

Exhibit 2

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

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

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

Job No.: 266048
Pages: 191 - 385
Reported by: Melanie L. Humphrey-Sonntag,
CSR, RDR, CRR, CRC, FAPR

Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

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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
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A P P E A R A N C E S

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Conducted on November 21, 2019

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2 ON BEHALF OF THE DEFENDANT CITY OF CHICAGO AND
3 VARIOUS POLICE DEPARTMENT SUPERVISORS:

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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:

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8 Chicago, Illinois 60601

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12 AND CADMAN:

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18 (866) 786-3705

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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

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(Attached to transcript.)

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(Attached to transcript.)

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Transcript of Kallatt Mohammed, Cont.
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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

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Transcript of Kallatt Mohammed, Cont.
Conducted on November 21, 2019

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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. PALLES: 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

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Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

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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

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Transcript of Kallatt Mohammed, Cont.
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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

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Transcript of Kallatt Mohammed, Cont.

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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. PALLES: 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

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Transcript of Kallatt Mohammed, Cont.

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1	MR. PALLES: 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

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Transcript of Kallatt Mohammed, Cont.
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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

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Transcript of Kallatt Mohammed, Cont.
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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

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Transcript of Kallatt Mohammed, Cont.
Conducted on November 21, 2019

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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

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Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

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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. PALLES: Objection. It's compound, as 10:14:34
24 well. 10:14:37

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Transcript of Kallatt Mohammed, Cont.

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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

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Transcript of Kallatt Mohammed, Cont.
Conducted on November 21, 2019

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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

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Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

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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

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Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

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1 question, foundation, mischaracterizes the
2 evidence in the record in this case.

10:16:31

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
8 framed anyone?

10:16:39

10:16:41

9 MR. BAZAREK: Object to the form of the
10 question, mischaracterizes the evidence in the
11 record in this case, as well as foundation.

10:16:43

10:16:43

10:16:48

12 And I'll also add all these questions
13 I think when we're talking about anyone also is
14 violative of the order in terms of questioning
15 about specific plaintiffs on any given day.

10:16:51

10:16:53

10:16:55

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
23 signed a police report that contained false
24 information about Harvey Blair related to the

10:17:09

10:17:12

10:17:15

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Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

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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

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Transcript of Kallatt Mohammed, Cont.

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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. PALLES: 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

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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. PALLES: 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. PALLES: Objection; attorney-client/	10:19:16
23	work product.	10:19:19
24	Instruct him not to answer.	10:19:19

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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

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Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

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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

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Transcript of Kallatt Mohammed, Cont.

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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. PALLES: 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

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Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

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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

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Transcript of Kallatt Mohammed, Cont.
Conducted on November 21, 2019

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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

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Transcript of Kallatt Mohammed, Cont.

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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

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Transcript of Kallatt Mohammed, Cont.

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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

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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

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Transcript of Kallatt Mohammed, Cont.

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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

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Transcript of Kallatt Mohammed, Cont.
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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

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Transcript of Kallatt Mohammed, Cont.
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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

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Transcript of Kallatt Mohammed, Cont.

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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

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Transcript of Kallatt Mohammed, Cont.

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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

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Transcript of Kallatt Mohammed, Cont.
Conducted on November 21, 2019

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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

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Transcript of Kallatt Mohammed, Cont.

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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

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Transcript of Kallatt Mohammed, Cont.

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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

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Transcript of Kallatt Mohammed, Cont.
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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

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Transcript of Kallatt Mohammed, Cont.
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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

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Transcript of Kallatt Mohammed, Cont.
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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. PALLES: 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

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Transcript of Kallatt Mohammed, Cont.

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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

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Transcript of Kallatt Mohammed, Cont.

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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. PALLES: 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

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Transcript of Kallatt Mohammed, Cont.
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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. PALLES: 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

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Transcript of Kallatt Mohammed, Cont.

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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

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Transcript of Kallatt Mohammed, Cont.

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1 assigned to the tactical team second watch in
2 civilian dress."

10:40:11

10:40:15

3 On March 3rd, 2004, were you assigned to
4 the tactical team second watch in civilian dress?

10:40:15

10:40:19

5 A Take the Fifth.

10:40:21

6 Q Would you read the next paragraph, 2, to
7 yourself.

10:40:22

10:40:28

8 Have you read -- had a chance to read
9 paragraph 2?

10:40:36

10:40:39

10 A Yeah.

10:40:40

11 Q And you understand what I mean when
12 I refer to "paragraph 2"?

10:40:40

10:40:41

13 A Yes.

10:40:42

14 Q Okay. Is paragraph true -- is paragraph 2
15 a true statement?

10:40:42

10:40:45

16 A Take the Fifth.

10:40:46

17 Q Can you please read paragraph 3 and let me
18 know when you've read it?

10:40:51

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
23 and let me know and you've finished reading it?

