

# Exhibit 1



**KENTUCKIANA**  
— COURT REPORTERS —

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

**DEPONENT:**  
**DARRYL EDWARDS**

**DATE:**  
**October 28, 2021**



✉ [schedule@kentuckianareporters.com](mailto:schedule@kentuckianareporters.com)

☎ 877.808.5856 | 502.589.2273

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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23   DEPONENT:   DARRYL EDWARDS

24   DATE:       OCTOBER 28, 2021

25   REPORTER:   CHLOE HOWARD

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1 doesn't ring a bell, no.

2 Q What types of reports would you generate, as a

3 result of a narcotics arrest at Ida B. Wells?

4 A Vice case report, an arrest report, inventory,

5 complaint.

6 Q Did you ever -- I'm sorry. Strike that,

7 please. For both the vice case report and the arrest

8 report, there's a portion of the report for the

9 narrative section, right?

10 A Uh-huh. Yes.

11 Q Did you ever complete the narrative section of

12 one of those reports before making an arrest?

13 A Never.

14 Q And why not?

15 A You don't know the facts of the case.

16 Q Did you know someone at the Wells by the name

17 of Roy Bennett (phonetic)?

18 A No.

19 Q What about someone with a nickname Shock?

20 A No.

21 Q Did you know someone by the name Wilbert

22 Moore?

23 A No.

24 Q Did you know someone by the nickname Big

25 Shorty?

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1 A No.

2 Q Did you know someone by the name of Willi

3 Gaiety (phonetic)?

4 A No.

5 Q Did you know someone by the nickname Fantasia?

6 A No.

7 Q Do you remember any residents of Ida B. Wells

8 from the time that you were on the Watts tactical team?

9 A Nobody specific, no.

10 Q Do you remember anybody by their nickname?

11 A No.

12 Q While you were a member of the Watts tactical

13 team, did you ever hear any complaints from residents or

14 visitors at the Wells about how police officers were

15 treating them?

16 A Well, as a policeman, various citizens would

17 always say, when policemen come up arbitrarily, that

18 policeman are -- you know, F the police, things of that

19 nature, lot of vulgar comments sometimes. Just the

20 normal stuff I got throughout my career. Sometimes

21 citizens just don't like the police.

22 Q Did anyone ever tell you that they had been

23 falsely arrested for a --

24 A No.

25 Q -- narcotics crime? Okay. Did anyone ever

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1 tell you that they'd had drugs planted on them?

2 A Never.

3 Q Did anyone ever tell you that there were drugs

4 attributed to them that weren't their drugs?

5 A Never.

6 Q Did you ever hear any complaints about

7 excessive force by any of your fellow officers on the

8 Watts tactical team?

9 A No.

10 Q Did you ever observe anyone on the Watts

11 tactical team use force against residents or visitors of

12 Ida B. Wells?

13 A What do you mean by -- can you repeat -- can

14 you clear the question up?

15 MR. ZECCHIN: I'm going object to form. But go

16 ahead.

17 Q Sure. Did you see members of the tactical

18 team use force -- physical force against residents or

19 visitors at the Wells?

20 A To affect the arrest, but not to the extent of

21 excessive force.

22 Q Okay. And what type of force did you see them

23 use to affect arrests?

24 A Just through the training, arm bar -- armbars,

25 emergency take downs.

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1 Q Okay. Did you ever see any members of the

2 tactical team slap or punch residents of the Wells?

3 A No.

4 Q If member -- I'm sorry. Strike that, please.

5 Did you ever use force against residents or visitors at

6 the Wells?

7 A Emergency take downs and armbars.

8 Q And describe for me, please, what an emergency

9 take down consists of?

10 A When you have to take someone down to the

11 ground to affect the arrest and put handcuffs on.

12 Q And what do you do to take them down to the

13 ground?

14 A You would grab their arm, guide them down to

15 the ground, and use the techniques we use. Three-point

16 kneeling to affect the arrest to get them handcuffed.

17 Q And what's three-point kneeling?

18 A It's a procedure that you do when you're

19 trained in the academy. Where you -- you put your foot

20 on the side, and your other leg is -- I can't -- I can't

21 physically describe it, but it's called three-point

22 kneeling. When you take the individual down to the

23 ground and you handcuff them.

