

# Exhibit 1



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

**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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23   DEPONENT:   DARRYL EDWARDS  
24   DATE:          OCTOBER 28, 2021  
25   REPORTER:     CHLOE HOWARD

<p style="text-align: right;">Page 58</p> <p>1    doesn't ring a bell, no.</p> <p>2    Q    What types of reports would you generate, as a</p> <p>3    result of a narcotics arrest at Ida B. Wells?</p> <p>4    A    Vice case report, an arrest report, inventory,</p> <p>5    complaint.</p> <p>6    Q    Did you ever -- I'm sorry. Strike that,</p> <p>7    please. For both the vice case report and the arrest</p> <p>8    report, there's a portion of the report for the</p> <p>9    narrative section, right?</p> <p>10   A    Uh-huh. Yes.</p> <p>11   Q    Did you ever complete the narrative section of</p> <p>12   one of those reports before making an arrest?</p> <p>13   A    Never.</p> <p>14   Q    And why not?</p> <p>15   A    You don't know the facts of the case.</p> <p>16   Q    Did you know someone at the Wells by the name</p> <p>17   of Roy Bennett (phonetic)?</p> <p>18   A    No.</p> <p>19   Q    What about someone with a nickname Shock?</p> <p>20   A    No.</p> <p>21   Q    Did you know someone by the name Wilbert</p> <p>22   Moore?</p> <p>23   A    No.</p> <p>24   Q    Did you know someone by the nickname Big</p> <p>25   Shorty?</p>	<p style="text-align: right;">Page 60</p> <p>1    tell you that they'd had drugs planted on them?</p> <p>2    A    Never.</p> <p>3    Q    Did anyone ever tell you that there were drugs</p> <p>4    attributed to them that weren't their drugs?</p> <p>5    A    Never.</p> <p>6    Q    Did you ever hear any complaints about</p> <p>7    excessive force by any of your fellow officers on the</p> <p>8    Watts tactical team?</p> <p>9    A    No.</p> <p>10   Q    Did you ever observe anyone on the Watts</p> <p>11   tactical team use force against residents or visitors of</p> <p>12   Ida B. Wells?</p> <p>13   A    What do you mean by -- can you repeat -- can</p> <p>14   you clear the question up?</p> <p>15        MR. ZECCHIN: I'm going object to form. But go</p> <p>16   ahead.</p> <p>17   Q    Sure. Did you see members of the tactical</p> <p>18   team use force -- physical force against residents or</p> <p>19   visitors at the Wells?</p> <p>20   A    To affect the arrest, but not to the extent of</p> <p>21   excessive force.</p> <p>22   Q    Okay. And what type of force did you see them</p> <p>23   use to affect arrests?</p> <p>24   A    Just through the training, arm bar -- armbars,</p> <p>25   emergency take downs.</p>
<p style="text-align: right;">Page 59</p> <p>1    A    No.</p> <p>2    Q    Did you know someone by the name of Willi</p> <p>3    Gaiety (phonetic)?</p> <p>4    A    No.</p> <p>5    Q    Did you know someone by the nickname Fantasia?</p> <p>6    A    No.</p> <p>7    Q    Do you remember any residents of Ida B. Wells</p> <p>8    from the time that you were on the Watts tactical team?</p> <p>9    A    Nobody specific, no.</p> <p>10   Q    Do you remember anybody by their nickname?</p> <p>11   A    No.</p> <p>12   Q    While you were a member of the Watts tactical</p> <p>13   team, did you ever hear any complaints from residents or</p> <p>14   visitors at the Wells about how police officers were</p> <p>15   treating them?</p> <p>16   A    Well, as a policeman, various citizens would</p> <p>17   always say, when policemen come up arbitrarily, that</p> <p>18   policeman are -- you know, F the police, things of that</p> <p>19   nature, lot of vulgar comments sometimes. Just the</p> <p>20   normal stuff I got throughout my career. Sometimes</p> <p>21   citizens just don't like the police.</p> <p>22   Q    Did anyone ever tell you that they had been</p> <p>23   falsely arrested for a --</p> <p>24   A    No.</p> <p>25   Q    -- narcotics crime? Okay. Did anyone ever</p>	<p style="text-align: right;">Page 61</p> <p>1    Q    Okay. Did you ever see any members of the</p> <p>2    tactical team slap or punch residents of the Wells?</p> <p>3    A    No.</p> <p>4    Q    If member -- I'm sorry. Strike that, please.</p> <p>5    Did you ever use force against residents or visitors at</p> <p>6    the Wells?</p> <p>7    A    Emergency take downs and armbars.</p> <p>8    Q    And describe for me, please, what an emergency</p> <p>9    take down consists of?</p> <p>10   A    When you have to take someone down to the</p> <p>11   ground to affect the arrest and put handcuffs on.</p> <p>12   Q    And what do you do to take them down to the</p> <p>13   ground?</p> <p>14   A    You would grab their arm, guide them down to</p> <p>15   the ground, and use the techniques we use. Three-point</p> <p>16   kneeling to affect the arrest to get them handcuffed.</p> <p>17   Q    And what's three-point kneeling?</p> <p>18   A    It's a procedure that you do when you're</p> <p>19   trained in the academy. Where you -- you put your foot</p> <p>20   on the side, and your other leg is -- I can't -- I can't</p> <p>21   physically describe it, but it's called three-point</p> <p>22   kneeling. When you take the individual down to the</p> <p>23   ground and you handcuff them.</p> <p>24   Q    You can't describe it?</p> <p>25   A    Basically, you're taking their arm, you're</p>

