

Exhibit 18



KENTUCKIANA
— COURT REPORTERS —

MASTER DOCKET CASE NO. 19-CV-01717
IN RE: WATTS COORDINATED
PRETRIAL PROCEEDINGS

Confidential Portions

DEPONENT:
DARRYL EDWARDS

DATE:
October 28, 2021



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1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF
3 ILLINOIS EASTERN DIVISION
4 MASTER DOCKET CASE NO. 19-CV-01717
5 JUDGE VALDERRAMA
6 MAGISTRATE JUDGE SHELIA M. FINNEGAN
7

8 IN RE: WATTS COORDINATED
9 PRETRIAL PROCEEDINGS
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20 CONFIDENTIAL PORTIONS
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23 DEPONENT: DARRYL EDWARDS

24 DATE: OCTOBER 28, 2021

25 REPORTER: CHLOE HOWARD

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1 the arrest for June 18, 2004, correct?

2 A Yes.

3 Q And if Officer Jones had planted drugs on Mr.

4 Carter, you would've been aware of that, right?

5 MR. ZECCHIN: Objection. Form and foundation.

6 You can answer.

7 A No. I've never seen Officer Jones planting

8 drugs on anyone.

9 Q Okay. And my understanding from looking at

10 the reports, was that the reports indicated that you

11 were present when Mr. Carter was arrested, right?

12 A I'd need to see the reports again, but yes, I

13 was the second arresting officer.

14 Q Okay. Okay. And if Mr. Jones -- if Officer

15 Jones had punched Mr. Carter in jaw, you would've

16 observed that, too, correct?

17 MR. ZECCHIN: Objection. Form. You can

18 answer.

19 A If that happened, yes.

20 Q Okay. And did you ever see Officer Jones

21 punch somebody in the jaw?

22 A No.

23 Q The last page of this exhibit -- oh, and I'm

24 sorry the -- because we're looking at a confidential

25 exhibit, this part of the deposition should be marked

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1 Do you have any recollection of preparing this, "To,

2 from," report?

3 A No.

4 Q Okay. Was it your practice to prepare

5 truthful, "To, from," reports when you were a Chicago

6 police officer?

7 A Yes.

8 Q Okay. Did anybody -- when you were -- sorry.

9 Were there other times that you prepared, "To, from,"

10 reports in response to complaints of misconduct?

11 A Not to my knowledge.

12 Q To your knowledge, this is the only one?

13 A That I see in front of me, yes.

14 Q Okay. Were there other times that you were

15 asked to prepare a, "To, from," report during your

16 career as a police officer?

17 A Yes.

18 Q Okay. And what was your practice? What would

19 you do when you had to prepare a, "To, from," report?

20 A Requesting time off.

21 Q Okay. This, "To, from," report was prepared

22 in response to a complaint of misconduct; is that

23 correct?

24 A Yes. A witness statement.

25 Q Oh, correct. Okay. Were there other times

Page 21

1 when you made witness statements that were, "To, from,"

2 reports?

3 A I don't recall anything specific.

4 Q Okay. To prepare this report, would you have

5 spoken to Officer Jones before preparing it?

6 A No.

7 Q Okay. Would you have looked at the police

8 reports before preparing it?

9 A Not to my knowledge.

10 Q Okay. So it's your recollection, that you

11 would have gone based on your memory preparing this

12 report?

13 A Yes.

14 Q All right. Having looked at all of this

15 information about Mr. Carter's arrest on June 18th of

16 2004 --

17 MR. ZECCHIN: You were --

18 MR. FLAXMAN: Oh, I'm sorry.

19 MR. ZECCHIN: No --

20 A No. No. No. But normally if you -- normally

21 if you're writing it for an investigator, they will

22 provide you a copy of your report as a -- as a

23 complainant or a witness and will show you reports.

24 BY MR. FLAXMAN:

25 Q Okay. And --

<p style="text-align: right;">Page 22</p> <p>1 A I just wanted to clear -- answering your</p> <p>2 question.</p> <p>3 Q Sure. So meaning that you might have -- you</p> <p>4 might have looked at reports before preparing?</p> <p>5 A Yeah. You -- do you recall, did you arrest or</p> <p>6 be part of arrest with this individual? And then it</p> <p>7 will show you the whole packet of this complaint, is</p> <p>8 what I'm saying.</p> <p>9 Q Okay.</p> <p>10 A I just wanted to make that -- make that clear.</p> <p>11 Q I appreciate that. Thank you.</p> <p>12 A Yeah.</p> <p>13 Q So now that we've looked at these documents</p> <p>14 about the arrest of William Carter on June 18, 2004,</p> <p>15 have you recalled anything about that cross the re --</p> <p>16 about that arrest?</p> <p>17 A No.</p> <p>18 Q And are you aware of anything that -- other</p> <p>19 than what we've looked at, that might help you refresh</p> <p>20 your recollection?</p> <p>21 (END CONFIDENTIAL PORTION IV)</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	
<p style="text-align: right;">Page 23</p> <p>1 CERTIFICATE OF REPORTER</p> <p>2 COMMONWEALTH OF KENTUCKY AT LARGE</p> <p>3</p> <p>4 I do hereby certify that the witness in the foregoing</p> <p>5 transcript was taken on the date, and at the time and</p> <p>6 place set out on the Stipulation page hereof, by me</p> <p>7 after first being duly sworn to testify the truth, the</p> <p>8 whole truth, and nothing but the truth; and that the</p> <p>9 said matter was recorded by me and then reduced to</p> <p>10 typewritten form under my direction, and constitutes a</p> <p>11 true record of the transcript as taken, all to the best</p> <p>12 of my skill and ability. I certify that I am not a</p> <p>13 relative or employee of either counsel and that I am in</p> <p>14 no way interested financially, directly or indirectly,</p> <p>15 in this action.</p> <p>16</p> <p>17</p> <p>18</p> <p>19 <i>Chloe Howard</i></p> <p>20</p> <p>21</p> <p>22 CHLOE HOWARD</p> <p>23 COURT REPORTER/NOTARY</p> <p>24 MY COMMISSION EXPIRES: 12/11/2024</p> <p>25 SUBMITTED ON: 11/10/2021</p>	