

Exhibit 19



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Transcript of Gerome Summers Jr., Volume II

Date: February 13, 2020

Case: Watts Coordinated Cases

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Transcript of Gerome Summers Jr., Volume II
February 13, 2020

1 (241 to 244)

<p style="text-align: right;">241</p> <p>1 IN THE UNITED STATES DISTRICT COURT</p> <p>2 FOR THE NORTHERN DISTRICT OF</p> <p>3 ILLINOIS EASTERN DIVISION</p> <p>4 -----x</p> <p>5 In re: WATTS COORDINATED : Master Docket</p> <p>6 PRETRIAL PROCEEDINGS : Case No. 19-cv-01717</p> <p>7 -----x</p> <p>8</p> <p>9</p> <p>10 Deposition of Gerome Summers Jr., Volume 2</p> <p>11 Chicago, Illinois</p> <p>12 Thursday, February 13, 2020</p> <p>13 10:07 a.m.</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22 Job No. 274040</p> <p>23 Pages: 241-491</p> <p>24 Transcribed by: Megan Wunsch, AAERT CET</p>	<p style="text-align: right;">243</p> <p>1 A P P E A R A N C E S</p> <p>2 ON BEHALF OF CERTAIN PLAINTIFFS:</p> <p>3 SCOTT R. RAUSCHER, ESQUIRE</p> <p>4 LOEVY & LOEVY</p> <p>5 311 North Aberdeen Street, Third Floor</p> <p>6 Chicago, Illinois 60607</p> <p>7 (312) 243-5900</p> <p>8</p> <p>9 ON BEHALF OF CERTAIN PLAINTIFFS:</p> <p>10 JOEL FLAXMAN, ESQUIRE</p> <p>11 KENNETH N. FLAXMAN, PC</p> <p>12 200 South Michigan Avenue, Suite 201</p> <p>13 Chicago, Illinois 60604</p> <p>14 (312) 427-3200</p> <p>15</p> <p>16 ON BEHALF OF DEFENDANT RONALD WATTS:</p> <p>17 AHMED A. KOSOKO, ESQUIRE</p> <p>18 JOHNSON & BELL LTD.</p> <p>19 33 West Monroe Street, Suite 2700</p> <p>20 Chicago, Illinois 60603</p> <p>21 (312) 372-0770</p> <p>22</p> <p>23</p> <p>24 APPEARANCES CONTINUED ON FOLLOWING PAGE</p>
<p style="text-align: right;">242</p> <p>1 Deposition of Gerome Summers Jr., held at the</p> <p>2 offices of:</p> <p>3</p> <p>4 Loevy & Loevy</p> <p>5 311 North Aberdeen Street, 3rd Floor</p> <p>6 Chicago, Illinois 60607</p> <p>7 (312) 243-5900</p> <p>8</p> <p>9 Pursuant to agreement, before Ryan Grzelak,</p> <p>10 Notary Public in and for the State of Illinois.</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>	<p style="text-align: right;">244</p> <p>1 A P P E A R A N C E S C O N T I N U E D</p> <p>2 ON BEHALF OF DEFENDANT KALLATT MOHAMMED:</p> <p>3 LAURA S. PLATT, ESQUIRE</p> <p>4 DALEY MOHAN GROBLE PC</p> <p>5 55 West Monroe, Suite 1600</p> <p>6 Chicago, Illinois 60603</p> <p>7 (312) 422-9999</p> <p>8</p> <p>9 ON BEHALF OF DEFENDANTS ALVIN JONES, ROBERT</p> <p>10 GONZALEZ, MIGUEL CABRALES, DOUGLAS NICHOLS</p> <p>11 JR., MANUEL S. LEANO, BRIAN BOLTON, KENNETH</p> <p>12 YOUNG JR., DAVID SOLTIS, ELSWORTH J. SMITH</p> <p>13 JR., JOHN RODRIGUEZ, GEROME SUMMERS, JR.,</p> <p>14 CALVIN RIDGELL JR., LAMONICA LEWIS, REBECCA</p> <p>15 BOGARD, FRANKIE LANE, and KATHERINE</p> <p>16 MOSES-HUGHES, DARRYL EDWARDS:</p> <p>17 ALLYSON L. WEST, ESQUIRE</p> <p>18 HALE & MONICO, LLC</p> <p>19 The Monadnock building</p> <p>20 53 West Jackson Boulevard, Suite 337</p> <p>21 Chicago, Illinois 60604</p> <p>22 (312) 500-2951</p> <p>23</p> <p>24 APPEARANCES CONTINUED ON FOLLOWING PAGE</p>

