

Exhibit 2

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

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

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

192

1 Videotaped deposition of KALLATT MOHAMMED, II,
2 Volume II, held at the location of:

3
4
5 LOEVY & LOEVY
6 311 North Aberdeen Street
7 Third Floor
8 Chicago, Illinois 60607
9 (312) 243-5900

10
11
12
13 Pursuant to notice before Melanie L.
14 Humphrey-Sonntag, a Certified Shorthand Reporter,
15 Registered Diplomate Reporter, Certified Realtime
16 Reporter, and a Notary Public in and for the State
17 of Illinois.

18
19
20
21
22
23
24

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

193

1 A P P E A R A N C E S

2 ON BEHALF OF CERTAIN PLAINTIFFS:

3 SCOTT RAUSCHER, ESQUIRE

4 LOEVY & LOEVY

5 311 North Aberdeen Street

6 Third Floor

7 Chicago, Illinois 60607

8 (312) 243-5900

9

10 ON BEHALF OF CERTAIN PLAINTIFFS:

11 JOEL FLAXMAN, ESQUIRE

12 KENNETH N. FLAXMAN, PC

13 200 South Michigan Avenue

14 Suite 201

15 Chicago, Illinois 60604

16 (312) 427-3200

17

18

19

20

21

22

23

24

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

194

1 A P P E A R A N C E S C O N T I N U E D

2 ON BEHALF OF THE DEFENDANT CITY OF CHICAGO AND

3 VARIOUS POLICE DEPARTMENT SUPERVISORS:

4 PAUL A. MICHALIK, ESQUIRE

5 REITER BURNS, LLP

6 311 South Wacker Drive

7 Suite 5200

8 Chicago, Illinois 60606

9 (312) 982-0090

10

11 ON BEHALF OF THE DEFENDANT WATTS:

12 AHMED A. KOSOKO, ESQUIRE

13 JOHNSON & BELL, LTD.

14 33 West Monroe Street

15 Suite 2700

16 Chicago, Illinois 60603

17 (312) 372-0770

18

19

20

21

22

23

24

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

195

1 A P P E A R A N C E S C O N T I N U E D

2 ON BEHALF OF THE DEFENDANT MOHAMMED:

3 ERIC PALLES, ESQUIRE

4 GARY RAVITZ, ESQUIRE

5 RAVITZ & PALLES, PC

6 203 North LaSalle Street

7 Suite 2100

8 Chicago, Illinois 60601

9 (312) 558-1689

10

11 ON BEHALF OF THE DEFENDANTS SPAARGAREN

12 AND CADMAN:

13 MICHAEL J. SCHALKA, ESQUIRE

14 LEINENWEBER, BARONI & DAFFADA, LLC

15 203 North LaSalle Street

16 Suite 1620

17 Chicago, Illinois 60601

18 (866) 786-3705

19

20

21

22

23

24

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

196

1 A P P E A R A N C E S C O N T I N U E D

2 ON BEHALF OF CERTAIN DEFENDANT OFFICERS:

3 WILLIAM E. BAZAREK, ESQUIRE

4 HALE & MONICO

5 53 West Jackson Street

6 Suite 337

7 Chicago, Illinois 60604

8 (312) 870-6902

9

10 ALSO PRESENT:

11 ANDREW SEGAL

12 RICK KOSBERG, Videographer

13

14

15

16

17

18

19

20

21

22

23

24

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

197

1 C O N T E N T S

2 EXAMINATION OF KALLATT MOHAMMED, II	PAGE
3 By Mr. Flaxman	200
4 By Mr. Rauscher	366

5 E X H I B I T S

6 (Attached to transcript.)

7 MOHAMMED DEPOSITION EXHIBITS	PAGE
9 Exhibit 25 Harvey Blair Vice Case	201
10 Report	
11 Exhibit 26 William Carter Vice Case	223
12 Report	
13 Exhibit 27 William Carter Grand Jury	232
14 Indictment	
15 Exhibit 28 Memo, Mohammed to Anaele,	235
16 7/21/04	
17 Exhibit 29 William Carter Vice Case	240
18 Report	
19 Exhibit 30 Memo, Mohammed to Wilmouth,	252
20 8/25/04	
21 Exhibit 31 William Carter Arrest Report	255
22 Exhibit 32 William Carter and Sandra	266
23 Berry Vice Case Report	

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

198

1 E X H I B I T S C O N T I N U E D

2 (Attached to transcript.)

	MOHAMMED DEPOSITION EXHIBITS	PAGE
4	Exhibit 33 Multiple Arrest Reports	271
5	Exhibit 34 Notification of	295
6	Charges/Allegations, 6/16/11	
7	Exhibit 35 Memo, Mohammed to Waller,	299
8	6/19/11	
9	Exhibit 36 Multiple Arrest and Vice	303
10	Case Reports	
11	Exhibit 37 Multiple Arrest and Vice	319
12	Case Reports	
13	Exhibit 38 Angelo Shenault Vice Case	337
14	Report	
15	Exhibit 39 Angelo Shenault Arrest and	350
16	Vice Case Report	
17	Exhibit 40 Anthony McDaniels Arrest	370
18	Report	
19	Exhibit 41 McDaniels' Handwritten	373
20	Affidavit	
21		
22		
23		
24		

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

199

1	P R O C E E D I N G S	10:05:56
2	THE VIDEOGRAPHER: This is Day 2 of the	10:05:56
3	video deposition of Kallatt Mohammed, taken by	10:06:03
4	Loevy & Loevy, in the matter of the Watts	10:06:06
5	coordinated pretrial proceedings, Master Docket	10:06:08
6	Case No. 19-cv-01717, held at Loevy & Loevy,	10:06:11
7	311 North Aberdeen Street, Chicago, Illinois.	10:06:18
8	Today is November 21st, 2019. The time is 10:06.	10:06:21
9	The court reporter is Melanie Sonntag of	10:06:27
10	Planet Depos. The videographer is Rick Kosberg.	10:06:30
11	The counsel can now introduce themselves, and the	10:06:33
12	court reporter is free to administer the oath.	10:06:36
13	MR. FLAXMAN: Joel Flaxman on behalf of	10:06:39
14	plaintiffs represented by my office.	10:06:41
15	My paralegal, Andrew Segal, is also	10:06:43
16	present.	10:06:45
17	MR. RAUSCHER: Scott Rauscher on behalf of	10:06:46
18	plaintiffs represented by Loevy & Loevy in the	10:06:48
19	coordinated Watts proceedings.	10:06:50
20	MR. MICHALIK: Paul Michalik on behalf of	10:06:52
21	the Defendant City of Chicago and various	10:06:54
22	supervisory personnel.	10:06:57
23	MR. SCHALKA: I'm Michael Schalka on	10:06:58
24	behalf of the Defendants Spaargaren and Cadman.	10:07:00

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

200

1	MR. BAZAREK: William E. Bazarek for the	10:07:01
2	individual defendants represented by Hale &	10:07:04
3	Monaco.	10:07:06
4	MR. KOSOKO: I'm Ahmed Kosoko on behalf of	10:07:06
5	Ronald Watts.	10:07:09
6	MR. PALLE: Eric Palles. With me, Gary	10:07:09
7	Ravitz on behalf of Kallatt Mohammed.	10:07:12
8	THE COURT REPORTER: Would you raise your	12:01:35
9	right hand, please.	12:01:35
10	(Witness sworn.)	12:01:35
11	THE COURT REPORTER: Thank you.	12:01:35
12	MR. FLAXMAN: Good morning. My name is	10:07:31
13	Joel Flaxman. I represent various plaintiffs in	10:07:32
14	these coordinated proceedings.	10:07:34
15	KALLATT MOHAMMED, II,	10:07:34
16	having been duly sworn, testified further	10:07:34
17	as follows:	10:07:34
18	EXAMINATION BY COUNSEL FOR THE FLAXMAN PLAINTIFFS:	10:07:26
19	BY MR. FLAXMAN:	10:07:26
20	Q I'm going to be asking you some questions	10:07:37
21	about some of the cases that we disclosed. Do you	10:07:38
22	understand that?	10:07:40
23	A Yes.	10:07:40
24	Q Okay.	10:07:41

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

201

1	MR. FLAXMAN: I want to just put on the	10:07:42
2	record that one of the cases that we had disclosed	10:07:43
3	in advance about the arrest of Goleather	10:07:45
4	Jefferson -- that's G-o-l-e-h- -- I'm sorry --	10:07:49
5	G-o-l-e-a-t-h-e-r -- and Willie Martin we are	10:07:54
6	going to postpone questioning on because of	10:08:00
7	outstanding documents about those cases.	10:08:03
8	Q Is there any reason that you would not be	10:08:08
9	able to truthfully and accurately answer my	10:08:10
10	questions today?	10:08:12
11	A No.	10:08:13
12	Q Okay. I'm going to ask the court reporter	10:08:14
13	to mark this document as Exhibit 25.	10:08:15
14	(Mohammed Deposition Exhibit 25 marked for	10:08:27
15	identification and attached to the transcript.)	10:08:31
16	Q Do you recognize this as a vice case	10:08:31
17	report of the Chicago Police Department?	10:08:46
18	A Yes.	10:08:48
19	Q And do you see your name on this report?	10:08:49
20	A Yes.	10:08:52
21	Q Did you write your name on this report?	10:08:52
22	A Take the Fifth.	10:08:56
23	Q Do you know who wrote your name on this	10:08:58
24	report?	10:09:05

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

202

1	A Take the Fifth.	10:09:05
2	Q Have you ever seen this report before	10:09:07
3	today?	10:09:08
4	A Not before today, no.	10:09:08
5	Q Does this report document the arrest of	10:09:25
6	Harvey Blair on July 10th, 2004?	10:09:31
7	A It says it on here, yes.	10:09:35
8	Q And do you see, at the top of the page,	10:09:42
9	there's something called a UCR offense code?	10:09:48
10	A Yes.	10:09:53
11	Q What's a UCR offense code?	10:09:53
12	A I don't recall.	10:09:57
13	Q Okay. Next to that box it says "R-D N-O,"	10:09:58
14	period.	10:10:03
15	Do you see that?	10:10:05
16	A Yes.	10:10:05
17	Q Does that mean "RD number"?	10:10:07
18	A I would assume, yes.	10:10:09
19	Q Okay. And do you know what an RD number is?	10:10:14
20	A I don't recall.	10:10:17
21	Q Underneath "RD number" there's a box	10:10:21
22	that's listed as No. 7. It says "Beat/Unit	10:10:26
23	Assigned."	10:10:30
24	Do you see that?	10:10:31

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

203

1	A Yes.	10:10:32
2	Q And it lists "4512B" in that box.	10:10:32
3	Do you see that?	10:10:36
4	A Yes.	10:10:36
5	Q Do you know what "4512B" means?	10:10:37
6	A That would be a beat, beat unit.	10:10:39
7	Q Okay. At this time in July 2004, what was	10:10:45
8	your beat unit?	10:10:49
9	A Take the Fifth.	10:10:50
10	Q And you're taking the Fifth on advice of	10:10:52
11	your counsel?	10:11:00
12	A Yes.	10:11:01
13	Q And you believe that answering what your	10:11:01
14	beat unit was in July of 2004 would subject you to	10:11:04
15	criminal prosecution?	10:11:09
16	MR. PALLE: Objection; calls for	10:11:10
17	attorney-client privilege and work product.	10:11:13
18	I instruct him not to answer.	10:11:15
19	Q Are you going to follow your attorney's	10:11:19
20	instruction?	10:11:21
21	A Yes.	10:11:22
22	Q Why do you believe revealing your beat and	10:11:22
23	unit assigned in July of 2004 would subject you to	10:11:24
24	criminal prosecution?	10:11:27

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

204

1	MR. PALLE: Objection; attorney-client	10:11:29
2	privilege/work product.	10:11:32
3	Instruct him not to answer.	10:11:33
4	Q Are you going to follow your attorney's	10:11:35
5	instruction?	10:11:38
6	A Yes.	10:11:38
7	Q Going down the page, at the second line to	10:11:39
8	the bottom there's a Box No. 45.	10:11:45
9	Do you see that lists in that box Officer	10:11:49
10	Young as a reporting officer?	10:11:52
11	A Yes.	10:11:53
12	Q Do you know Officer Young?	10:11:55
13	A Yes.	10:11:58
14	Q Did you work on the same tactical team as	10:11:58
15	Officer Young?	10:12:01
16	A Yes.	10:12:02
17	Q Do you recognize Officer Young's signature	10:12:03
18	below his name?	10:12:06
19	A No.	10:12:09
20	Q Did you ever learn that Officer Young	10:12:10
21	falsely arrested Harvey Blair on July 10th, 2004?	10:12:13
22	MR. BAZAREK: Object to the form of the	10:12:17
23	question, foundation, mischaracterizes the	10:12:18
24	evidence in the record in this case.	10:12:22

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

205

1	MR. MICHALIK: Join.	10:12:24
2	MR. SCHALKA: Join.	10:12:25
3	MR. KOSOKO: Join.	10:12:26
4	A Taking the Fifth.	10:12:27
5	Q Did you ever hear that Officer Young	10:12:28
6	falsely arrested Harvey Blair on July 10th, 2004?	10:12:29
7	MR. BAZAREK: Object to the form of the	10:12:32
8	question, foundation, mischaracterizes the	10:12:33
9	evidence in the record in this case.	10:12:36
10	A Taking the Fifth.	10:12:36
11	Q Did you ever learn that Officer Young	10:12:37
12	falsely arrested anyone?	10:12:39
13	MR. BAZAREK: Object to the form of the	10:12:41
14	question, foundation, mischaracterizes the	10:12:44
15	evidence in the record in this case.	10:12:45
16	MR. MICHALIK: Join.	10:12:48
17	MR. SCHALKA: Join.	10:12:48
18	MR. KOSOKO: Join.	10:12:49
19	A Fifth Amendment.	10:12:49
20	Q Did you ever hear that Officer Young	10:12:50
21	falsely arrested anyone?	10:12:52
22	MR. BAZAREK: Object to the form of the	10:12:53
23	question, foundation, mischaracterizes the	10:12:54
24	evidence in the record in this case.	10:12:56

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

206

1	MR. SCHALKA: Join.	10:12:58
2	A Fifth Amendment.	10:12:59
3	Q Did you ever learn that Officer Young	10:12:59
4	framed Harvey Blair on July 10th, 2004?	10:13:02
5	MR. BAZAREK: Object to the form of the	10:13:04
6	question, foundation, mischaracterizes the	10:13:05
7	evidence in the record in this case.	10:13:07
8	MR. MICHALIK: Join.	10:13:09
9	MR. SCHALKA: Join.	10:13:09
10	MR. KOSOKO: Join.	10:13:10
11	A Fifth Amendment.	10:13:10
12	Q Did you ever hear that Officer Young	10:13:12
13	framed Harvey Blair on July 10th, 2004?	10:13:14
14	MR. BAZAREK: Object to the form of the	10:13:16
15	question, foundation, mischaracterizes the	10:13:17
16	evidence in the record in this case.	10:13:19
17	MR. MICHALIK: Join.	10:13:22
18	MR. SCHALKA: Join.	10:13:22
19	MR. KOSOKO: Join.	10:13:23
20	A Fifth Amendment.	10:13:23
21	Q Did you ever learn that Officer Young	10:13:24
22	framed anyone?	10:13:25
23	MR. BAZAREK: Object to the form of the	10:13:26
24	question, foundation, mischaracterizes the	10:13:28

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

207

1	evidence in the record in this case.	10:13:30
2	MR. PALLEs: Objection; asked and	10:13:34
3	answered, too.	10:13:34
4	MR. MICHALIK: Join.	10:13:36
5	MR. SCHALKA: Join.	10:13:36
6	MR. KOSOKO: Join.	10:13:36
7	A Fifth Amendment.	10:13:36
8	Q Did you ever hear that Officer Young	10:13:37
9	framed anyone?	10:13:39
10	MR. BAZAREK: Object to the form of the	10:13:40
11	question, foundation, mischaracterizes the	10:13:42
12	evidence in the record in this case.	10:13:44
13	MR. PALLEs: Objection; asked and	10:13:46
14	answered.	10:13:47
15	MR. MICHALIK: Join.	10:13:48
16	MR. SCHALKA: Join.	10:13:48
17	MR. KOSOKO: Join.	10:13:49
18	A Fifth Amendment.	10:13:49
19	Q Did you ever learn that Officer Young	10:13:50
20	signed a police report that contained false	10:13:52
21	information about Harvey Blair related to the	10:13:55
22	arrest on July 10th, 2004?	10:13:57
23	MR. BAZAREK: Object to the form of the	10:13:59
24	question, foundation, mischaracterizes the	10:14:00

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

208

1	evidence in the record in this case.	10:14:02
2	MR. MICHALIK: Join.	10:14:04
3	MR. SCHALKA: Join.	10:14:04
4	MR. KOSOKO: Join.	10:14:06
5	A Fifth Amendment.	10:14:06
6	Q Did you ever hear that Officer Young	10:14:06
7	signed a police report that contained false	10:14:08
8	information about Harvey Blair related to the	10:14:10
9	arrest on July 10th, 2004?	10:14:12
10	MR. BAZAREK: Object to the form of the	10:14:14
11	question, foundation, mischaracterizes the	10:14:16
12	evidence in the record in this case.	10:14:19
13	MR. MICHALIK: Join.	10:14:21
14	MR. SCHALKA: Join.	10:14:21
15	MR. KOSOKO: Join.	10:14:22
16	A Fifth Amendment.	10:14:22
17	Q Did you ever learn or hear that Officer	10:14:23
18	Young signed a police report that contained false	10:14:25
19	information about any subject?	10:14:28
20	MR. BAZAREK: Object to the form of the	10:14:29
21	question, foundation, mischaracterizes the	10:14:30
22	evidence in the report in this case.	10:14:33
23	MR. PALLE: Objection. It's compound, as	10:14:34
24	well.	10:14:37

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

209

1	MR. SCHALKA: Join.	10:14:38
2	MR. MICHALIK: Join.	10:14:38
3	A Fifth Amendment.	10:14:39
4	Q Moving to the right of Box No. 45, there's	10:14:47
5	Box No. 46. Do you see that that lists Officer	10:14:49
6	Jones as a reporting officer on this report?	10:14:54
7	A Yes.	10:14:57
8	Q Do you know Officer Jones?	10:14:57
9	A Yes.	10:14:59
10	Q Did you work on the same tactical team as	10:15:01
11	Officer Jones?	10:15:03
12	A Yes.	10:15:03
13	Q Do you recognize Officer Jones' signature	10:15:04
14	below his name?	10:15:07
15	A No.	10:15:08
16	Q Did you ever learn that Officer Jones	10:15:09
17	falsely arrested Harvey Blair on July 10th, 2004?	10:15:13
18	MR. BAZAREK: Object to the form of the	10:15:15
19	question, foundation, mischaracterizes the	10:15:17
20	evidence in the record in this case.	10:15:19
21	MR. MICHALIK: Join.	10:15:24
22	MR. SCHALKA: Join.	10:15:24
23	MR. KOSOKO: Join.	10:15:24
24	A Fifth Amendment.	10:15:24

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

210

1	Q Did you ever hear that Officer Jones	10:15:25
2	falsely arrested Harvey Blair on July 10th, 2004?	10:15:27
3	MR. BAZAREK: Object to the form of the	10:15:30
4	question, foundation, mischaracterizes the	10:15:31
5	evidence in the record in this case.	10:15:33
6	MR. MICHALIK: Join.	10:15:35
7	MR. SCHALKA: Join.	10:15:35
8	MR. KOSOKO: Join.	10:15:37
9	A Fifth Amendment.	10:15:37
10	Q Did you ever learn that Officer Jones	10:15:37
11	falsely arrested anyone?	10:15:39
12	MR. BAZAREK: Object to the form of the	10:15:41
13	question, foundation, mischaracterizes the	10:15:42
14	evidence in the record in this case.	10:15:45
15	MR. MICHALIK: Join.	10:15:47
16	MR. SCHALKA: Join.	10:15:47
17	MR. KOSOKO: Join.	10:15:48
18	A Fifth Amendment.	10:15:48
19	Q Did you ever hear that Officer Jones	10:15:49
20	falsely arrested anyone?	10:15:53
21	MR. BAZAREK: Object to the form of the	10:15:54
22	question, foundation, mischaracterizes the	10:15:56
23	evidence in the record in this case.	10:15:57
24	MR. MICHALIK: Join.	10:15:47

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

211

1	MR. SCHALKA: Join.	10:15:47
2	MR. KOSOKO: Join.	10:16:02
3	A Fifth Amendment.	10:16:02
4	Q Did you ever learn that Officer Jones	10:16:03
5	framed Harvey Blair on July 10th, 2004?	10:16:04
6	MR. BAZAREK: Object to the form of the	10:16:07
7	question, foundation, mischaracterizes the	10:16:08
8	evidence in the record in this case.	10:16:10
9	MR. MICHALIK: Join.	10:16:13
10	MR. SCHALKA: Join.	10:16:13
11	MR. KOSOKO: Join.	10:16:14
12	A Fifth Amendment.	10:16:14
13	Q Did you ever hear that Officer Jones	10:16:15
14	framed Harvey Blair on July 10th, 2004?	10:16:17
15	MR. BAZAREK: Object to the form of the	10:16:19
16	question, foundation, mischaracterizes the	10:16:20
17	evidence in the record in this case.	10:16:23
18	MR. MICHALIK: Join.	10:16:27
19	MR. SCHALKA: Join.	10:16:27
20	MR. KOSOKO: Join.	10:16:27
21	A Fifth Amendment.	10:16:27
22	Q Did you ever learn that Officer Jones	10:16:28
23	framed anyone?	10:16:29
24	MR. BAZAREK: Object to the form of the	10:16:30

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

212

1	question, foundation, mischaracterizes the	10:16:31
2	evidence in the record in this case.	10:16:35
3	MR. MICHALIK: Join.	10:16:38
4	MR. SCHALKA: Join.	10:16:38
5	MR. KOSOKO: Join.	10:16:38
6	A Fifth Amendment.	10:16:38
7	Q Did you ever hear that Officer Jones	10:16:39
8	framed anyone?	10:16:41
9	MR. BAZAREK: Object to the form of the	10:16:43
10	question, mischaracterizes the evidence in the	10:16:43
11	record in this case, as well as foundation.	10:16:48
12	And I'll also add all these questions	10:16:51
13	I think when we're talking about anyone also is	10:16:53
14	violative of the order in terms of questioning	10:16:55
15	about specific plaintiffs on any given day.	10:16:58
16	MR. MICHALIK: Join that objection.	10:17:04
17	MR. SCHALKA: Join.	10:17:05
18	MR. KOSOKO: Join.	10:17:07
19	MR. PALLEs: Join.	10:17:08
20	A Fifth Amendment.	10:17:09
21	BY MR. FLAXMAN:	10:17:09
22	Q Did you ever learn that Officer Jones	10:17:09
23	signed a police report that contained false	10:17:12
24	information about Harvey Blair related to the	10:17:15

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

213

1	arrest on July 10th, 2004?	10:17:16
2	MR. BAZAREK: Object to the form of the	10:17:18
3	question, foundation, mischaracterizes the	10:17:19
4	evidence in the record in this case.	10:17:22
5	MR. MICHALIK: Join.	10:17:24
6	MR. KOSOKO: Join.	10:17:25
7	A Fifth Amendment.	10:17:26
8	Q Did you ever hear that Officer Jones	10:17:26
9	signed a police report that contained false	10:17:28
10	information about Harvey Blair related to the	10:17:30
11	arrest on July 10th, 2004?	10:17:32
12	MR. BAZAREK: Object to the form of the	10:17:34
13	question, foundation, mischaracterizes the record	10:17:35
14	and the evidence in this case.	10:17:38
15	MR. MICHALIK: Join.	10:17:38
16	MR. SCHALKA: Join.	10:17:38
17	MR. KOSOKO: Join.	10:17:42
18	A Fifth Amendment.	10:17:42
19	Q Did you ever learn that Officer Jones	10:17:44
20	signed a police report that contained false	10:17:45
21	information about any arrestee?	10:17:46
22	MR. BAZAREK: Object to the form of the	10:17:50
23	question, foundation, mischaracterizes the	10:17:52
24	evidence in the record in this case, and, further,	10:17:54

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

214

1	it's violative of the Court's order in terms of	10:17:58
2	questioning about any given plaintiffs or any	10:18:02
3	other individuals.	10:18:05
4	MR. MICHALIK: Join.	10:18:06
5	MR. KOSOKO: Join.	10:18:07
6	MR. PALLE: Join.	10:18:07
7	A Fifth Amendment.	10:18:08
8	BY MR. FLAXMAN:	10:18:09
9	Q Did you ever hear that Officer Jones	10:18:09
10	signed a police report that contained false	10:18:11
11	information about any arrestee?	10:18:14
12	MR. BAZAREK: Object to the form of the	10:18:16
13	question, foundation, mischaracterizes the	10:18:17
14	evidence in the record in this case.	10:18:21
15	It also violates the court order in terms	10:18:25
16	of questioning regarding certain plaintiffs or	10:18:29
17	other individuals unless you're asking for all the	10:18:32
18	plaintiffs today with this line of questioning --	10:18:36
19	MR. MICHALIK: I'll join that objection.	10:18:40
20	MR. SCHALKA: I'll join, as well.	10:18:44
21	MR. BAZAREK: -- if you want to stipulate	10:18:46
22	to that.	10:18:47
23	MR. KOSOKO: Join.	10:18:49
24	A Fifth Amendment.	10:18:50

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

215

1	BY MR. FLAXMAN:	10:18:50
2	Q Were you involved in arresting Harvey	10:18:50
3	Blair on July 10th, 2004?	10:18:50
4	A Fifth Amendment.	10:18:50
5	Q Do you believe that stating whether you	10:18:52
6	were involved with arresting Harvey Blair on	10:18:53
7	July 10th, 2004, would subject you to criminal	10:18:55
8	prosecution?	10:18:57
9	MR. PALLE: Objection; work product/	10:18:57
10	attorney-client.	10:19:00
11	Instruct him not to answer.	10:19:00
12	Q Are you going to follow your attorney's	10:19:03
13	instruction?	10:19:03
14	A Yes.	10:19:05
15	Q Was Ronald Watts present for the arrest of	10:19:05
16	Harvey Blair on July 10th, 2004?	10:19:07
17	A Fifth Amendment.	10:19:08
18	Q Do you believe that stating whether Ronald	10:19:09
19	Watts was present for the arrest of Harvey Blair	10:19:11
20	on July 10th, 2004, will subject you to criminal	10:19:13
21	prosecution?	10:19:15
22	MR. PALLE: Objection; attorney-client/	10:19:16
23	work product.	10:19:19
24	Instruct him not to answer.	10:19:19

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

216

1 Q Are you going to follow your attorney's 10:19:20
2 instruction? 10:19:22

3 A Yes. 10:19:22

4 Q Are you familiar with the phrase "hand-to- 10:19:23
5 hand exchange"? 10:19:26

6 A Yes. 10:19:27

7 Q What does that phrase mean? 10:19:27

8 A Passing something hand to hand. 10:19:32

9 Q Okay. Did you see Harvey Blair conduct 10:19:33
10 any hand-to-hand exchanges on July 10th, 2004, at 10:19:36
11 about 2:35 p.m.? 10:19:41

12 A Fifth Amendment. 10:19:42

13 Q Is the statement in the report that police 10:19:43
14 saw Harvey Blair conduct hand-to-hand exchanges of 10:19:45
15 suspected narcotics on July 10th, 2004, a false 10:19:48
16 statement? 10:19:52

17 MR. BAZAREK: Object to the form of the 10:19:53
18 question, foundation, mischaracterizes the 10:19:54
19 evidence in the record in this case. 10:19:57

20 MR. MICHALIK: Join. 10:20:01

21 MR. SCHALKA: Join. 10:20:01

22 MR. KOSOKO: Join. 10:20:01

23 A Fifth Amendment. 10:20:01

24 Q Did you see Harvey Blair on July 10th, 10:20:01

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

217

1	2004, at about 2:35 p.m. holding a clear	10:20:03
2	plastic bag?	10:20:06
3	A Fifth Amendment.	10:20:07
4	Q Is the statement in the report that police	10:20:08
5	saw Harvey Blair holding a clear plastic bag in	10:20:11
6	his hand on July 10th, 2004, at about 2:35 p.m. a	10:20:14
7	false statement?	10:20:18
8	MR. BAZAREK: Object to the form of the	10:20:19
9	question, foundation, mischaracterizes the	10:20:20
10	evidence in the record in this case.	10:20:22
11	MR. MICHALIK: Join.	10:20:24
12	MR. SCHALKA: Join.	10:20:24
13	MR. KOSOKO: Join.	10:20:25
14	A Fifth Amendment.	10:20:25
15	Q Did you see Harvey Blair on July 10th,	10:20:26
16	2004, at about 2:35 p.m. run from police officers?	10:20:30
17	A Fifth Amendment.	10:20:33
18	Q Is the statement in the report that police	10:20:34
19	officers saw Harvey Blair run from police on	10:20:36
20	July 10th, 2004, at about 2:35 p.m. a false	10:20:39
21	statement?	10:20:42
22	MR. BAZAREK: Object to the form of the	10:20:42
23	question, foundation, mischaracterizes the	10:20:44
24	evidence in the record in this case.	10:20:46