10:41:01

10:41:03

24 A Finished.

10:41:05

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Transcript of Kallatt Mohammed, Cont.

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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

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Transcript of Kallatt Mohammed, Cont.

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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

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Transcript of Kallatt Mohammed, Cont.
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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

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Transcript of Kallatt Mohammed, Cont.

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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

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Transcript of Kallatt Mohammed, Cont.

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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

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Transcript of Kallatt Mohammed, Cont.
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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

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Transcript of Kallatt Mohammed, Cont.
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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

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Transcript of Kallatt Mohammed, Cont.

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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

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Transcript of Kallatt Mohammed, Cont.

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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. PALLES: 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

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Transcript of Kallatt Mohammed, Cont.

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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

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Transcript of Kallatt Mohammed, Cont.

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1	MR. KOSOKO: Join.	10:49:06
2	MR. PALLES: 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

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Transcript of Kallatt Mohammed, Cont.

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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

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Transcript of Kallatt Mohammed, Cont.

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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. PALLES: 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. PALLES: 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. PALLES: Let me take a look.	10:52:52
24	Q Your lawyer can take a look at it first,	10:52:54

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Transcript of Kallatt Mohammed, Cont.
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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. PALLES: 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

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Transcript of Kallatt Mohammed, Cont.

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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

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Transcript of Kallatt Mohammed, Cont.

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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

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Transcript of Kallatt Mohammed, Cont.

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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

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Transcript of Kallatt Mohammed, Cont.

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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

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Transcript of Kallatt Mohammed, Cont.

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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

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Transcript of Kallatt Mohammed, Cont.
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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

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Transcript of Kallatt Mohammed, Cont.

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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

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Transcript of Kallatt Mohammed, Cont.

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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

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Transcript of Kallatt Mohammed, Cont.
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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

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Transcript of Kallatt Mohammed, Cont.
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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

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Transcript of Kallatt Mohammed, Cont.
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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

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Transcript of Kallatt Mohammed, Cont.

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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

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Transcript of Kallatt Mohammed, Cont.

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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

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Transcript of Kallatt Mohammed, Cont.
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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. PALLES: 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. PALLES: 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

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Transcript of Kallatt Mohammed, Cont.

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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

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Transcript of Kallatt Mohammed, Cont.
Conducted on November 21, 2019

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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

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Transcript of Kallatt Mohammed, Cont.
Conducted on November 21, 2019

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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

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Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

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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. PALLES: 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

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Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

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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

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Transcript of Kallatt Mohammed, Cont.
Conducted on November 21, 2019

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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

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Transcript of Kallatt Mohammed, Cont.
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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

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Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

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1 arrest on October 15th, 2009?

11:25:50

2 MR. BAZAREK: Object to the form of the
3 question, foundation, mischaracterizes the
4 evidence in the record in this case.

11:25:52

11:25:54

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
10 Lindsey on October 15th, 2009?

11:25:59

11:26:01

11 A Take the Fifth.

11:26:03

12 Q Was Ronald Watts present for the arrest of
13 Robert Lindsey on October 15th, 2009?

11:26:04

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
17 Watts was present for the arrest of Robert Lindsey
18 on October 15th, 2009, would subject you to
19 criminal prosecution?

11:26:12

11:26:13

11:26:15

11:26:18

20 MR. PALLES: Objection; attorney-client
21 privilege/work product.

11:26:18

11:26:22

22 Instruct the witness not to answer.

11:26:22

23 Q Are you going to follow your attorney's
24 instruction?

11:26:26

11:26:27

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Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

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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

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Transcript of Kallatt Mohammed, Cont.

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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
4 of Germain Sims on October 15th, 2009, in
5 October of 2009?

11:27:40

11:27:43

11:27:46

6 A Take the Fifth.

11:27:47

7 Q Did you ever learn that Officer Jones
8 falsely arrested Germain Sims on October 15th,
9 2009?

11:27:48

11:27:55

11:27:58

10 MR. BAZAREK: Object to the form of the
11 question, foundation, mischaracterizes the
12 evidence in the record in this case.