24 Q You can't describe it?

25 A Basically, you're taking their arm, you're

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1 A Yes.

2 Q Did you sign on both of those lines?

3 A Yes.

4 Q And what it says above the second one -- it

5 says, "Being first duly sworn." Do you see where I'm

6 reading?

7 A Yes.

8 Q It says, "POD Edwards, number 16280 on oath

9 deposes and says that he/she read the foregoing

10 complaint by him/her subscribed and that the same is

11 true." Did I read that right?

12 A Yes.

13 Q So did you understand that you were swearing

14 under oath, that the information here was true?

15 A Yes.

16 Q Okay. And then the next line after your

17 signature says, subscribed and sworn to me. I'm sorry.

18 It says, "Subscribed and sworn to before me,

19 June 26, 2004." And underneath it has the signature of,

20 "Sergeant R. Watts, number 2640." Do you see that?

21 A Yes.

22 Q Okay. Did you sign it in front of Sergeant

23 Watts?

24 A I believe so. I don't recall.

25 Q Okay. Did you see Sergeant Watts sign it?

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1 A I don't recall.

2 Q Okay. And -- well, do you recognize that as

3 Sergeant Watts' signature?

4 A It's his signature.

5 Q And I think we went through this before and --

6 A Yes. We did.

7 Q -- I'm just trying to understand.

8 A Yeah. He signed --

9 Q What do you mean --

10 A That he signed it that day. It says he -- his

11 signature.

12 Q Okay. Let me look at the next page that's

13 marked Adam 05, page 2 of 2. And what is this document?

14 A It's a felony complaint.

15 Q Okay. And was it typically the responsibility

16 to the first arresting officer to complete felony

17 complaints?

18 A Yes.

19 Q Okay. And is that your signature on the lines

20 that say, "Complainant's signature," on this document?

21 A Yes.

22 Q Okay. And is that the signature of Sergeant

23 Ronald Watts underneath that?

24 A It says he signed it.

25 Q Okay. All right. You've looked at a few

Page 132

1 different documents about the arrest of Demetris Adams

2 on June 26, 2004. Having looked at those, are you still

3 unable to remember that arrest?

4 A That's correct.

5 Q Do you know that Mr. Adams says he was falsely

6 arrested on June 26, 2004?

7 A No. I do not.

8 Q Okay. Do you believe that Mr. Adams was

9 falsely arrested on June 26, 2004?

10 A No.

11 Q And why not?

12 A Because I made a legal arrest.

13 Q Okay. Do you have a recollection of making

14 that legal arrest?

15 MR. ZECCHIN: Objection. Asked and answered.

16 You can answer again.

17 A No.

18 Q Okay. And what's the basis for your

19 confidence that it was a legal arrest?

20 A I don't make false arrests.

21 Q All right. Let me go now to this set of

22 exhibits that are marked with Carter. And I'll ask you

23 to start with Exhibit Carter 01.

24 (CARTER EXHIBIT 01 MARKED FOR IDENTIFICATION)

25 A Okay.

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1 Q Is Exhibit Carter 01 the arrest report for the

2 arrest of William Carter on June 18, 2004?

3 A Yes.

4 Q And is your name on this arrest report?

5 A Yes.

6 Q Okay. Where's your name?

7 A Box 45.

8 Q Okay. And that lists you as the second

9 arresting officer?

10 A Yes.

11 Q What does it mean to be the second arresting

12 officer?

13 A That I was on scene that day, worked with that

14 partner.

15 Q And who was your partner?

16 A That's Alvin Jones.

17 Q And according to this report, did you and

18 Alvin Jones observe Mr. Carter holding a clear plastic

19 bag of suspected narcotics?

20 A Yes.

21 Q Okay. Do you have any recollection of this

22 arrest of Mr. Carter?

23 A No. I do not.

24 Q Do you have any recollection of William

25 Carter?

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1 A No. I do not.

2 Q Do you know why Officer Jones was your partner

3 on June 18, 2004?

4 A We're all partners on the tactical team.

5 Q In the report for Mr. Adams, which was also

6 from June 2004, was prepared with you as first arresting

7 and Mohammed as second arresting, correct?

8 A I don't have that in front of me.

9 Q Okay. Could I ask your lawyer to show that to

10 you again? It's marked as Adams 01?