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

218

1	MR. MICHALIK: Join.	10:20:49
2	MR. SCHALKA: Join.	10:20:49
3	MR. KOSOKO: Join.	10:20:49
4	A Fifth Amendment.	10:20:49
5	Q Did you search Harvey Blair on July 10th,	10:20:51
6	2004?	10:20:53
7	A Fifth Amendment.	10:20:54
8	Q Did you see any police officer search	10:20:54
9	Harvey Blair on July 10th, 2004?	10:20:57
10	A Fifth Amendment.	10:20:58
11	Q Do you believe that stating whether you	10:20:59
12	saw another police officer search Mr. Blair would	10:21:04
13	subject you to criminal prosecution?	10:21:07
14	MR. PALLE: Object; attorney-client/work	10:21:08
15	product.	10:21:13
16	Instruct him not to answer.	10:21:13
17	Q Are you going to follow your attorney's	10:21:14
18	instruction?	10:21:16
19	A Yes.	10:21:16
20	Q Is the statement in the police report that	10:21:16
21	officers searched Harvey Blair on July 10th, 2004,	10:21:18
22	a false statement?	10:21:20
23	MR. BAZAREK: Object to the form of the	10:21:21
24	question, foundation, mischaracterizes the	10:21:23

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

219

1	evidence in the record in this case.	10:21:25
2	MR. MICHALIK: Join.	10:21:25
3	MR. SCHALKA: Join.	10:21:25
4	MR. KOSOKO: Join.	10:21:28
5	A Fifth Amendment.	10:21:29
6	Q Did you find a clear plastic bag on Harvey	10:21:29
7	Blair's person on July 10th, 2004, at about	10:21:32
8	2:35 p.m.?	10:21:35
9	A Fifth Amendment.	10:21:36
10	Q Did you see any other police officer find	10:21:36
11	a clear plastic bag on Harvey Blair's person on	10:21:39
12	July 10th, 2004, at about 2:35 p.m.?	10:21:42
13	A Fifth Amendment.	10:21:46
14	Q Is the statement in the report that police	10:21:47
15	officers found a clear plastic bag on Harvey	10:21:49
16	Blair's person on July 10th, 2004, at about	10:21:51
17	2:35 p.m. a false statement?	10:21:54
18	MR. BAZAREK: Object to the form of the	10:21:55
19	question, foundation, mischaracterizes the	10:21:57
20	evidence in the record in this case.	10:21:59
21	MR. MICHALIK: Join.	10:22:02
22	MR. SCHALKA: Join.	10:22:03
23	A Fifth Amendment.	10:22:04
24	Q Is Exhibit 25 the report of Harvey Blair's	10:22:04

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

220

1	arrest on July 10th, 2004, an accurate report?	10:22:06
2	A Fifth Amendment.	10:22:11
3	MR. BAZAREK: Objection; foundation.	10:22:13
4	Q Were you involved in framing Harvey Blair	10:22:14
5	on July 10, 2004?	10:22:16
6	MR. BAZAREK: Object to the form of the	10:22:17
7	question, foundation, mischaracterizes the	10:22:18
8	evidence in the record in this case.	10:22:20
9	A Fifth Amendment.	10:22:22
10	Q Did you observe on July 10th, 2004, Ronald	10:22:23
11	Watts slap Harvey Blair in the face?	10:22:26
12	A Fifth Amendment.	10:22:29
13	Q Did you observe Ronald Watts plant drugs	10:22:30
14	on Harvey Blair on July 10th, 2004?	10:22:31
15	MR. KOSOKO: Objection to the form of the	10:22:33
16	question.	10:22:35
17	A Fifth Amendment.	10:22:36
18	Q Did you hear Ronald Watts tell Harvey	10:22:37
19	Blair words to the effect of "This shit is yours,"	10:22:38
20	referencing drugs that Ronald Watts planted on	10:22:41
21	Harvey Blair on July 10th, 2004?	10:22:43
22	MR. KOSOKO: Objection to the form of the	10:22:45
23	question.	10:22:46
24	MR. MICHALIK: Join.	10:22:47

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

221

1	MR. BAZAREK: Join.	10:22:48
2	A Fifth Amendment.	10:22:49
3	Q Do you believe that answering questions	10:22:49
4	about what you observed and heard Ronald Watts do	10:22:52
5	on July 10th, 2004, would subject you to criminal	10:22:55
6	prosecution?	10:22:57
7	MR. PALLES: Objection --	10:23:00
8	MR. KOSOKO: Objection to the form of the	10:22:58
9	question.	10:22:59
10	MR. PALLES: Objection; attorney-client	10:23:00
11	privilege/work-product privilege.	10:23:03
12	Instruct him not to answer.	10:23:04
13	Q Are you going to follow your attorney's	10:23:06
14	instruction?	10:23:08
15	A Yes.	10:23:08
16	Q Looking at that report in Box No. 48, do	10:23:21
17	you see that it states that the supervisor	10:23:26
18	approving is R. Watts?	10:23:27
19	A Yes.	10:23:30
20	Q And is that Officer Watts -- excuse me.	10:23:31
21	Is that Sergeant Watts' signature	10:23:34
22	underneath his name?	10:23:36
23	MR. KOSOKO: Objection; foundation, form	10:23:38
24	of the question.	10:23:40

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

222

1	A Not for sure.	10:23:43
2	Q On the next page of this document -- you	10:23:45
3	can just flip it over.	10:23:50
4	In the box that says "Supervisor's	10:23:51
5	Signature," do you recognize that to be the	10:23:53
6	signature of Ronald Watts?	10:23:55
7	A No.	10:23:56
8	Q Meaning you believe it's not Ronald Watts'	10:23:59
9	signature?	10:24:00
10	A Don't know.	10:24:00
11	Q Sir, how long did you work with Ronald	10:24:02
12	Watts when you were a Chicago police officer?	10:24:06
13	MR. KOSOKO: Objection to form of the	10:24:08
14	question.	10:24:09
15	A Not for certain.	10:24:09
16	Q Were you working with Ronald Watts more	10:24:12
17	than five years?	10:24:16
18	MR. KOSOKO: Objection to the form of the	10:24:18
19	question.	10:24:19
20	A Probably.	10:24:19
21	Q Okay. Did you ever see Ronald Watts'	10:24:24
22	signature?	10:24:26
23	A Don't remember.	10:24:26
24	Q Is it common for police officers to put	10:24:29

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

223

1	their signatures on official police reports?	10:24:34
2	MR. MICHALIK: Object to the form of the	10:24:37
3	question, foundation.	10:24:38
4	MR. KOSOKO: Join.	10:24:39
5	A Yes.	10:24:40
6	(Mohammed Deposition Exhibit 26 marked for	10:25:06
7	identification and attached to the transcript.)	10:25:25
8	(An off-the-record discussion was held.)	10:25:25
9	Q Do you recognize Exhibit 26 to be a vice	10:25:43
10	case report of the Chicago Police Department?	10:25:46
11	A Yes.	10:25:48
12	Q Do you see your name on this report?	10:25:55
13	A Yes.	10:25:58
14	Q Did you write your name on this report?	10:26:03
15	A Take the Fifth.	10:26:05
16	Q Do you know who wrote your name on this	10:26:07
17	report?	10:26:13
18	MR. MICHALIK: Object to the form of the	10:26:14
19	question, assumes facts not in evidence.	10:26:15
20	A Take the Fifth.	10:26:17
21	Q Have you ever seen this report before	10:26:17
22	today?	10:26:21
23	A Don't recall.	10:26:21
24	Q Does this report document the arrest of	10:26:22

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

224

1	William Carter on March 3rd, 2004?	10:26:29
2	A That's what it says.	10:26:35
3	Q Is that a yes?	10:26:36
4	A Yes.	10:26:36
5	Q Are you listed as the arresting officer in	10:26:41
6	Box 45?	10:26:43
7	MR. BAZAREK: Object to the --	10:26:46
8	mischaracterizes the box, what -- what it says.	10:26:47
9	MR. FLAXMAN: Let me ask that again.	10:26:51
10	Q Does Box 45 list your name under the words	10:26:52
11	"Reporting Officer's Name"?	10:26:56
12	A Yes.	10:26:58
13	Q And is that your signature under your	10:26:58
14	name?	10:27:01
15	A Take the Fifth.	10:27:01
16	Q Sir, do you know what your signature looks	10:27:01
17	like?	10:27:07
18	A Yes.	10:27:07
19	Q Does this signature under your name on	10:27:08
20	this form look like your signature?	10:27:13
21	A Take the Fifth.	10:27:14
22	Q Do you believe answering questions about	10:27:14
23	your signature will subject you to criminal	10:27:16
24	prosecution?	10:27:18

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

225

1	MR. PALLES: Objection; attorney-client	10:27:19
2	privilege/work product.	10:27:23
3	Instruct him not to answer.	10:27:23
4	Q Are you going to follow your attorney's	10:27:25
5	instruction?	10:27:25
6	A Yes.	10:27:25
7	Q Is Officer Young listed in Box 46 under	10:27:29
8	the words "Reporting Officer's Name"?	10:27:32
9	A Yes.	10:27:34
10	Q Do you recognize Officer Young's signature	10:27:35
11	under his name?	10:27:37
12	A No, I don't.	10:27:39
13	Q Meaning you don't know if it's his	10:27:39
14	signature or not?	10:27:44
15	A No, I don't.	10:27:45
16	Q Do you know Officer Young?	10:27:46
17	A Yes.	10:27:48
18	Q Did you ever learn that Officer Young	10:27:50
19	falsely arrested William Carter on March 3rd,	10:27:52
20	2004?	10:27:55
21	MR. BAZAREK: Object to the form of the	10:27:55
22	question, foundation, mischaracterizes the	10:27:56
23	evidence in the record in this case.	10:27:59
24	MR. KOSOKO: Join.	10:28:01

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

226

1	A Take the Fifth.	10:28:02
2	MR. MICHALIK: Join.	10:28:03
3	Q Did you ever hear that Officer Young	10:28:06
4	falsely arrested William Carter on March 3rd,	10:28:08
5	2004?	10:28:11
6	MR. BAZAREK: Object to the form of the	10:28:11
7	question, foundation, mischaracterizes the	10:28:12
8	evidence in the record in this case.	10:28:13
9	MR. MICHALIK: Join.	10:28:16
10	MR. KOSOKO: Join.	10:28:17
11	A Take the Fifth.	10:28:18
12	Q Did you ever learn that Officer Young	10:28:19
13	framed William Carter on March 3rd, 2004?	10:28:20
14	MR. BAZAREK: Object to the form of the	10:28:24
15	question, foundation, mischaracterizes the	10:28:24
16	evidence in the record in this case.	10:28:27
17	MR. MICHALIK: Join.	10:28:29
18	MR. KOSOKO: Join.	10:28:30
19	A Take the Fifth.	10:28:31
20	Q Did you ever hear that Officer Young	10:28:32
21	framed William Carter on March 3rd, 2004?	10:28:34
22	MR. BAZAREK: Object to the form of the	10:28:37
23	question, foundation, mischaracterizes the	10:28:38
24	evidence in the record in this case.	10:28:40

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

227

1	MR. MICHALIK: Join.	10:28:44
2	MR. KOSOKO: Join.	10:28:44
3	A Take the Fifth.	10:28:45
4	Q Did you ever learn that Officer Young	10:28:46
5	signed a police report that contained false	10:28:48
6	information about William Carter related to the	10:28:49
7	arrest on March 3rd, 2004?	10:28:52
8	MR. BAZAREK: Object to the form of the	10:28:53
9	question, foundation, mischaracterizes the	10:28:55
10	evidence in the record in this case.	10:28:57
11	MR. MICHALIK: Join.	10:28:59
12	MR. KOSOKO: Join.	10:29:00
13	MR. SCHALKA: Join.	10:29:00
14	A Take the Fifth.	10:29:01
15	Q Did you ever hear that Officer Young	10:29:01
16	signed a police report that contained false	10:29:03
17	information about William Carter related to the	10:29:05
18	arrest on March 3rd, 2004?	10:29:08
19	MR. BAZAREK: Object to the form of the	10:29:10
20	question, foundation, mischaracterizes the	10:29:11
21	evidence in the record in this case.	10:29:14
22	MR. MICHALIK: Join.	10:29:16
23	MR. SCHALKA: Join.	10:29:16
24	MR. KOSOKO: Join.	10:29:17

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

228

1	A Take the Fifth.	10:29:17
2	Q Were you involved in arresting William	10:29:18
3	Carter on March 3rd, 2004?	10:29:21
4	A Take the Fifth.	10:29:22
5	Q Was Ronald Watts present for the arrest of	10:29:23
6	William Carter on March 3rd, 2004?	10:29:25
7	MR. KOSOKO: Objection; foundation, form	10:29:27
8	of the question.	10:29:29
9	A Take the Fifth.	10:29:29
10	Q Did you see William Carter on March 3rd,	10:29:30
11	2004, at about 5- -- excuse me -- at about --	10:29:34
12	excuse me.	10:29:38
13	Did you see William Carter on March 3rd,	10:29:39
14	2004, at about 5:05 p.m. holding a clear	10:29:41
15	plastic bag?	10:29:45
16	A Take the Fifth.	10:29:45
17	Q Is the statement in the report that police	10:29:47
18	saw William Carter holding in his hand a clear	10:29:53
19	plastic bag on March 3rd, 2004, at about 5:05 p.m.	10:29:56
20	a false statement?	10:29:59
21	MR. BAZAREK: Object to the form of the	10:30:00
22	question, foundation, mischaracterizes the	10:30:01
23	evidence in the record in this case.	10:30:03
24	MR. MICHALIK: Join.	10:30:05

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

229

1	MR. SCHALKA: Join.	10:30:05
2	MR. KOSOKO: Join.	10:30:06
3	A Take the Fifth.	10:30:06
4	Q Did you see William Carter on March 3rd,	10:30:08
5	2004, at about 5:05 p.m. run from police officers?	10:30:10
6	A Take the Fifth.	10:30:14
7	Q Is the statement in the report that police	10:30:15
8	officers saw William Carter run from police on	10:30:17
9	March 3rd, 2004, at about 5:05 p.m. a false	10:30:20
10	statement?	10:30:24
11	MR. BAZAREK: Object to the form of the	10:30:24
12	question, foundation, mischaracterizes the	10:30:25
13	evidence in the record in this case.	10:30:28
14	MR. MICHALIK: Join.	10:30:30
15	MR. SCHALKA: Join.	10:30:30
16	MR. KOSOKO: Join.	10:30:31
17	A Fifth Amendment.	10:30:31
18	Q Did you search William Carter on	10:30:33
19	March 3rd, 2004, at about 5:05 p.m.?	10:30:35
20	A Fifth Amendment.	10:30:38
21	Q Did you see any police officer search	10:30:39
22	William Carter on March 3rd, 2004, at about	10:30:40
23	5:05 p.m.?	10:30:45
24	A Fifth Amendment.	10:30:45

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

230

1	Q Did you find clear plastic bags on William	10:30:46
2	Carter's person on March 3rd, 2004, at about	10:30:48
3	5:05 p.m.?	10:30:52
4	A Fifth Amendment.	10:30:52
5	Q Did you see any other police officer find	10:30:53
6	clear plastic bags on William Carter's person on	10:30:54
7	March 3rd, 2004, at about 5:05 p.m.?	10:30:57
8	A Fifth Amendment.	10:31:00
9	Q Is the statement in the report that police	10:31:00
10	officers found clear plastic bags on William	10:31:02
11	Carter's person on March 3rd, 2004, at about	10:31:04
12	5:05 p.m. a false statement?	10:31:09
13	MR. BAZAREK: Object to the form of the	10:31:10
14	question, foundation, mischaracterizes the	10:31:11
15	evidence in the record in this case.	10:31:14
16	MR. MICHALIK: Join.	10:31:15
17	MR. SCHALKA: Join.	10:31:15
18	MR. KOSOKO: Join.	10:31:16
19	A Fifth Amendment.	10:31:16
20	Q Is this report, Exhibit 26, about William	10:31:17
21	Carter's arrest on March 3rd, 2004, an accurate	10:31:20
22	report?	10:31:23
23	A Fifth Amendment.	10:31:23
24	Q Were you involved in framing William	10:31:24

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

231

1	Carter on March 3rd, 2004?	10:31:26
2	MR. BAZAREK: Object to the form of the	10:31:27
3	question, foundation, mischaracterizes the	10:31:29
4	evidence in the record in this case.	10:31:32
5	MR. MICHALIK: Join.	10:31:34
6	MR. SCHALKA: Join.	10:31:34
7	MR. KOSOKO: Join.	10:31:34
8	A Fifth Amendment.	10:31:35
9	Q Did you use force against William Carter	10:31:36
10	on March 3rd, 2004?	10:31:38
11	A Fifth Amendment.	10:31:39
12	Q Did you see any police officer use force	10:31:40
13	against William Carter on March 3rd, 2004?	10:31:42
14	A Fifth Amendment.	10:31:45
15	Q Do you see that R. Watts is listed in Box	10:31:45
16	No. 48 as the supervisor approving on Exhibit 26?	10:32:07
17	A Yes.	10:32:13
18	Q And are you able to tell whether that's	10:32:14
19	Ronald Watts' signature underneath his name?	10:32:17
20	A No, I'm not.	10:32:19
21	MR. KOSOKO: Objection; foundation.	10:32:20
22	Q And on the second page of this report, do	10:32:23
23	you see a signature in the box that says	10:32:31
24	"Supervisor's Signature"?	10:32:33

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

232

1	A Yes.	10:32:34
2	Q Are you able to tell whether that is the	10:32:35
3	signature of Ronald Watts?	10:32:36
4	MR. KOSOKO: Objection; foundation.	10:32:38
5	A No, I'm not.	10:32:39
6	Q Did you testify in front of the grand jury	10:32:41
7	about the arrest of William Carter on March 3rd,	10:32:59
8	2004?	10:33:02
9	A Do you have something that I could see?	10:33:03
10	Q Do you remember if you testified in front	10:33:10
11	of the grand jury about the arrest of William	10:33:13
12	Carter on March 3rd, 2004?	10:33:15
13	A I don't remember.	10:33:16
14	MR. FLAXMAN: We're going to mark that as	10:33:23
15	Exhibit 27.	10:33:25
16	(Mohammed Deposition Exhibit 27 marked for	10:33:31
17	identification and attached to the transcript.)	10:34:25
18	Q Does Exhibit 27 refresh your recollection	10:34:31
19	about whether you testified in front of the grand	10:34:33
20	jury about the arrest of William Carter on	10:34:35
21	March 3rd, 2004?	10:34:37
22	A No, it doesn't.	10:34:38
23	Q Do you recognize Exhibit 27 as a grand	10:34:40
24	jury indictment of William Carter?	10:34:43

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

233

1	MR. KOSOKO: Objection; foundation.	10:34:45
2	THE WITNESS: Could you repeat the	10:34:50
3	question?	10:34:50
4	MR. FLAXMAN: Could you please read it	10:34:50
5	back?	10:34:52
6	(The Reporter read the record as follows:	12:40:20
7	"Question: Do you recognize Exhibit 27 as a grand	12:40:20
8	jury indictment of William Carter?")	10:34:59
9	A That's what it says. I don't --	10:34:59
10	Q And it charges Mr. Carter for crimes	10:35:05
11	committed on March 3rd, 2004; is that right?	10:35:10
12	A That's what it says, yes.	10:35:13
13	Q And in your career as a police officer,	10:35:15
14	you testified before grand juries; right?	10:35:16
15	A I have.	10:35:18
16	Q Do you remember how many times?	10:35:19
17	A No, I don't.	10:35:21
18	Q Okay. On the last page of Exhibit 27,	10:35:22
19	underneath where it says "Foreman of the Grand	10:35:28
20	Jury," it says "Witnesses" and then it lists your	10:35:30
21	name; correct?	10:35:34
22	A That's correct.	10:35:34
23	Q Does this grand jury indictment indicate	10:35:35
24	that you testified before the grand jury about	10:35:40

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

234

1	William Carter's arrest on March 3rd, 2004?	10:35:44
2	MR. KOSOKO: Object to the foundation.	10:35:47
3	MR. MICHALIK: Join.	10:35:47
4	MR. PALLE: Object to the form.	10:35:49
5	A That's what it says.	10:35:50
6	Q Did you speak with the prosecutor before	10:35:55
7	you testified at the grand jury?	10:35:57
8	A Take the Fifth.	10:35:59
9	Q Did you tell the prosecutor that you had	10:36:00
10	framed William Carter?	10:36:03
11	MR. RAVITZ: Objection --	10:36:06
12	MR. BAZAREK: Object -- yeah. Object to	10:36:07
13	the form of the question, foundation,	10:36:09
14	mischaracterizes the evidence in the record in	10:36:10
15	this case.	10:36:12
16	MR. MICHALIK: Join.	10:36:13
17	MR. SCHALKA: Join.	10:36:13
18	MR. KOSOKO: Join.	10:36:14
19	A Take the Fifth.	10:36:14
20	Q Did you tell the prosecutor that William	10:36:14
21	Carter was not guilty of the offenses charged?	10:36:16
22	MR. BAZAREK: Object to the form of the	10:36:18
23	question, foundation, mischaracterizes the	10:36:19
24	evidence in the record in this case.	10:36:21

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

235

1	MR. KOSOKO: Join.	10:36:23
2	A Take the Fifth.	10:36:24
3	Q When you testified to the grand jury, did	10:36:25
4	a prosecutor ask you questions?	10:36:26
5	A Take the Fifth.	10:36:29
6	Q Did you give truthful answers to the	10:36:30
7	prosecutor's questions?	10:36:33
8	A Take the Fifth.	10:36:33
9	Q Did you testify falsely to the grand jury?	10:36:35
10	A Take the Fifth.	10:36:36
11	(Mohammed Deposition Exhibit 28 marked for	10:36:54
12	identification and attached to the transcript.)	10:37:03
13	(An off-the-record discussion was held.)	10:37:03
14	Q The court reporter just handed you	10:37:04
15	Exhibit 28.	10:37:23
16	Do you see your name on this memorandum?	10:37:26
17	A Yes.	10:37:29
18	Q And your name is at the bottom and there's	10:37:30
19	a signature above it. Do you see that?	10:37:35
20	A Take the Fifth.	10:37:37
21	Q Do you see where your name is under a	10:37:38
22	line after the text on this page?	10:37:51
23	A Take the Fifth.	10:37:54
24	Q Can you see that there appears to be a	10:37:55

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

236

1	signature above your name --	10:37:59
2	A Take the Fifth.	10:38:01
3	Q -- on this memorandum?	10:38:01
4	And that's because you believe answering	10:38:04
5	whether you see something that looks like a	10:38:06
6	signature will subject you to criminal	10:38:07
7	prosecution?	10:38:10
8	MR. PALLE: Objection; attorney-client/	10:38:10
9	work product.	10:38:14
10	Instruct him not to answer.	10:38:14
11	Q Are you going to follow your attorney's	10:38:17
12	instruction?	10:38:17
13	A Yes.	10:38:17
14	Q Did you write this memorandum, Exhibit 28?	10:38:18
15	A Take the Fifth.	10:38:21
16	Q Did you sign this memorandum, Exhibit 28?	10:38:23
17	A Take the Fifth.	10:38:25
18	Q Is this a witness report about a police	10:38:26
19	incident with RD No. HK-218057?	10:38:32
20	A Take the Fifth.	10:38:36
21	Q Do you see where the word "Subject" are	10:38:37
22	written on this memorandum?	10:38:42
23	A Take the Fifth.	10:38:44
24	Q Sir, do you know how to read?	10:38:44

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

237

1	MR. MICHALIK: Object to the form of the	10:38:47
2	question, argumentative.	10:38:48
3	MR. KOSOKO: Join.	10:38:49
4	A Yes.	10:38:50
5	Q And do you believe that reading this	10:38:51
6	memorandum would subject you to criminal	10:38:54
7	prosecution?	10:38:56
8	MR. PALLE: Objection; attorney-client	10:38:57
9	privilege/work product.	10:39:00
10	Instruct him not to answer.	10:39:00
11	Q Are you going to follow your attorney's	10:39:03
12	instruction?	10:39:04
13	A Yes.	10:39:04
14	Q Okay. At the top of this memorandum, do	10:39:05
15	you see the word "Confidential"?	10:39:07
16	A Yes.	10:39:09
17	Q Okay. What does it say after the word	10:39:09
18	"Confidential"?	10:39:12
19	A "Subject to protective order entered in	10:39:13
20	Case No. 16 C 8940."	10:39:16
21	Q Okay. And the next line I see says	10:39:21
22	"Operational Services." Do you see that?	10:39:23
23	A Yes.	10:39:25
24	Q Underneath that it says "PHS Unit	10:39:25

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

238

1	No. 715." Do you see that?	10:39:29
2	A Yes.	10:39:30
3	Q What's PHS Unit No. 715?	10:39:30
4	A Don't recall.	10:39:33
5	Q Okay. Underneath that it says the word	10:39:34
6	"To, T-o." Do you see that?	10:39:37
7	A I do.	10:39:40
8	Q Okay. Underneath that it says "From." Do	10:39:41
9	you see that?	10:39:44
10	A Yes.	10:39:44
11	Q And next to "From" it says your name,	10:39:45
12	doesn't it?	10:39:47
13	A Yes.	10:39:47
14	Q Okay. Underneath "From" it says	10:39:48
15	"Subject." Do you see that?	10:39:50
16	A Yes.	10:39:51
17	Q Can you read what the subject of this	10:39:51
18	memorandum is?	10:39:53
19	A "Witness Report."	10:39:54
20	Q Okay. And is there a number after	10:39:55
21	"Witness Report"?	10:39:57
22	A Henry -- HK-218057.	10:39:58
23	Q Okay. The next thing it says on No. 1,	10:40:03
24	"On 03 March 2004 the reporting officer was	10:40:08

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

239

1 assigned to the tactical team second watch in 10:40:11
2 civilian dress." 10:40:15
3 On March 3rd, 2004, were you assigned to 10:40:15
4 the tactical team second watch in civilian dress? 10:40:19
5 A Take the Fifth. 10:40:21
6 Q Would you read the next paragraph, 2, to 10:40:22
7 yourself. 10:40:28
8 Have you read -- had a chance to read 10:40:36
9 paragraph 2? 10:40:39
10 A Yeah. 10:40:40
11 Q And you understand what I mean when 10:40:40
12 I refer to "paragraph 2"? 10:40:41
13 A Yes. 10:40:42
14 Q Okay. Is paragraph true -- is paragraph 2 10:40:42
15 a true statement? 10:40:45
16 A Take the Fifth. 10:40:46
17 Q Can you please read paragraph 3 and let me 10:40:51
18 know when you've read it? 10:40:52
19 A I'm finished. 10:40:53
20 Q Okay. Is paragraph 3 a true statement? 10:40:57
21 A Take the Fifth. 10:41:00
22 Q Okay. Could you please read paragraph 4 10:41:01
23 and let me know and you've finished reading it? 10:41:03
24 A Finished. 10:41:05

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

240

1	Q Is paragraph 4 a true statement?	10:41:06
2	A Take the Fifth.	10:41:08
3	Q Okay. Could you please read paragraph 5	10:41:09
4	and let me know when you've finished reading it?	10:41:11
5	A Finished.	10:41:14
6	Q Okay. Is paragraph 5 a true statement?	10:41:16
7	A Take the Fifth.	10:41:18
8	Q Do you recognize Exhibit 28 as a to-from	10:41:18
9	memorandum?	10:41:29
10	A That's -- that's what it says, yes.	10:41:36
11	Q Do you know what that phrase means, "a	10:41:38
12	to-from memo"?	10:41:40
13	A Don't recall.	10:41:41
14	Q Okay.	10:41:43
15	(Mohammed Deposition Exhibit 29 marked for	10:42:13
16	identification and attached to the transcript.)	10:42:15
17	Q The reporter has handed you Exhibit 29.	10:42:15
18	Do you recognize Exhibit 29 as a vice case	10:42:53
19	report from the Chicago Police Department?	10:42:55
20	A Yes.	10:42:56
21	Q Do you see your name on this report?	10:42:58
22	A Yes.	10:43:00
23	Q Do you know who wrote your name on this	10:43:00
24	report?	10:43:02

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

241

1	A Take the Fifth.	10:43:02
2	Q Have you ever seen this report before	10:43:06
3	today?	10:43:08
4	A Don't recall.	10:43:08
5	Q Does this report document the arrest of	10:43:12
6	William Carter and two other people on June 18th,	10:43:17
7	2004?	10:43:21
8	A That's what it states.	10:43:21
9	Q Is Officer Jones listed as the reporting	10:43:24
10	officer in Box No. 45?	10:43:31
11	A That's what it says.	10:43:33
12	Q Are you able to say whether that's Officer	10:43:35
13	Jones' signature below his name?	10:43:37
14	A No, I'm not.	10:43:40
15	Q Did you ever learn that Officer Jones	10:43:41
16	falsely arrested William Carter on June 18th,	10:43:43
17	2004?	10:43:46
18	MR. BAZAREK: Object to the form of the	10:43:47
19	question, foundation, mischaracterizes the	10:43:48
20	evidence in the record in this case.	10:43:51
21	MR. MICHALIK: Join.	10:43:53
22	MR. KOSOKO: Join.	10:43:54
23	A Fifth Amendment.	10:43:55
24	Q Did you ever hear that Officer Jones	10:43:57