11:27:58

11:28:00

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
18 falsely arrested Germain Sims on October 15th,
19 2009?

11:28:05

11:28:09

11:28:11

20 MR. BAZAREK: Object to the form of the
21 question, foundation, mischaracterizes the
22 evidence in the record in this case.

11:28:12

11:28:12

11:28:13

23 MR. MICHALIK: Join.

11:28:15

24 MR. SCHALKA: Join.

11:28:15

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Transcript of Kallatt Mohammed, Cont.
Conducted on November 21, 2019

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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

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Transcript of Kallatt Mohammed, Cont.
Conducted on November 21, 2019

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1 MR. BAZAREK: Object to the form of the
2 question, foundation, mischaracterizes the
3 evidence in the record in this case.

11:28:52

11:28:53

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
9 to a false -- a police report that contained false
10 information about Germain Sims related to the
11 arrest on October 15th, 2009?

11:28:58

11:29:02

11:29:05

11:29:08

12 MR. BAZAREK: Object to the form of the
13 question, foundation, mischaracterizes the
14 evidence in the record in this case.

11:29:10

11:29:12

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
20 Germain Sims on October 15th, 2009?

11:29:16

11:29:18

21 A Take the Fifth.

11:29:19

22 Q Was Ronald Watts present for the arrest of
23 Germain Sims on October 15th, 2009?

11:29:20

11:29:23

24 A Take --

11:29:25

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Transcript of Kallatt Mohammed, Cont.

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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. PALLES: 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

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Transcript of Kallatt Mohammed, Cont.

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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

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Transcript of Kallatt Mohammed, Cont.
Conducted on November 21, 2019

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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

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Transcript of Kallatt Mohammed, Cont.

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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

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Transcript of Kallatt Mohammed, Cont.

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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

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Transcript of Kallatt Mohammed, Cont.

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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

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Transcript of Kallatt Mohammed, Cont.

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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

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Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

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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

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Transcript of Kallatt Mohammed, Cont.
Conducted on November 21, 2019

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1 Q Were you involved in framing Robert
2 Lindsey on October 15th, 2009?

3 MR. BAZAREK: Object to the form of the
4 question, foundation, mischaracterizes the
5 evidence and the record in this case.

6 MR. MICHALIK: Join.

7 MR. SCHALKA: Join.

8 MR. KOSOKO: Join.

9 A Take the Fifth.

10 Q Were you involved in framing Germain Sims
11 on October 15th, 2009?

12 MR. BAZAREK: Object to the form of the
13 question, foundation, mischaracterizes the
14 evidence in the record in this case.

15 MR. MICHALIK: Join.

16 MR. SCHALKA: Join.

17 MR. KOSOKO: Join.

18 A Take the Fifth.

19 Q Did you see Alvin Jones plant drugs on
20 Robert Lindsey on October 15th, 2009?

21 MR. BAZAREK: Object to the form of the
22 question, foundation, mischaracterizes the
23 evidence and the record in this case.

24 MR. MICHALIK: Join.

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Transcript of Kallatt Mohammed, Cont.
Conducted on November 21, 2019

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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

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Transcript of Kallatt Mohammed, Cont.

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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

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Transcript of Kallatt Mohammed, Cont.
Conducted on November 21, 2019

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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

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Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

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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. PALLES: 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

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Transcript of Kallatt Mohammed, Cont.
Conducted on November 21, 2019

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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

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Transcript of Kallatt Mohammed, Cont.
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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. PALLES: Join. 11:43:03

24 A Fifth Amendment. 11:43:04

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Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

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1 Q On October 15th, 2009, did you ever see
2 Ronald Watts show a bag of drugs to Mr. Lindsey
3 and Mr. Sims and say words to the effect of "This
4 is yours"?

11:43:04

11:43:16

11:43:20

11:43:23

5 MR. KOSOKO: Objection to the form of the
6 question, foundation.

11:43:24

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
10 identification and attached to the transcript.)

11:44:04

11:44:31

11 (An off-the-record discussion was held.)

11:44:31

12 MR. PALLES: It's fine.

11:44:57

13 BY MR. FLAXMAN:

11:45:02

14 Q Sir, do you recognize Exhibit 34 as a
15 notification of charges/allegations addressed
16 to you?

11:45:03

11:45:04

11:45:07

17 A Yes. That's what it says.

11:45:07

18 Q And it's from a complainant identified as
19 "Lindsey, comma, Robert"?

11:45:09

11:45:13

20 A Yes.

11:45:16

21 Q And do you see that Mr. Lindsey alleges
22 that on October 15th, 2009, you, along with
23 several others, planted drugs on him?