	Page 130		Page 132
1	A Yes.	1	different documents about the arrest of Demetris Adams
2	Q Did you sign on both of those lines?	2	on June 26, 2004. Having looked at those, are you still
3	A Yes.	3	unable to remember that arrest?
4	Q And what it says above the second one -- it	4	A That's correct.
5	says, "Being first duly sworn." Do you see where I'm	5	Q Do you know that Mr. Adams says he was falsely
6	reading?	6	arrested on June 26, 2004?
7	A Yes.	7	A No. I do not.
8	Q It says, "POD Edwards, number 16280 on oath	8	Q Okay. Do you believe that Mr. Adams was
9	deposes and says that he/she read the foregoing	9	falsely arrested on June 26, 2004?
10	complaint by him/her subscribed and that the same is	10	A No.
11	true." Did I read that right?	11	Q And why not?
12	A Yes.	12	A Because I made a legal arrest.
13	Q So did you understand that you were swearing	13	Q Okay. Do you have a recollection of making
14	under oath, that the information here was true?	14	that legal arrest?
15	A Yes.	15	MR. ZECCHIN: Objection. Asked and answered.
16	Q Okay. And then the next line after your	16	You can answer again.
17	signature says, subscribed and sworn to me. I'm sorry.	17	A No.
18	It says, "Subscribed and sworn to before me,	18	Q Okay. And what's the basis for your
19	June 26, 2004." And underneath it has the signature of,	19	confidence that it was a legal arrest?
20	"Sergeant R. Watts, number 2640." Do you see that?	20	A I don't make false arrests.
21	A Yes.	21	Q All right. Let me go now to this set of
22	Q Okay. Did you sign it in front of Sergeant	22	exhibits that are marked with Carter. And I'll ask you
23	Watts?	23	to start with Exhibit Carter 01.
24	A I believe so. I don't recall.	24	(CARTER EXHIBIT 01 MARKED FOR IDENTIFICATION)
25	Q Okay. Did you see Sergeant Watts sign it?	25	A Okay.
	Page 131		Page 133
1	A I don't recall.	1	Q Is Exhibit Carter 01 the arrest report for the
2	Q Okay. And -- well, do you recognize that as	2	arrest of William Carter on June 18, 2004?
3	Sergeant Watts' signature?	3	A Yes.
4	A It's his signature.	4	Q And is your name on this arrest report?
5	Q And I think we went through this before and --	5	A Yes.
6	A Yes. We did.	6	Q Okay. Where's your name?
7	Q -- I'm just trying to understand.	7	A Box 45.
8	A Yeah. He signed --	8	Q Okay. And that lists you as the second
9	Q What do you mean --	9	arresting officer?
10	A That he signed it that day. It says he -- his	10	A Yes.
11	signature.	11	Q What does it mean to be the second arresting
12	Q Okay. Let me look at the next page that's	12	officer?
13	marked Adam 05, page 2 of 2. And what is this document?	13	A That I was on scene that day, worked with that
14	A It's a felony complaint.	14	partner.
15	Q Okay. And was it typically the responsibility	15	Q And who was your partner?
16	to the first arresting officer to complete felony	16	A That's Alvin Jones.
17	complaints?	17	Q And according to this report, did you and
18	A Yes.	18	Alvin Jones observe Mr. Carter holding a clear plastic
19	Q Okay. And is that your signature on the lines	19	bag of suspected narcotics?
20	that say, "Complainant's signature," on this document?	20	A Yes.
21	A Yes.	21	Q Okay. Do you have any recollection of this
22	Q Okay. And is that the signature of Sergeant	22	arrest of Mr. Carter?
23	Ronald Watts underneath that?	23	A No. I do not.
24	A It says he signed it.	24	Q Do you have any recollection of William
25	Q Okay. All right. You've looked at a few	25	Carter?