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

242

1	falsely arrested William Carter on June 18th,	10:43:59
2	2004?	10:44:01
3	MR. BAZAREK: Object to the form of the	10:44:01
4	question, foundation, mischaracterizes the	10:44:02
5	evidence in the record in this case.	10:44:04
6	MR. MICHALIK: Join.	10:44:06
7	MR. KOSOKO: Join.	10:44:07
8	A Fifth Amendment.	10:44:07
9	Q Did you ever learn that Officer Jones	10:44:08
10	framed William Carter on June 18th, 2004?	10:44:10
11	MR. BAZAREK: Object to the form of the	10:44:13
12	question, foundation, mischaracterizes the	10:44:14
13	evidence in the record in this case.	10:44:16
14	MR. MICHALIK: Join.	10:44:18
15	MR. KOSOKO: Join.	10:44:19
16	A Fifth Amendment.	10:44:20
17	Q Did you ever hear that Officer Jones	10:44:20
18	framed William Carter on June 18th, 2004?	10:44:22
19	MR. BAZAREK: Object to the form of the	10:44:25
20	question, foundation, mischaracterizes the	10:44:27
21	evidence in the record in this case.	10:44:28
22	MR. MICHALIK: Join.	10:44:30
23	MR. SCHALKA: Join.	10:44:30
24	MR. KOSOKO: Join.	10:44:31

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

243

1	A Fifth Amendment.	10:44:31
2	Q Did you ever learn that Officer Jones	10:44:32
3	signed a police report that contained false	10:44:34
4	information about William Carter related to the	10:44:36
5	arrest on June 18th, 2004?	10:44:38
6	MR. BAZAREK: Objection -- object to the	10:44:40
7	form of the question, foundation, mischaracterizes	10:44:41
8	the evidence in the record in this case.	10:44:43
9	MR. MICHALIK: Join.	10:44:45
10	MR. SCHALKA: Join.	10:44:45
11	MR. KOSOKO: Join.	10:44:47
12	A Fifth Amendment.	10:44:47
13	Q Did you ever hear that Officer Jones	10:44:47
14	signed a police report that contained false	10:44:49
15	information about William Carter related to the	10:44:51
16	arrest on June 18th, 2004?	10:44:53
17	MR. BAZAREK: Object to the form of the	10:44:56
18	question, foundation, mischaracterizes the	10:44:57
19	evidence in the record in this case.	10:44:58
20	MR. MICHALIK: Join.	10:45:01
21	MR. SCHALKA: Join.	10:45:01
22	MR. KOSOKO: Join.	10:45:01
23	A Fifth Amendment.	10:45:01
24	Q Is Officer Edwards listed as the reporting	10:45:02

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

244

1	officer in Box 46?	10:45:07
2	A That's what it says.	10:45:08
3	Q Do you know Officer Edwards?	10:45:09
4	A Yes.	10:45:11
5	Q Did you work on the same tactical team as	10:45:11
6	Officer Edwards?	10:45:14
7	A Yes.	10:45:14
8	Q Are you able to say whether that is	10:45:15
9	Officer Edwards' signature underneath his name?	10:45:17
10	A No, I'm not.	10:45:20
11	Q Did you ever learn that Officer Edwards	10:45:21
12	falsely arrested William Carter on June 18th,	10:45:25
13	2014?	10:45:28
14	MR. BAZAREK: Object to the form of the	10:45:29
15	question, foundation, mischaracterizes the	10:45:30
16	evidence in the record in this case.	10:45:32
17	MR. MICHALIK: Join.	10:45:34
18	MR. SCHALKA: Join.	10:45:34
19	MR. KOSOKO: Join.	10:45:35
20	A Fifth Amendment.	10:45:35
21	Q Did you ever hear that Officer Edwards	10:45:36
22	falsely arrested William Carter on June 18th,	10:45:39
23	2004?	10:45:41
24	MR. BAZAREK: Object to the form of the	10:45:41

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

245

1	question, foundation, mischaracterizes the	10:45:43
2	evidence in the record in this case.	10:45:46
3	MR. MICHALIK: Join.	10:45:48
4	MR. SCHALKA: Join.	10:45:48
5	MR. KOSOKO: Join.	10:45:48
6	A Fifth Amendment.	10:45:49
7	Q Did you ever learn that Officer Edwards	10:45:49
8	framed William Carter on June 18th, 2004?	10:45:55
9	MR. BAZAREK: Object --	10:45:58
10	A Fifth Amendment.	10:45:59
11	MR. BAZAREK: Object to foundation --	10:46:00
12	MR. MICHALIK: Form of the question.	10:46:04
13	MR. BAZAREK: -- form of the question,	10:46:06
14	mischaracterizes the evidence in the record in	10:46:08
15	this case.	10:46:10
16	MR. MICHALIK: Join.	10:46:10
17	MR. SCHALKA: Join.	10:46:10
18	MR. KOSOKO: Join.	10:46:10
19	Q Did you ever learn that Officer Edwards	10:46:10
20	signed a police report that contained false	10:46:11
21	information about William Carter related to the	10:46:13
22	arrest on June 18th, 2004?	10:46:15
23	MR. BAZAREK: Object to the form of the	10:46:16
24	question, foundation, mischaracterizes the	10:46:17

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

246

1	evidence in the record in this case.	10:46:19
2	MR. MICHALIK: Join.	10:46:21
3	MR. SCHALKA: Join.	10:46:21
4	MR. KOSOKO: Join.	10:46:21
5	A Fifth Amendment.	10:46:22
6	Q Did you ever hear that Officer Edwards	10:46:23
7	signed a police report that contained false	10:46:25
8	information about William Carter related to the	10:46:27
9	arrest on June 18th, 2004?	10:46:29
10	MR. BAZAREK: Object to the form of the	10:46:31
11	question, foundation, mischaracterizes the	10:46:32
12	evidence in the record in this case.	10:46:36
13	MR. MICHALIK: Join.	10:46:38
14	MR. SCHALKA: Join.	10:46:38
15	MR. KOSOKO: Join.	10:46:40
16	A Fifth Amendment.	10:46:40
17	Q Were you involved in arresting William	10:46:41
18	Carter on June 18th, 2004?	10:46:43
19	A Fifth Amendment.	10:46:45
20	Q Was Ronald Watts present for the arrest of	10:46:45
21	William Carter on June 18th, 2004?	10:46:48
22	MR. KOSOKO: Objection; foundation.	10:46:50
23	A Fifth Amendment.	10:46:52
24	Q When you worked at Ida B. Wells, did you	10:46:53

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

247

1	ever hear that people were lined up in a hallway	10:46:59
2	preventing residents from passing through?	10:47:01
3	MR. BAZAREK: I'd object to the form of	10:47:05
4	the question, foundation.	10:47:07
5	MR. MICHALIK: Vague.	10:47:08
6	MR. KOSOKO: Join.	10:47:09
7	A No.	10:47:09
8	Q Did you see a line of people in a hallway	10:47:10
9	at 540 East 36th Street on June 18th, 2004, at	10:47:16
10	about 10:15 a.m.?	10:47:20
11	A No.	10:47:21
12	Q Is the statement in the report that police	10:47:25
13	saw a line of people in a hallway at 540 East 36th	10:47:26
14	Street on June 18th, 2004, at about 10:15 a.m. a	10:47:29
15	false statement?	10:47:33
16	MR. BAZAREK: Object to the form of the	10:47:35
17	question, foundation, mischaracterizes the	10:47:36
18	evidence in the record in this case.	10:47:38
19	MR. MICHALIK: Join.	10:47:40
20	MR. SCHALKA: Join.	10:47:40
21	MR. KOSOKO: Join.	10:47:40
22	A Fifth Amendment.	10:47:40
23	Q Did you see William Carter on June 18th,	10:47:42
24	2004, at about 10:15 a.m. holding a clear	10:47:44

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

248

1	plastic bag?	10:47:47
2	A Fifth Amendment.	10:47:48
3	Q Is the statement in the police report that	10:47:51
4	officers saw William Carter holding a clear	10:47:57
5	plastic bag on June 18th, 2004, at about	10:47:59
6	10:15 a.m. a false statement?	10:48:02
7	MR. BAZAREK: Object to the form of the	10:48:05
8	question, foundation, mischaracterizes the	10:48:06
9	evidence in the record in this case.	10:48:08
10	MR. MICHALIK: Join.	10:48:08
11	MR. SCHALKA: Join.	10:48:08
12	MR. KOSOKO: Join.	10:48:11
13	MR. PALLE: Join.	10:48:11
14	A Fifth Amendment.	10:48:11
15	Q Did you search William Carter on	10:48:13
16	June 18th, 2004, at about 10:15 p.m. [sic]?	10:48:14
17	A Fifth Amendment.	10:48:16
18	Q Did you see any police officer search	10:48:17
19	William Carter on June 18th, 2004, at about	10:48:20
20	10:15 a.m.?	10:48:23
21	A Fifth Amendment.	10:48:24
22	Q Is the statement in the report that police	10:48:25
23	officers searched William Carter on June 18, 2004,	10:48:27
24	at about 10:15 a.m. a false statement?	10:48:30

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

249

1	MR. BAZAREK: Object to the form of the	10:48:32
2	question, foundation, mischaracterizes the	10:48:34
3	evidence in the record in this case.	10:48:35
4	MR. MICHALIK: Join.	10:48:35
5	MR. SCHALKA: Join.	10:48:35
6	MR. KOSOKO: Join.	10:48:35
7	A Fifth Amendment.	10:48:38
8	Q Did you recover a bag from William	10:48:39
9	Carter's hand on June 18th, 2004, at about	10:48:41
10	10:15 a.m.?	10:48:43
11	A Fifth Amendment.	10:48:44
12	Q Did you see any police officer recover a	10:48:45
13	bag from William Carter's hand on June 18th, 2004,	10:48:47
14	at about 10:15 a.m.?	10:48:50
15	A Fifth Amendment.	10:48:51
16	Q Is the statement in the report that an	10:48:52
17	officer recovered a bag from William Carter's hand	10:48:55
18	on June 18th, 2004, at about 10:15 a.m. a false	10:48:58
19	statement?	10:49:01
20	MR. BAZAREK: Object to the form of the	10:49:02
21	question, foundation, mischaracterizes the	10:49:03
22	evidence in the record in this case.	10:49:04
23	MR. MICHALIK: Join.	10:49:04
24	MR. SCHALKA: Join.	10:49:04

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

250

1	MR. KOSOKO: Join.	10:49:06
2	MR. PALLE: Join.	10:49:06
3	A Because I am concerned that the mere act	10:49:07
4	of testifying to this subject matter, this	10:49:11
5	incident, may cause me to be criminally indicted	10:49:13
6	by the United States Attorney's Office and/or	10:49:16
7	Cook County State's Attorney's Office, on the	10:49:19
8	advice of counsel -- any questions about certain	10:49:22
9	aspects -- I am going to decline to answer any	10:49:25
10	questions about certain aspects of my conduct as a	10:49:29
11	police officer, based upon the rights guaranteed	10:49:33
12	to me by the Fifth Amendment of the United States	10:49:36
13	Constitution.	10:49:38
14	Q Is the statement that you just read to me	10:49:41
15	what you intend to mean when you say "Fifth	10:49:52
16	Amendment" in response to a question?	10:49:55
17	A Yes.	10:49:56
18	Q And is that a statement that your	10:49:57
19	attorneys wrote for you?	10:49:59
20	A Yes.	10:50:00
21	Q Is Exhibit 29 the report of William	10:50:01
22	Carter's arrest on June 18th, 2004, an accurate	10:50:05
23	report?	10:50:07
24	A Fifth Amendment.	10:50:08

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

251

1	Q Were you involved in framing William	10:50:10
2	Carter on June 18th, 2004?	10:50:11
3	MR. BAZAREK: Object to the form of the	10:50:13
4	question, foundation, mischaracterizes the	10:50:14
5	evidence in the record in this case.	10:50:17
6	MR. KOSOKO: Join.	10:50:19
7	MR. MICHALIK: Join.	10:50:20
8	A Fifth Amendment.	10:50:21
9	Q Did you observe Alvin Jones plant drugs on	10:50:21
10	William Carter on June 18th, 2004?	10:50:24
11	MR. BAZAREK: Object to the form of the	10:50:26
12	question, foundation, mischaracterizes the	10:50:28
13	evidence in the record in this case.	10:50:29
14	MR. MICHALIK: Join.	10:50:33
15	MR. KOSOKO: Join.	10:50:34
16	A Fifth Amendment.	10:50:35
17	Q Did you use force against William Carter	10:50:36
18	on June 18th, 2004?	10:50:41
19	A Fifth Amendment.	10:50:43
20	Q Did you see any police officer use force	10:50:44
21	against William Carter on June 18th, 2004?	10:50:49
22	A Fifth Amendment.	10:50:51
23	Q Did you point a gun at William Carter on	10:50:52
24	June 18th, 2004?	10:50:54

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

252

1	A Fifth Amendment.	10:50:56
2	Q Did you see any police officer point a gun	10:50:56
3	at William Carter on June 18th, 2004?	10:50:58
4	A Fifth Amendment.	10:51:00
5	(Mohammed Deposition Exhibit 30 marked for	10:51:18
6	identification and attached to the transcript.)	10:51:18
7	MR. FLAXMAN: This is marked as	10:51:48
8	Exhibit 30.	10:51:49
9	MR. PALLE: Yeah.	10:51:50
10	May we know who the complainant is here?	10:51:55
11	MR. MICHALIK: Could I -- did I miss 29?	10:51:58
12	Oh, I got it. I'm sorry.	10:52:02
13	I do remember. Thank you.	10:52:04
14	MR. RAUSCHER: I may have it.	10:52:15
15	MR. FLAXMAN: I have it. It's a blank	10:52:16
16	copy.	10:52:21
17	MR. PALLE: I got a list of the --	10:52:29
18	BY MR. FLAXMAN:	10:52:29
19	Q I'm going to show you a document with the	10:52:32
20	Bates range City-BG-11178 through 11260, which --	10:52:34
21	which -- which I hope we can get through without	10:52:47
22	marking it as an exhibit.	10:52:50
23	MR. PALLE: Let me take a look.	10:52:52
24	Q Your lawyer can take a look at it first,	10:52:54

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

253

1	sure.	10:52:56
2	And do you understand that packet to be a	10:53:16
3	file from the investigation into a complaint made	10:53:19
4	by William Carter about his arrest on June 18th,	10:53:22
5	2004?	10:53:25
6	A Yes.	10:53:26
7	Q Okay. And within that is a page marked	10:53:28
8	City-BG-11211?	10:53:36
9	MR. RAVITZ: Can you show me?	10:53:45
10	THE WITNESS: Yeah.	10:53:47
11	MR. PALLE: It's the same page.	10:53:49
12	Q And do you understand that that	10:53:51
13	page within that packet is what we've marked as	10:53:53
14	Exhibit 30?	10:53:55
15	A Yes.	10:53:57
16	Q Okay. Did you write the memorandum that	10:53:57
17	we marked as Exhibit 30?	10:54:02
18	A Take the Fifth.	10:54:04
19	(An off-the-record discussion was held.)	10:54:07
20	Q Does your signature appear on Exhibit 30?	10:54:11
21	A Take the Fifth.	10:54:14
22	Q Does your name appear on Exhibit 30?	10:54:17
23	A Yes.	10:54:18
24	Q And is Exhibit 30 a witness report about	10:54:22

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

254

1 an incident at 540 East 36th Street? 10:54:24

2 A Yes. 10:54:27

3 Q Is it true that you came into contact with 10:54:29

4 William Carter at that address? 10:54:34

5 A Take the Fifth. 10:54:36

6 Q Is it true that William Carter was placed 10:54:37

7 under arrest for being in possession of a 10:54:39

8 controlled substance? 10:54:44

9 A Take the Fifth. 10:54:44

10 Q Is it true that William Carter cooperated 10:54:45

11 with arresting officers and obeyed all lawful 10:54:47

12 orders? 10:54:50

13 A Take the Fifth. 10:54:50

14 Q Is it true that the only physical contact 10:54:50

15 with William Carter was placing him under arrest, 10:54:53

16 searching, transporting, and recovering the 10:54:55

17 suspect narcotics? 10:54:57

18 A Take the Fifth. 10:54:58

19 Q Is it true that you did not observe 10:54:58

20 Officer Jones punch William Carter in the jaw? 10:55:01

21 A Take the Fifth. 10:55:04

22 Q Is it true that William Carter was 10:55:05

23 lawfully arrested. 10:55:07

24 A Take the Fifth. 10:55:08

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

255

1	Q Is it true that William Carter was charged	10:55:10
2	accordingly with a lawful arrest?	10:55:12
3	A Take the Fifth.	10:55:14
4	(Mohammed Deposition Exhibit 31 marked for	10:55:57
5	identification and attached to the transcript.)	10:56:03
6	(An off-the-record discussion was held.)	10:56:33
7	Q Do you recognize Exhibit 31 as an arrest	10:56:35
8	report of the Chicago Police Department?	10:56:40
9	A Yes.	10:56:41
10	Q And did you see your name on this report?	10:56:44
11	A Yes, I did.	10:56:48
12	Q Do you know who wrote your name on this	10:56:50
13	report?	10:56:52
14	A Take the Fifth.	10:56:52
15	Q Have you ever seen this report before	10:56:53
16	today?	10:56:56
17	A No, I haven't.	10:56:56
18	Q Does Exhibit 31 document the arrest of	10:56:57
19	William Carter on May 19th, 2006?	10:57:01
20	A That's what it says.	10:57:04
21	Q And on page 3 is Officer Smith listed as	10:57:06
22	the attesting officer?	10:57:13
23	A That's what it says.	10:57:14
24	Q And is Officer Smith also listed as the	10:57:19

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

256

1	second arresting officer?	10:57:21
2	A That's what it says.	10:57:22
3	Q Do you know Officer Smith?	10:57:24
4	A Yes.	10:57:26
5	Q Did you work on the same tactical team as	10:57:27
6	Officer Smith?	10:57:30
7	A Yes.	10:57:31
8	Q Did you ever learn that Officer Smith	10:57:33
9	falsely arrested William Carter on May 19th, 2006?	10:57:35
10	MR. BAZAREK: Object to the form of the	10:57:38
11	question, foundation, mischaracterizes the	10:57:39
12	evidence in the record in this case.	10:57:41
13	MR. MICHALIK: Join.	10:57:44
14	MR. SCHALKA: Join.	10:57:44
15	MR. KOSOKO: Join.	10:57:44
16	A Because I am concerned that the mere act	10:57:47
17	of testifying to this subject matter, this	10:57:49
18	incident, may cause me to be criminally indicted	10:57:52
19	by the United States Attorney's Office and/or	10:57:54
20	Cook County State's Attorney's Office, on the	10:58:00
21	advice of counsel I am going to decline to answer	10:58:00
22	any questions about certain aspects of my conduct	10:58:03
23	as a Chicago police officer, based upon the rights	10:58:07
24	guaranteed to me by the Fifth Amendment of the	10:58:10

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

257

1	United States Constitution.	10:58:13
2	Q And is that one of the questions you're	10:58:14
3	going to take the Fifth on?	10:58:17
4	A Yes.	10:58:19
5	Q Okay. Did you ever hear that Officer	10:58:19
6	Smith falsely arrested William Carter on May 19th,	10:58:21
7	2006?	10:58:24
8	MR. BAZAREK: Object to the form of the	10:58:25
9	question, foundation, mischaracterizes the	10:58:26
10	evidence in the record in this case.	10:58:27
11	MR. MICHALIK: Join.	10:58:31
12	MR. SCHALKA: Join.	10:58:31
13	MR. KOSOKO: Join.	10:58:31
14	A Fifth Amendment.	10:58:31
15	Q Did you ever learn that Officer Smith	10:58:32
16	framed William Carter on May 19th, 2006?	10:58:33
17	MR. BAZAREK: Object to the form of the	10:58:36
18	question, foundation, mischaracterizes the	10:58:37
19	evidence in the record in this case.	10:58:38
20	MR. MICHALIK: Join.	10:58:40
21	MR. SCHALKA: Join.	10:58:40
22	MR. KOSOKO: Join.	10:58:41
23	A Fifth Amendment.	10:58:41
24	Q Did you ever hear that Officer Smith	10:58:42

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

258

1	framed William Carter on May 19th, 2006?	10:58:45
2	MR. BAZAREK: Object to the form of the	10:58:47
3	question, foundation, mischaracterizes the	10:58:48
4	evidence in the record in this case.	10:58:50
5	MR. MICHALIK: Join.	10:58:52
6	MR. SCHALKA: Join.	10:58:52
7	MR. KOSOKO: Join.	10:58:53
8	A Fifth Amendment.	10:58:53
9	Q Did you ever learn that Officer Smith	10:58:54
10	swore to a police report that contained false	10:58:57
11	information about William Carter related to the	10:58:59
12	arrest on May 19th --	10:59:01
13	MR. BAZAREK: Object to the --	10:59:03
14	Q -- 2006?	10:59:02
15	MR. BAZAREK: Object to the form of the	10:59:02
16	question, foundation, mischaracterizes the	10:59:04
17	evidence in the record in this case.	10:59:05
18	MR. MICHALIK: Join.	10:59:08
19	MR. SCHALKA: Join.	10:59:08
20	MR. KOSOKO: Join.	10:59:08
21	A Fifth Amendment.	10:59:08
22	Q Did you ever hear that Officer Smith swore	10:59:09
23	to a police report that contained false	10:59:11
24	information about William Carter related to the	10:59:12

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

259

1	arrest on May 19th, 2006?	10:59:14
2	MR. BAZAREK: Object to the form of the	10:59:16
3	question, foundation, mischaracterizes the	10:59:18
4	evidence in the record in this case.	10:59:19
5	MR. MICHALIK: Join.	10:59:22
6	MR. SCHALKA: Join.	10:59:22
7	MR. KOSOKO: Join.	10:59:22
8	A Fifth Amendment.	10:59:22
9	Q Do you see on page 3 of this report that	10:59:27
10	Officer Jones is listed as the first arresting	10:59:29
11	officer?	10:59:31
12	A Yes.	10:59:31
13	Q Did you ever learn that Officer Jones	10:59:36
14	falsely arrested William Carter on May 19th, 2006?	10:59:38
15	MR. BAZAREK: Object to the form of the	10:59:41
16	question, foundation, mischaracterizes the	10:59:42
17	evidence in the record in this case	10:59:46
18	and -- evidence -- and it's been asked and	10:59:51
19	answered.	10:59:52
20	MR. MICHALIK: Join.	10:59:52
21	MR. SCHALKA: Join.	10:59:52
22	MR. KOSOKO: Join.	10:59:54
23	A Fifth Amendment.	10:59:54
24	Q Did you ever hear that Officer Jones	10:59:55

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

260

1	falsely arrested William Carter on May 19th, 2006?	10:59:56
2	MR. BAZAREK: Object to the form of the	10:59:58
3	question, foundation, mischaracterizes the	11:00:00
4	evidence in the record in this case, and already	11:00:02
5	asked and answered.	11:00:05
6	MR. MICHALIK: Join.	11:00:07
7	MR. SCHALKA: Join.	11:00:07
8	MR. KOSOKO: Join.	11:00:08
9	A Fifth Amendment.	11:00:08
10	Q Did you ever learn that Officer Jones	11:00:09
11	framed William Carter on May 19th, 2006?	11:00:13
12	MR. BAZAREK: Object to the form of the	11:00:16
13	question, foundation, mischaracterizes the	11:00:17
14	evidence in the record in this case, and asked and	11:00:19
15	answered.	11:00:22
16	MR. MICHALIK: Join.	11:00:23
17	MR. SCHALKA: Join.	11:00:23
18	MR. KOSOKO: Join.	11:00:24
19	A Fifth Amendment.	11:00:24
20	Q Did you ever hear that Officer Jones	11:00:25
21	framed William Carter on May 19th, 2006?	11:00:27
22	MR. BAZAREK: Object to the form of the	11:00:30
23	question, foundation, mischaracterizes the	11:00:31
24	evidence in the record in this case. And already	11:00:33

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

261

1	asked and answered.	11:00:39
2	MR. MICHALIK: Join.	11:00:42
3	MR. SCHALKA: Join.	11:00:42
4	MR. KOSOKO: Join.	11:00:42
5	A Fifth Amendment.	11:00:43
6	Q Were you involved in arresting William	11:00:44
7	Carter on May 19th, 2006?	11:00:45
8	A Fifth Amendment.	11:00:46
9	Q Was Ronald Watts present for the arrest of	11:00:47
10	William Carter on May 19th, 2006?	11:00:50
11	MR. KOSOKO: Objection; foundation.	11:00:52
12	A Fifth Amendment.	11:00:53
13	Q Were you conducting a narcotics	11:00:54
14	investigation at 527 East Browning on May 19th,	11:00:59
15	2006, at about 7:15 p.m.?	11:01:02
16	A Fifth Amendment.	11:01:05
17	Q Do you know what a narcotics	11:01:06
18	investigation is?	11:01:08
19	A Don't recall.	11:01:11
20	Q As a police officer, did you ever	11:01:12
21	participate in a narcotics investigation?	11:01:16
22	A Don't recall.	11:01:20
23	Q Do you know what narcotics are?	11:01:24
24	A Yes.	11:01:41

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

262

1	Q	Do you know what an investigation is?	11:01:41
2	A	Yes.	11:01:46
3	Q	Do you know what a reverse sting is?	11:01:48
4	MR. RAVITZ:	Objection. It's been asked	11:01:52
5		and answered.	11:01:54
6	A	Yes.	11:01:54
7	Q	Did you talk about reverse stings when we	11:01:56
8		were here in this room a few days ago?	11:01:58
9	A	I did.	11:02:00
10	Q	Okay. Would you consider a reverse sting	11:02:00
11		a narcotics investigation?	11:02:02
12	A	Yep.	11:02:03
13	Q	Have I refreshed your recollection about	11:02:06
14		whether you ever participated in narcotics	11:02:07
15		investigations as a Chicago police officer?	11:02:09
16	A	No.	11:02:11
17	Q	So you still can't remember if you ever	11:02:11
18		participated in a narcotics investigation as a	11:02:15
19		Chicago police officer?	11:02:16
20	A	No.	11:02:17
21	Q	Sir, have you ever --	11:02:18
22	A	It's been --	11:02:19
23	Q	Go ahead. I'm sorry.	11:02:20
24	A	It's been a long time since I've been a	11:02:22

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

263

1	police officer.	11:02:23
2	Q Do you remember participating in reverse	11:02:24
3	stings as a Chicago police officer?	11:02:25
4	A I do.	11:02:26
5	Q Can you remember any other work you did	11:02:27
6	related to narcotics as a Chicago police officer?	11:02:29
7	A I don't remember.	11:02:31
8	Q Okay. Did you see Sandra Berry give	11:02:32
9	William Carter a \$20 bill on May 19th, 2006, at	11:02:40
10	about 7:30 p.m.?	11:02:43
11	A Take the Fifth.	11:02:45
12	Q Is the statement in the report that police	11:02:46
13	saw Sandra Berry give William Carter a \$20 bill on	11:02:48
14	May 19th, 2006, a false statement?	11:02:51
15	A I --	11:02:54
16	MR. BAZAREK: Object to the form of the	11:02:55
17	question, foundation, mischaracterizes the	11:02:56
18	evidence in the record in this case.	11:02:57
19	MR. MICHALIK: Join.	11:02:59
20	MR. SCHALKA: Join.	11:02:59
21	MR. KOSOKO: Join.	11:03:00
22	A (Continuing.) Take the Fifth.	11:03:00
23	Q Did you see William Carter reach into a	11:03:01
24	clear plastic bag to remove two bags on May 19th,	11:03:10

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

264

1	2006?	11:03:13
2	A Take the Fifth.	11:03:14
3	Q Is the statement in the report that	11:03:14
4	William Carter reached into a clear plastic bag to	11:03:20
5	remove two plastic -- remove two bags on May 19th,	11:03:22
6	2006, a false statement?	11:03:26
7	MR. BAZAREK: Object to the form of the	11:03:28
8	question, foundation, mischaracterizes the	11:03:29
9	evidence in the record in this case.	11:03:30
10	MR. MICHALIK: Join.	11:03:32
11	MR. SCHALKA: Join.	11:03:32
12	MR. KOSOKO: Join.	11:03:32
13	A Take the Fifth.	11:03:32
14	Q Did you see William Carter hand a bag or	11:03:34
15	bags to Sandra Berry on May 19th, 2006?	11:03:47
16	A Take the Fifth.	11:03:50
17	Q Is the statement in the report that police	11:03:54
18	saw William Carter hand a bag to Sandra Berry on	11:03:55
19	May 19th, 2006, a false statement?	11:03:58
20	MR. BAZAREK: Object to the form of the	11:04:00
21	question, foundation, mischaracterizes the	11:04:01
22	evidence in the record in this case.	11:04:03
23	MR. MICHALIK: Join.	11:04:05
24	MR. SCHALKA: Join.	11:04:05

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

265

1	MR. KOSOKO: Join.	11:04:05
2	A Take the Fifth.	11:04:06
3	(Mr. Ravitz left the proceedings.)	11:04:08
4	Q Did you recover a clear plastic bag from	11:04:12
5	William Carter on May 19th, 2006?	11:04:14
6	A Take the Fifth.	11:04:16
7	Q Did you see any police officer recover a	11:04:17
8	bag from William Carter's hand on May 19th, 2006?	11:04:21
9	A Take the Fifth.	11:04:25
10	Q Is the statement in the report that a	11:04:25
11	police officer recovered a bag from William	11:04:27
12	Carter's hand a false statement?	11:04:28
13	MR. BAZAREK: Object to the form of the	11:04:30
14	question, foundation, mischaracterizes the	11:04:31
15	evidence in the record in this case.	11:04:33
16	MR. MICHALIK: Join.	11:04:35
17	MR. SCHALKA: Join.	11:04:35
18	MR. KOSOKO: Join.	11:04:36
19	A Take -- take the Fifth.	11:04:36
20	Q Did you search William Carter on May 19th,	11:04:39
21	2006?	11:04:41
22	A Take the Fifth.	11:04:42
23	Q Did you see any police officer search	11:04:43
24	William Carter on May 19th, 2006?	11:04:45