11:45:16

11:45:18

11:45:23

24 A That's what it says.

11:45:25

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Transcript of Kallatt Mohammed, Cont.
Conducted on November 21, 2019

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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

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Transcript of Kallatt Mohammed, Cont.
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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

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Transcript of Kallatt Mohammed, Cont.
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1	Exhibit 34?	11:46:59
2	A Take the Fifth.	11:47:00
3	Q At the top of this notification, it	11:47:01
4	states, "Given to Accused Date."	11:47:10
5	Do you see that?	11:47:13
6	A I do.	11:47:13
7	Q Okay. What date is in that box?	11:47:14
8	A 16 June 2011.	11:47:16
9	Q Okay. Was this form given to you on	11:47:21
10	June 16th, 2011?	11:47:24
11	A I don't recall.	11:47:28
12	Q Did you sign this form to acknowledge	11:47:29
13	receipt in writing of the charges or allegations	11:47:37
14	against you?	11:47:38
15	A Fifth Amendment.	11:47:40
16	Q And you believe that stating whether you	11:47:41
17	signed this form would subject you to criminal	11:47:43
18	prosecution?	11:47:45
19	MR. PALLES: Objection; attorney-client/	11:47:46
20	work product.	11:47:49
21	Instruct the witness not to answer.	11:47:50
22	Q Are you going to follow your attorney's	11:47:52
23	instruction?	11:47:54
24	A Yes.	11:47:54

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Transcript of Kallatt Mohammed, Cont.
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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

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Transcript of Kallatt Mohammed, Cont.
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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

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Transcript of Kallatt Mohammed, Cont.

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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

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Transcript of Kallatt Mohammed, Cont.

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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

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Transcript of Kallatt Mohammed, Cont.

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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

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Transcript of Kallatt Mohammed, Cont.

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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

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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

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Transcript of Kallatt Mohammed, Cont.
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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. PALLES: 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

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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

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Transcript of Kallatt Mohammed, Cont.
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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

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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

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Transcript of Kallatt Mohammed, Cont.

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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

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Transcript of Kallatt Mohammed, Cont.
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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

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Transcript of Kallatt Mohammed, Cont.
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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

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Transcript of Kallatt Mohammed, Cont.
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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

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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

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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

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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. PALLES: Objection; attorney-client	12:05:53
23	privilege/work product.	12:05:54
24	Instruct the witness not to answer.	12:05:54

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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

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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. PALLES: 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

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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

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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

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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

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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. PALLES: Objection; asked and	12:12:25

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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

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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

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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

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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

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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

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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

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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

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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

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Transcript of Kallatt Mohammed, Cont.

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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

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Transcript of Kallatt Mohammed, Cont.
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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

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Transcript of Kallatt Mohammed, Cont.
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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 an 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

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Transcript of Kallatt Mohammed, Cont.
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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 an 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

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Transcript of Kallatt Mohammed, Cont.

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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

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Transcript of Kallatt Mohammed, Cont.
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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. PALLES: 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	///	

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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

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Transcript of Kallatt Mohammed, Cont.

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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

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Transcript of Kallatt Mohammed, Cont.

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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

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Transcript of Kallatt Mohammed, Cont.
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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

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Transcript of Kallatt Mohammed, Cont.

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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

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Transcript of Kallatt Mohammed, Cont.

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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

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Transcript of Kallatt Mohammed, Cont.
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1 falsely arrested Angelo Shenault on October 29th,
2 2004?

13:32:47

13:32:50

3 MR. BAZAREK: Object to the form of the
4 question, foundation, mischaracterizes the
5 evidence in the record in this case.

13:32:51

13:32:52

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
11 framed Angelo Shenault on October 29th, 2004?

13:32:58

13:33:00

12 MR. BAZAREK: Object to the form of the
13 question, foundation, mischaracterizes the
14 evidence in the record in this case.

13:33:04

13:33:06

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
20 framed Angelo Shenault on October 29th, 2004?

13:33:13

13:33:15

21 MR. BAZAREK: Object to the form of the
22 question, foundation, mischaracterizes the
23 evidence in the record in this case.