11 A Now, go ahead.

12 Q Okay.

13 A Ask me again.

14 Q Sure. For the Adams' arrest on June 26, 2004,

15 you and Officer Mohammed were the arresting officers,

16 correct?

17 A Yes.

18 Q For the Carter arrest on June 18th of 2004,

19 you and Jones were the arresting officers, correct?

20 A Yes.

21 Q Was there some reason why you were with Jones

22 on one and Mohammed on the other?

23 A We were part of the tactical team and we work

24 in unisons. Officer Ha -- Mohammed could have been in a

25 different location at that time and I was with Jones in

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1 the same area and we observed that crime together.

2 That's why.

3 Q And then looking at the narrative section of

4 the arrest report for Carter -- are you looking at that

5 now?

6 A Yes.

7 Q And -- well, stepping back, would you expect

8 that Officer Jones prepared the narrative on this

9 because he's the first arresting officer?

10 A Yes.

11 Q Okay. The narrative begins, "This is an

12 arrest by PHS TACT units ETS 4512 B, C, D"; is that

13 right?

14 A Yes.

15 Q Okay. And PHS means public housing staff,

16 correct?

17 A Yes.

18 Q And TACT means tactical?

19 A Yes.

20 Q And BTS means beats?

21 A Yes.

22 Q And then those beats are 4512 B, C, and D,

23 correct?

24 A Yes.

25 Q Meaning that those three beats were part of

Page 136

1 this arrest, right?

2 A Yes.

3 Q All right. Let me ask you to take a look at

4 the next Carter exhibit that's marked as Carter 02,

5 please.

6 (CARTER EXHIBIT 02 MARKED FOR IDENTIFICATION)

7 A Okay.

8 Q Is Carter 02 the vice case report for the

9 arrest of William Carter on June 18, 2004?

10 A Yes.

11 Q Okay. And you're listed as the second

12 reporting officer on this; is that correct?

13 A Yes.

14 Q Is that -- that's your name in box 46, right?

15 A Yes. It is.

16 Q Okay. Did you sign underneath box 46 your

17 name?

18 A No.

19 Q Okay. Who signed your name?

20 A I don't know that day, but I gave them

21 permission, whoever it was.

22 Q Okay. Do you recognize the signature under

23 Alvin Jones' name?

24 A No.

25 Q Okay. And then higher up in box 18, there's a

Page 137

1 list of officers, correct?

2 A Yes.

3 Q And based on what you told me before about

4 vice case reports, am I right that those are officers

5 who were -- assisted with this arrest?

6 A Uh-huh. Yes.

7 Q Okay. But unless it's in the report, you're

8 not able to say what they did to assist, right?

9 A Exactly.

10 Q Okay. And this report lists three people who

11 were arrested. Do you see that?

12 A Yes.

13 Q Okay. Do you have any recollection of the

14 second person, Jamon Walker?

15 A No.

16 Q And for the court reporter's benefit, that's

17 J-A-M-O-N, last name, Walker. What about the third

18 person, Roy Tate? Do you have any recollection of Roy

19 Tate?

20 A No.

21 Q Okay. All right. The next three exhibits are

22 all -- well, why don't we go through them. The next

23 exhibit, please take a look at Carter 03. And this is a

24 mugshot that says it's of Carter William F. Do you

25 recognize this person?