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

266

1	A Take the Fifth.	11:04:47
2	Q Is the statement in the police report that	11:04:48
3	police officers searched William Carter a false	11:04:53
4	statement?	11:04:55
5	A Take --	11:04:55
6	MR. BAZAREK: Object to the form of the	11:04:56
7	question, foundation, mischaracterizes the	11:04:57
8	evidence in the record in this case.	11:04:58
9	MR. MICHALIK: Join.	11:04:59
10	MR. SCHALKA: Join.	11:04:59
11	MR. KOSOKO: Join.	11:05:00
12	A (Continuing.) Take the Fifth.	11:05:00
13	Q Is this report of William Carter's arrest	11:05:04
14	on May 19th, 2006, an accurate report?	11:05:06
15	A Take the Fifth.	11:05:08
16	(Mohammed Deposition Exhibit 32 marked for	11:05:28
17	identification and attached to the transcript.)	11:05:30
18	Q Do you recognize Exhibit 32 as a vice case	11:05:30
19	report of the Chicago Police Department?	11:05:49
20	A Yes.	11:05:50
21	Q And is this a report documenting the	11:05:51
22	arrest of William Carter and Sandra Berry on	11:05:55
23	May 19th, 2006?	11:05:59
24	A That's what it says.	11:05:59

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

267

1	(Mr. Ravitz returned to the proceedings.)	11:05:59
2	Q Have you ever seen Exhibit 32 before	11:06:01
3	today?	11:06:03
4	A No.	11:06:03
5	Q Have you ever seen Exhibit 31 before	11:06:04
6	today?	11:06:07
7	MR. PALLE: 31. (Indicating.)	11:06:07
8	Q I'm sorry. 31 is the exhibit I showed you	11:06:13
9	a moment --	11:06:15
10	A Oh.	11:06:15
11	Q -- ago, the arrest report.	11:06:15
12	A Oh. Could you repeat the question?	11:06:17
13	Q Yeah.	11:06:18
14	And why don't you take out Exhibit 31 just	11:06:19
15	to make sure you're looking at it.	11:06:20
16	MR. PALLE: Yeah.	11:06:22
17	Q Had you ever seen Exhibit 31 before today?	11:06:24
18	A No.	11:06:26
19	Q Did you recover a bag or bags from Sandra	11:06:41
20	Berry's hand on May 19th, 2006, at about	11:06:44
21	7:15 p.m.?	11:06:48
22	A Take the Fifth.	11:06:48
23	Q Did you see any police officer recover a	11:06:49
24	bag or bags from Sandra Berry's hand on May 19th,	11:06:50

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

268

1	2006?	11:06:55
2	A Take the Fifth.	11:06:55
3	Q Is the statement in this report that a	11:06:56
4	police officer recovered a bag or bags from Sandra	11:06:58
5	Berry's hand on May 19th, 2006, at about 7:15 p.m.	11:07:00
6	a false report?	11:07:03
7	MR. BAZAREK: Object to the form of the	11:07:04
8	question, foundation, mischaracterizes the	11:07:05
9	evidence in the record in this case.	11:07:07
10	MR. MICHALIK: Join.	11:07:09
11	MR. SCHALKA: Join.	11:07:09
12	MR. KOSOKO: Join.	11:07:10
13	A Take the Fifth.	11:07:10
14	Q Did you say to Sandra Berry on May 19th,	11:07:21
15	2006, words to the effect of "You've got to get in	11:07:25
16	line"?	11:07:26
17	A Take the Fifth.	11:07:27
18	Q Is Exhibit 32, the report of William	11:07:28
19	Carter and Sandra Berry's arrest on May 19th,	11:07:35
20	2006, an accurate report?	11:07:37
21	A Take the Fifth.	11:07:39
22	Q Is Exhibit 31, the arrest report of	11:07:40
23	William Carter from May 19th, 2006, an accurate	11:07:44
24	report?	11:07:46

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

269

1	A Take the Fifth.	11:07:47
2	MR. MICHALIK: Objection; asked and	11:07:49
3	answered.	11:07:50
4	Q Were you involved in framing William	11:07:51
5	Carter on May 19th, 2006?	11:07:52
6	MR. BAZAREK: Object to the form of the	11:07:54
7	question, foundation, mischaracterizes the	11:07:56
8	evidence in the record in this case.	11:07:57
9	MR. MICHALIK: Join.	11:08:00
10	MR. SCHALKA: Join.	11:08:00
11	MR. KOSOKO: Join.	11:08:00
12	A Take the Fifth.	11:08:00
13	Q Were you involved in framing Sandra Berry	11:08:03
14	on May 19th, 2006?	11:08:05
15	MR. BAZAREK: Object to the form of the	11:08:07
16	question, foundation, mischaracterizes the	11:08:08
17	evidence in the record in this case.	11:08:09
18	MR. MICHALIK: Join.	11:08:12
19	MR. SCHALKA: Join.	11:08:12
20	MR. KOSOKO: Join.	11:08:12
21	A Take the Fifth.	11:08:13
22	Q Did you see Alvin Jones plant drugs on	11:08:15
23	William Carter on May 19th, 2006?	11:08:17
24	MR. BAZAREK: Object to the form of the	11:08:19

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

270

1	question, foundation, mischaracterizes the	11:08:20
2	evidence in the record in this case.	11:08:21
3	MR. MICHALIK: Join.	11:08:25
4	MR. SCHALKA: Join.	11:08:25
5	MR. KOSOKO: Join.	11:08:25
6	A Take the Fifth.	11:08:25
7	Q Did you see Alvin Jones plant drugs on	11:08:27
8	Sandra Berry on May 19th, 2006?	11:08:29
9	MR. BAZAREK: Object to the form of the	11:08:30
10	question, foundation, mischaracterizes the	11:08:32
11	evidence and the record in this case.	11:08:33
12	MR. MICHALIK: Join.	11:08:38
13	MR. SCHALKA: Join.	11:08:38
14	MR. KOSOKO: Join.	11:08:39
15	A Take the Fifth.	11:08:39
16	Q On May 19th, 2006, did you use force	11:08:51
17	against William Carter?	11:08:53
18	A Take the Fifth.	11:08:54
19	Q Did you see any other officer use force	11:08:54
20	against William Carter on May 19th, 2006?	11:08:57
21	A Take the Fifth.	11:08:59
22	Q Did you process William Carter at the	11:09:00
23	police station after his arrest?	11:09:10
24	A Take the Fifth.	11:09:12

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

271

1	Q Did you tell William Carter words to the	11:09:13
2	effect of "Give me all the money you have in your	11:09:16
3	pocket"?	11:09:18
4	A Take the Fifth.	11:09:19
5	Q Were William Carter and Sandra Berry taken	11:09:34
6	into custody in separate locations?	11:09:36
7	A Take the Fifth.	11:09:40
8	MR. FLAXMAN: Let's take a break.	11:10:13
9	MR. PALLE: Yeah.	11:10:14
10	THE VIDEOGRAPHER: Off the record, 11:10.	11:10:15
11	(A recess was taken from 11:10 a.m. to	11:10:18
12	11:23 a.m.)	11:23:12
13	(Mohammed Deposition Exhibit 33 marked for	11:23:12
14	identification and attached to the transcript.)	11:22:05
15	THE VIDEOGRAPHER: Back on the record, 11:23.	11:23:13
16	BY MR. FLAXMAN:	11:23:18
17	Q Sir, the reporter's handed you Exhibit 33,	11:23:21
18	which -- the first page -- well, let me ask you,	11:23:25
19	do you recognize the first page to be the arrest	11:23:31
20	report of Robert Lindsey from August 30th --	11:23:34
21	I'm sorry.	11:23:37
22	Do you recognize the first page to be the	11:23:37
23	arrest report of Robert Lindsey from October 15th,	11:23:40
24	2009?	11:23:44

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

272

1	A That's what it says.	11:23:44
2	Q And do you see your name on this report?	11:23:47
3	A Yes.	11:23:54
4	Q Did you write your name on this report?	11:23:54
5	A Take the Fifth.	11:24:05
6	Q Did you review this report in October of	11:24:06
7	2009?	11:24:10
8	A Take the Fifth.	11:24:11
9	Q Have you ever seen this report before	11:24:13
10	today?	11:24:16
11	A No, I haven't.	11:24:16
12	Q I'm sorry?	11:24:17
13	A No.	11:24:18
14	Q Does this -- excuse me.	11:24:18
15	Does the third page of this report list	11:24:27
16	Officer Jones as the attesting officer?	11:24:30
17	A That's what it says.	11:24:34
18	Q Did you work on the same tactical team as	11:24:35
19	Officer Jones?	11:24:37
20	A Yes.	11:24:38
21	Q Did you ever learn that Officer Jones	11:24:38
22	falsely arrested Robert Lindsey on October 15th,	11:24:40
23	2009?	11:24:43
24	MR. BAZAREK: Object to the form of the	11:24:43

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

273

1	question, foundation, mischaracterizes the	11:24:43
2	evidence in the record in this case.	11:24:45
3	MR. MICHALIK: Join.	11:24:48
4	MR. SCHALKA: Join.	11:24:48
5	MR. KOSOKO: Join.	11:24:49
6	A Take the Fifth.	11:24:49
7	Q Did you ever hear that Officer Jones	11:24:49
8	falsely arrested Robert Lindsey on October 15th,	11:24:53
9	2009?	11:24:56
10	MR. BAZAREK: Object to the form of the	11:24:56
11	question, foundation, mischaracterizes the	11:24:57
12	evidence in the record in this case.	11:24:59
13	MR. MICHALIK: Join.	11:25:01
14	MR. SCHALKA: Join.	11:25:01
15	MR. KOSOKO: Join.	11:25:01
16	A Take the Fifth.	11:25:02
17	Q Did you ever learn that Officer Jones	11:25:03
18	framed Robert Lindsey on October 15th, 2009?	11:25:04
19	MR. BAZAREK: Object to the form of the	11:25:07
20	question, foundation, mischaracterizes the record	11:25:08
21	and the evidence in this case.	11:25:12
22	MR. MICHALIK: Join.	11:25:14
23	MR. SCHALKA: Join.	11:25:14
24	MR. KOSOKO: Join.	11:25:14

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

274

1 A Take the Fifth. 11:25:14

2 Q Did you ever hear that Officer Jones 11:25:15

3 framed Robert Lindsey on October 15th, 2009? 11:25:17

4 MR. BAZAREK: Object to the form of the 11:25:20

5 question, foundation, mischaracterizes the 11:25:21

6 evidence in the record in this case. 11:25:23

7 MR. MICHALIK: Join. 11:25:26

8 MR. SCHALKA: Join. 11:25:26

9 MR. KOSOKO: Join. 11:25:26

10 A Take the Fifth. 11:25:27

11 Q Did you ever learn that Officer Jones 11:25:28

12 swore to a police report that contained false 11:25:30

13 information about Robert Lindsey related to the 11:25:33

14 arrest on October 15th, 2009? 11:25:35

15 MR. BAZAREK: Object -- object to the form 11:25:37

16 of the question, foundation, mischaracterizes the 11:25:38

17 evidence in the record in this case. 11:25:39

18 MR. MICHALIK: Join. 11:25:43

19 MR. SCHALKA: Join. 11:25:43

20 MR. KOSOKO: Join. 11:25:43

21 A Take the Fifth. 11:25:44

22 Q Did you ever hear that Officer Jones swore 11:25:44

23 to a police report that contained false 11:25:47

24 information about Robert Lindsey related to the 11:25:49

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

275

1	arrest on October 15th, 2009?	11:25:50
2	MR. BAZAREK: Object to the form of the	11:25:52
3	question, foundation, mischaracterizes the	11:25:54
4	evidence in the record in this case.	11:25:55
5	MR. MICHALIK: Join.	11:25:58
6	MR. SCHALKA: Join.	11:25:58
7	MR. KOSOKO: Join.	11:25:58
8	A Take the Fifth.	11:25:58
9	Q Were you involved in arresting Robert	11:25:59
10	Lindsey on October 15th, 2009?	11:26:01
11	A Take the Fifth.	11:26:03
12	Q Was Ronald Watts present for the arrest of	11:26:04
13	Robert Lindsey on October 15th, 2009?	11:26:07
14	MR. KOSOKO: Objection; foundation.	11:26:09
15	A Take the Fifth.	11:26:10
16	Q Do you believe that stating whether Ronald	11:26:12
17	Watts was present for the arrest of Robert Lindsey	11:26:13
18	on October 15th, 2009, would subject you to	11:26:15
19	criminal prosecution?	11:26:18
20	MR. PALLE: Objection; attorney-client	11:26:18
21	privilege/work product.	11:26:22
22	Instruct the witness not to answer.	11:26:22
23	Q Are you going to follow your attorney's	11:26:26
24	instruction?	11:26:27

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

276

1 A Yes. 11:26:27

2 Q If you go through this document past that 11:26:27

3 first arrest report of Mr. Lindsey, there's a 11:26:33

4 part of it that starts with the Bates label 11:26:38

5 CCPubDef 2409. 11:26:41

6 A What page is it? 11:26:45

7 Q At the bottom right it says "2409." 11:26:45

8 A Yes. 11:26:52

9 Q Do you recognize the document that starts 11:26:55

10 at 2409 to be the arrest report of Germin [sic] 11:26:56

11 Sims from October 15th, 2009. 11:27:00

12 A That's what it says. 11:27:02

13 Q Did you see your name on this report? 11:27:04

14 A Yes. 11:27:06

15 Q And you're listed as the second arresting 11:27:12

16 officer; correct? 11:27:14

17 A Yes. 11:27:15

18 Q Okay. Did you complete this report of 11:27:16

19 Mr. Sims from October 15th, 2009? 11:27:21

20 A Take the Fifth. 11:27:23

21 Q Did you see Officer Jones listed as the 11:27:24

22 attesting officer on this report? 11:27:26

23 A Yes. 11:27:28

24 Q Did Officer Jones complete this arrest 11:27:34

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

277

1	report of Germain Sims from October 15th, 2009?	11:27:37
2	A Take the Fifth.	11:27:39
3	Q Did you review this report of the arrest	11:27:40
4	of Germain Sims on October 15th, 2009, in	11:27:43
5	October of 2009?	11:27:46
6	A Take the Fifth.	11:27:47
7	Q Did you ever learn that Officer Jones	11:27:48
8	falsely arrested Germain Sims on October 15th,	11:27:55
9	2009?	11:27:58
10	MR. BAZAREK: Object to the form of the	11:27:58
11	question, foundation, mischaracterizes the	11:28:00
12	evidence in the record in this case.	11:28:01
13	MR. MICHALIK: Join.	11:28:04
14	MR. SCHALKA: Join.	11:28:04
15	MR. KOSOKO: Join.	11:28:04
16	A Take the Fifth.	11:28:04
17	Q Did you ever hear that Officer Jones	11:28:05
18	falsely arrested Germain Sims on October 15th,	11:28:09
19	2009?	11:28:11
20	MR. BAZAREK: Object to the form of the	11:28:12
21	question, foundation, mischaracterizes the	11:28:12
22	evidence in the record in this case.	11:28:13
23	MR. MICHALIK: Join.	11:28:15
24	MR. SCHALKA: Join.	11:28:15

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

278

1	MR. KOSOKO: Join.	11:28:15
2	A Take the Fifth.	11:28:18
3	Q Did you ever learn that Officer Jones	11:28:18
4	framed Germain Sims on October 15th, 2009?	11:28:20
5	MR. BAZAREK: Object to the form of the	11:28:23
6	question, foundation, mischaracterizes the	11:28:25
7	evidence in the record in this case.	11:28:27
8	MR. MICHALIK: Join.	11:28:29
9	MR. SCHALKA: Join.	11:28:29
10	MR. KOSOKO: Join.	11:28:29
11	A Take the Fifth.	11:28:30
12	Q Did you ever hear that Officer Jones	11:28:31
13	framed Germain Sims on October 15th, 2009?	11:28:33
14	MR. BAZAREK: Object to the form of the	11:28:36
15	question, foundation, mischaracterizes the	11:28:37
16	evidence in the record in this case.	11:28:39
17	MR. MICHALIK: Join.	11:28:41
18	MR. SCHALKA: Join.	11:28:41
19	MR. KOSOKO: Join.	11:28:41
20	A Take the Fifth.	11:28:42
21	Q Did you ever learn that Officer Jones	11:28:43
22	swore to a police report that contained false	11:28:45
23	information about Germain Sims related to the	11:28:48
24	arrest on October 15th, 2009?	11:28:50

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

279

1	MR. BAZAREK: Object to the form of the	11:28:52
2	question, foundation, mischaracterizes the	11:28:53
3	evidence in the record in this case.	11:28:54
4	MR. MICHALIK: Join.	11:28:57
5	MR. SCHALKA: Join.	11:28:57
6	MR. KOSOKO: Join.	11:28:57
7	A Take the Fifth.	11:28:57
8	Q Did you ever hear that Officer Jones swore	11:28:58
9	to a false -- a police report that contained false	11:29:02
10	information about Germain Sims related to the	11:29:05
11	arrest on October 15th, 2009?	11:29:08
12	MR. BAZAREK: Object to the form of the	11:29:10
13	question, foundation, mischaracterizes the	11:29:12
14	evidence in the record in this case.	11:29:13
15	MR. MICHALIK: Join.	11:29:15
16	MR. SCHALKA: Join.	11:29:15
17	MR. KOSOKO: Join.	11:29:15
18	A Take the Fifth.	11:29:15
19	Q Were you involved in arresting	11:29:16
20	Germain Sims on October 15th, 2009?	11:29:18
21	A Take the Fifth.	11:29:19
22	Q Was Ronald Watts present for the arrest of	11:29:20
23	Germain Sims on October 15th, 2009?	11:29:23
24	A Take --	11:29:25

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

280

1	MR. KOSOKO: Objection; foundation.	11:29:25
2	A (Continuing.) Take the Fifth.	11:29:26
3	Q Sir, if you go past that arrest report of	11:29:30
4	Mr. Sims, there's one final report in this	11:29:37
5	exhibit, No. 33, which begins at the page numbered	11:29:39
6	at the bottom of 2414.	11:29:48
7	Do you see that?	11:29:50
8	A I see it.	11:29:50
9	Q Do you recognize this as an original case	11:29:55
10	incident report of the Chicago Police Department?	11:29:58
11	A That's what it says.	11:29:59
12	Q And does this report document the arrest	11:30:01
13	of Germain Sims and Robert Lindsey on October 15th	11:30:03
14	of 2009?	11:30:07
15	A Take the Fifth.	11:30:08
16	Q Sir, do you believe stating whether this	11:30:09
17	report documents the arrest of Germain Sims and	11:30:16
18	Robert Lindsey on October 15th, 2009, would	11:30:19
19	subject you to criminal prosecution?	11:30:21
20	MR. PALLE: Objection; attorney-client	11:30:23
21	privilege/work product.	11:30:26
22	Instruct the witness not to answer.	11:30:26
23	Q Are you going to follow your attorney's	11:30:29
24	instruction?	11:30:30

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

281

1 A Yes. 11:30:30

2 Q Sir, do you see that at the top right of 11:30:30

3 this original case incident report there's a box 11:30:51

4 for an RD number? 11:30:53

5 A Yes. 11:30:54

6 Q Can you read the RD number to me, please? 11:31:00

7 A HR588828. 11:31:02

8 Q And lower down on the page there's a box 11:31:05

9 for Suspect No. 1. Do you see that? 11:31:10

10 A You said "Suspect" -- oh. Okay. 11:31:12

11 Q You do see that? 11:31:20

12 A "Suspect 1." 11:31:21

13 Q You see where that box is, sir? 11:31:22

14 A Yes. 11:31:24

15 Q Okay. And does that list Germain M. Sims 11:31:24

16 as Suspect No. 1? 11:31:28

17 A That's what it says. 11:31:29

18 Q And underneath that there's a box for 11:31:30

19 Suspect No. 2. Do you see that? 11:31:32

20 A Yes. 11:31:33

21 Q And does that list Robert E. Lindsey, 11:31:34

22 L-i-n-d-s-e-y, as Suspect No. 2? 11:31:37

23 A That's what it says. 11:31:41

24 Q The last page of this report has a 11:31:42

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

282

1	"Narrative" section. Do you see that?	11:31:57
2	A Yes.	11:31:58
3	Q Do you know what a narcotics	11:31:59
4	surveillance is?	11:32:06
5	A Don't recall.	11:32:07
6	Q Do you know what narcotics are?	11:32:09
7	MR. MICHALIK: Objection; asked and	11:32:16
8	answered.	11:32:17
9	A Yes.	11:32:19
10	Q Do you know what a surveillance is?	11:32:20
11	A Don't recall.	11:32:22
12	Q Have you ever heard the word	11:32:23
13	"surveillance" before?	11:32:27
14	A Heard it.	11:32:28
15	Q But you don't know what it means?	11:32:28
16	A No.	11:32:31
17	Q Sir, what's your highest level of	11:32:31
18	education?	11:32:35
19	A College.	11:32:35
20	Q Did you complete college?	11:32:36
21	A Two years.	11:32:38
22	Q Where did you go to college for two years?	11:32:39
23	A Went to Western Illinois University.	11:32:47
24	Q Why didn't you finish?	11:32:48

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

283

1 A Because I had to make some money. 11:32:49
2 So I could get -- came home to get a job. 11:32:55
3 Q What job did you get? 11:32:59
4 A Worked at National Car Rental. 11:33:00
5 Q When you were employed as a Chicago police 11:33:02
6 officer, did you ever apply for a promotion? 11:33:18
7 A No. 11:33:20
8 Q Why not? 11:33:21
9 A Wasn't interested. 11:33:22
10 Q When you were a Chicago police officer, 11:33:30
11 did you earn enough money to support yourself? 11:33:33
12 A Yes, I did. 11:33:35
13 Q Sir, do you know what punitive damages are? 11:33:35
14 A Don't recall. 11:33:38
15 Q Are you aware that you could be personally 11:33:40
16 liable for punitive damages that a jury awards 11:33:44
17 against you in these lawsuits? 11:33:46
18 A Yes. 11:33:47
19 Q But you don't recall what punitive 11:33:50
20 damages are? 11:33:56
21 A No. 11:33:56
22 Q Did you -- were you involved in conducting 11:33:57
23 a narcotics surveillance on October 15th, 2009, 11:34:01
24 that led to the arrest of Germain Sims and Robert 11:34:06

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

284

1	Lindsey?	11:34:09
2	A Take the Fifth.	11:34:09
3	Q Did you observe unknown individuals	11:34:18
4	approach a burgundy Mercury Mystique and exchange	11:34:23
5	paper, US currency, for bags?	11:34:28
6	A Take the Fifth.	11:34:31
7	Q Is the statement in this report that	11:34:32
8	police officers observed that a true statement?	11:34:35
9	A Take the Fifth.	11:34:37
10	MR. MICHALIK: Object to the last	11:34:40
11	question, form, foundation.	11:34:41
12	MR. KOSOKO: Join.	11:34:44
13	Q Did you observe on October 15th, 2009,	11:35:08
14	that -- I'm sorry. Let me strike that question.	11:35:12
15	On October 15th, 2009, did you approach a	11:35:30
16	vehicle that Germain Sims and Robert Lindsey were	11:35:33
17	seated in?	11:35:37
18	A Take the Fifth.	11:35:37
19	Q On October 15th, 2009, did other officers	11:35:38
20	approach a vehicle that Robert Lindsey and	11:35:44
21	Germain Sims were seated in -- seated in?	11:35:46
22	A Take the Fifth.	11:35:50
23	Q Is the statement in this report that	11:35:51
24	officers approached a vehicle in which Mr. Sims	11:35:52

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

285

1	and Mr. Lindsey were a true statement?	11:35:55
2	MR. BAZAREK: Object to the form of the	11:35:58
3	question.	11:36:00
4	MR. MICHALIK: And foundation.	11:36:00
5	MR. KOSOKO: Join.	11:36:03
6	A Take --	11:36:04
7	MR. SCHALKA: Join.	11:36:04
8	A (Continuing.) Take the Fifth.	11:36:05
9	Q Did you recover suspected narcotics from	11:36:06
10	Germain Sims on October 15th, 2009?	11:36:08
11	A Take the Fifth.	11:36:10
12	Q Did you see any other officer recover	11:36:12
13	suspected narcotics from Germain Sims on	11:36:15
14	October 15th, 2009?	11:36:17
15	A Take the Fifth.	11:36:18
16	Q Is the statement in this report that	11:36:19
17	officers recovered suspect narcotics from	11:36:21
18	Germain Sims on October 15th, 2009, a true	11:36:23
19	statement?	11:36:26
20	A Take --	11:36:27
21	MR. BAZAREK: Object to the form of the	11:36:27
22	question. Foundation.	11:36:28
23	MR. MICHALIK: Join.	11:36:34
24	MR. SCHALKA: Join.	11:36:34

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

286

1	MR. KOSOKO: Join.	11:36:35
2	A (Continuing.) Take the Fifth.	11:36:35
3	Q Did you search Germain Sims on	11:36:36
4	October 15th, 2009?	11:36:38
5	A Take the Fifth.	11:36:40
6	Q Did you see another officer search	11:36:41
7	Germain Sims on October 15th, 2009?	11:36:44
8	A Take the Fifth.	11:36:45
9	Q Is the statement in this police report	11:36:47
10	that a custodial search was performed on	11:36:49
11	Germain Sims a true statement?	11:36:53
12	MR. BAZAREK: Object to the form of the	11:36:54
13	question, foundation.	11:36:54
14	MR. MICHALIK: Join.	11:36:56
15	MR. SCHALKA: Join.	11:36:56
16	MR. KOSOKO: Join.	11:36:56
17	A Take the Fifth.	11:36:56
18	Q Did you observe Robert Lindsey exit the	11:36:59
19	vehicle on October 15th, 2009?	11:37:02
20	A Take the Fifth.	11:37:04
21	Q Did you observe Robert Lindsey drop to the	11:37:05
22	floor a clear plastic bag when he was exiting the	11:37:08
23	vehicle on October 15th, 2009?	11:37:11
24	A Take the Fifth.	11:37:13

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

287

1	Q Did you recover a bag that Mr. Lindsey	11:37:14
2	dropped on October 15th, 2009?	11:37:19
3	A Take the Fifth.	11:37:20
4	Q Did any other officer recover a bag that	11:37:21
5	Mr. Lindsey dropped on October 15th, 2009?	11:37:24
6	A Take the Fifth.	11:37:26
7	Q Is the statement in the police report that	11:37:31
8	officers recovered a bag that Mr. Lindsey dropped	11:37:33
9	a true statement?	11:37:35
10	MR. BAZAREK: Object to the form of the	11:37:36
11	question, foundation.	11:37:37
12	MR. MICHALIK: Join.	11:37:39
13	MR. SCHALKA: Join.	11:37:39
14	MR. KOSOKO: Join.	11:37:40
15	A Take the Fifth.	11:37:40
16	Q Are the three reports in Exhibit 33 about	11:37:41
17	the arrests of Mr. Lindsey and Mr. Sims accurate	11:37:46
18	police reports?	11:37:51
19	MR. BAZAREK: Object to the form of the	11:37:52
20	question, foundation.	11:37:52
21	MR. MICHALIK: Join.	11:37:54
22	MR. SCHALKA: Join.	11:37:54
23	MR. KOSOKO: Join.	11:37:55
24	A Take the Fifth.	11:37:55

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

288

1	Q Were you involved in framing Robert	11:37:56
2	Lindsey on October 15th, 2009?	11:37:59
3	MR. BAZAREK: Object to the form of the	11:38:01
4	question, foundation, mischaracterizes the	11:38:03
5	evidence and the record in this case.	11:38:05
6	MR. MICHALIK: Join.	11:38:08
7	MR. SCHALKA: Join.	11:38:08
8	MR. KOSOKO: Join.	11:38:08
9	A Take the Fifth.	11:38:09
10	Q Were you involved in framing Germain Sims	11:38:10
11	on October 15th, 2009?	11:38:12
12	MR. BAZAREK: Object to the form of the	11:38:14
13	question, foundation, mischaracterizes the	11:38:15
14	evidence in the record in this case.	11:38:17
15	MR. MICHALIK: Join.	11:38:19
16	MR. SCHALKA: Join.	11:38:19
17	MR. KOSOKO: Join.	11:38:20
18	A Take the Fifth.	11:38:20
19	Q Did you see Alvin Jones plant drugs on	11:38:20
20	Robert Lindsey on October 15th, 2009?	11:38:24
21	MR. BAZAREK: Object to the form of the	11:38:25
22	question, foundation, mischaracterizes the	11:38:26
23	evidence and the record in this case.	11:38:28
24	MR. MICHALIK: Join.	11:38:31