13:33:19

13:33:20

13:33:22

24 MR. MICHALIK: Join.

13:33:27

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Transcript of Kallatt Mohammed, Cont.
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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

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Transcript of Kallatt Mohammed, Cont.

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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

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Transcript of Kallatt Mohammed, Cont.

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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. PALLES: 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

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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

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Transcript of Kallatt Mohammed, Cont.

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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

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Transcript of Kallatt Mohammed, Cont.
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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

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Transcript of Kallatt Mohammed, Cont.

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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

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Transcript of Kallatt Mohammed, Cont.
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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

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Transcript of Kallatt Mohammed, Cont.
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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

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Transcript of Kallatt Mohammed, Cont.
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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

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Transcript of Kallatt Mohammed, Cont.
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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

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Transcript of Kallatt Mohammed, Cont.
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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

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Transcript of Kallatt Mohammed, Cont.

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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

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Transcript of Kallatt Mohammed, Cont.

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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

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Transcript of Kallatt Mohammed, Cont.

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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

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Transcript of Kallatt Mohammed, Cont.
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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

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Transcript of Kallatt Mohammed, Cont.

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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. PALLES: 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. PALLES: Just the vice case report.	13:48:39
24	THE WITNESS: Right. Right here. Okay.	13:48:42

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Transcript of Kallatt Mohammed, Cont.

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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

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Transcript of Kallatt Mohammed, Cont.
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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

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Transcript of Kallatt Mohammed, Cont.

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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

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Transcript of Kallatt Mohammed, Cont.

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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

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Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

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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

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Transcript of Kallatt Mohammed, Cont.

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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. PALLES: 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. PALLES: 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

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Transcript of Kallatt Mohammed, Cont.

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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

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Transcript of Kallatt Mohammed, Cont.

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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

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Transcript of Kallatt Mohammed, Cont.
Conducted on November 21, 2019

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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

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Transcript of Kallatt Mohammed, Cont.

Conducted on November 21, 2019

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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

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Transcript of Kallatt Mohammed, Cont.

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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

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Transcript of Kallatt Mohammed, Cont.
Conducted on November 21, 2019

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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

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Transcript of Kallatt Mohammed, Cont.
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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

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Transcript of Kallatt Mohammed, Cont.
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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

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Transcript of Kallatt Mohammed, Cont.

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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

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Transcript of Kallatt Mohammed, Cont.
Conducted on November 21, 2019

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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

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Transcript of Kallatt Mohammed, Cont.

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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

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Transcript of Kallatt Mohammed, Cont.
Conducted on November 21, 2019

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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. PALLES: 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

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Transcript of Kallatt Mohammed, Cont.
Conducted on November 21, 2019

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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

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Transcript of Kallatt Mohammed, Cont.

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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

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1 And, therefore, I'm instructing him not to
2 answer.

3 MR. RAUSCHER: That is definitely not a
4 proper instruction. I would be happy to talk to
5 you -- in my opinion.

6 MR. PALLES: Yeah.

7 MR. RAUSCHER: I would be happy to talk to
8 you off the record now to see if we can work it
9 out while he's here.

10 MR. PALLES: Well, I'll tell you what. We
11 can talk about it because -- let me add, in
12 addition to that, that in numerous interrogatory
13 answers that you've given in this case relating to
14 numerous plaintiffs who have been alleged -- who
15 are alleging that they were falsely accused of
16 being in possession, selling, or using drugs, you
17 have -- in response to interrogatory answers --
18 stated "Irrelevant" and refused to answer further.
19 So those appear to be the rules that you're
20 playing by.

21 MR. RAUSCHER: So they're not equivalent
22 and they have --

23 MR. PALLES: I believe they are.

24 MR. RAUSCHER: Hold on.

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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

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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. PALLES: 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. PALLES: 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

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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
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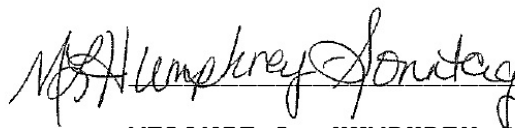
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CERTIFICATE OF COURT REPORTER - NOTARY PUBLIC

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

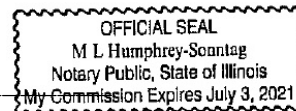
IN WITNESS WHEREOF, I have hereunto set my
hand and affixed my notarial seal this 15th day of
December, 2019.

My commission expires July 3, 2021.



MELANIE L. HUMPHREY-SONNTAG

NOTARY PUBLIC IN AND FOR ILLINOIS



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