<p style="text-align: right;">Page 134</p> <p>1 A No. I do not.</p> <p>2 Q Do you know why Officer Jones was your partner</p> <p>3 on June 18, 2004?</p> <p>4 A We're all partners on the tactical team.</p> <p>5 Q In the report for Mr. Adams, which was also</p> <p>6 from June 2004, was prepared with you as first arresting</p> <p>7 and Mohammed as second arresting, correct?</p> <p>8 A I don't have that in front of me.</p> <p>9 Q Okay. Could I ask your lawyer to show that to</p> <p>10 you again? It's marked as Adams 01?</p> <p>11 A Now, go ahead.</p> <p>12 Q Okay.</p> <p>13 A Ask me again.</p> <p>14 Q Sure. For the Adams' arrest on June 26, 2004,</p> <p>15 you and Officer Mohammed were the arresting officers,</p> <p>16 correct?</p> <p>17 A Yes.</p> <p>18 Q For the Carter arrest on June 18th of 2004,</p> <p>19 you and Jones were the arresting officers, correct?</p> <p>20 A Yes.</p> <p>21 Q Was there some reason why you were with Jones</p> <p>22 on one and Mohammed on the other?</p> <p>23 A We were part of the tactical team and we work</p> <p>24 in unisons. Officer Ha -- Mohammed could have been in a</p> <p>25 different location at that time and I was with Jones in</p>	<p style="text-align: right;">Page 136</p> <p>1 this arrest, right?</p> <p>2 A Yes.</p> <p>3 Q All right. Let me ask you to take a look at</p> <p>4 the next Carter exhibit that's marked as Carter 02,</p> <p>5 please.</p> <p>6 (CARTER EXHIBIT 02 MARKED FOR IDENTIFICATION)</p> <p>7 A Okay.</p> <p>8 Q Is Carter 02 the vice case report for the</p> <p>9 arrest of William Carter on June 18, 2004?</p> <p>10 A Yes.</p> <p>11 Q Okay. And you're listed as the second</p> <p>12 reporting officer on this; is that correct?</p> <p>13 A Yes.</p> <p>14 Q Is that -- that's your name in box 46, right?</p> <p>15 A Yes. It is.</p> <p>16 Q Okay. Did you sign underneath box 46 your</p> <p>17 name?</p> <p>18 A No.</p> <p>19 Q Okay. Who signed your name?</p> <p>20 A I don't know that day, but I gave them</p> <p>21 permission, whoever it was.</p> <p>22 Q Okay. Do you recognize the signature under</p> <p>23 Alvin Jones' name?</p> <p>24 A No.</p> <p>25 Q Okay. And then higher up in box 18, there's a</p>
<p style="text-align: right;">Page 135</p> <p>1 the same area and we observed that crime together.</p> <p>2 That's why.</p> <p>3 Q And then looking at the narrative section of</p> <p>4 the arrest report for Carter -- are you looking at that</p> <p>5 now?</p> <p>6 A Yes.</p> <p>7 Q And -- well, stepping back, would you expect</p> <p>8 that Officer Jones prepared the narrative on this</p> <p>9 because he's the first arresting officer?</p> <p>10 A Yes.</p> <p>11 Q Okay. The narrative begins, "This is an</p> <p>12 arrest by PHS TACT units ETS 4512 B, C, D"; is that</p> <p>13 right?</p> <p>14 A Yes.</p> <p>15 Q Okay. And PHS means public housing staff,</p> <p>16 correct?</p> <p>17 A Yes.</p> <p>18 Q And TACT means tactical?</p> <p>19 A Yes.</p> <p>20 Q And BTS means beats?</p> <p>21 A Yes.</p> <p>22 Q And then those beats are 4512 B, C, and D,</p> <p>23 correct?</p> <p>24 A Yes.</p> <p>25 Q Meaning that those three beats were part of</p>	<p style="text-align: right;">Page 137</p> <p>1 list of officers, correct?</p> <p>2 A Yes.</p> <p>3 Q And based on what you told me before about</p> <p>4 vice case reports, am I right that those are officers</p> <p>5 who were -- assisted with this arrest?</p> <p>6 A Uh-huh. Yes.</p> <p>7 Q Okay. But unless it's in the report, you're</p> <p>8 not able to say what they did to assist, right?</p> <p>9 A Exactly.</p> <p>10 Q Okay. And this report lists three people who</p> <p>11 were arrested. Do you see that?</p> <p>12 A Yes.</p> <p>13 Q Okay. Do you have any recollection of the</p> <p>14 second person, Jamon Walker?</p> <p>15 A No.</p> <p>16 Q And for the court reporter's benefit, that's</p> <p>17 J-A-M-O-N, last name, Walker. What about the third</p> <p>18 person, Roy Tate? Do you have any recollection of Roy</p> <p>19 Tate?</p> <p>20 A No.</p> <p>21 Q Okay. All right. The next three exhibits are</p> <p>22 all -- well, why don't we go through them. The next</p> <p>23 exhibit, please take a look at Carter 03. And this is a</p> <p>24 mugshot that says it's of Carter William F. Do you</p> <p>25 recognize this person?</p>