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

289

1	MR. SCHALKA: Join.	11:38:31
2	MR. KOSOKO: Join.	11:38:31
3	A Take the Fifth.	11:38:32
4	Q Did you see Alvin Jones plant drugs on	11:38:33
5	Germain Sims on October 15th, 2009?	11:38:36
6	MR. BAZAREK: Object to the form of the	11:38:38
7	question, foundation, mischaracterizes the	11:38:39
8	evidence in the record in this case.	11:38:41
9	MR. MICHALIK: Join.	11:38:43
10	MR. SCHALKA: Join.	11:38:43
11	MR. KOSOKO: Join.	11:38:44
12	A Take the Fifth.	11:38:45
13	Q Was Ronald Watts present for the arrest --	11:38:48
14	MR. KOSOKO: Object --	11:38:51
15	Q -- of Robert Lindsey on October 15th,	11:38:52
16	2009?	11:38:54
17	MR. KOSOKO: Objection; foundation.	11:38:54
18	A Take the Fifth.	11:38:55
19	Q Was Ronald Watts present for the arrest of	11:38:56
20	Germain Sims on October 15th, 2009?	11:38:58
21	MR. KOSOKO: Objection; foundation.	11:39:01
22	A Take the Fifth.	11:39:02
23	Q Did you arrest a man named Willie Brownlee	11:39:02
24	on October 15th, 2009?	11:39:07

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

290

1	A Take the Fifth.	11:39:08
2	Q Did you recover drugs from Willie	11:39:09
3	Brownlee?	11:39:12
4	A Take the Fifth.	11:39:12
5	Q Did any other officer recover drugs from	11:39:13
6	Willie Brownlee?	11:39:14
7	A Take the Fifth.	11:39:16
8	MR. MICHALIK: Objection; foundation.	11:39:17
9	Q Did you take drugs found on Willie	11:39:19
10	Brownlee and charge Robert Lindsey with possessing	11:39:22
11	those drugs?	11:39:23
12	A Take the Fifth.	11:39:24
13	Q Did you take drugs found on Willie	11:39:25
14	Brownlee and charge Germain Sims with possessing	11:39:27
15	those drugs?	11:39:29
16	A Take the Fifth.	11:39:29
17	Q Did you ever learn that other -- other	11:39:32
18	officers had taken drugs found on Willie Brownlee	11:39:33
19	and charged Robert Lindsey with possessing those	11:39:38
20	drugs?	11:39:40
21	MR. BAZAREK: Object to the form of the	11:39:40
22	question, foundation, mischaracterizes the	11:39:41
23	evidence in the record in this case.	11:39:43
24	MR. MICHALIK: Join.	11:39:46

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

291

1	MR. SCHALKA: Join.	11:39:46
2	MR. KOSOKO: Join.	11:39:47
3	A Take the Fifth.	11:39:47
4	Q Did you ever hear that any other officer	11:39:50
5	had taken drugs found on Willie Brownlee and	11:39:55
6	charged Robert Lindsey with possessing those	11:39:57
7	drugs?	11:40:00
8	MR. BAZAREK: Object to the form of the	11:40:00
9	question, foundation, mischaracterizes the	11:40:01
10	evidence in the record in this case.	11:40:04
11	MR. MICHALIK: Join.	11:40:06
12	MR. SCHALKA: Join.	11:40:06
13	MR. KOSOKO: Join.	11:40:06
14	A Take the Fifth.	11:40:07
15	Q Did you ever learn that another officer	11:40:08
16	had taken drugs found on Willie Brownlee and	11:40:09
17	charged Germain Sims with possessing those drugs?	11:40:12
18	MR. BAZAREK: Object to the form of the	11:40:14
19	question, foundation, mischaracterizes the	11:40:17
20	evidence in the record in this case.	11:40:19
21	MR. MICHALIK: Join.	11:40:21
22	MR. SCHALKA: Join.	11:40:21
23	MR. KOSOKO: Join.	11:40:22
24	A Take the Fifth.	11:40:22

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

292

1	Q Did you ever hear that another officer	11:40:24
2	took drugs found on Willie Brownlee and charged	11:40:27
3	Germain Sims with possessing those drugs?	11:40:30
4	MR. BAZAREK: Object to the form of the	11:40:32
5	question, foundation, mischaracterizes the	11:40:34
6	evidence in the record in this case.	11:40:36
7	And I'll also note that Brownlee's name is	11:40:38
8	not identified in the communication about, you	11:40:42
9	know, plaintiffs and what inquiries would be made	11:40:47
10	for the deposition of Mr. Mohammed for the two days	11:40:51
11	we have for this week.	11:40:55
12	MR. MICHALIK: Join.	11:40:58
13	MR. SCHALKA: Join.	11:40:58
14	MR. KOSOKO: Join.	11:41:00
15	MR. PALLE: Join.	11:41:00
16	A Take the Fifth.	11:41:01
17	Q Did you ever learn that any Chicago police	11:41:05
18	officer took drugs found on one person and charged	11:41:14
19	another person with possessing those drugs?	11:41:17
20	MR. BAZAREK: Object to the form of the	11:41:18
21	question, foundation, mischaracterizes the	11:41:20
22	evidence in the record in this case, and further	11:41:22
23	violates the Court's order in terms of advance	11:41:27
24	notice during questionings at depositions in the	11:41:30

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

293

1	Watts coordinated pretrial proceedings.	11:41:34
2	MR. MICHALIK: Join.	11:41:34
3	MR. SCHALKA: Join.	11:41:34
4	MR. KOSOKO: Join.	11:41:38
5	MR. PALLEs: Join.	11:41:38
6	MR. RAUSCHER: Just so we don't risk	11:41:40
7	someone saying we didn't say anything, I don't	11:41:41
8	agree with that interpretation. We don't have to	11:41:44
9	have a debate about it.	11:41:46
10	MR. BAZAREK: I mean, if you want to	11:41:47
11	stipulate, we could really shorten these deps up	11:41:47
12	if those are the questions for all plaintiffs in	11:41:51
13	the coordinated proceedings. Sounds like it's	11:41:53
14	just been asked.	11:41:54
15	MR. RAUSCHER: Clearly, you know that he	11:41:55
16	didn't just ask all the questions for all the	11:41:56
17	plaintiffs in the coordinated proceedings, Bill.	11:41:57
18	MR. BAZAREK: Well, he certainly asked --	11:41:59
19	the question certainly -- in addition to the	11:42:01
20	plaintiffs in the coordinated proceedings --	11:42:06
21	contemplates, you know --	11:42:08
22	MR. RAUSCHER: If you want --	11:42:11
23	MR. BAZAREK: -- way broader --	11:42:11
24	MR. RAUSCHER: -- to take the position	11:42:11

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

294

1	that we don't get any more depositions of	11:42:12
2	defendants, then you'll take the position.	11:42:14
3	MR. BAZAREK: I'm just -- I'm just making	11:42:15
4	a record, you know. And I don't think it's a fair	11:42:16
5	question to be asked at this deposition, and I do	11:42:18
6	think that, you know, it's violative of the	11:42:21
7	Court's order.	11:42:23
8	A Fifth Amendment.	11:42:26
9	BY MR. FLAXMAN:	11:42:28
10	Q Did you ever hear that a Chicago police	11:42:32
11	officer took drugs found on one person and charged	11:42:36
12	another person with possessing those drugs?	11:42:38
13	MR. BAZAREK: I'm going to adopt the	11:42:39
14	objection I just made, but I'll do it again.	11:42:41
15	Object to the form of the question,	11:42:43
16	foundation, mischaracterizes the evidence in the	11:42:46
17	record in this case, and it goes beyond what the	11:42:49
18	Court has ordered in terms of advance notice for	11:42:54
19	areas of inquiry at the deposition.	11:42:59
20	MR. MICHALIK: Join.	11:43:03
21	MR. SCHALKA: Join.	11:43:03
22	MR. KOSOKO: Join.	11:43:03
23	MR. PALLE: Join.	11:43:03
24	A Fifth Amendment.	11:43:04

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

295

1	Q On October 15th, 2009, did you ever see	11:43:04
2	Ronald Watts show a bag of drugs to Mr. Lindsey	11:43:16
3	and Mr. Sims and say words to the effect of "This	11:43:20
4	is yours"?	11:43:23
5	MR. KOSOKO: Objection to the form of the	11:43:24
6	question, foundation.	11:43:25
7	A Fifth Amendment.	11:43:27
8	MR. FLAXMAN: Let's mark this as 34.	11:43:54
9	(Mohammed Deposition Exhibit 34 marked for	11:44:04
10	identification and attached to the transcript.)	11:44:31
11	(An off-the-record discussion was held.)	11:44:31
12	MR. PALLE: It's fine.	11:44:57
13	BY MR. FLAXMAN:	11:45:02
14	Q Sir, do you recognize Exhibit 34 as a	11:45:03
15	notification of charges/allegations addressed	11:45:04
16	to you?	11:45:07
17	A Yes. That's what it says.	11:45:07
18	Q And it's from a complainant identified as	11:45:09
19	"Lindsey, comma, Robert"?	11:45:13
20	A Yes.	11:45:16
21	Q And do you see that Mr. Lindsey alleges	11:45:16
22	that on October 15th, 2009, you, along with	11:45:18
23	several others, planted drugs on him?	11:45:23
24	A That's what it says.	11:45:25

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

296

1	Q Was Mr. Lindsey's allegation in this	11:45:27
2	complaint true?	11:45:30
3	A Take the Fifth.	11:45:31
4	Q Mr. Lindsey goes on to allege that you	11:45:34
5	took the drugs from another individual and let	11:45:35
6	that person go.	11:45:39
7	Do you see that?	11:45:40
8	A I see it.	11:45:41
9	Q Is that allegation true?	11:45:43
10	A Take the Fifth.	11:45:45
11	MR. BAZAREK: Object to the form of the	11:45:47
12	question, foundation.	11:45:48
13	A (Continuing.) Take the Fifth.	11:45:48
14	Q The next sentence states "The complainant	11:45:49
15	stated that you then planted those drugs on him."	11:45:51
16	Do you see that?	11:45:54
17	MR. BAZAREK: Object to the form of the	11:45:55
18	question, foundation. Also, I think it	11:45:56
19	mischaracterizes what is said on the exhibit.	11:45:59
20	MR. FLAXMAN: What did I get wrong?	11:46:04
21	MR. BAZAREK: Can you read it back?	11:46:06
22	(The Reporter read the record as follows:	12:40:20
23	"Question: The next sentence states 'The	12:40:20
24	complainant stated that you then planted those	12:40:20

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

297

1	drugs on him.' Do you see that?"')	11:46:20
2	MR. BAZAREK: That -- that's correct. The	11:46:20
3	third sentence, yes. It says, "The complainant	11:46:22
4	stated that you then planted the drugs on him,"	11:46:25
5	and I'm going to object to the form of the	11:46:27
6	question and foundation.	11:46:29
7	BY MR. FLAXMAN:	11:46:29
8	Q Do you see that sentence, sir?	11:46:33
9	A I see it.	11:46:34
10	Q Okay. Is that sentence true?	11:46:35
11	MR. BAZAREK: Object to the form of the	11:46:37
12	question, foundation.	11:46:38
13	A Take the Fifth.	11:46:38
14	Q Did you plant drugs on Mr. Lindsey?	11:46:39
15	MR. BAZAREK: Object to the form of the	11:46:41
16	question, foundation.	11:46:43
17	A Take the Fifth.	11:46:45
18	Q Okay. Is that your signature on the	11:46:46
19	line for "Signature" on Exhibit 34?	11:46:48
20	A Take the Fifth.	11:46:51
21	Q Sir, do you know what your signature looks	11:46:54
22	like?	11:46:54
23	A Yes.	11:46:57
24	Q And does that look like your signature on	11:46:57

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

298

PLANET DEPOS
888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

299

1	Q Do you see the place on this notification	11:47:56
2	where it states "Witnesses"?	11:48:04
3	A Yes. Yes.	11:48:05
4	Q And is Ronald Watts' name and star number	11:48:06
5	written under that?	11:48:08
6	MR. KOSOKO: Objection; foundation.	11:48:10
7	A That's what it says.	11:48:13
8	Q Okay. Do you know who wrote that?	11:48:13
9	A Take the Fifth.	11:48:16
10	MR. KOSOKO: Objection; foundation.	11:48:17
11	MR. FLAXMAN: This is going to be	11:48:27
12	Exhibit 35.	11:48:30
13	(Mohammed Deposition Exhibit 35 marked for	11:48:31
14	identification and attached to the transcript.)	11:48:31
15	Q And before we go to 35, I had one last	11:48:50
16	question on Exhibit 34.	11:48:52
17	At the bottom, in the box that says	11:48:55
18	"Complaint Log Number," do you see that?	11:48:57
19	A Yes.	11:48:59
20	Q That has the number 1044999; correct?	11:48:59
21	A That's what it says.	11:49:04
22	Q Okay. Then moving to Exhibit 3, does this	11:49:05
23	memorandum have the subject line with the same	11:49:10
24	CR number as Exhibit 34?	11:49:13

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

300

1	A You said exhibit number --	11:49:15
2	Q Exhibit 35 is a memorandum; correct?	11:49:21
3	A Right.	11:49:24
4	Q Exhibit 34 is a notification of charges;	11:49:26
5	correct?	11:49:27
6	MR. RAVITZ: Counsel misspoke. You	11:49:28
7	misidentified it as Exhibit 3. You didn't say	11:49:31
8	"35," just to clarify it for the record.	11:49:34
9	MR. FLAXMAN: Thank you. I appreciate	11:49:36
10	that.	11:49:38
11	MR. RAVITZ: I'm sure you do.	11:49:38
12	BY MR. FLAXMAN:	11:49:39
13	Q Exhibit 35 lists the CR number for	11:49:40
14	"Subject." Do you see that?	11:49:43
15	A I see it.	11:49:44
16	Q Okay. And that's the same CR number as on	11:49:45
17	Exhibit 34, which I misspoke a minute ago; is that	11:49:48
18	right?	11:49:51
19	A That's what it says.	11:49:51
20	Q Okay. And did you complete this	11:49:52
21	memorandum that's marked as Exhibit 35?	11:49:53
22	A Take the Fifth.	11:49:55
23	Q Okay. Is that your signature on	11:49:56
24	Exhibit 35?	11:49:59

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

301

1	A Take the Fifth.	11:49:59
2	Q Did you sign Exhibit 35?	11:50:02
3	A Take the Fifth.	11:50:03
4	Q Did somebody else sign your name on	11:50:04
5	Exhibit 35?	11:50:06
6	A Take the Fifth.	11:50:07
7	Q Are the statements that are made	11:50:10
8	underneath "Subject" in Exhibit 35 true	11:50:16
9	statements?	11:50:20
10	A Take the Fifth.	11:50:20
11	Q Does this memorandum state that it comes	11:50:22
12	from you?	11:50:29
13	A Take the Fifth.	11:50:30
14	Q Sir, what are the words next to the word	11:50:30
15	"From" near the top of this memorandum?	11:50:33
16	A It's my name.	11:50:39
17	Q Okay. In the first paragraph, the	11:50:40
18	narrative, do you see it starts, "This statement	11:50:48
19	is not being given voluntarily"?	11:50:50
20	A I see that.	11:50:53
21	Q I'm just asking if it says those words.	11:50:54
22	A That's what it says.	11:50:56
23	Q Okay. Is that true, that this statement	11:50:57
24	was not given voluntarily?	11:50:58

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

302

1	A Take the Fifth.	11:50:59
2	Q Is it true that you gave this statement	11:51:00
3	under duress?	11:51:02
4	MR. MICHALIK: I'm going to object. It's	11:51:04
5	been asked and answered as to whether the	11:51:05
6	statements in the memo were true.	11:51:06
7	A Take the Fifth.	11:51:09
8	Q The last sentence in that first	11:51:11
9	paragraph begins "This to-from report."	11:51:18
10	Do you see that?	11:51:22
11	A Okay.	11:51:22
12	Q And does reviewing this refresh your	11:51:26
13	recollection about what a to-from report is?	11:51:28
14	A From reading this, no, it doesn't.	11:51:32
15	Q Is it true that Offender Robert Lindsey	11:51:35
16	did indeed plead guilty to the facts of the arrest	11:52:34
17	in Cook County Courtroom 306?	11:52:36
18	A Take the Fifth.	11:52:38
19	Q Is it true that Robert Lindsey was	11:52:39
20	sentenced by Judge Lawrence E. Flood to two years	11:52:40
21	in the Illinois Department of Corrections?	11:52:44
22	A Take the Fifth.	11:52:45
23	Q Is it true that the IR number for	11:52:45
24	Mr. Lindsey's arrest was 1158974?	11:52:52

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

303

1	A Take the Fifth.	11:52:55
2	Q Is it true that your star number is 19462?	11:52:56
3	MR. RAUSCHER: Could you -- no.	11:53:00
4	MR. FLAXMAN: I will withdraw the	11:53:04
5	question.	11:53:05
6	MR. PALLES: Right.	11:53:06
7	Q Is it true that Officer Jones' star number	11:53:08
8	was 19462 in 2011?	11:53:10
9	MR. KOSOKO: Objection; foundation.	11:53:15
10	THE COURT REPORTER: Excuse me. Who said	11:53:16
11	that?	11:53:17
12	MR. KOSOKO: Watts.	11:53:17
13	A I don't recall.	11:53:18
14	(Mohammed Deposition Exhibit 36 marked for	11:54:18
15	identification and attached to the transcript.)	11:54:28
16	(Mr. Rauscher left the proceedings.)	11:54:28
17	Q Do you recognize Exhibit 36 to be an	11:54:58
18	arrest report of the Chicago Police Department?	11:55:01
19	A That's what it says.	11:55:02
20	Q And do you see your name on this report?	11:55:04
21	A Yes, I did.	11:55:06
22	MR. MICHALIK: Just to clarify, Exhibit 36	11:55:10
23	actually contains a couple of reports.	11:55:13
24	Q The first five pages of Exhibit 36 are an	11:55:19

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

304

1	arrest report? Did I get that right?	11:55:24
2	A (No verbal response.)	11:55:26
3	MR. FLAXMAN: This one -- we could just	11:55:35
4	pull off the last page, make that another exhibit;	11:55:36
5	right?	11:55:39
6	MR. KOSOKO: It's the last two pages.	11:55:40
7	MR. MICHALIK: It's on the front and back.	11:55:43
8	MR. FLAXMAN: Oh. It's on the back? All	11:55:45
9	right. Scratch that. That will be too hard.	11:55:46
10	BY MR. FLAXMAN:	11:55:49
11	Q Exhibit 36 begins with an arrest report of	11:55:50
12	the Chicago Police Department; correct?	11:55:54
13	A That's what it says.	11:55:55
14	Q Okay. And do you see your name on that	11:55:56
15	arrest report?	11:56:00
16	A Yes, I do.	11:56:00
17	Q Were you involved in the arrest of Angelo	11:56:07
18	Shenault on April 4th, 2006?	11:56:12
19	A Take the Fifth.	11:56:16
20	(Mr. Rauscher returned to the proceedings.)	11:56:23
21	Q Do you know who Angelo Shenault -- who was	11:56:25
22	arrested on April 4th, 2006 -- is?	11:56:35
23	A Don't recall.	11:56:37
24	Q Okay. Following the arrest report,	11:56:38

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

305

1 there's another document that's part of this 11:56:42
2 exhibit. Will you turn to that? It starts at 11:56:44
3 City-BG-32195. 11:56:47
4 A Okay. 11:56:54
5 Q Do you recognize the document starting at 11:56:55
6 32195 to be a vice case report of the Chicago 11:56:57
7 Police Department? 11:57:00
8 A That's what it says. 11:57:00
9 Q Okay. Do you see your name on this 11:57:02
10 report? 11:57:04
11 A Yep. 11:57:05
12 Q And did you put your name on this report? 11:57:08
13 A Take the Fifth. 11:57:12
14 Q Does this report document the arrest of 11:57:12
15 Angelo Shenault, Christopher Scott, and David 11:57:16
16 Mayberry on April 4th, 2006? 11:57:20
17 A That's what it says. 11:57:25
18 Q And were you involved in the arrest of 11:57:27
19 those three people on April 4th, 2006? 11:57:29
20 A Take the Fifth. 11:57:33
21 Q Was Ronald Watts present for the arrest of 11:57:34
22 those three people on April 4th, 2006? 11:57:37
23 MR. KOSOKO: Objection; foundation. 11:57:40
24 A Take the Fifth. 11:57:41

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

306

1	Q And I think I misspoke.	11:57:42
2	The -- it's actually -- this report	11:57:48
3	actually lists four people as being arrested. Do	11:57:56
4	you see that?	11:58:00
5	MR. PALLE: Six.	11:58:00
6	MR. FLAXMAN: Six. Thank you.	11:58:01
7	Am I missing a page?	11:58:04
8	Thank you.	11:58:16
9	Let me ask the questions about this report	11:58:17
10	again.	11:58:19
11	BY MR. FLAXMAN:	11:58:19
12	Q We're looking at the same vice case report	11:58:19
13	from April 4th, 2006; correct?	11:58:22
14	A That's correct.	11:58:23
15	Q Okay. And in Box No. 19, it gives the	11:58:24
16	offender's name as Christopher L. Scott. Do you	11:58:32
17	see that?	11:58:35
18	A Yes.	11:58:35
19	Q And below Mr. Scott there's another	11:58:42
20	offender's name that states "David M. Mayberry."	11:58:46
21	Do you see that?	11:58:51
22	A Yes.	11:58:51
23	Q And below Mr. Mayberry there's another	11:58:52
24	offender that states "Angelo M. Shenault,"	11:58:55

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

307

1	S-h-e-n-a-u-l-t.	11:58:57
2	Do you see that?	11:59:02
3	A Yes.	11:59:02
4	Q And then in the narrative it states	11:59:03
5	"Offender No. 4, Grant, Jr., comma, Ollie,"	11:59:05
6	O-l-l-i-e?	11:59:10
7	A Yes.	11:59:11
8	Q And on the next line it says "Offender	11:59:11
9	No. 5, Lyles, comma, Victor"?	11:59:14
10	A Yes.	11:59:16
11	Q And then at the end of that line and going	11:59:16
12	on to the next, it states "Offender No. 6, Woods,	11:59:19
13	comma, Anthony"?	11:59:22
14	Do you see that?	11:59:24
15	A Yes.	11:59:24
16	Q Were you involved in the arrest of these	11:59:24
17	six individuals?	11:59:26
18	A Take the Fifth.	11:59:27
19	Q Was Ronald Watts present for the arrest of	11:59:28
20	these six individuals on April 4th, 2006?	11:59:30
21	MR. KOSOKO: Objection; foundation.	11:59:34
22	A Take the Fifth.	11:59:36
23	Q And do you see that Officer Jones is	11:59:40
24	listed as a reporting officer in Box 45?	11:59:42

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

308

1	A That's what it says.	11:59:45
2	Q Okay. Did you ever learn that Officer	11:59:50
3	Jones falsely arrested these six individuals on	11:59:53
4	April 4th, 2006?	11:59:56
5	MR. BAZAREK: Object to the form of the	11:59:57
6	question, foundation, mischaracterizes the	11:59:59
7	evidence in the record in this case.	12:00:01
8	MR. MICHALIK: Join.	12:00:05
9	MR. SCHALKA: Join.	12:00:05
10	MR. KOSOKO: Join.	12:00:05
11	A Take the Fifth.	12:00:05
12	Q Did you ever hear that Officer Jones	12:00:06
13	falsely arrested these six individuals on	12:00:08
14	April 4th, 2006?	12:00:10
15	MR. BAZAREK: Object to the form of the	12:00:11
16	question, foundation, mischaracterizes the	12:00:12
17	evidence in the record in this case.	12:00:14
18	MR. MICHALIK: Join.	12:00:16
19	MR. SCHALKA: Join.	12:00:16
20	MR. KOSOKO: Join.	12:00:17
21	A Take the Fifth.	12:00:17
22	Q Did you ever learn that Officer Jones	12:00:18
23	framed Angelo Shenault on April 4th, 2006?	12:00:22
24	MR. BAZAREK: Object to the form of the	12:00:26

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

309

1	question, foundation, mischaracterizes the	12:00:27
2	evidence in the record in this case.	12:00:29
3	MR. MICHALIK: Join.	12:00:31
4	MR. SCHALKA: Join.	12:00:31
5	MR. KOSOKO: Join.	12:00:31
6	A Take the Fifth.	12:00:31
7	Q Did you ever hear that Officer Jones	12:00:33
8	framed Angelo Shenault on April 4th, 2006?	12:00:36
9	MR. BAZAREK: Object to the form of the	12:00:40
10	question, foundation, mischaracterizes the	12:00:41
11	evidence in the record in this case.	12:00:43
12	MR. MICHALIK: Join.	12:00:48
13	MR. SCHALKA: Join.	12:00:48
14	MR. KOSOKO: Join.	12:00:48
15	A Take the Fifth.	12:00:48
16	Q Did you ever learn that Officer Jones	12:00:49
17	signed a police report containing false	12:00:51
18	information about the arrest of these six	12:00:55
19	individuals on April 4th, 2006?	12:00:56
20	MR. BAZAREK: Object to the form of the	12:00:58
21	question, foundation, mischaracterizes the	12:00:59
22	evidence in the record in this case.	12:01:01
23	MR. MICHALIK: Join.	12:01:04
24	MR. SCHALKA: Join.	12:01:04

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

310

1	MR. KOSOKO: Join.	12:01:04
2	A Take the Fifth.	12:01:04
3	Q Did you ever hear that Officer Jones	12:01:06
4	signed a police report containing false	12:01:08
5	information about the six individuals arrested on	12:01:10
6	April 4th, 2006?	12:01:12
7	MR. BAZAREK: Object to the form of the	12:01:14
8	question, foundation, mischaracterizes the	12:01:15
9	evidence in the record in this case.	12:01:16
10	MR. MICHALIK: Join.	12:01:20
11	MR. SCHALKA: Join.	12:01:20
12	MR. KOSOKO: Join.	12:01:20
13	A Take the Fifth.	12:01:20
14	Q Do you see Box 46? It risks -- excuse me.	12:01:23
15	Let me try and say that again.	12:01:26
16	Do you see Box 46 lists as a reporting	12:01:28
17	officer Officer Smith?	12:01:31
18	A That's what it says.	12:01:33
19	Q Okay. Do you know Officer E. Smith?	12:01:33
20	A Yes.	12:01:37
21	MR. MICHALIK: Objection; asked and	12:01:37
22	answered.	12:01:38
23	THE COURT REPORTER: Excuse me. Who said	12:01:38
24	that?	12:01:39

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

311

1	MR. MICHALIK: (Indicating.)	12:01:40
2	THE COURT REPORTER: Thank you.	12:01:41
3	BY MR. FLAXMAN:	12:01:42
4	Q Did you ever learn that Officer Smith	12:01:43
5	falsely arrested these six individuals on	12:01:45
6	April 4th, 2006?	12:01:47
7	MR. BAZAREK: Object to the form of the	12:01:48
8	question, foundation, mischaracterizes the	12:01:49
9	evidence in the record in this case.	12:01:52
10	MR. MICHALIK: Join.	12:01:55
11	MR. SCHALKA: Join.	12:01:55
12	MR. KOSOKO: Join.	12:01:55
13	A Take the Fifth.	12:01:55
14	Q Did you ever hear that Officer Smith	12:01:56
15	falsely arrested these six individuals on	12:02:01
16	April 4th, 2006?	12:02:02
17	MR. BAZAREK: Object to the form of the	12:02:03
18	question, foundation, mischaracterizes the	12:02:05
19	evidence in the record in this case.	12:02:07
20	MR. MICHALIK: Join.	12:02:12
21	MR. SCHALKA: Join.	12:02:12
22	MR. KOSOKO: Join.	12:02:12
23	A Take the Fifth.	12:02:12
24	Q Did you ever learn that Officer Jones	12:02:13

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

312

1	signed a police report containing false	12:02:14
2	information about the six individuals arrested on	12:02:16
3	April 4th, 2006?	12:02:18
4	MR. BAZAREK: Object -- object to the form	12:02:19
5	of the question, foundation, mischaracterizes the	12:02:20
6	evidence in the record in this case. And I think	12:02:22
7	it's been asked and answered.	12:02:25
8	MR. MICHALIK: Join.	12:02:28
9	MR. SCHALKA: Join.	12:02:28
10	MR. KOSOKO: Join.	12:02:29
11	A Take the Fifth.	12:02:30
12	Q Did you ever hear that Officer Smith	12:02:30
13	signed a police report that contained false	12:02:33
14	information about the six individuals arrested on	12:02:35
15	April 4th, 2006?	12:02:37
16	MR. BAZAREK: Object to the form of the	12:02:39
17	question, foundation, mischaracterizes the	12:02:41
18	evidence in the record in this case.	12:02:42
19	MR. MICHALIK: Join.	12:02:44
20	MR. SCHALKA: Join.	12:02:44
21	MR. KOSOKO: Join.	12:02:45
22	A Take the Fifth.	12:02:45
23	Q Did you ever learn that Officer Smith	12:02:47
24	framed Angelo Shenault on April 4th, 2006?	12:02:51

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

313

1	MR. BAZAREK: Object to the form of the	12:02:53
2	question, foundation, mischaracterizes the	12:02:54
3	evidence in the record in this case.	12:02:56
4	MR. MICHALIK: And it's been asked and	12:03:00
5	answered. Join and object; asked and answered.	12:03:01
6	MR. SCHALKA: Join.	12:03:03
7	MR. KOSOKO: Join.	12:03:03
8	A Take the Fifth.	12:03:05
9	Q Did you ever hear that Officer Smith	12:03:06
10	framed Angelo Shenault on April 4th, 2006?	12:03:07
11	MR. BAZAREK: Object to the form of the	12:03:11
12	question, foundation, mischaracterizes the	12:03:12
13	evidence in the record in this case and asked and	12:03:14
14	answered.	12:03:16
15	MR. MICHALIK: Join.	12:03:17
16	MR. SCHALKA: Join.	12:03:17
17	MR. KOSOKO: Join.	12:03:19
18	A Take the Fifth.	12:03:19
19	Q Were you conducting a narcotics	12:03:19
20	investigation on April 4th, 2006?	12:03:22
21	A Take the Fifth.	12:03:25
22	Q Did you observe Christopher Scott give	12:03:26
23	David Mayberry small Ziploc Baggies with suspect	12:03:37
24	narcotics?	12:03:42

