calling for a narrative answer that is better suited for a discovery deposition. Notwithstanding and without waiving these objections, Defendant Watts was hired by the Chicago Police Department in January of 1994. Following his attendance at the police academy he was assigned to the Seventh District as a patrolman in June of 1994. In the early part of 1995, Defendant Watts was transferred to the Second District where he remained until he was named Sergeant in May of 2000. He worked in the Fifteenth District as a Patrol Sergeant for approximately a year before being transferred to Public Housing South in 2001. Defendant Watts became a Tactical Sergeant in Public Housing South in 2003. When the Public Housing South unit was dissolved in approximately 2005, Defendant Watts became a Tactical Sergeant in the Second District where he remained until he retired.

4 Answering separately for each Plaintiff, do you contend that each Plaintiff was guilty of the underlying crime or crimes for which they allege in their civil complaints that they were wrongfully convicted? If so, please provide the complete factual basis for your contention

ANSWER: Defendant objects to this Interrogatory because it calls for a legal conclusion. Notwithstanding and without waiving this objection, see the transcripts of Plaintiff's criminal trial and plea hearings believed to be in the possession of the Cook County State's Attorney's Office.

5 For each Plaintiff, please answer the following Did you participate in the arrest of Plaintiff? If your answer to this question is anything other than an unqualified "no," please describe