<p style="text-align: right;">Page 138</p> <p>1 (CARTER EXHIBIT 03 MARKED FOR IDENTIFICATION)</p> <p>2 A No. I do not.</p> <p>3 Q Okay. The next one is Carter 04, and this is</p> <p>4 the first page of a criminal history report for Jamon</p> <p>5 Walker. Do you see that?</p> <p>6 (CARTER EXHIBIT 04 MARKED FOR IDENTIFICATION)</p> <p>7 A Yes.</p> <p>8 Q And that has a picture of Mr. Walker. Do you</p> <p>9 see that?</p> <p>10 A Yes. It says that that's him.</p> <p>11 Q Okay. Do you have any recollection of the</p> <p>12 person whose photograph appears on Carter 04?</p> <p>13 A No.</p> <p>14 Q Okay. Please take a look at Carter 05. And</p> <p>15 this is another criminal history report. This is for</p> <p>16 Roy Tate. Do you see the picture that's on Carter 05?</p> <p>17 (CARTER EXHIBIT 05 MARKED FOR IDENTIFICATION)</p> <p>18 A Yes. I do.</p> <p>19 Q Okay. Do you have any recollection of the</p> <p>20 person in that picture?</p> <p>21 A No.</p> <p>22 Q Okay. Can you please take a look at the</p> <p>23 exhibit we marked as Carter 06? And are these two</p> <p>24 inventory sheets from the arrest of William Carter on</p> <p>25 June 18, 2004?</p>	<p style="text-align: right;">Page 140</p> <p>1 Q Is this the arrest report for the arrest of</p> <p>2 Rickey Henderson on August 27, 2003?</p> <p>3 A Yes.</p> <p>4 Q And is your name listed on this report?</p> <p>5 A Yes. It is.</p> <p>6 Q Where's your name?</p> <p>7 A It's 45.</p> <p>8 Q Okay. And that's the box for a second</p> <p>9 arresting officer?</p> <p>10 A Yes.</p> <p>11 Q Okay. And is Officer Mohammed also in that</p> <p>12 box?</p> <p>13 A Yes.</p> <p>14 Q Do you know why there's two officers listed in</p> <p>15 the second arresting officer box?</p> <p>16 A Because we observed that together.</p> <p>17 Q Okay. Me -- that, meaning, the events that</p> <p>18 are described in the narrative?</p> <p>19 A Yeah. We was working together in that vehicle</p> <p>20 it says -- our vehicle sign, it says "Other three men."</p> <p>21 Q Can you show -- can you tell me what box we're</p> <p>22 looking at?</p> <p>23 A 46.</p> <p>24 Q I see. Meaning that you -- and I'm sorry. And</p> <p>25 so the third man would be Officer Jones, who's listed as</p>
<p style="text-align: right;">Page 139</p> <p>1 (CARTER EXHIBIT 06 MARKED FOR IDENTIFICATION)</p> <p>2 A Yes. It is.</p> <p>3 Q Okay. And are you the second officer on both</p> <p>4 of these reports?</p> <p>5 A Yes. I am.</p> <p>6 (CONFIDENTIAL PORTION IV REDACTED)</p> <p>7 A No.</p> <p>8 Q When you were a Chicago police officer, did</p> <p>9 you testify in court?</p> <p>10 A Yes.</p> <p>11 Q How often?</p> <p>12 A Whenever I was called.</p> <p>13 Q Okay. Do you recall the last time that you</p> <p>14 testified?</p> <p>15 A No.</p> <p>16 Q Okay.</p> <p>17 A No. It's been four -- I know it's been at</p> <p>18 least four years since 2017.</p> <p>19 Q All right. Okay.</p> <p>20 A I know that much.</p> <p>21 Q All right. Let me ask you to take a look at</p> <p>22 the next exhibit, that's Henderson 01.</p> <p>23 (HENDERSON EXHIBIT 01 MARKED FOR</p> <p>24 IDENTIFICATION)</p> <p>25 A Okay.</p>	<p style="text-align: right;">Page 141</p> <p>1 first arresting?</p> <p>2 A Yeah. Me, Mohammed, and Jones.</p> <p>3 Q And the three of you were working in a car</p> <p>4 together that day?</p> <p>5 A That's what it states.</p> <p>6 Q Okay. Do you have any recollection of the</p> <p>7 arrest of Rickey Henderson on August 27, 2003?</p> <p>8 A No. I do not.</p> <p>9 Q And does the report also state that officers</p> <p>10 Summers, Ridgell, Spaargaren, and Bolton were assisting?</p> <p>11 A Yes.</p> <p>12 Q And do you know whose signature or whose name</p> <p>13 that is above the second arresting officer box in the</p> <p>14 deputy clerk signature box?</p> <p>15 A No. I can't make that out.</p> <p>16 Q Does it look like it's a -- does it look like</p> <p>17 the number after the name is 2649?</p> <p>18 A Yes.</p> <p>19 Q As I'm looking at it more closely, it could be</p> <p>20 some other numbers, too. It could be 2645 or 2640.</p> <p>21 A Right. I don't know what that is.</p> <p>22 Q You're not the right person to ask, are you?</p> <p>23 A I don't know what it is.</p> <p>24 Q Yeah. I -- understood. Let me ask you to go</p> <p>25 to what's marked as Henderson 02, please.</p>