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<p style="text-align: right;">445</p> <p>1 I just don't recall.</p> <p>2 Q Okay. I'm going to ask you about the</p> <p>3 arrest of William Carter on June 18th, 2004. Do</p> <p>4 you have any recollection about the arrest of</p> <p>5 William Carter on June 18th, 2004?</p> <p>6 A I don't.</p> <p>7 Q Okay. Did you look at any documents about</p> <p>8 that arrest?</p> <p>9 A Yes.</p> <p>10 Q Okay. And those didn't refresh your</p> <p>11 recollection?</p> <p>12 A They didn't.</p> <p>13 Q Okay. Did you look at an arrest report?</p> <p>14 A If -- let me look at it and see if I did.</p> <p>15 I believe I did.</p> <p>16 THE WITNESS: Thank you.</p> <p>17 MR. FLAXMAN: And I'm sorry. Are we at</p> <p>18 28?</p> <p>19 MALE SPEAKER: Yeah.</p> <p>20 (Exhibit 28 was marked for identification</p> <p>21 and is attached to the transcript.)</p> <p>22 THE WITNESS: Okay. Yeah, I did -- I did</p> <p>23 look over this, but it didn't refresh my memory at</p> <p>24 all.</p>	<p style="text-align: right;">447</p> <p>1 prepare for today's deposition?</p> <p>2 A Yes.</p> <p>3 Q And having reviewed it, does it help you</p> <p>4 remember this arrest?</p> <p>5 A It doesn't.</p> <p>6 Q You're listed in -- well, which box number</p> <p>7 are you listed in?</p> <p>8 A I'm on the line with 18.</p> <p>9 Q Okay. And what do you take the listing of</p> <p>10 your name there to mean?</p> <p>11 A Under where it's checked witness.</p> <p>12 Q So you're listed as a witness?</p> <p>13 A It says witness, so I witnessed something.</p> <p>14 Q Okay. So the -- it was your practice to</p> <p>15 list somebody as a witness on a vice case report</p> <p>16 if they had witnessed something about the</p> <p>17 incident; is that right?</p> <p>18 A Yes.</p> <p>19 Q But based on reviewing the report and</p> <p>20 based on your own recollection, you don't know</p> <p>21 what exactly you witnessed about this incident; is</p> <p>22 that right?</p> <p>23 A I do not know, and I -- you know, I don't</p> <p>24 remember, no.</p>
<p style="text-align: right;">446</p> <p>1 Q Okay. You did review Exhibit 28?</p> <p>2 A Yes.</p> <p>3 Q Okay. And you recognize that to be the</p> <p>4 arrest report for William Carter on June 18th,</p> <p>5 2004?</p> <p>6 A Yes.</p> <p>7 Q Okay. But you're not one of the -- you're</p> <p>8 not the first or second arresting officer on this</p> <p>9 report; right?</p> <p>10 A No.</p> <p>11 MR. FLAXMAN: Let's mark this next one.</p> <p>12 MS. WEST: Thank you.</p> <p>13 MR. FLAXMAN: This is Exhibit 29.</p> <p>14 (Exhibit 29 was marked for identification</p> <p>15 and is attached to the transcript.)</p> <p>16 Q Do you recognize Exhibit 29 to be a vice</p> <p>17 case report for the arrest of William Carter and</p> <p>18 two other people on June 18th, 2004?</p> <p>19 A Yes. One second.</p> <p>20 Q Oh, please.</p> <p>21 A Okay. Yes, I -- yes, I do -- I recognize.</p> <p>22 Q Okay.</p> <p>23 A I see it.</p> <p>24 Q And is this a document you reviewed to</p>	<p style="text-align: right;">448</p> <p>1 Q And the -- did you take a look at the</p> <p>2 narrative of this report?</p> <p>3 A I did.</p> <p>4 Q Okay. And a few times it lists statements</p> <p>5 about reporting officers; right?</p> <p>6 A Correct.</p> <p>7 Q Would you be included in -- is it possible</p> <p>8 that you were included in one of those groups of</p> <p>9 ROs?</p> <p>10 MS. WEST: Objection. Foundation.</p> <p>11 A It is -- I don't remember, but it's both</p> <p>12 possible and not possible because reporting</p> <p>13 officers could refer to just officers Al Jones and</p> <p>14 Darryl Edwards.</p> <p>15 Q Could it also refer to other officers?</p> <p>16 A It --</p> <p>17 MR. MICHALIK: Objection to foundation and</p> <p>18 form.</p> <p>19 A It could.</p> <p>20 Q This vice case report, in addition to</p> <p>21 Mr. Carter, also lists J-A-M-O-N -- I'll say Jamon</p> <p>22 -- Walker as the second offender. Do you see</p> <p>23 that?</p> <p>24 A I see that.</p>