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

314

1	A Take the Fifth.	12:03:42
2	Q Is the statement in this report that a --	12:03:44
3	police officers observed Christopher Scott give	12:03:46
4	David Mayberry small Ziploc Baggies a true	12:03:50
5	statement?	12:03:54
6	MR. BAZAREK: Object to the form of the	12:03:54
7	question, foundation.	12:03:55
8	MR. MICHALIK: Join.	12:03:58
9	MR. SCHALKA: Join.	12:03:58
10	MR. KOSOKO: Join.	12:03:59
11	A Take the Fifth.	12:03:59
12	Q Did you observe David Mayberry give	12:03:59
13	Christopher Scott United States currency?	12:04:03
14	A Take the Fifth.	12:04:04
15	Q Is the statement in this report that	12:04:06
16	police officers observed David Mayberry give	12:04:07
17	Christopher Scott United States currency a true	12:04:10
18	statement?	12:04:12
19	MR. BAZAREK: Object to the form of the	12:04:13
20	question, foundation.	12:04:14
21	MR. MICHALIK: Join.	12:04:19
22	MR. SCHALKA: Join.	12:04:19
23	MR. KOSOKO: Join.	12:04:16
24	A Take the Fifth.	12:04:16

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

315

1	Q Did you observe Angelo Shenault holding a	12:04:19
2	clear plastic bag on April 4th, 2006, at about	12:04:21
3	1:00 p.m.?	12:04:25
4	A Take the Fifth.	12:04:26
5	Q Is the statement in this report that	12:04:27
6	officers observed Angelo Shenault holding a clear	12:04:29
7	plastic bag on April 4th, 2006, at about 1:00 p.m.	12:04:33
8	a true statement?	12:04:35
9	MR. BAZAREK: Object to the form of the	12:04:36
10	question, foundation.	12:04:37
11	MR. MICHALIK: Join.	12:04:39
12	MR. SCHALKA: Join.	12:04:39
13	MR. KOSOKO: Join.	12:04:39
14	A Take the Fifth.	12:04:39
15	Q Did you search Angelo Shenault on	12:04:41
16	April 4th, 2006?	12:04:45
17	A Take the Fifth.	12:04:47
18	Q Did you see any officer search Angelo	12:04:47
19	Shenault on April 4th, 2006?	12:04:52
20	A Take the Fifth.	12:04:53
21	Q Did you find narcotics on Angelo	12:04:54
22	Shenault's person on April 4th, 2006, at about	12:05:07
23	1:00 p.m.?	12:05:11
24	A Take the Fifth.	12:05:12

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

316

1	Q Did you see any officer find narcotics on	12:05:13
2	Angelo Shenault's person on April 4th, 2006, at	12:05:16
3	about 1:00 p.m.?	12:05:18
4	A Take the Fifth.	12:05:19
5	Q Is the statement in this report that	12:05:21
6	Angelo Shenault had a clear plastic bag with	12:05:23
7	51 Ziploc Baggies with white powder, suspect	12:05:26
8	heroin, on April 4th, 2006, a true statement?	12:05:30
9	MR. BAZAREK: Object to the form of the	12:05:33
10	question, foundation.	12:05:34
11	MR. MICHALIK: Join.	12:05:34
12	MR. SCHALKA: Join.	12:05:34
13	MR. KOSOKO: Join.	12:05:37
14	A Take the Fifth.	12:05:37
15	Q Have you ever heard Ricky Lake used as a	12:05:38
16	street name for crack cocaine?	12:05:42
17	A Take the Fifth.	12:05:44
18	Q Do you believe that answering whether	12:05:45
19	you've heard Ricky Lake used as a street name for	12:05:47
20	crack cocaine would subject you to criminal	12:05:51
21	prosecution?	12:05:52
22	MR. PALLE: Objection; attorney-client	12:05:53
23	privilege/work product.	12:05:54
24	Instruct the witness not to answer.	12:05:54

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

317

1	Q Are you going to follow your attorney's	12:05:59
2	instruction?	12:06:01
3	A Yes.	12:06:01
4	Q On April 4th, 2006, did you observe	12:06:02
5	Officer Alvin Jones pointing a gun at anyone?	12:06:18
6	MR. BAZAREK: Object to the form of the	12:06:21
7	question, foundation.	12:06:24
8	A Take the Fifth.	12:06:27
9	Q On April 4th, 2006, did you hear Officer	12:06:28
10	Jones say to anyone words to the effect of "I got	12:06:31
11	you motherfuckers; don't move"?	12:06:34
12	MR. BAZAREK: Object to the form of the	12:06:37
13	question, foundation.	12:06:37
14	MR. MICHALIK: Join.	12:06:40
15	MR. KOSOKO: Join.	12:06:41
16	A Take the Fifth.	12:06:42
17	Q On October 4th, 2006, did Ronald Watts	12:06:56
18	call a drug dealer known as Shock?	12:07:01
19	MR. KOSOKO: Objection; foundation, form	12:07:06
20	of the question.	12:07:08
21	A Take the Fifth.	12:07:08
22	Q On April 4th, 2006, did a drug dealer	12:07:12
23	known as Shock instruct Ronald Watts on which	12:07:15
24	arrestees to charge with drug offenses?	12:07:20

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

318

1	A Take --	12:07:23
2	MR. KOSOKO: Objection; foundation, form	12:07:23
3	of the question.	12:07:24
4	A (Continuing.) Take the Fifth.	12:07:25
5	Q Did you ever learn that a drug dealer	12:07:27
6	named Shock was paying bribes to Watts?	12:07:30
7	MR. KOSOKO: Objection; form of the	12:07:33
8	question, foundation, argumentative.	12:07:35
9	A Take the Fifth.	12:07:37
10	Q Did a drug dealer named Shock ever pay	12:07:37
11	bribes to you?	12:07:41
12	A Take the Fifth.	12:07:42
13	Q Has any drug dealer ever paid a bribe	12:07:44
14	to you?	12:07:46
15	A Take the Fifth.	12:07:47
16	Q Did you ever learn that a drug dealer was	12:07:48
17	paying bribes to Ronald Watts?	12:07:52
18	MR. KOSOKO: Objection; foundation, form	12:07:53
19	of the question, argumentative.	12:07:55
20	A Take the Fifth.	12:07:57
21	MR. PALLE: And I'd say beyond the scope	12:07:58
22	of permissible questioning today.	12:08:00
23	MR. FLAXMAN: I'm sorry. What are we on?	12:08:09
24	THE COURT REPORTER: 37.	12:08:29

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

319

1	(Mohammed Deposition Exhibit 37 marked for	12:08:30
2	identification and attached to the transcript.)	12:08:30
3	Q The first report that's part of	12:09:09
4	Exhibit 37, do you recognize that to be a Chicago	12:09:18
5	Police Department arrest report?	12:09:21
6	A That's what it says.	12:09:22
7	Q Okay. And do you see your name on this	12:09:23
8	report?	12:09:29
9	A Yes, I do.	12:09:32
10	Q Do you know who put your name on the	12:09:34
11	report that begins Exhibit 37?	12:09:39
12	A Take the Fifth Amendment.	12:09:40
13	Q Does this report document the arrest of	12:09:43
14	Angelo Shenault on March 3rd, 2008?	12:09:45
15	A That's what it says.	12:09:49
16	Q And is Officer Nichols listed as the	12:09:49
17	attesting officer on the third page of this arrest	12:09:58
18	report?	12:10:00
19	A That's what it says.	12:10:00
20	Q Do you know Officer Nichols?	12:10:01
21	A Yes.	12:10:06
22	Q Did you work on the same tactical team as	12:10:06
23	Officer Nichols?	12:10:10
24	A Yes.	12:10:10

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

320

1	Q Did you ever learn that Officer Nichols	12:10:10
2	falsely arrested Angelo Shenault on March 3rd,	12:10:14
3	2008?	12:10:16
4	MR. BAZAREK: Object to the form of the	12:10:17
5	question, foundation, mischaracterizes the	12:10:18
6	evidence in the record in this case.	12:10:19
7	MR. MICHALIK: Join.	12:10:22
8	MR. SCHALKA: Join.	12:10:22
9	MR. KOSOKO: Join.	12:10:23
10	A Fifth Amendment.	12:10:23
11	Q Did you ever hear that Officer Nichols	12:10:23
12	falsely arrested Angelo Shenault on March 3rd,	12:10:26
13	2008?	12:10:29
14	MR. BAZAREK: Object to the form of the	12:10:30
15	question, foundation, mischaracterizes the	12:10:31
16	evidence in the record in this case.	12:10:32
17	MR. MICHALIK: Join.	12:10:36
18	MR. SCHALKA: Join.	12:10:36
19	MR. KOSOKO: Join.	12:10:36
20	A Fifth Amendment.	12:10:37
21	Q Did you ever learn that Officer Nichols	12:10:38
22	framed Angelo Shenault on March 3rd, 2008?	12:10:43
23	MR. BAZAREK: Object to the form of the	12:10:46
24	question, foundation, mischaracterizes the	12:10:48

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

321

1	evidence in the record in this case.	12:10:51
2	MR. MICHALIK: Join.	12:10:53
3	MR. SCHALKA: Join.	12:10:53
4	MR. KOSOKO: Join.	12:10:54
5	A Fifth Amendment.	12:10:54
6	Q Did you ever hear that Officer Nichols	12:10:56
7	framed Angelo Shenault on March 3rd, 2008?	12:10:58
8	MR. BAZAREK: Object to the form of the	12:11:01
9	question, foundation, mischaracterizes the	12:11:03
10	evidence in the record in this case.	12:11:04
11	MR. MICHALIK: Join.	12:11:06
12	MR. SCHALKA: Join.	12:11:06
13	MR. KOSOKO: Join.	12:11:06
14	A Fifth Amendment.	12:11:07
15	Q Did you ever learn that Officer Nichols	12:11:08
16	swore to a police report that contained false	12:11:11
17	information about Angelo Shenault related to the	12:11:14
18	arrest on March 3rd, 2008?	12:11:16
19	MR. BAZAREK: Object to the form of the	12:11:18
20	question, foundation, mischaracterizes the	12:11:20
21	evidence in the record in this case.	12:11:22
22	MR. MICHALIK: Join.	12:11:24
23	MR. SCHALKA: Join.	12:11:24
24	MR. KOSOKO: Join.	12:11:25

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

322

1	A Fifth Amendment.	12:11:25
2	Q Did you ever hear that Officer Nichols	12:11:26
3	swore to a police report that contained false	12:11:31
4	information about the arrest of Angelo Shenault on	12:11:33
5	March 3rd, 2008?	12:11:35
6	MR. BAZAREK: Object to the form of the	12:11:37
7	question, foundation, mischaracterizes the	12:11:38
8	evidence in the record in this case.	12:11:41
9	MR. MICHALIK: Join.	12:11:42
10	MR. SCHALKA: Join.	12:11:42
11	MR. KOSOKO: Join.	12:11:43
12	A Fifth Amendment.	12:11:44
13	Q Were you involved in the arrest of Angelo	12:11:45
14	Shenault on March 3rd, 2008?	12:11:47
15	A Fifth Amendment.	12:11:49
16	Q Was Ronald Watts present for the arrest of	12:11:51
17	Angelo Shenault on March 3rd, 2008?	12:12:02
18	MR. KOSOKO: Objection; foundation.	12:12:04
19	A Fifth Amendment.	12:12:06
20	MR. KOSOKO: Former question, also.	12:12:07
21	Q When you were a police officer, did you	12:12:16
22	get to know any of the residents of the	12:12:21
23	Ida B. Wells homes?	12:12:23
24	MR. PALLE: Objection; asked and	12:12:25

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

323

1	answered.	12:12:25
2	A No.	12:12:29
3	Q Did you ever learn the names of any of the	12:12:30
4	residents of the Ida B. Wells homes?	12:12:37
5	A I don't recall.	12:12:39
6	Q Are you familiar with the phrase "a	12:12:39
7	premise check"?	12:12:55
8	A Don't recall.	12:12:56
9	Q Do you know what a premise check of a	12:12:58
10	Chicago Housing Authority property is?	12:13:05
11	A Don't recall.	12:13:07
12	Q Okay. On March 3rd, 2008, did you observe	12:13:07
13	Angelo Shenault standing on the third floor rear	12:13:13
14	stairwell holding a clear plastic bag?	12:13:16
15	A Take the Fifth.	12:13:19
16	Q Is the statement in this police report	12:13:20
17	that police officers observed Mr. Shenault holding	12:13:24
18	a clear plastic bag a true statement?	12:13:27
19	MR. BAZAREK: Object to the form of the	12:13:29
20	question, foundation.	12:13:30
21	MR. MICHALIK: Join.	12:13:30
22	MR. SCHALKA: Join.	12:13:30
23	MR. KOSOKO: Join.	12:13:32
24	A Take the Fifth.	12:13:35

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

324

1	Q On April 4th -- excuse me.	12:13:36
2	On March 3rd, 2008, did you see Angelo	12:13:44
3	Shenault run up a stairwell?	12:13:50
4	A Take the Fifth.	12:13:52
5	Q On March 3rd, 2008, did you see Angelo	12:13:54
6	Shenault drop a clear plastic bag to the ground?	12:14:00
7	A Take the Fifth.	12:14:02
8	Q Is the statement in the police report that	12:14:02
9	a police officer saw Mr. Shenault drop a bag to	12:14:04
10	the ground a true statement?	12:14:10
11	MR. BAZAREK: Object to the form of the	12:14:11
12	question, foundation.	12:14:11
13	MR. MICHALIK: Join.	12:14:14
14	MR. KOSOKO: Join.	12:14:14
15	MR. SCHALKA: Join.	12:14:15
16	A Take the Fifth.	12:14:15
17	Q Is the statement in the police report that	12:14:15
18	Mr. Shenault started to flee up a stairwell a true	12:14:18
19	statement?	12:14:21
20	MR. BAZAREK: Object to the form of the	12:14:21
21	question, foundation.	12:14:22
22	MR. MICHALIK: Join.	12:14:26
23	MR. KOSOKO: Join.	12:14:26
24	MR. SCHALKA: Join.	12:14:26

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

325

1	A Take the Fifth.	12:14:26
2	Q Did you see Officer Nichols recover a bag	12:14:33
3	from Angelo Shenault on March 3rd, 2008?	12:14:37
4	A Take the Fifth.	12:14:40
5	Q Is the statement that Officer Nichols	12:14:41
6	recovered a bag from Angelo Shenault on March 3rd,	12:14:43
7	2008, in the police report a true statement?	12:14:46
8	MR. BAZAREK: Object to the form of the	12:14:48
9	question, foundation.	12:14:49
10	MR. MICHALIK: Join.	12:14:51
11	MR. SCHALKA: Join.	12:14:51
12	MR. KOSOKO: Join.	12:14:52
13	A Take the Fifth.	12:14:52
14	Q If you'd turn past the arrest report in	12:15:03
15	Exhibit 37, the first thing there is a vice case	12:15:23
16	report.	12:15:35
17	Does this vice case report record the	12:15:37
18	arrest of Angelo Shenault on March 3rd, 2008?	12:15:40
19	A That's what it says.	12:15:44
20	Q Okay. Does it list your name on this	12:15:45
21	report?	12:15:47
22	A Yes.	12:15:47
23	MR. BAZAREK: Counsel, is there a -- like	12:15:52
24	a Bates Stamp number on that one?	12:15:53

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

326

1	I just don't see one if it's on there.	12:15:58
2	MR. RAUSCHER: I bet it got cut off in	12:16:01
3	printing.	12:16:03
4	MR. BAZAREK: Okay.	12:16:04
5	MR. FLAXMAN: Yeah. I'm sorry about that.	12:16:05
6	I think it's --	12:16:06
7	MR. BAZAREK: It's clear it's part -- I'm	12:16:06
8	assuming it --	12:16:06
9	MR. FLAXMAN: Yeah, I'll put in --	12:16:07
10	I mean -- so this is a vice case report. The	12:16:09
11	Bates -- I'm sorry.	12:16:12
12	The RD number in the top box is HP-206297,	12:16:13
13	and the date of occurrence is 3 March '08 at 1710.	12:16:17
14	I apologize but it looks like the Bates	12:16:22
15	label got cut off of this one in printing.	12:16:24
16	MR. BAZAREK: So it's a two-page report,	12:16:29
17	it looks like?	12:16:31
18	MR. FLAXMAN: Yes.	12:16:32
19	BY MR. FLAXMAN:	12:16:39
20	Q Do you see Box 45 lists Officer Nichols as	12:16:45
21	a reporting officer?	12:16:48
22	A That's what it says.	12:16:49
23	Q Okay. Do you recognize Officer Nichols'	12:16:50
24	signature under his name?	12:16:52

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

327

1	A No, I don't.	12:16:54
2	Q Okay. Do you see that the -- Box 46 lists	12:16:55
3	Officer Leano as a reporting officer?	12:17:00
4	A That's what it says.	12:17:05
5	Q Do you recognize Officer Leano's signature	12:17:05
6	under his name?	12:17:07
7	A No, I don't.	12:17:08
8	Q Do you know what the abbreviation "P-O-M"	12:17:09
9	before Officer Leano's name means?	12:17:13
10	A No, I don't.	12:17:17
11	Q Do you know what the --	12:17:18
12	MR. MICHALIK: Off the record, Joel. It's	12:17:19
13	"Police Officer M. Leano."	12:17:23
14	MR. FLAXMAN: We can put that on the	12:17:27
15	record.	12:17:28
16	MR. MICHALIK: If you want. That's up	12:17:29
17	to you.	12:17:30
18	MR. FLAXMAN: I have a hundred more	12:17:30
19	questions about those abbreviations.	12:17:32
20	Thank you.	12:17:34
21	Thank you.	12:17:35
22	BY MR. FLAXMAN:	12:17:52
23	Q Is this vice case report about the arrest	12:17:54
24	of Angelo Shenault on March 3, 2008, an accurate	12:17:58

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

328

1	report?	12:18:01
2	A Take the Fifth.	12:18:02
3	MR. MICHALIK: I'd object to foundation on	12:18:03
4	that last question.	12:18:05
5	MR. KOSOKO: Join.	12:18:06
6	MR. SCHALKA: Join.	12:18:09
7	MR. BAZAREK: Join.	12:18:11
8	Q The next document in here does have a	12:18:13
9	Bates label. It's DO-Joint 18070 to 18071.	12:18:15
10	Do you recognize this to be a general	12:18:22
11	offense case report of the Chicago Police?	12:18:24
12	A That's what it says.	12:18:28
13	Q And is your name listed on this report?	12:18:29
14	A Yes.	12:18:32
15	Q And do you see this report has a date of	12:18:33
16	occurrence of March 3rd, 2008, at 1720 hours?	12:18:37
17	A That's what it says.	12:18:42
18	Q Okay. Did you review this report in	12:18:45
19	March of 2008?	12:18:50
20	A Don't recall.	12:18:51
21	Q Do you know what a pod-related mission is?	12:18:53
22	A Don't remember.	12:19:05
23	Q On March 3, 2008, did you observe Gregory	12:19:07
24	McElrath and John Massey to be loitering at	12:19:20

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

329

1	574 East 36th Street?	12:19:24
2	A Take the Fifth.	12:19:27
3	Q Is the statement in this report that	12:19:30
4	officers observed those men to be loitering a true	12:19:31
5	statement?	12:19:35
6	A Take the Fifth.	12:19:35
7	MR. MICHALIK: Object to the form and	12:19:37
8	foundation.	12:19:39
9	Q Did you conduct --	12:19:40
10	MR. KOSOKO: Join.	12:19:40
11	MR. BAZAREK: Join.	12:19:41
12	Q On March 3rd, 2008, did you announce your	12:19:44
13	office to Gregory McElrath?	12:19:46
14	A Take the Fifth.	12:19:49
15	Q On March 3rd, 2008, did you announce your	12:19:49
16	office to John Massey?	12:19:52
17	A Take the Fifth.	12:19:53
18	Q Do you know what it means to announce your	12:19:54
19	office?	12:19:56
20	A Don't recall.	12:19:56
21	Q On March 3rd, 2008, did you tell Gregory	12:19:59
22	McElrath that you were a police officer?	12:20:10
23	MR. BAZAREK: Object.	12:20:12
24	A Take the Fifth.	12:20:13

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

330

1	Q On March 3rd, 2008, did you tell John	12:20:14
2	Massey that you were a police officer?	12:20:17
3	A Take the Fifth.	12:20:18
4	Q On March 3rd, 2008, did you conduct a	12:20:20
5	field interview of Gregory McElrath?	12:20:21
6	A Take the Fifth.	12:20:25
7	Q On March 3, 2008, did you conduct a field	12:20:25
8	interview of John Massey?	12:20:28
9	A Take the Fifth.	12:20:29
10	MR. BAZAREK: I just want to put an	12:20:35
11	additional objection on the record that the names	12:20:37
12	Gregory McElrath and John Massey were not listed	12:20:40
13	in the individuals who would be covered at the	12:20:46
14	deposition.	12:20:52
15	Q Is the statement in this report that	12:21:00
16	police officers conducted a field interview of	12:21:03
17	Gregory McElrath and John Massey an accurate	12:21:05
18	statement?	12:21:08
19	MR. BAZAREK: Object to the form of the	12:21:09
20	question, foundation.	12:21:10
21	MR. MICHALIK: Join.	12:21:10
22	MR. SCHALKA: Join.	12:21:10
23	MR. KOSOKO: Join.	12:21:13
24	A Take the Fifth.	12:21:13

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

331

1	Q Is this general offense case report about	12:21:17
2	Gregory McElrath and John Massey dated March 3,	12:21:19
3	2008, an accurate report?	12:21:23
4	MR. BAZAREK: Object to the form of the	12:21:24
5	question, foundation.	12:21:25
6	MR. MICHALIK: Join.	12:21:28
7	MR. SCHALKA: Join.	12:21:28
8	MR. KOSOKO: Join.	12:21:29
9	A Take the Fifth.	12:21:29
10	Q Were you involved in arresting Gregory	12:21:36
11	McElrath on March 3rd, 2008?	12:21:40
12	A Take the Fifth.	12:21:41
13	Q Were you involved in arresting John Massey	12:21:43
14	on March 3rd, 2008?	12:21:45
15	A Take the Fifth.	12:21:47
16	Q Okay. The next report in this Exhibit 37	12:21:48
17	is a vice case report.	12:21:57
18	Can you turn to that next page?	12:21:59
19	A I'm already there.	12:22:02
20	Q Okay. Do you recognize this as a vice	12:22:03
21	case report listing offenders Darnell Trabeck and	12:22:04
22	Trinere Johnson?	12:22:09
23	A That's what it says.	12:22:11
24	Q Is your name listed on this vice case	12:22:12

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

332

1	report?	12:22:14
2	A Yes, it is.	12:22:15
3	Q And did you put your name on this vice	12:22:16
4	case report?	12:22:18
5	A Take the Fifth.	12:22:18
6	Q Do you know who put your name on this vice	12:22:19
7	case report?	12:22:21
8	A Take the Fifth.	12:22:21
9	Q Were you involved in the arrest of Darnell	12:22:23
10	Trabeck on March 3rd, 2008?	12:22:24
11	A Take the Fifth.	12:22:26
12	Q Were you involved in the arrest of Trinere	12:22:27
13	Johnson on March 3rd, 2008?	12:22:30
14	A Take the Fifth.	12:22:32
15	MR. BAZAREK: I just want to again note	12:22:36
16	on the record that these two individuals,	12:22:38
17	Messrs. Darnell Trabeck and Trinere Johnson, were	12:22:41
18	not listed on the communication listing	12:22:45
19	individuals whose arrests would be covered on the	12:22:51
20	deposition days for this week.	12:22:55
21	Q Did you ever learn that Darnell Trabeck	12:23:07
22	was falsely arrested on March 3, 2008?	12:23:10
23	MR. BAZAREK: Object to the form of the	12:23:14
24	question, foundation, mischaracterizes the	12:23:15

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

333

1	evidence in the record in this case.	12:23:17
2	MR. MICHALIK: Join.	12:23:19
3	MR. SCHALKA: Join.	12:23:19
4	MR. KOSOKO: Join.	12:23:19
5	A Take the Fifth.	12:23:20
6	Q Did you ever hear that Darnell Trabeck was	12:23:21
7	falsely arrested on March 3, 2008?	12:23:25
8	MR. BAZAREK: Object to the form of the	12:23:25
9	question, foundation, mischaracterizes the	12:23:29
10	evidence in the record in this case.	12:23:30
11	MR. MICHALIK: Join.	12:23:31
12	MR. SCHALKA: Join.	12:23:31
13	MR. KOSOKO: Join.	12:23:31
14	A Take the Fifth.	12:23:31
15	Q Were you involved in falsely arresting	12:23:33
16	Darnell Trabeck on March 3rd, 2008?	12:23:34
17	MR. BAZAREK: Object to the form of the	12:23:36
18	question, foundation, mischaracterizes the	12:23:37
19	evidence in the record in this case.	12:23:39
20	MR. MICHALIK: Join.	12:23:42
21	A Take --	12:23:42
22	MR. SCHALKA: Join.	12:23:42
23	A (Continuing.) Take --	12:23:42
24	MR. KOSOKO: Join.	12:23:42

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

334

1	A (Continuing.) Take the Fifth.	12:23:42
2	Q Did you ever learn that Trinere Johnson	12:23:43
3	was falsely arrested on March 3rd, 2008?	12:23:49
4	MR. BAZAREK: Object to the form of the	12:23:53
5	question, foundation, mischaracterizes the	12:23:54
6	evidence in the record in this case.	12:23:55
7	MR. MICHALIK: Join.	12:23:57
8	MR. SCHALKA: Join.	12:23:57
9	MR. KOSOKO: Join.	12:23:58
10	A Take the Fifth.	12:23:58
11	Q Did you ever hear that Trinere Johnson was	12:24:00
12	falsely arrested on March 3, 2008?	12:24:02
13	MR. BAZAREK: Object to the form of the	12:24:05
14	question, foundation, mischaracterizes the	12:24:06
15	evidence in the record in this case.	12:24:07
16	MR. MICHALIK: Join.	12:24:10
17	MR. KOSOKO: Join.	12:24:10
18	MR. SCHALKA: Join.	12:24:12
19	A Take the Fifth.	12:24:12
20	Q Were you involved in falsely arresting	12:24:13
21	Trinere Johnson on March 3rd, 2008?	12:24:15
22	MR. BAZAREK: Object to the form of the	12:24:17
23	question, foundation, mischaracterizes the	12:24:18
24	evidence in the record in this case.	12:24:20

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

335

1	A Take the Fifth.	12:24:23
2	MR. MICHALIK: Join.	12:24:25
3	MR. SCHALKA: Join.	12:24:25
4	MR. KOSOKO: Join.	12:24:25
5	Q Is this vice case report about the arrests	12:24:25
6	of Darnell Trabeck and Trinere Johnson an accurate	12:24:27
7	report?	12:24:31
8	MR. MICHALIK: Objection; foundation.	12:24:31
9	MR. BAZAREK: Yeah. Join.	12:24:32
10	MR. KOSOKO: Join.	12:24:33
11	MR. SCHALKA: Join.	12:24:35
12	A Take the Fifth.	12:24:35
13	Q Was Ronald Watts present for the arrest of	12:24:36
14	Darnell Trabeck?	12:24:38
15	A Take the Fifth.	12:24:40
16	Q Was Ronald Watts present for the arrest of	12:24:41
17	Trinere Johnson?	12:24:43
18	A Take the Fifth.	12:24:44
19	Q Was Ronald Watts present for the arrest of	12:24:45
20	Gregory McElrath?	12:24:50
21	MR. KOSOKO: Object to foundation.	12:24:52
22	A Take the Fifth.	12:24:53
23	Q Was Ronald Watts present for the arrest of	12:24:53
24	John Massey?	12:24:55

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

336

1	MR. KOSOKO: Objection; foundation.	12:24:56
2	A Take the Fifth.	12:24:57
3	Q Did you ever hear -- excuse me.	12:25:18
4	I believe on Monday you talked about	12:25:21
5	hearing people say "cleanup" at the Ida B. Wells	12:25:25
6	homes.	12:25:28
7	Do you remember that?	12:25:28
8	A I didn't say that but I heard of it.	12:25:29
9	Q Did you ever hear someone saying "cleanup"	12:25:34
10	at the Ida B. Wells homes?	12:25:37
11	A Yes.	12:25:37
12	Q I'm sorry. Was that a yes?	12:25:38
13	A Yes.	12:25:39
14	Q Okay. And have you ever heard of a --	12:25:39
15	something called "a cleanup spot"?	12:25:41
16	A No.	12:25:42
17	Q Okay. Did you ever know drug dealers to	12:25:45
18	hide their drugs in an apartment when they knew	12:25:51
19	the police were coming?	12:25:53
20	A Yes.	12:25:54
21	MR. PALLE: Let's take a break.	12:25:57
22	MR. FLAXMAN: Sure.	12:25:59
23	THE VIDEOGRAPHER: Off the record, 12:25.	12:25:59
24	///	

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

337

1	(A recess was taken from 12:25 p.m. to	12:26:02
2	1:27 p.m.)	13:27:55
3	THE VIDEOGRAPHER: Back on the record, 1:27.	13:27:55
4	MR. FLAXMAN: Okay. I'm going to move to	13:28:02
5	the next exhibit, which the reporter, I believe,	13:28:04
6	will mark as 38.	13:28:06
7	(Mohammed Deposition Exhibit 38 marked for	13:28:15
8	identification and attached to the transcript.)	13:28:26
9	(An off-the-record discussion was held.)	13:28:26
10	MR. FLAXMAN: Are you okay?	13:28:31
11	MR. RAVITZ: Yeah, we're fine.	13:28:32
12	BY MR. FLAXMAN:	13:28:36
13	Q Do you recognize Exhibit 38 as a vice case	13:28:37
14	report of the Chicago Police Department?	13:28:39
15	A Yes.	13:28:40
16	Q And does this report document the arrest	13:28:41
17	of Angelo Shenault with a -- let me start that	13:28:46
18	question again.	13:28:55
19	MR. RAVITZ: Yes.	13:28:58
20	Q Does this Exhibit 38 document the result	13:29:00
21	of Angelo Shenault, born in 1963, on October 29th,	13:29:01
22	2004?	13:29:06
23	A That's what it says.	13:29:06
24	(An off-the-record discussion was held.)	13:29:10

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

338

1	Q Were you involved in the arrest of	13:29:11
2	Mr. Shenault on October 29th, 2004?	13:29:17
3	A Take the Fifth Amendment.	13:29:18
4	Q Do you see that Officer Gonzalez is listed	13:29:23
5	in Box 45 under "Reporting Officer's Name"?	13:29:32
6	A Yes.	13:29:38
7	Q And are you able to tell whether that's	13:29:38
8	Officer Gonzalez's signature underneath his name?	13:29:40
9	A No, I'm not.	13:29:42
10	Q Do you know Officer Gonzalez?	13:29:44
11	A Yes, I do.	13:29:46
12	Q Did you work on the same tactical team as	13:29:47
13	Officer Gonzalez?	13:29:49
14	A Yes, I did.	13:29:50
15	Q Did you ever learn that Officer Gonzalez	13:29:51
16	falsely arrested Angelo Shenault on October 29th,	13:29:54
17	2004?	13:29:57
18	MR. BAZAREK: Object to the form of the	13:29:57
19	question, foundation, mischaracterizes the	13:29:58
20	evidence in the record in this case.	13:30:01
21	MR. MICHALIK: Join.	13:30:04
22	MR. SCHALKA: Join.	13:30:04
23	MR. KOSOKO: Join.	13:30:04
24	A Fifth Amendment.	13:30:05

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

339

1	Q Did you ever hear that Officer Gonzalez	13:30:06
2	falsely arrested Angelo Shenault on October 29th,	13:30:10
3	2004?	13:30:14
4	MR. BAZAREK: Object to the form of the	13:30:14
5	question, foundation, mischaracterizes the	13:30:15
6	evidence in the record in this case.	13:30:16
7	MR. MICHALIK: Join.	13:30:16
8	MR. SCHALKA: Join.	13:30:16
9	MR. KOSOKO: Join.	13:30:22
10	A Fifth Amendment.	13:30:22
11	Q Did you ever learn that Officer Gonzalez	13:30:22
12	framed Angelo Shenault on October 29th, 2004?	13:30:27
13	MR. BAZAREK: Object to the form of the	13:30:30
14	question, foundation, mischaracterizes the	13:30:31
15	evidence in the record in this case.	13:30:32
16	MR. MICHALIK: Join.	13:30:36
17	MR. SCHALKA: Join.	13:30:36
18	MR. KOSOKO: Join.	13:30:37
19	A Fifth Amendment.	13:30:37
20	Q Did you ever hear that Officer Gonzalez	13:30:38
21	framed Angelo Shenault on October 29th, 2004?	13:30:41
22	MR. BAZAREK: Object to the form of the	13:30:44
23	question, foundation, mischaracterizes the	13:30:45
24	evidence in the record in this case.	13:30:47

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

340

1	MR. MICHALIK: Join.	13:30:50
2	MR. SCHALKA: Join.	13:30:50
3	MR. KOSOKO: Join.	13:30:51
4	A Fifth Amendment.	13:30:52
5	Q Did you ever learn that Officer Gonzalez	13:30:52
6	signed a police report that contained false	13:30:55
7	information about the arrest of Angelo Shenault on	13:30:58
8	October 29th, 2004?	13:31:00
9	MR. BAZAREK: Object to the form of the	13:31:02
10	question, foundation, mischaracterizes the	13:31:03
11	evidence in the record in this case.	13:31:05
12	MR. MICHALIK: Join.	13:31:08
13	MR. SCHALKA: Join.	13:31:08
14	MR. KOSOKO: Join.	13:31:09
15	A Fifth Amendment.	13:31:09
16	Q Did you ever hear that Officer Gonzalez	13:31:10
17	signed a police report that contained false	13:31:12
18	information about the arrest of Angelo Shenault on	13:31:15
19	October 29th, 2004?	13:31:16
20	MR. BAZAREK: Object to the form of the	13:31:18
21	question, foundation, misstates -- or -- misstates	13:31:20
22	and mischaracterizes the evidence in the record in	13:31:24
23	this case.	13:31:25
24	MR. MICHALIK: Join.	13:31:27

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

341

1	MR. SCHALKA: Join.	13:31:27
2	MR. KOSOKO: Join.	13:31:27
3	A Fifth Amendment.	13:31:28
4	Q Was Ronald Watts present for the arrest of	13:31:28
5	Angelo Shenault on October 29th, 2004?	13:31:32
6	MR. KOSOKO: Objection; foundation.	13:31:33
7	A Fifth Amendment.	13:31:36
8	Q Were you involved in framing Angelo	13:31:36
9	Shenault on October 29th, 2004?	13:31:40
10	MR. KOSOKO: Objection; form of the	13:31:42
11	question.	13:31:45
12	MR. BAZAREK: Object to the question	13:31:45
13	further as to form and foundation and	13:31:47
14	mischaracterizes the record and the evidence in	13:31:50
15	this case.	13:31:53
16	MR. MICHALIK: Join.	13:31:53
17	A Fifth Amendment.	13:31:54
18	Q Were you involved in the false arrest of	13:31:55
19	Angelo Shenault on October 29th, 2004?	13:31:59
20	MR. BAZAREK: Object -- object to the form	13:32:00
21	of the question, foundation, mischaracterizes the	13:32:02
22	evidence and the record in this case.	13:32:03
23	MR. MICHALIK: Join.	13:32:03
24	MR. SCHALKA: Join.	13:32:03

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

342

1	MR. KOSOKO: Join.	13:32:07
2	A Fifth Amendment.	13:32:07
3	Q Do you see Officer Bolton listed in Box	13:32:10
4	No. 46 under "Reporting Officer's Name"?	13:32:14
5	A Yes. That's what it says, yes.	13:32:16
6	Q Okay. Do you know Officer Bolton?	13:32:18
7	A Yes.	13:32:20
8	Q Did you work on the same tactical team as	13:32:21
9	Officer Bolton?	13:32:23
10	A Yes.	13:32:24
11	Q Can you tell if that's Officer Bolton's	13:32:25
12	signature below his name?	13:32:27
13	A No, I can't.	13:32:29
14	Q Did you ever learn that Officer Bolton	13:32:30
15	falsely arrested Angelo Shenault on October 29th,	13:32:33
16	2004?	13:32:35
17	MR. BAZAREK: Object to the form of the	13:32:35
18	question, foundation, mischaracterizes the	13:32:37
19	evidence in the record in this case.	13:32:38
20	MR. MICHALIK: Join.	13:32:38
21	MR. SCHALKA: Join.	13:32:38
22	MR. KOSOKO: Join.	13:32:44
23	A Fifth Amendment.	13:32:44
24	Q Did you ever hear that Officer Bolton	13:32:45

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

343

1	falsely arrested Angelo Shenault on October 29th,	13:32:47
2	2004?	13:32:50
3	MR. BAZAREK: Object to the form of the	13:32:51
4	question, foundation, mischaracterizes the	13:32:52
5	evidence in the record in this case.	13:32:53
6	MR. MICHALIK: Join.	13:32:53
7	MR. SCHALKA: Join.	13:32:53
8	MR. KOSOKO: Join.	13:32:58
9	A Fifth Amendment.	13:32:58
10	Q Did you ever learn that Officer Bolton	13:32:58
11	framed Angelo Shenault on October 29th, 2004?	13:33:00
12	MR. BAZAREK: Object to the form of the	13:33:04
13	question, foundation, mischaracterizes the	13:33:06
14	evidence in the record in this case.	13:33:07
15	MR. MICHALIK: Join.	13:33:11
16	MR. SCHALKA: Join.	13:33:11
17	MR. KOSOKO: Join.	13:33:12
18	A Fifth Amendment.	13:33:12
19	Q Did you ever hear that Officer Bolton	13:33:13
20	framed Angelo Shenault on October 29th, 2004?	13:33:15
21	MR. BAZAREK: Object to the form of the	13:33:19
22	question, foundation, mischaracterizes the	13:33:20
23	evidence in the record in this case.	13:33:22
24	MR. MICHALIK: Join.	13:33:27

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

344

1	MR. SCHALKA: Join.	13:33:27
2	MR. KOSOKO: Join.	13:33:27
3	A Fifth Amendment.	13:33:27
4	Q Did you ever learn that Officer Bolton	13:33:29
5	signed a police report containing false	13:33:31
6	information about the arrest of Angelo Shenault --	13:33:33
7	MR. BAZAREK: Object to --	13:33:35
8	Q -- on October 29th, 2004?	13:33:36
9	MR. BAZAREK: Object to the form of the	13:33:38
10	question, foundation, mischaracterizes the	13:33:39
11	evidence in the record in this case.	13:33:40
12	MR. MICHALIK: Join.	13:33:43
13	MR. SCHALKA: Join.	13:33:43
14	MR. KOSOKO: Join.	13:33:45
15	A Fifth Amendment.	13:33:45
16	Q Did you ever hear that Officer Bolton	13:33:45
17	signed a police report containing false	13:33:49
18	information about the arrest of Angelo Shenault on	13:33:51
19	October 29th, 2004?	13:33:53
20	MR. BAZAREK: Object to the form of the	13:33:55
21	question, foundation, mischaracterizes the	13:33:57
22	evidence in the record in this case.	13:34:00
23	MR. MICHALIK: Join.	13:34:12
24	MR. SCHALKA: Join.	13:34:12

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

345

1	MR. KOSOKO: Join.	13:34:12
2	A Fifth Amendment.	13:34:13
3	Q Did you observe Angelo Shenault on	13:34:13
4	October 29th, 2004, to be holding in his hand a	13:34:15
5	clear sandwich bag?	13:34:23
6	A Fifth Amendment.	13:34:26
7	Q Is the statement in the report that police	13:34:27
8	officers observed Mr. Shenault to be holding in	13:34:32
9	his hand a clear plastic sandwich bag a true	13:34:36
10	statement?	13:34:39
11	MR. BAZAREK: Object to the form of the	13:34:39
12	question and foundation.	13:34:41
13	MR. MICHALIK: Join.	13:34:41
14	MR. SCHALKA: Join.	13:34:41
15	MR. KOSOKO: Join.	13:34:46
16	A Fifth Amendment.	13:34:46
17	Q Did you observe Angelo Shenault on	13:34:47
18	October 29th, 2004, look at police officers and	13:34:50
19	enter an apartment he was standing next to?	13:34:56
20	A Fifth Amendment.	13:34:59
21	Q Is the statement in the police report that	13:35:00
22	Mr. Shenault looked at police officers and entered	13:35:03
23	an apartment he was standing next to a true	13:35:06
24	statement?	13:35:07

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

346

1	MR. BAZAREK: Object to the form of the	13:35:07
2	question, foundation.	13:35:08
3	MR. MICHALIK: Join.	13:35:13
4	MR. SCHALKA: Join.	13:35:13
5	MR. KOSOKO: Join.	13:35:16
6	A Fifth Amendment.	13:35:16
7	Q Did Officer Gonzalez recover a bag with	13:35:17
8	drugs in it from Angelo Shenault on October 29th,	13:35:22
9	2004?	13:35:24
10	A Fifth Amendment.	13:35:24
11	MR. MICHALIK: Objection; foundation.	13:35:26
12	Q Do you believe that answering whether	13:35:28
13	Officer Gonzalez recovered drugs would subject you	13:35:34
14	to criminal prosecution?	13:35:35
15	MR. PALLE: Objection; attorney-client	13:35:37
16	privilege/work product.	13:35:41
17	Instruct the witness not to answer.	13:35:41
18	Q Are you going to follow your attorney's	13:35:45
19	instruction?	13:35:46
20	A Yes.	13:35:46
21	Q Did you hear Angelo Shenault on	13:35:47
22	October 29th, 2004, say to police officers, "I was	13:35:50
23	just holding this shit for the dope boys"?	13:35:53
24	A Fifth Amendment.	13:35:56

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

347

1	Q Is the statement in the police report that	13:35:57
2	Angelo Shenault stated to the police officers on	13:35:59
3	October 29th, 2004, "I was just holding this shit	13:36:01
4	for the dope boys" a true statement?	13:36:04
5	MR. BAZAREK: Object to the form of the	13:36:06
6	question, foundation.	13:36:08
7	MR. MICHALIK: Join.	13:36:10
8	MR. SCHALKA: Join.	13:36:10
9	MR. KOSOKO: Join.	13:36:11
10	A Fifth Amendment.	13:36:11
11	Q On October 29th, 2004, did you hear Ronald	13:36:12
12	Watts say to Angelo Shenault words to the effect	13:36:25
13	of "If you don't tell me where the drugs are,	13:36:27
14	I'm going to tell my officers to do their job"?	13:36:30
15	MR. KOSOKO: Objection; foundation, form	13:36:33
16	of the question.	13:36:36
17	A Fifth Amendment.	13:36:37
18	Q Did you understand Watts to mean that if	13:36:38
19	Mr. Shenault did not tell the officers where they	13:36:41
20	could find drugs, they would falsely charge	13:36:44
21	Mr. Shenault with possessing drugs?	13:36:45
22	MR. BAZAREK: Object to the form of the	13:36:46
23	question, foundation, mischaracterizes the	13:36:47
24	evidence in the record in this case.	13:36:50

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

348

1	MR. MICHALIK: Join.	13:36:54
2	MR. KOSOKO: Join.	13:36:55
3	A Fifth Amendment.	13:36:55
4	Q Did you hear Ronald Watts on October 29th,	13:36:56
5	2004, say to Mr. Shenault, "This could have turned	13:36:58
6	out better"?	13:37:02
7	MR. KOSOKO: Objection to the form of the	13:37:04
8	question.	13:37:05
9	A Fifth Amendment.	13:37:06
10	Q Did you understand Ronald Watts to mean	13:37:06
11	when he said words to the effect of "This could	13:37:09
12	have turned out better" that officers had put	13:37:11
13	false charges on Mr. Shenault because Mr. Shenault	13:37:13
14	refused to sell drugs for Watts?	13:37:16
15	MR. BAZAREK: Object to the form of the	13:37:19
16	question, foundation, mischaracterizes the	13:37:20
17	evidence in the record in this case.	13:37:21
18	MR. MICHALIK: Join.	13:37:24
19	MR. SCHALKA: Join.	13:37:24
20	MR. KOSOKO: Join.	13:37:24
21	A Fifth Amendment.	13:37:24
22	Q Did you know that Angelo Shenault refused	13:37:25
23	to sell drugs for Ronald Watts?	13:37:27
24	A Fifth Amendment.	13:37:29

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

349

1	MR. KOSOKO: Objection to the form of the	13:37:31
2	question, argumentative, foundation.	13:37:32
3	Q Did you ever learn that residents at the	13:37:37
4	Ida B. Wells home were selling drugs for Ronald	13:37:44
5	Watts?	13:37:47
6	MR. KOSOKO: Objection to the form of the	13:37:48
7	question, argumentative.	13:37:50
8	A Fifth Amendment.	13:37:51
9	Q Did you ever hear that residents of the	13:37:51
10	Ida B. Wells home were selling drugs for Ronald	13:37:53
11	Watts?	13:37:55
12	MR. KOSOKO: Objection to the form of the	13:37:56
13	question, foundation.	13:37:58
14	A Fifth Amendment.	13:37:59
15	Q Did you ever hear that residents of the	13:38:00
16	Ida B. Wells homes were falsely charged with drug	13:38:03
17	possession because they didn't tell Ronald Watts	13:38:07
18	where he could find drugs?	13:38:08
19	MR. KOSOKO: Objection to the form of the	13:38:10
20	question.	13:38:12
21	A Fifth Amendment.	13:38:13
22	Q Did you ever learn that residents of the	13:38:13
23	Ida Wells homes were falsely charged with	13:38:16
24	possessing drugs because they did not tell Ronald	13:38:19

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

350

1	Watts where he could find drugs?	13:38:21
2	MR. KOSOKO: Objection to form of the	13:38:23
3	question.	13:38:25
4	A Fifth Amendment.	13:38:25
5	Q Is the police report that we've marked as	13:38:25
6	Exhibit 38 a true and accurate report?	13:38:39
7	MR. MICHALIK: Objection; foundation.	13:38:41
8	MR. SCHALKA: Join.	13:38:43
9	MR. BAZAREK: Join.	13:38:44
10	MR. KOSOKO: Join.	13:38:45
11	A Fifth Amendment.	13:38:46
12	MR. FLAXMAN: This is going to be	13:39:01
13	Exhibit 39.	13:39:02
14	(Mohammed Deposition Exhibit 39 marked for	13:39:11
15	identification and attached to the transcript.)	13:39:11
16	MR. FLAXMAN: I'm sorry. Let me look at	13:39:13
17	that one to make sure I gave you the right copy.	13:39:14
18	I did. I'm sorry about that.	13:39:18
19	BY MR. FLAXMAN:	13:39:18
20	Q The first page of Exhibit 39 has a Bates	13:39:34
21	label that's partially cut off, City-BG-032627.	13:39:37
22	And there's one report followed by another report	13:39:47
23	in this exhibit. Do you see that?	13:39:49
24	A Yes.	13:39:53

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

351

1	Q Do you recognize the first report in this	13:39:53
2	exhibit as the arrest report of Angelo Shenault	13:39:58
3	from November 26th, 2006?	13:40:01
4	A That's what it says.	13:40:03
5	Q And you recognize this as an official	13:40:05
6	report of the Chicago Police Department?	13:40:09
7	A That's what it says.	13:40:10
8	Q Okay. Do you see your name on this	13:40:13
9	report?	13:40:15
10	A Yes.	13:40:15
11	Q And you're listed as one of the assisting	13:40:16
12	arresting officers on page 5 of this arrest	13:40:19
13	report?	13:40:22
14	A Yes.	13:40:22
15	Q Okay. Were you involved in the arrest of	13:40:22
16	Angelo Shenault on November 26th, 2006?	13:40:25
17	A Take the Fifth.	13:40:27
18	Q Did you write your name on the report --	13:40:29
19	on the arrest report of Angelo Shenault from	13:40:35
20	November 26th, 2006?	13:40:37
21	A Take the Fifth.	13:40:38
22	Q Was Ronald Watts present for the arrest of	13:40:39
23	Angelo Shenault on November 26th, 2006?	13:40:56
24	MR. KOSOKO: Objection to the form of the	13:40:59

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

352

1	question and foundation.	13:41:00
2	A Take the Fifth.	13:41:01
3	Q Do you see on the third page that Officer	13:41:02
4	Gonzalez is listed as the attesting officer on	13:41:15
5	this report?	13:41:19
6	A Yes.	13:41:19
7	Q Did you ever learn that Officer Gonzalez	13:41:19
8	falsely arrested Angelo Shenault on November 26th,	13:41:25
9	2006?	13:41:27
10	MR. BAZAREK: Object to the form of the	13:41:28
11	question, foundation, and it mischaracterizes the	13:41:30
12	evidence in the record in this case.	13:41:33
13	MR. MICHALIK: Join.	13:41:36
14	MR. SCHALKA: Join.	13:41:36
15	MR. KOSOKO: Join.	13:41:37
16	A Take the Fifth.	13:41:37
17	Q Did you ever hear that Officer Gonzalez	13:41:38
18	falsely arrested Angelo Shenault on November 26th,	13:41:41
19	2006?	13:41:43
20	MR. BAZAREK: Object to the form of the	13:41:44
21	question, foundation, mischaracterizes the	13:41:45
22	evidence in the record in this case.	13:41:47
23	MR. MICHALIK: Join.	13:41:49
24	MR. SCHALKA: Join.	13:41:49

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

353

1	MR. KOSOKO: Join.	13:41:50
2	A Take the Fifth.	13:41:50
3	Q Did you ever learn that Officer Gonzalez	13:41:52
4	framed Angelo Shenault on November 26th, 2006?	13:41:55
5	MR. BAZAREK: Object to the form of the	13:41:59
6	question, foundation, mischaracterizes the	13:42:00
7	evidence in the record in this case.	13:42:02
8	MR. MICHALIK: Join.	13:42:05
9	MR. SCHALKA: Join.	13:42:05
10	MR. KOSOKO: Join.	13:42:05
11	A Take the Fifth.	13:42:06
12	Q Did you ever hear that Officer Gonzalez	13:42:07
13	framed Angelo Shenault on November 26th, 2006?	13:42:09
14	MR. BAZAREK: Object to the form of the	13:42:12
15	question, foundation, mischaracterizes the	13:42:14
16	evidence in the record in this case.	13:42:16
17	MR. MICHALIK: Join.	13:42:19
18	MR. SCHALKA: Join.	13:42:19
19	MR. KOSOKO: Join.	13:42:20
20	A Take the Fifth.	13:42:20
21	Q Did you ever learn that Officer Gonzalez	13:42:21
22	attested to a police report containing false	13:42:24
23	information about the arrest of Angelo Shenault on	13:42:26
24	November 26th, 2006?	13:42:28

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

354

1	MR. BAZAREK: Object to the form of the	13:42:30
2	question, foundation, mischaracterizes the	13:42:31
3	evidence in the record in this case.	13:42:33
4	MR. MICHALIK: Join.	13:42:35
5	MR. SCHALKA: Join.	13:42:35
6	MR. KOSOKO: Join.	13:42:36
7	A Take the Fifth.	13:42:36
8	Q Did you ever hear that Officer Gonzalez	13:42:37
9	swore to a police report that contained false	13:42:40
10	information about the arrest of Angelo Shenault on	13:42:42
11	November 26th, 2006?	13:42:44
12	MR. BAZAREK: Object to the form of the	13:42:46
13	question, foundation, mischaracterizes the	13:42:47
14	evidence in the record in this case.	13:42:49
15	MR. MICHALIK: Join.	13:42:53
16	MR. SCHALKA: Join.	13:42:53
17	MR. KOSOKO: Join.	13:42:53
18	A Take the Fifth.	13:42:53
19	Q Were you involved in falsely arresting	13:42:54
20	Angelo Shenault on November 26th, 2006?	13:42:57
21	MR. BAZAREK: Object to the form of the	13:42:59
22	question, foundation, mischaracterizes the	13:43:00
23	evidence in the record in this case.	13:43:02
24	MR. MICHALIK: Join.	13:43:04

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

355

1	MR. SCHALKA: Join.	13:43:04
2	MR. KOSOKO: Join.	13:43:04
3	A Take the Fifth.	13:43:04
4	Q Were you involved in framing Angelo	13:43:06
5	Shenault on November 26th, 2006?	13:43:08
6	MR. BAZAREK: Object to the form of the	13:43:10
7	question, foundation, mischaracterizes the	13:43:11
8	evidence in the record in this case.	13:43:13
9	MR. MICHALIK: Join.	13:43:15
10	MR. KOSOKO: Join.	13:43:16
11	MR. SCHALKA: Join.	13:43:16
12	A Take the Fifth.	13:43:16
13	Q On November 26th, 2006, at about	13:43:18
14	11:55 a.m., did you see Angelo Shenault discard to	13:43:32
15	the ground a Cheetos chip bag?	13:43:34
16	A Take the Fifth.	13:43:36
17	Q Is the statement in the police report that	13:43:39
18	Angelo Shenault discarded to the ground a Cheetos	13:43:41
19	chip bag a true statement?	13:43:44
20	MR. BAZAREK: Object to the form of the	13:43:46
21	question and foundation.	13:43:47
22	MR. MICHALIK: Join.	13:43:49
23	MR. SCHALKA: Join.	13:43:49
24	MR. KOSOKO: Join.	13:43:49

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

356

1	A Take the Fifth.	13:43:49
2	Q Did you find suspect narcotics in a Cheeto	13:43:50
3	chip bag that Mr. Shenault threw to the ground on	13:43:55
4	October -- excuse me -- on November 26th, 2006?	13:43:58
5	A Take the Fifth.	13:44:01
6	Q Was the statement that police officers	13:44:02
7	found narcotics in a Cheeto chip bag that	13:44:04
8	Mr. Shenault threw to the ground on November 26th,	13:44:08
9	2006, a true statement?	13:44:10
10	MR. BAZAREK: Object to the form of the	13:44:11
11	question, foundation.	13:44:12
12	MR. MICHALIK: Join.	13:44:14
13	MR. SCHALKA: Join.	13:44:14
14	MR. KOSOKO: Join.	13:44:14
15	A Take the Fifth.	13:44:14
16	Q Did you search Mr. Shenault's person on	13:44:14
17	November 26th, 2006?	13:44:29
18	A Take the Fifth.	13:44:30
19	Q Did you see another officer search Angelo	13:44:31
20	Shenault's person on November 26th, 2006?	13:44:34
21	A Take the Fifth.	13:44:37
22	Q Did you hear Officer Gonzalez on	13:44:47
23	October -- excuse me. Let me start over.	13:44:50
24	Did you hear Officer Gonzalez on	13:44:53

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

357

1	November 26, 2006, ask Angelo Shenault where his	13:44:54
2	stash was?	13:44:58
3	A Take the Fifth.	13:45:00
4	Q And you believe that answering questions	13:45:01
5	about what Officer Gonzalez said would subject you	13:45:04
6	to criminal prosecution?	13:45:06
7	MR. PALLES: Objection --	13:45:09
8	MR. BAZAREK: Objection --	13:45:10
9	MR. PALLES: -- privilege -- attorney-	13:45:10
10	client privilege/work product privilege.	13:45:13
11	Instruct the witness not to answer.	13:45:13
12	Q Are you going to follow your attorney's	13:45:17
13	instruction?	13:45:18
14	A Yes.	13:45:18
15	Q On November 26th, 2006, did you hear	13:45:19
16	Angelo Shenault say to Officer Gonzalez that he	13:45:22
17	did not have a stash?	13:45:24
18	A Take the Fifth.	13:45:26
19	Q On November 26th, 2006, did you ask Angelo	13:45:31
20	Shenault who was selling drugs in the area?	13:45:35
21	A Take the Fifth.	13:45:38
22	Q On November 26th, 2006, did you see	13:45:43
23	Officer Gonzalez searching through a pile of	13:45:47
24	leaves across the street from Angelo Shenault?	13:45:49

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

358

1	A Take the Fifth.	13:45:53
2	Q On November 26th, 2006, did you see	13:45:54
3	Officer Gonzalez return from across the street and	13:46:04
4	show a bag of drugs contain -- let me start that	13:46:07
5	one over.	13:46:11
6	On November 26th, 2006, did you see	13:46:12
7	Officer Gonzalez cross the street to Mr. Shenault	13:46:15
8	and show Mr. Shenault a bag containing drugs?	13:46:20
9	A Take the Fifth.	13:46:23
10	Q Did you ever learn that on October --	13:46:24
11	starting over.	13:46:29
12	Did you ever learn that on November 26th,	13:46:29
13	2006, Officer Jones stole more than \$100 from	13:46:33
14	Angelo Shenault?	13:46:37
15	MR. BAZAREK: Object to the form of the	13:46:37
16	question, foundation, mischaracterizes the	13:46:39
17	evidence in the record in this case.	13:46:42
18	MR. MICHALIK: Join.	13:46:45
19	MR. SCHALKA: Join.	13:46:45
20	MR. KOSOKO: Join.	13:46:45
21	A Take the Fifth.	13:46:45
22	Q Did you take the money that Officer Jones	13:46:47
23	stole from Angelo Shenault and buy sandwiches from	13:46:49
24	Subway for yourself and your colleagues?	13:46:52

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

359

1	MR. BAZAREK: Object to the form of the	13:46:54
2	question, foundation, mischaracterizes the	13:46:56
3	evidence in the record in this case.	13:46:58
4	MR. MICHALIK: Join.	13:47:00
5	MR. SCHALKA: Join.	13:47:00
6	MR. KOSOKO: Join.	13:47:01
7	A Take the Fifth.	13:47:01
8	Q Did you give the lunch from Subway to your	13:47:03
9	colleagues and say that it was compliments of	13:47:06
10	Mr. Shenault?	13:47:10
11	MR. BAZAREK: Object to the form of the	13:47:11
12	question, foundation, mischaracterizes the	13:47:12
13	evidence in the record in this case.	13:47:13
14	MR. MICHALIK: Join.	13:47:15
15	MR. SCHALKA: Join.	13:47:15
16	MR. KOSOKO: Join.	13:47:15
17	A Take the Fifth.	13:47:16
18	Q Have you ever bought sandwiches from	13:47:24
19	Subway with money that was stolen from someone who	13:47:26
20	was arrested by you or one of your team members?	13:47:29
21	MR. BAZAREK: Object to the form of the	13:47:31
22	question, foundation, mischaracterizes the	13:47:32
23	evidence in the record in this case.	13:47:33
24	MR. MICHALIK: Join.	13:47:37

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

360

1	MR. SCHALKA: Join.	13:47:37
2	MR. KOSOKO: Join.	13:47:37
3	A Take the Fifth.	13:47:37
4	Q Turning to the end of Exhibit 39, after	13:47:49
5	the arrest report do you see a vice case report	13:47:54
6	from the Chicago Police Department?	13:47:56
7	A Yes.	13:47:57
8	Q And is that a vice case report relating to	13:47:58
9	the arrest of Angelo Shenault --	13:48:03
10	A Yes, it is.	13:48:05
11	Q -- with a -- okay. And -- and let me ask	13:48:06
12	it again just to make sure.	13:48:08
13	Is this an arrest -- is this a vice case	13:48:10
14	report about the arrest of Angelo Shenault with a	13:48:14
15	birth year 1963 for an arrest on November 26th of	13:48:17
16	2006?	13:48:21
17	A That's what it says.	13:48:21
18	Q Okay. And is your name on this report?	13:48:23
19	MR. PALLE: Yeah, just the -- just the	13:48:26
20	vice case report now, not the -- not on the arrest	13:48:35
21	report.	13:48:38
22	THE WITNESS: Okay.	13:48:38
23	MR. PALLE: Just the vice case report.	13:48:39
24	THE WITNESS: Right. Right here. Okay.	13:48:42

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

361

1	A Yes.	13:48:44
2	Q Do you see in Box 46 that Officer Bolton	13:48:57
3	is listed as a reporting officer?	13:49:00
4	A Yes.	13:49:06
5	Q Are you able to tell whether that's	13:49:06
6	Officer Bolton's signature underneath his name?	13:49:08
7	A No, I couldn't.	13:49:09
8	Q Do you see Ronald Watts' name in the box	13:49:11
9	for "Supervisor Approving"?	13:49:12
10	A Yes.	13:49:14
11	Q And are you able to tell whether that's	13:49:15
12	Ronald Watts' signature underneath his name?	13:49:18
13	MR. KOSOKO: Objection; foundation.	13:49:20
14	A No, I couldn't.	13:49:21
15	Q Did you ever learn that Officer Bolton	13:49:24
16	falsely arrested Angelo Shenault on November 26th,	13:49:27
17	2006?	13:49:29
18	MR. BAZAREK: Object to the form of the	13:49:30
19	question, foundation, mischaracterizes the	13:49:31
20	evidence in the record in this case.	13:49:33
21	MR. MICHALIK: Join.	13:49:37
22	MR. SCHALKA: Join.	13:49:37
23	MR. KOSOKO: Join.	13:49:37
24	A Take the Fifth.	13:49:37

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

362

1	Q Did you ever hear that Officer Bolton	13:49:38
2	falsely arrested Angelo Shenault on November 26th,	13:49:40
3	2006?	13:49:43
4	MR. BAZAREK: Object to the form of the	13:49:44
5	question, foundation, mischaracterizes the	13:49:44
6	evidence in the record in this case.	13:49:46
7	MR. FLAXMAN: Join.	13:49:46
8	MR. SCHALKA: Join.	13:49:46
9	MR. KOSOKO: Join.	13:49:51
10	A Take the Fifth.	13:49:51
11	Q Did you ever learn that Officer Bolton	13:49:53
12	framed Angelo Shenault on November 26th, 2006?	13:49:55
13	MR. BAZAREK: Object to the form of the	13:49:57
14	question, foundation, mischaracterizes the	13:49:58
15	evidence in the record in this case.	13:49:59
16	MR. MICHALIK: Join.	13:50:01
17	MR. SCHALKA: Join.	13:50:01
18	MR. KOSOKO: Join.	13:50:02
19	A Take the Fifth.	13:50:02
20	Q Did you ever hear that Officer Bolton	13:50:04
21	framed Angelo Shenault on November 26th, 2006?	13:50:06
22	MR. BAZAREK: Object to the form of the	13:50:10
23	question, foundation, mischaracterizes the	13:50:11
24	evidence in the record in this case.	13:50:15

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

363

1	MR. MICHALIK: Join.	13:50:17
2	MR. SCHALKA: Join.	13:50:17
3	MR. KOSOKO: Join.	13:50:17
4	A Take the Fifth.	13:50:17
5	Q Did you ever learn that Officer Bolton	13:50:20
6	signed a police report containing false	13:50:22
7	information about the arrest of Angelo Shenault on	13:50:24
8	November 26th, 2006?	13:50:27
9	MR. BAZAREK: Object to the form of the	13:50:28
10	question, foundation, mischaracterizes the	13:50:28
11	evidence in the record in this case.	13:50:30
12	MR. MICHALIK: Join.	13:50:33
13	MR. SCHALKA: Join.	13:50:33
14	MR. KOSOKO: Join.	13:50:33
15	A Take the Fifth.	13:50:33
16	Q Did you ever hear that Officer Bolton	13:50:35
17	signed a police report containing false	13:50:38
18	information about the arrest of Angelo Shenault on	13:50:40
19	November 26th, 2006?	13:50:42
20	MR. BAZAREK: Object to the form of the	13:50:44
21	question, foundation, mischaracterizes the	13:50:46
22	evidence in the record in this case.	13:50:48
23	MR. MICHALIK: Join.	13:50:51
24	MR. KOSOKO: Join.	13:50:51

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

364

1	MR. SCHALKA: Join.	13:50:52
2	A Take the Fifth.	13:50:52
3	Q Do you know what a premise check of a park	13:50:53
4	area is?	13:50:55
5	A Yes.	13:50:56
6	Q What is it?	13:50:57
7	A Checking the area of the park.	13:50:58
8	Q Checking it for what?	13:51:01
9	A For whatever. I don't -- just checking	13:51:03
10	it, checking the park.	13:51:09
11	Q Okay. Did you -- were you involved in a	13:51:10
12	premise check before the arrest of Angelo Shenault	13:51:14
13	on November 26th, 2006?	13:51:17
14	A Take the Fifth.	13:51:19
15	Q Did you recover United States currency	13:51:20
16	from Angelo Shenault on November 26th, 2006?	13:51:26
17	A Take the Fifth.	13:51:29
18	Q Did another police officer recover \$51 in	13:51:31
19	United States currency from Angelo Shenault on	13:51:36
20	November 26th, 2006?	13:51:38
21	MR. BAZAREK: Object to the form of the	13:51:40
22	question, foundation.	13:51:41
23	MR. MICHALIK: Join.	13:51:42
24	MR. KOSOKO: Join.	13:51:42

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

365

1	MR. SCHALKA: Join.	13:51:43
2	A Take the Fifth.	13:51:43
3	Q Is the statement in the police report that	13:51:44
4	officers recovered from Mr. Shenault \$51 in	13:51:47
5	US currency a true statement?	13:51:50
6	MR. BAZAREK: Object to the form of the	13:51:52
7	question, foundation.	13:51:53
8	MR. MICHALIK: Join.	13:51:54
9	MR. SCHALKA: Join.	13:51:54
10	MR. KOSOKO: Join.	13:51:54
11	A Take the Fifth.	13:51:54
12	MR. FLAXMAN: Give me one minute but	13:52:24
13	I think I'm done.	13:52:26
14	Are we going off? Do you want to go off?	13:52:35
15	MR. BAZAREK: Yeah, just for a second.	13:52:35
16	THE VIDEOGRAPHER: Off the record, 1:52.	13:52:38
17	(A recess was taken from 1:52 p.m. to	13:52:39
18	1:58 p.m.)	13:58:17
19	THE VIDEOGRAPHER: Back on the record, 1:58.	13:58:37
20	MR. RAUSCHER: We had two more individual	13:59:04
21	cases left on the list.	13:59:05
22	We have agreed to postpone questions about	13:59:07
23	Lionel White, Sr.'s case, so we'll do Anthony	13:59:09
24	McDaniels.	13:59:12

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

366

1	We have some CRs we're going to go	13:59:13
2	through, and then, at least from plaintiffs, we'll	13:59:15
3	be done for today, and then we'll get another date	13:59:17
4	a different time.	13:59:18
5	MR. PALLE: Okay.	13:59:19
6	EXAMINATION BY COUNSEL FOR THE LOEVY PLAINTIFFS	13:59:21
7	BY MR. RAUSCHER:	13:59:21
8	Q Do you know who Anthony McDaniels is?	13:59:22
9	A No.	13:59:24
10	Q Did you know a guy named Butch, nicknamed	13:59:24
11	Butch, when you were working Ida B. Wells?	13:59:27
12	A No.	13:59:30
13	Q I'm going to just hand you over this iPad	13:59:31
14	that's got a -- I'm going to show you a picture	13:59:36
15	that's marked DO-Joint 005768.	13:59:37
16	MR. PALLE: Good.	13:59:44
17	Q Do you recognize the man in that picture?	13:59:49
18	A No, I don't.	13:59:50
19	Q Did you plant a gun on Anthony McDaniels	13:59:53
20	on November 21st, 2008?	14:00:06
21	MR. BAZAREK: Object to the form of the	14:00:07
22	question, foundation, mischaracterizes the	14:00:10
23	evidence in the record in this case.	14:00:15
24	A Fifth Amendment.	14:00:18

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

367

1	Q Did you ever drive a civilian's car while	14:00:18
2	you were on duty and working as a tactical team	14:00:28
3	officer?	14:00:33
4	A Fifth Amendment.	14:00:34
5	MR. KOSOKO: Objection to the form of the	14:00:35
6	question.	14:00:36
7	MR. BAZAREK: Further objection, it's	14:00:37
8	vague and ambiguous.	14:00:40
9	MR. MICHALIK: Join.	14:00:41
10	A (Continuing.) Fifth Amendment.	14:00:42
11	Q Did you ever drive -- and I don't --	14:00:43
12	I don't -- so -- well -- after arresting someone	14:00:48
13	or after one of your team members arrested	14:00:55
14	someone, did you ever take that person's car and	14:00:59
15	drive it to the police station?	14:01:01
16	A Fifth -- Fifth Amendment.	14:01:02
17	Q Do you know if the City of Chicago had a	14:01:03
18	policy on towing cars?	14:01:07
19	A Yes.	14:01:11
20	Q And what do you know about that policy?	14:01:12
21	A I don't remember.	14:01:15
22	Q Did you ever read it?	14:01:16
23	A I'm sure I did.	14:01:17
24	Q And do -- did you ever receive training on	14:01:18

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

368

1 the policy about towing cars? 14:01:20

2 A Yes. 14:01:22

3 Q Do you remember what that training was? 14:01:23

4 A No, I don't. 14:01:24

5 Q Do you remember when you received that 14:01:27

6 training? 14:01:28

7 A When I was in the academy. 14:01:28

8 Q Did you ever go to any training classes 14:01:29

9 outside of the academy? 14:01:31

10 A I can't remember. I -- I can't remember. 14:01:32

11 Q Did you ever receive any formal training 14:01:40

12 other than what you got at the academy? 14:01:43

13 A Yes. 14:01:44

14 Q Did you ever receive any formal training 14:01:48

15 on policies relating to towing cars outside of the 14:01:50

16 academy? 14:01:53

17 A I -- I don't recall. 14:01:54

18 Q Did you ever receive any training on 14:01:55

19 writing police reports outside of the academy? 14:01:59

20 A Yes. 14:02:01

21 Q Tell me about that training. Tell me what 14:02:02

22 you remember about that. 14:02:04

23 A I don't remember. 14:02:05

24 Q Do you -- 14:02:05

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

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

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

371

1	A Take the Fifth.	14:04:55
2	Q Were you Beat 264C -- I'm sorry.	14:04:55
3	Were you Beat 264A on November 21st, 2008?	14:05:01
4	A Yes.	14:05:04
5	Q Did you relocate Mr. McDaniels' car to the	14:05:17
6	Second District on November 21st, 2008?	14:05:25
7	A Take the Fifth.	14:05:27
8	Q Did you see anybody plant a gun on	14:05:28
9	Mr. McDaniels November 21st, 2008?	14:05:38
10	A Take the Fifth.	14:05:40
11	Q You never heard Mr. McDaniels say that he	14:05:40
12	had a gun on November 21st, 2008, did you?	14:05:45
13	A Take the Fifth.	14:05:48
14	Q Mr. McDaniels never stated, "I bought the	14:05:53
15	gun on the street for protection, and I wanted to	14:05:56
16	get the gun out of my car"?	14:05:58
17	A Take the Fifth.	14:05:59
18	Q You never saw Mr. McDaniels commit any	14:06:01
19	traffic or speeding violations at all on	14:06:07
20	November 21st, 2008?	14:06:10
21	A Take the Fifth.	14:06:11
22	Q You stopped Mr. McDaniels while he was	14:06:17
23	on foot outside of his car on November 21st, 2008?	14:06:19
24	MR. BAZAREK: Object to the form of the	14:06:22

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

372

1	question, foundation, mischaracterizes the	14:06:24
2	evidence in the record in this case.	14:06:28
3	MR. RAUSCHER: What am I missing on	14:06:31
4	foundation? I just asked if he did it.	14:06:32
5	MR. BAZAREK: I've stated my objection.	14:06:34
6	MR. RAUSCHER: I know. I want to see if	14:06:36
7	I can cure the foundation. So what's wrong with	14:06:39
8	the foundation of that?	14:06:41
9	MR. BAZAREK: I -- I -- you have my	14:06:41
10	objection.	14:06:42
11	MR. RAUSCHER: I think I'm allowed to ask	14:06:43
12	for clarification on a form or foundation	14:06:44
13	objection.	14:06:46
14	MR. BAZAREK: I'm going to stand by --	14:06:46
15	I'm going to stand by the objection.	14:06:46
16	MR. RAUSCHER: Okay. Well, I will take	14:06:48
17	that as that there's nothing wrong with the	14:06:50
18	foundation.	14:06:51
19	MR. BAZAREK: And I've already stated my	14:06:52
20	objection.	14:06:53
21	BY MR. RAUSCHER:	14:06:54
22	Q Can you answer the question, please?	14:06:58
23	A Take the Fifth.	14:07:00
24	MR. RAUSCHER: We're going to mark	14:07:01

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

373

1 Exhibit 41, which is PL Joint 038414 to 038416. 14:07:02
2 (Mohammed Deposition Exhibit 41 marked for 14:07:20
3 identification and attached to the transcript.) 14:07:48
4 MR. BAZAREK: That's a clawback. I gave 14:07:48
5 it to you. 14:07:50
6 MR. RAUSCHER: You can keep it, actually, 14:07:51
7 if you want it. 14:07:53
8 Thank you. 14:07:59
9 BY MR. RAUSCHER: 14:08:00
10 Q Have you had a chance to review this 14:08:38
11 affidavit? 14:08:39
12 A Yes. 14:08:39
13 Q This is an affidavit from Anthony 14:08:40
14 McDaniels; is that correct? 14:08:43
15 A Yes. 14:08:45
16 Q Is there anything in here that you 14:08:46
17 disagree with? 14:08:49
18 A Take the Fifth. 14:08:50
19 Q Paragraph 7 states that you took \$638 from 14:08:51
20 Anthony McDaniels on November 21st, 2008. 14:08:57
21 Is that true? 14:09:00
22 A Take the Fifth. 14:09:00
23 Q Paragraph 6 says that "Mohammed, Nichols, 14:09:01
24 Sergeant Watts, and other members of Watts' 14:09:12

PLANET DEPOS
888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

374

1	tactical team had stopped me several times over	14:09:15
2	the last couple of years and taken money from me."	14:09:18
3	Do you see that?	14:09:21
4	A I see it.	14:09:21
5	Q Is that true?	14:09:22
6	MR. BAZAREK: Object to the form of the	14:09:23
7	question, foundation, mischaracterizes the	14:09:24
8	evidence in the record in this case.	14:09:25
9	MR. KOSOKO: Join.	14:09:28
10	MR. MICHALIK: Join.	14:09:29
11	A Fifth Amendment.	14:09:31
12	Q Paragraph 3 -- well, actually, paragraph 2	14:09:36
13	says "On November 21st, 2008, I exited 5613 South	14:09:39
14	Prairie Ave."	14:09:43
15	Do you see that?	14:09:45
16	A I see it.	14:09:45
17	Q Is that true?	14:09:46
18	A Take the Fifth Amendment.	14:09:47
19	Q Paragraph 3 says "As I was approaching my	14:09:49
20	1999 Ford Taurus, Officers Kallatt Mohammed and	14:09:52
21	Douglas Nichols approached me."	14:09:57
22	Do you see that?	14:10:00
23	A Take the Fifth.	14:10:00
24	Q You take -- do you agree that I read that	14:10:00

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

375

1	correctly?	14:10:03
2	A You did.	14:10:04
3	Q And do you -- is that a true statement?	14:10:04
4	A I take the Fifth.	14:10:07
5	MR. BAZAREK: Object to the form of the	14:10:08
6	question, foundation, mischaracterizes the	14:10:10
7	evidence in the record in this case.	14:10:11
8	MR. MICHALIK: Join.	14:10:13
9	MR. KOSOKO: Join.	14:10:14
10	MR. RAUSCHER: How does asking him if a	14:10:18
11	statement in an affidavit is true mischaracterize	14:10:20
12	evidence?	14:10:25
13	MR. BAZAREK: I'm not crediting	14:10:26
14	Mr. McDaniels', a convicted murderer's, testimony	14:10:29
15	or affidavits.	14:10:32
16	MR. RAUSCHER: You don't have to credit	14:10:32
17	it. It doesn't mean I'm mischaracterizing	14:10:35
18	evidence with the question. You're not waiving	14:10:36
19	that objection by not making that objection.	14:10:37
20	I think it's interfering with the deposition.	14:10:39
21	MR. BAZAREK: He's -- he's answering your	14:10:41
22	questions.	14:10:43
23	MR. MICHALIK: You're also asking him	14:10:43
24	questions about other officers and conduct of	14:10:45

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

376

1	other officers when you know that the witness is	14:10:47
2	going to assert the Fifth Amendment.	14:10:49
3	So to the extent that you have any	14:10:51
4	intention of using or asserting a negative	14:10:53
5	inference or asking for a negative inference	14:10:56
6	against anyone other than the witness, it's an	14:11:00
7	improper question and -- improper knowing that	14:11:02
8	he's going to take the Fifth Amendment.	14:11:04
9	MR. BAZAREK: And for all these questions	14:11:06
10	over the past couple days, there wouldn't be a	14:11:07
11	good faith basis for -- for doing that.	14:11:10
12	MR. RAUSCHER: If there's an affidavit	14:11:12
13	that says him and another officer did something	14:11:12
14	together, I'm entitled to ask a question if that's	14:11:17
15	true. It's not characterizing anything. It's	14:11:19
16	asking a question.	14:11:22
17	BY MR. RAUSCHER:	14:11:30
18	Q Did you hear Officer Nichols talk to	14:11:33
19	Anthony McDaniels on November 21st, 2008?	14:11:35
20	A Take the Fifth.	14:11:38
21	Q Is Anthony McDaniels telling the truth	14:11:39
22	when he says that you were with Officer Nichols on	14:11:41
23	November 21st, 2008?	14:11:44
24	MR. BAZAREK: Object to the form of the	14:11:45

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

377

1	question, also calls for speculation.	14:11:46
2	A Take the Fifth.	14:11:49
3	Q Would you have to speculate as to whether	14:11:55
4	you were with another person? Or would you know	14:11:57
5	that?	14:12:00
6	MR. KOSOKO: I'm going to object just to	14:12:06
7	the form of the question, just ambiguous, which --	14:12:08
8	what do you mean by that?	14:12:12
9	THE WITNESS: What -- what are you	14:12:13
10	asking me.	14:12:14
11	Q Well, we're in the same -- we're together	14:12:15
12	right now; right? You're -- you're with the	14:12:17
13	people in this room?	14:12:18
14	A Yes.	14:12:19
15	Q Would you agree that you -- as a person	14:12:19
16	and as a police officer -- you would know the	14:12:22
17	other people you were with?	14:12:23
18	A Yes.	14:12:25
19	Q Look at Paragraph No. 10 in the affidavit.	14:12:32
20	A (Complied.)	14:12:36
21	Q It states, "Mohammed then said, 'We can	14:12:36
22	make this go away if you give us something.'	14:12:40
23	"I told him, 'I ain't got nothing to give	14:12:44
24	you.'"	14:12:46

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

378

1	Did that conversation happen?	14:12:47
2	A I take the Fifth.	14:12:49
3	Q Was anyone other than you and Officer	14:12:56
4	Nichols at the scene of Anthony McDaniels' arrest	14:13:00
5	on November 21st, 2008?	14:13:02
6	MR. BAZAREK: Object to the form of the	14:13:03
7	question, foundation, mischaracterizes the	14:13:04
8	evidence in the record in this case.	14:13:06
9	MR. MICHALIK: Join.	14:13:09
10	MR. PALLE: I'm going to join in	14:13:10
11	that one.	14:13:12
12	MR. KOSOKO: I'm going to join, too.	14:13:13
13	A Take the Fifth.	14:13:16
14	Q Who was at the scene of Mr. McDaniels'	14:13:17
15	arrest on November 21st, 2008?	14:13:19
16	A Take the Fifth.	14:13:20
17	Q Do you see numbered paragraph 14?	14:13:21
18	A Yes.	14:13:37
19	Q It says Mr. McDaniels -- it's	14:13:38
20	Mr. McDaniels saying he was innocent of the	14:13:40
21	charges?	14:13:41
22	Do you see that?	14:13:41
23	A Yes.	14:13:42
24	Q Is he telling the truth?	14:13:42

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

379

1	MR. BAZAREK: Object to the form of the	14:13:44
2	question, foundation. Also. Calls for	14:13:46
3	speculation.	14:13:49
4	A Take the Fifth.	14:13:49
5	Q You never saw Mr. McDaniels in a moving	14:13:50
6	car on November 21st, 2008?	14:14:16
7	MR. BAZAREK: Object to the form of the	14:14:18
8	question, also foundation.	14:14:20
9	A Take the Fifth.	14:14:22
10	Q You never heard Mr. McDaniels yelling "Go,	14:14:22
11	go, go" as he jumped in a gold Taurus on	14:14:28
12	November 21st, 2008?	14:14:31
13	A Take the Fifth.	14:14:32
14	Q You didn't hear a call on the radio saying	14:14:33
15	that Mr. McDaniels had been arrested?	14:14:40
16	A Take the Fifth.	14:14:43
17	Q You've looked at some excerpts from CRs	14:14:43
18	today?	14:15:03
19	A No.	14:15:04
20	Q Do you recall that?	14:15:04
21	A Do I recall?	14:15:05
22	Q Looking at excerpts of CRs today, pages	14:15:06
23	from CRs.	14:15:09
24	A No.	14:15:10

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

380

1	Q	Do you know what a CR is?	14:15:11
2	A	Case review.	14:15:16
3	Q	Are they citizen -- like citizen	14:15:19
4		complaints, for example?	14:15:21
5	A	Yes.	14:15:22
6	Q	The complaint register?	14:15:22
7	A	Right. Uh-huh.	14:15:24
8	Q	Were you ever disciplined as a City of	14:15:26
9		Chicago police officer?	14:15:31
10	A	Don't remember.	14:15:33
11	Q	Do you recall getting some CRs filed	14:15:34
12		against you?	14:15:40
13	A	Don't remember but probably.	14:15:41
14	Q	You don't remember if -- the specifics or	14:15:44
15		you don't remember if there were any?	14:15:49
16	A	I don't remember specifics.	14:15:50
17	Q	Do you remember at least three CRs	14:15:51
18		relating to alleged domestic violence?	14:15:55
19	MR. PALLEs:	You know, for the record,	14:16:01
20		I'm going to object as beyond the permissible	14:16:04
21		scope of discovery. It's un- -- it's irrelevant	14:16:09
22		to any claim or defense in the case. It's not	14:16:13
23		calculated to lead to admissible evidence by	14:16:16
24		reason of Federal Rule of Evidence 404.	14:16:19

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

381

1	And, therefore, I'm instructing him not to	14:16:24
2	answer.	14:16:28
3	MR. RAUSCHER: That is definitely not a	14:16:31
4	proper instruction. I would be happy to talk to	14:16:32
5	you -- in my opinion.	14:16:34
6	MR. PALLES: Yeah.	14:16:36
7	MR. RAUSCHER: I would be happy to talk to	14:16:36
8	you off the record now to see if we can work it	14:16:38
9	out while he's here.	14:16:40
10	MR. PALLES: Well, I'll tell you what. We	14:16:41
11	can talk about it because -- let me add, in	14:16:43
12	addition to that, that in numerous interrogatory	14:16:44
13	answers that you've given in this case relating to	14:16:48
14	numerous plaintiffs who have been alleged -- who	14:16:52
15	are alleging that they were falsely accused of	14:16:56
16	being in possession, selling, or using drugs, you	14:16:59
17	have -- in response to interrogatory answers --	14:17:04
18	stated "Irrelevant" and refused to answer further.	14:17:07
19	So those appear to be the rules that you're	14:17:12
20	playing by.	14:17:15
21	MR. RAUSCHER: So they're not equivalent	14:17:16
22	and they have --	14:17:17
23	MR. PALLES: I believe they are.	14:17:18
24	MR. RAUSCHER: Hold on.	14:17:19

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

382

1	MR. PALLES: Yeah.	14:17:19
2	MR. RAUSCHER: Let's -- we should have the	14:17:20
3	rest of the conversation off the record.	14:17:21
4	MR. PALLES: Okay. That's fine. Let's go	14:17:22
5	off the record.	14:17:23
6	MR. RAUSCHER: This is a deposition and	14:17:24
7	not interrogatories.	14:17:25
8	MR. PALLES: Fine. Fine. We'll go off	14:17:26
9	the record.	14:17:28
10	THE VIDEOGRAPHER: Off the record, 2:17.	14:17:28
11	(A recess was taken from 2:17 p.m. to	14:17:32
12	2:23 p.m.)	14:23:12
13	THE VIDEOGRAPHER: Back on the record, 2:23.	14:23:15
14	MR. RAUSCHER: Counsel for Mr. Mohammed	14:23:23
15	and I just went out and conferred, and we have a	14:23:26
16	disagreement on permissible questioning on CRs.	14:23:29
17	Given that Mr. Mohammed will be coming	14:23:32
18	back for additional days of deposition anyway,	14:23:34
19	we've agreed to postpone questioning about CRs and	14:23:36
20	see if we can work out the scope of questioning on	14:23:39
21	that without the Court involvement.	14:23:42
22	MR. PALLES: Agreed.	14:23:44
23	MR. RAUSCHER: So we, for plaintiffs,	14:23:45
24	don't have any other questions for Mr. Mohammed	14:23:47

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

383

1	today.	14:23:49
2	MR. MICHALIK: Okay.	14:23:52
3	MR. KOSOKO: Sergeant Watts -- Ronald	14:23:53
4	Watts has no questions.	14:23:56
5	MR. SCHALKA: No questions.	14:23:58
6	MR. MICHALIK: No questions at this time.	14:23:59
7	MR. BAZAREK: None at this time.	14:24:00
8	MR. PALLE: Okay.	14:24:03
9	All right.	14:24:04
10	THE VIDEOGRAPHER: This concludes Day 2 in	14:24:04
11	the video deposition of Kallatt Mohammed. The	14:24:06
12	time is 2:24.	14:24:12
13	(The following proceedings were outside	14:24:12
14	the video record:)	14:24:12
15	MR. RAUSCHER: We're going to take a copy,	14:24:27
16	just normal.	14:24:31
17	(An off-the-record discussion was held.)	14:24:44
18	THE COURT REPORTER: Gentlemen, the	14:24:44
19	transcript has been ordered. Would anyone like a	14:24:45
20	copy?	14:24:47
21	MR. PALLE: Yeah, I'll take one.	14:24:47
22	THE COURT REPORTER: Anyone else?	14:24:50
23	MR. MICHALIK: No. Thank you.	14:24:50
24	MR. SCHALKA: No. Thank you.	14:24:52

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

384

1 MR. KOSOKO: Not yet. I'll let you know. 14:24:54

2 THE COURT REPORTER: Mr. Bazarek, no; 14:25:00

3 right? 14:25:02

4 MR. BAZAREK: No. 14:25:02

5 (Off the record at 2:25 p.m.) 14:25:06

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

385

1 CERTIFICATE OF COURT REPORTER - NOTARY PUBLIC

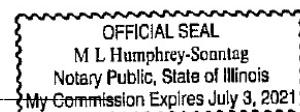
2

3 I, Melanie L. Humphrey-Sonntag, Certified
4 Shorthand Reporter No. 084-004299, CSR, RDR, CRR,
5 CRC, FAPR, and a Notary Public in and for the
6 County of Kane, State of Illinois, the officer
7 before whom the foregoing deposition was taken, do
8 hereby certify that the foregoing transcript is a
9 true and correct record of the testimony given;
10 that said testimony was taken by me and thereafter
11 reduced to typewriting under my direction; that
12 reading and signing was not requested; and that
13 I am neither counsel for, related to, nor employed
14 by any of the parties to this case and have no
15 interest, financial or otherwise, in its outcome.

16 IN WITNESS WHEREOF, I have hereunto set my
17 hand and affixed my notarial seal this 15th day of
18 December, 2019.

19 My commission expires July 3, 2021.

20 
21



22 MELANIE L. HUMPHREY-SONNTAG

23 NOTARY PUBLIC IN AND FOR ILLINOIS

24